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Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
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TO: Interested Parties / Applicant

DATE: February 14, 2006

RE: GDX Automotive / 169-22326-00004

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.

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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 impractible 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.

Enclosures
FNTV-PMOD.doc 1/10/05

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February 14, 2006

Mr. Todd England
GDX Automotive North America, Inc.
P. O. Box 507
Wabash, IN 46992

Re: 169-22326-00004
First Significant Source Modification to
Part 70 Permit No.: 169-5650-00004

Dear Mr. England:

GDX Automotive North America, Inc. was issued a Part 70 permit on April 15, 2002, for the operation of a rubber and plastic products manufacturing plant. An application to modify the source was received by the Office of Air Quality (OAQ) on December 7, 2005. Pursuant to the provisions of 326 IAC 2-7-10.5(f)(4), a significant source modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification includes the following:

(a) Removing Line 9 plastic parts adhesive prep application station, Department 350 RCT brush application operations, one (1) Finishing Area 239 topcoat booth and Finishing Area 239 Barwell Plug Presses and RCT Operations.

(b) Modifying existing surface coating operations (Line 2 Adhesive, Line 3 Primer, Line 3 topcoat and Line 3 Adhesive) to spray coat new products.

(c) Adding one (1) Line 6 topcoat booth, utilizing HVLP application method, with a maximum capacity of 1.75 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack L6-3.

(d) Adding Extrusion Line 10, consisting of the following:
   (1) Two (2) Line 10 rubber extruders, with a total maximum capacity of 1000 pounds rubber extruded per hour;
   (2) Four (4) Line 10 natural gas fired hot air curing ovens, each rated at 1.0 million British thermal units per hour (mmBtu/hr), exhausting to one (1) stack (L10-1-4);
   (3) Three (3) microwave zone ovens, each rated at 0.17 million BTU per hour, exhausting through stack L10-8-10;
   (4) One (1) Line 10 adhesive application booth, utilizing brush-and-wipe methods, with a maximum capacity of 1 gallon of coating per hour, used to coat rubber parts, exhausting through stack L10-5;
   (5) One (1) Line 10 primer booth, utilizing HVLP application method, with a maximum capacity of 1 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack L10-6; and

(6) One (1) Line 10 topcoat booth, utilizing HVLP application method, with a maximum capacity of 1 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack L10-7.

(e) Adding NBC/JS27 Coating Line, consisting of the following:
(1) One (1) NBC/JS27 Coating Line primer spray booth, utilizing HVLP application method, with a maximum capacity of 1 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack N-1;
(2) One (1) NBC/JS27 Coating Line topcoat spray booth, utilizing HVLP application method, with a maximum capacity of 2 gallons of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack N-2; and
(3) Three (3) NBC/JS27 Coating Line Post Flock Adhesive Stations (1, 2 and 3), each with a maximum capacity of 0.4 gallon of coating per hour, used to coat rubber parts, exhausting through stacks N-3, N-4 and N-5, respectively.

(f) Adding U222 Finishing Area, consisting of the following:
(1) One (1) U222 Finishing Area primer spray booth, utilizing HVLP application method, with a maximum capacity of 0.61 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack FA-5; (relocated from Finishing Area 239)
(2) One (1) U222 Finishing Area topcoat spray booth, utilizing HVLP application method, with a total maximum capacity of 0.83 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack FA-7; (relocated from Finishing Area 239)
(3) Three (3) U222 Finishing Area Post Flock Adhesive Stations (1, 2 and 3), each with a maximum capacity of 0.4 gallon of coating per hour, used to coat rubber parts, exhausting through stacks FA-1, FA-2 and FA-3, respectively;
(4) Two (2) U222 Finishing Area gas catalytic ovens (1 and 2), each rated at 0.29 million British thermal units per hour (mmBtu/hr), exhausting to stacks FA-4 and FA-6, respectively; and
(5) One (1) U222 Finishing Area gas catalytic oven (3), rated at 1.152 million British thermal units per hour (mmBtu/hr), exhausting to stack FA-8.

(g) Adding three (3) Combining Adhesive Stations (1, 2 and 3), each with a maximum capacity of 0.5 gallon of coating per hour, used to coat rubber parts, exhausting through stacks C-1, C-2 and C-3, respectively.

The following construction conditions shall apply:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l) the emission unit constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Alic Bent, c/o OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204-2251, or at 973-575-2555, extension 3206, or dial 1-800-451-6027, and ask for extension 3-6878.

Sincerely,

Original signed by
Paul Dubenetzky,
Assistant Commissioner
Office of Air Quality

Attachments
AB / EVP

cc: File - Wabash County
U.S. EPA, Region V
Air Compliance Section Inspector – Ryan Hillman
Compliance Data Section
Administrative and Development
Technical Support and Modeling

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PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

GDX Automotive North America, Inc.
One General Street
Wabash, Indiana 46992

(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; 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.

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

Operation Permit No.: T169-5650-00004	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: April 15, 2002 Expiration Date: April 15, 2007
First Administrative Amendment No.: 169-16057-00004	Issuance Date: June 10, 2002
Second Administrative Amendment No.: 169-17150-00004	Issuance Date: May 8, 2003
First Significant Permit Modification No.:169-17370-00004	Issuance Date: December 29, 2003
Third Administrative Amendment No.: 169-19567-00004	Issuance Date: September 20, 2004
First Minor Permit Modification No.: 169-19267-00004	Issuance Date: October 13, 2004
Fourth Administrative Amendment No.: 169-20170-00004	Issuance Date: October 19, 2004
Fifth Administrative Amendment No.: 169-21488-00004	Issuance Date: August 10, 2005
Sixth Administrative Amendment No.: 169-21959-00004	Issuance Date: December 2, 2005
First Significant Source Modification No.:169-22326-00004	Pages Affected: Entire Permit
Original signed by: Paul Dubenetzky, Assistant Commissioner Office of Air Quality	Issuance Date: February 14, 2006 Expiration Date: April 15, 2007

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary rubber and plastic products manufacturing operation.

Responsible Official:	Randy Shepherd, Plant Manager
Source Address:	One General Street, Wabash, IN 46992
Mailing Address:	One General Street, Wabash, IN 46992
General Source Phone Number:	260-569-5255
SIC Code:	3069
County Location:	Wabash
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor 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)]

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

(a) Banbury Mills and Mixers, constructed in 1965 and permitted in 1980, consisting of three (3) Banbury Mixers and three (3) Banbury Mills, with a maximum capacity of 11,100 pounds per hour, using four (4) baghouses (BH02, BH03, BH04, BH05) as particulate control and exhausting to four (4) stacks (BH02, BH03, BH04, BH05);

(b) Compound handling, constructed in 1984 and 1985, consisting of carbon black unloading, carbon black conveying, and weigh stations, with a maximum capacity of 15 tons per hour, using four (4) baghouses (BH06, BH07, BH08, BH10) as particulate control, exhausting to four (4) stacks (BH06, BH07, BH08, BH10);

(c) Extrusion Line 1, consisting of the following:

(1) Two (2) Line 1 Extruders, with a maximum total capacity of 1000 pounds per hour, and exhausting to the interior of the building;

(2) One (1) Line 1 natural gas hot air oven, with a rated heat input of 3.2 million British thermal units (mmBtu) per hour, and exhausting to stacks L1-1 through L1-5; and

(3) One (1) Line 1 flock adhesive application booth, with a maximum capacity of 12.45 pounds per hour of adhesive, and exhausting to stack L1-7.

(4) One (1) Line 1 On-Line topcoat booth, equipped with two (2) HVLP spray guns , with a maximum capacity of 0.5 gallons of coating per hour, used to coat truck door seals, with dry filters as control, exhausting to one stack (L1-6); and

(5) Two (2) high velocity hot air natural gas ovens, each with a maximum rated heat input of 1 mmBtu per hour, constructed in 1999, exhausting to stack L1-8 & 9.

(d) Extrusion Line 2, consisting of the following:
- (1) Two (2) Line 2 extruders with a total maximum capacity of 1000 pounds of extruded rubber per hour;
- (2) One (1) 5.6 million British thermal units per hour (mmBtu/hr) natural gas fired curing oven, constructed in 1986 and 1987, exhausting to six (6) stacks (L2-3 through L2-8);
- (3) One (1) Line 2 drip and wipe adhesive application booth, with a maximum capacity of 1.5 gallons of adhesive per hour, constructed in 1986 and 1987, and exhausting to stack (L2-9);

(e) Extrusion Line 3, consisting of the following:
- (1) Two (2) Line 3 rubber extruders, with a total maximum capacity of 1000 lb. rubber extruded per hour;
- (2) Five (5) natural gas fired hot air ovens, each rated at 1.0 million BTU per hour, exhausting through stacks/vents L3-1 through L3-5; and
- (3) One (1) Line 3 adhesive application booth, utilizing brush-and-wipe methods, exhausting through stack/vent L3-6.
- (4) Two (2) Line 3 HVLP spray booths, constructed in 1991, exhausting to two (2) stacks (L3-6a and L3-6b)

(f) Extrusion Line 4, consisting of the following:
- (1) Two (2) extruders, with a combined maximum capacity of 1000 pounds of rubber per hour;
- (2) One (1) electric molten salt curing oven exhausting to five (5) stacks (L4-1 through L4-5); and
- (3) One (1) Line 4 spray booth, utilizing HVLP application method, exhausting to stack L4-6.

(g) Extrusion Line 5, constructed in 1989, consisting of:
- (1) One (1) Line 5 extruder with a total maximum capacity of 1000 pounds of extruded rubber per hour;
- (2) One (1) Line 5 5.6 million British thermal units per hour (mmBtu/hr) natural gas fired curing oven exhausting to ten (10) stacks (L5-1 through L5-10); and
- (3) One (1) Line 5 drip and wipe adhesive application booth, with a maximum capacity of 1 gallon of adhesive per hour, exhausting to one (1) stack (L5-11).

(h) Extrusion Line 6, constructed in 1978 and 1985, consisting of:
- (1) two (2) extruders;
- (2) one (1) liquid salt curing bath, with a maximum capacity of 1,000 pounds per hour and exhausting to two (2) stacks (L6-1 and 2); and
- (3) one (1) Line 6 topcoat booth, utilizing HVLP application method, with a maximum capacity of 1.75 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack L6-3.

(i) One (1) HVLP surface coating booth, identified as Honda Coating Booth, coating rubber parts at a maximum rate of 94 parts per hour, with particulate emissions controlled by a dry filter system and emissions exhausted through stack H-1, and equipped with one (1) electric IR drying oven, identified as Honda IR oven, with emissions exhaust through stack H-2;

(j) One (1) Line 7 plastic parts adhesive application station using a brush application system with two (2) electric IR ovens, constructed in 1998, with a maximum capacity of coating 270 ft^2 of plastic products per hour, exhausting to three (3) stacks (L7-1 through L7-3);

(k) Extrusion Line 10, consisting of the following:
(1) Two (2) Line 10 rubber extruders, with a total maximum capacity of 1000 pound rubber extruded per hour;
(2) Four (4) Line 10 natural gas fired hot air curing ovens, each rated at 1.0 million British thermal units per hour (mmBtu/hr), exhausting to one (1) stack (L10-1-4);
(3) Three (3) microwave zone ovens, each rated at 0.17 million BTU per hour, exhausting through stack L10-8-10;
(4) One (1) Line 10 adhesive application booth, utilizing brush-and-wipe methods, with a maximum capacity of 1 gallon of coating per hour, used to coat rubber parts, exhausting through stack L10-5;
(5) One (1) Line 10 primer booth, utilizing HVLP application method, with a maximum capacity of 1 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack L10-6; and
(6) One (1) Line 10 topcoat booth, utilizing HVLP application method, with a maximum capacity of 1 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack L10-7.

(l) NBC/JS27 Coating Line, consisting of the following:
(1) One (1) NBC/JS27 Coating Line primer spray booth, utilizing HVLP application method, with a maximum capacity of 1 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack N-1;
(2) One (1) NBC/JS27 Coating Line topcoat spray booth, utilizing HVLP application method, with a maximum capacity of 2 gallons of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack N-2; and
(3) Three (3) NBC/JS27 Coating Line Post Flock Adhesive Stations (1, 2 and 3), each with a maximum capacity of 0.4 gallon of coating per hour, used to coat rubber parts, exhausting through stacks N-3, N-4 and N-5, respectively.

(m) U222 Finishing Area, consisting of the following:
(1) One (1) U222 Finishing Area primer spray booth, utilizing HVLP application method, with a maximum capacity of 0.61 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack FA-5; (relocated from Finishing Area 239)
(2) One (1) U222 Finishing Area topcoat spray booth, utilizing HVLP application method, with a total maximum capacity of 0.83 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack FA-7; (relocated from Finishing Area 239)
(3) Three (3) U222 Finishing Area Post Flock Adhesive Stations (1, 2 and 3), each with a maximum capacity of 0.4 gallon of coating per hour, used to coat rubber parts, exhausting through stacks FA-1, FA-2 and FA-3, respectively;
(4) Two (2) U222 Finishing Area gas catalytic ovens (1 and 2), each rated at 0.29 million British thermal units per hour (mmBtu/hr), exhausting to stacks FA-4 and FA-6, respectively; and
(5) One (1) U222 Finishing Area gas catalytic oven (3), rated at 1.152 million British thermal units per hour (mmBtu/hr), exhausting to stack FA-8.

(n) Three (3) Combining Adhesive Stations (1, 2 and 3), each with a maximum capacity of 0.5 gallon of coating per hour, used to coat rubber and plastic parts, exhausting through stacks C-1, C-2 and C-3, respectively.

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) Grinding and machining operation controlled with fabric filter, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations;[326 IAC 6-3-2(c)] (covered under C.1)

(b) Other activities or categories not previously identified with a potential to emit less than significant levels:

(1) Maintenance Wood Shop: one (1) wheel sander, one (1) belt sander, one (1) router, one (1) radial arm saw, one (1) table saw, one (1) planer, one (1) bandsaw, and two (2) drill presses; [326 IAC 6-3-2(c)] (covered under C.1)

(2) Maintenance metal and mill wright shop: three (3) portable arc welders, parts cleaners, nine (9) grinders, fourteen (14) drill presses, ten (1) metal lathes, two (2) portable cutting torches, one (1) enclosed sandblaster, one (1) grinder/honer, one (1) jigsaw, one (1) bandsaw, and one (1) cutting wheel; [326 IAC 6-3-2(c)] (covered under C.1)

(3) Maintenance area 220 enclosed abrasive blast; [326 IAC 6-3-2(c)] (covered under C.1)

(4) Two (2) Barwell Extruders, exhausting inside the building;[326 IAC 6-3-2(c)] (covered under C.1) and

(5) One (1) topcoat booth at Line 1, using a maximum of 12.4 pounds of coating per day, exhausting to Stack No. L1-7a;

(6) One (1) inserts coating operation using less than 5 gallons per day of coating.

(c) One (1) natural gas boiler with maximum rating of 2.93 MMBtu/hr; providing process heat to the salt bath lines at the plant (Lines 4 and 6).

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

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

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

(a) This permit, T169-5650-00004, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

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

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

B.4 Enforceability [326 IAC 2-7-7]

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

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

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

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

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

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

(a) The Permittee shall furnish to IDEM, OAQ within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

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

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

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

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 appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

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

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

B.10 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) The Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, for the source as described in 326 IAC 1-6-3. At a minimum, the PMPs shall include:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

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

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

B.11 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

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

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

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

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

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). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

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

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

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) 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.

(e) 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).

(f) 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)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]

(a) All terms and conditions of permits established prior to T169-5650-00004 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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

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

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

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

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

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

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

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

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

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

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

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

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 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.

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

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

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

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

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

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

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.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) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

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

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

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b), (c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

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

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

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

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

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(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.21 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

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

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

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

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

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

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

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

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

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

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

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

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

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

C.7 Performance Testing [326 IAC 3-6]

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

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

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

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

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.9 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

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

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

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

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

C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

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

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

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

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

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

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

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

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

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records;

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

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

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

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

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

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

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

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

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

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

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

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

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(a) Banbury Mills and Mixers, constructed in 1965 and permitted in 1980, consisting of three (3) Banbury Mixers and three (3) Banbury Mills, with a maximum capacity of 11,100 pounds per hour, using four (4) baghouses (BH02, BH03, BH04, BH05) as particulate control and exhausting to four (4) stacks (BH02, BH03, BH04, BH05);

(b) Compound handling, constructed in 1984 and 1985, consisting of carbon black unloading, carbon black conveying, and weigh stations, with a maximum capacity of 15 tons per hour, using four (4) baghouses (BH06, BH07, BH08, BH10) as particulate control, exhausting to four (4) stacks (BH06, BH07, BH08, BH10);

(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 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the rubber product manufacturing operation shall be limited by the following:

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

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

The allowable emissions for each facility are as follows:

Emission Unit	Process Weight Rate (tons/hr)	Allowable PM Emissions (326 IAC 6-3-2) (lb/hr)
Banbury Mills	5.55	12.93
Compound Handling	15.00	25.16

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

D.1.2 Particulate Control

(a) The baghouses (BH02 - BH08 and BH10); used in conjunction with the Banbury Mills and Compound handling for PM control shall be in operation at all times when the Banbury Mills and Compound handling are in operation.

(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.3 Visible Emissions Notations

(a) Visible emission notations of the Banbury Mills stacks (BH02, BH03, BH04, BH05) and Compound handling (BH06, BH07, BH08, BH10) exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.4 Parametric Monitoring

The Permittee shall record the pressure drop across baghouses (BH02 - BH08 and BH10); used in conjunction with the Banbury Mills and Compound handling, at least once per day when the Banbury Mills and Compound handling are in operation. When for any one reading, the pressure drop across the baghouses (BH02 - BH08 and BH10) is outside the normal range of 1 and 10 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

D.1.5 Broken or Failed Bag Detection

(a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

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

D.1.6 Record Keeping Requirements

(a) To document compliance with Condition D.1.3, the Permittee shall maintain records of visible emission notations of the Banbury Mills, stacks (BH02, BH03, BH04, BH05) and Compound handling, stacks (BH06, BH07, BH08, BH10) exhaust once per day.

(b) To document compliance with Condition D.1.4, the Permittee shall maintain records once per day of the pressure drop during normal operation.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(c) Extrusion Line 1, consisting of the following:
- (1) Two (2) Line 1 Extruders, with a maximum total capacity of 1000 pounds per hour, and exhausting to the interior of the building;
- (2) One (1) Line 1 natural gas hot air oven, with a rated heat input of 3.2 million British thermal units (mmBtu) per hour, and exhausting to stacks L1-1 through L1-5; and
- (3) One (1) Line 1 flock adhesive application booth, with a maximum capacity of 12.45 pounds per hour of adhesive, and exhausting to stack L1-7.
- (4) One (1) Line 1 On-Line topcoat booth, equipped with two (2) HVLP spray guns , with a maximum capacity of 0.5 gallons of coating per hour, used to coat truck door seals, with dry filters as control, exhausting to one stack (L1-6); and
- (5) Two (2) high velocity hot air natural gas ovens, each with a maximum rated heat input of 1 mmBtu per hour, constructed in 1999, exhausting to stack L1-8 & 9.

(d) Extrusion Line 2, consisting of the following:
- (1) Two (2) Line 2 extruders with a total maximum capacity of 1000 pounds of extruded rubber per hour;
- (2) One (1) 5.6 million British thermal units per hour (mmBtu/hr) natural gas fired curing oven, constructed in 1986 and 1987, exhausting to six (6) stacks (L2-3 through L2-8);
- (3) One (1) Line 2 drip and wipe adhesive application booth, with a maximum capacity of 1.5 gallons of adhesive per hour, constructed in 1986 and 1987, and exhausting to stack (L2-9);

(e) Extrusion Line 3, consisting of the following:
- (1) Two (2) Line 3 rubber extruders, with a total maximum capacity of 1000 lb. rubber extruded per hour;
- (2) Five (5) natural gas fired hot air ovens, each rated at 1.0 million BTU per hour, exhausting through stacks/vents L3-1 through L3-5; and
- (3) One (1) Line 3 adhesive application booth, utilizing brush-and-wipe methods, exhausting through stack/vent L3-6.
- (4) Two (2) Line 2 HVLP spray booths, constructed in 1991, exhausting to two (2) stacks (L3-6a and L3-6b)

(f) Extrusion Line 4, consisting of the following:
- (1) Two (2) extruders, with a combined maximum capacity of 1000 pounds of rubber per hour;
- (2) One (1) electric molten salt curing oven exhausting to five (5) stacks (L4-1 through L4-5); and
- (3) One (1) Line 4 spray booth, utilizing HVLP application method, exhausting to stack L4-6.

(g) Extrusion Line 5, constructed in 1989, consisting of:
- (1) One (1) Line 5 extruder with a total maximum capacity of 1000 pounds of extruded rubber per hour;
- (2) One (1) Line 5 5.6 million British thermal units per hour (mmBtu/hr) natural gas fired curing oven exhausting to ten (10) stacks (L5-1 through L5-10); and
- (3) One (1) Line 5 drip and wipe adhesive application booth, with a maximum capacity of 1 gallon of adhesive per hour, exhausting to one (1) stack (L5-11).

(h) Extrusion Line 6, constructed in 1978 and 1985, consisting of:
- (1) two (2) extruders;
- (2) one (1) liquid salt curing bath, with a maximum capacity of 1,000 pounds per hour and exhausting to two (2) stacks (L6-1 and 2); and
- (3) one (1) Line 6 topcoat booth, utilizing HVLP application method, with a maximum capacity of 1.75 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack L6-3.

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

(i) One (1) HVLP surface coating booth, identified as Honda Coating Booth, coating rubber parts at a maximum rate of 94 parts per hour, with particulate emissions controlled by a dry filter system and emissions exhausted through stack H-1, and equipped with one (1) electric IR drying oven, identified as Honda IR oven, with emissions exhaust through stack H-2;

(j) One (1) Line 7 plastic parts adhesive application station using a brush application system with two (2) electric IR ovens, constructed in 1998, with a maximum capacity of coating 270 ft2 of plastic products per hour, exhausting to three (3) stacks (L7-1 through L7-3);

(k) Extrusion Line 10, consisting of the following:

(1) Two (2) Line 10 rubber extruders, with a total maximum capacity of 1000 pound rubber extruded per hour;

(2) Four (4) Line 10 natural gas fired hot air curing ovens, each rated at 1.0 million British thermal units per hour (mmBtu/hr), exhausting to one (1) stack (L10-1-4);

(3) Three (3) microwave zone ovens, each rated at 0.17 million BTU per hour, exhausting through stack L10-8-10;

(4) One (1) Line 10 adhesive application booth, utilizing brush-and-wipe methods, with a maximum capacity of 1 gallon of coating per hour, used to coat rubber parts, exhausting through stack L10-5;

(5) One (1) Line 10 primer booth, utilizing HVLP application method, with a maximum capacity of 1 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack L10-6; and

(6) One (1) Line 10 topcoat booth, utilizing HVLP application method, with a maximum capacity of 1 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack L10-7.

(l) NBC/JS27 Coating Line, consisting of the following:

(1) One (1) NBC/JS27 Coating Line primer spray booth, utilizing HVLP application method, with a maximum capacity of 1 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack N-1;

(2) One (1) NBC/JS27 Coating Line topcoat spray booth, utilizing HVLP application method, with a maximum capacity of 2 gallons of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack N-2; and

(3) Three (3) NBC/JS27 Coating Line Post Flock Adhesive Stations (1, 2 and 3), each with a maximum capacity of 0.4 gallon of coating per hour, used to coat rubber parts, exhausting through stacks N-3, N-4 and N-5, respectively.

(m) U222 Finishing Area, consisting of the following:

(1) One (1) U222 Finishing Area primer spray booth, utilizing HVLP application method, with a maximum capacity of 0.61 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack FA-5; (relocated from Finishing Area 239)

(2) One (1) U222 Finishing Area topcoat spray booth, utilizing HVLP application method, with a total maximum capacity of 0.83 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack FA-7; (relocated from Finishing Area 239)

(3) Three (3) U222 Finishing Area Post Flock Adhesive Stations (1, 2 and 3), each with a maximum capacity of 0.4 gallon of coating per hour, used to coat rubber parts, exhausting through stacks FA-1, FA-2 and FA-3, respectively;

(4) Two (2) U222 Finishing Area gas catalytic ovens (1 and 2), each rated at 0.29 million British thermal units per hour (mmBtu/hr), exhausting to stacks FA-4 and FA-6, respectively; and

(5) One (1) U222 Finishing Area gas catalytic oven (3), rated at 1.152 million British thermal units per hour (mmBtu/hr), exhausting to stack FA-8.

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

(n) Three (3) Combining Adhesive Stations (1, 2 and 3), each with a maximum capacity of 0.5 gallon of coating per hour, used to coat rubber and plastic parts, exhausting through stacks C-1, C-2 and C-3, respectively.

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

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

D.2.1 New Source Toxics Control [326 IAC 2-4.1-1]

(a) Any change or modification which may increase actual usage of any single HAP and any combination of HAPs, to greater than 10 and 25 tons per year, respectively, before add-on controls, shall require OAQ's prior approval before such change can take place, for each of the:
(1) Line 3 Extruders;
(2) Line 4 Extruders;
(3) Line 5 Extruder;
(4) Line 6 Extruders;
(5) HVLP Honda Coating Booth
(6) Line 4 topcoat spray booth; and
(7) Line 3 adhesive application booth.

(b) Single HAP and total HAPs usages for each of the following HAPs emitting facilities:
(1) Line 5 adhesive application booth; and
(2) Line 7 adhesive application booth.

shall be limited, to less than 10 and 25 tons per twelve (12) consecutive month period, rolled on a monthly basis, respectively, so that the requirements of 326 IAC 2-4.1-1 do not apply.

D.2.2 PSD Minor Limit [326 IAC 2-2]

The use of VOC, including coatings, dilution solvents, and cleaning solvents for the surface coating processes shall be limited to less than 185 tons per 12 consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the source-wide potential to emit of VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.2.3 General Volatile Organic Compound Reduction Requirements [326 IAC 8-1-6]

(a) Any change or modification which may increase potential usage of VOC for each of the
(1) Banbury Mills and Mixers;
(2) Line 1 Extruders;
(3) Line 2 Extruders;
(4) Line 3 Extruders;
(5) Line 4 Extruders;
(6) Line 5 Extruder;
(7) Line 6 Extruders;
(8) HVLP Honda Coating Booth
(9) Line 4 topcoat spray booth;
(10) Line 1 On-Line topcoat spray booth;
(11) Line 3 adhesive application booth;

to greater than 25 tons per year, before add-on controls, shall require OAQ's prior approval before such change can take place.

(b) VOC usage for each of the following facilities shall be limited to less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month so that the requirements of 326 IAC 8-1-6 do not apply:
(1) Line 1 adhesive application booth;
(2) Line 2 adhesive booth;
(3) Line 3 booths (two (2) HVLP spray booths and adhesive application booth);
(4) Line 5 adhesive application booth;
(5) Line 7 adhesive application booth.
(6) Line 10 primer spray booth; and
(7) NBC/JS27 Offline primer spray booth.

These usage limits will limit VOC emissions to less than 25 tons per year for each of the facilities listed above. Therefore, the requirements of 326 IAC 8-1-6 do not apply. The VOC usage limits shall also limit source wide VOC emissions to less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 do not apply.

(c) Pursuant to CP169-4072-00004, issued on February 13, 1995, and 326 IAC 8-1-6, the extruded rubber flocking for Line 5, HVLP coating operations (U222 Finishing Area Primer Booth and U222 topcoat booth) shall use Best Available Control Technology (BACT). The BACT determined which shall be used at this facility is:
(1) Drip and wipe method for extruded rubber flocking;
(2) Wipe method for extruded rubber wipe/cleaning; and
(3) HVLP application method for spray coating of primer and decorative topcoat.

D.2.4 Nonapplicable Construction Permit Requirements

The requirements from:

(a) Construction Permit (169-1993-00004), issued on September 6, 1991, Condition 4, listing requirements pursuant to 326 IAC 2-3;

(b) Construction Permit (169-4072-00004), issued on February 13, 1995, Condition 5, listing requirements pursuant to 326 IAC 2-3;

(c) Amendment (169-11456-00004), issued on November 4, 1999 and the new operation condition #5 of [CP 169-4072-00004], listing requirements pursuant to 326 IAC 2-2;

are not applicable because IDEM, OAQ has determined that, based on the latest USEPA approved emission factors listed in AP-42 for the operations associated with the source, the potential to emit VOC from the source is less than 250 tons per year and is a PSD minor source. Therefore, these conditions are not required for the source to be a minor PSD source.

D.2.5 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating operations (Line 1 On-Line topcoat spray booth, the U222 Finishing Area primer and topcoat spray booth, Extrusion Line 3 primer and topcoat spray booths, one (1) Line 4 topcoat spray booth, Extrusion Line 6 topcoat spray booth, Extrusion Line 10 primer and topcoat spray booths, and NBC/JS27 coating line primer and topcoat spray booths) shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

Compliance Determination Requirements

D.2.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC content and usage limitations contained in Conditions D.2.1, D.2.2 and D.2.3 (a) and (b) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine-compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4

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

D.2.7 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 operations at the source (which include: Line 1 On-Line topcoat spray booth, the U222 Finishing Area primer and topcoat spray booth, Extrusion Line 3 primer and topcoat spray booths, Line 4 topcoat spray booth, Extrusion Line 6 topcoat spray booth, Extrusion Line 10 primer and topcoat spray booths, and NBC/JS27 coating line primer and topcoat spray booths) stacks while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.2.8 Record Keeping Requirements

(a) To document compliance with Conditions D.2.1, D.2.2 and D.2.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and/or the VOC and HAPs emission limits established in Conditions D.2.1, D.2.2 and D.2.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The amount and VOC and HAPs content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) The cleanup solvent usage for each month;

(3) The total VOC usage for each month; and

(4) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.2.7, 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.2.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1(b), D.2.2 and D.2.3(b) 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).

SECTION D.3 FACILITY OPERATION CONDITIONS

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

(c) One (1) natural gas fired boiler with maximum rating of 2.93 MMBtu/hr; providing process heat to the salt bath lines at the plant (Lines 4 and 6).

(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.3.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating: emission limitations for facilities specified in 326 IAC 6-2-1 (d)), particulate emissions from the boiler providing process heat to the salt bath lines at the plant (Lines 4 and 6), with maximum capacity 2.93 MMBTU/hr shall not exceed 0.6 pounds of particulate matter per million British thermal units (lb/MMBTU) heat input.

Compliance Determination Requirements

D.3.2 Natural Gas

In order to demonstrate compliance with D.3.1, the source shall burn only natural gas.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: GDX Automotive North America, Inc.
Source Address: One General Street, Wabash, Indiana 46992
Mailing Address: One General Street, Wabash, Indiana 46992
Part 70 Permit No.: T169-5650-00004

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)

☐ Report (specify)

☐ Notification (specify)

☐ Affidavit (specify)

☐ Other (specify)

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

Signature:
Printed Name:
Title/Position:
Phone:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: GDX Automotive North America, Inc.
Source Address: One General Street, Wabash, Indiana 46992
Mailing Address: One General Street, Wabash, Indiana 46992
Part 70 Permit No.: T169-5650-00004

This form consists of 2 pages **Page 1 of 2**

☐ This is an emergency as defined in 326 IAC 2-7-1(12)

X The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and

X The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

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

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:

Title / Position:

Date:

Phone:

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name: GDX Automotive North America, Inc.
Source Address: One General Street, Wabash, Indiana 46992
Mailing Address: One General Street, Wabash, Indiana 46992
Part 70 Permit No.: T169-5650-00004
Facility: Line 5 adhesive application booth, and Line 7 adhesive application booth
Parameter: HAPs usage
Limit: Single HAP and total HAPs usages in the Line 5 and Line 7 adhesive booths, shall each be limited to less than 10 and 25 tons per twelve (12) consecutive month period, rolled on a monthly basis, respectively, so that the requirements of 326 IAC 2-4.1-1 do not apply.

YEAR:

Month	Facilities	HAPs Usages This Month		HAPs Usages Previous 11 Months		HAPs Usages 12 Months Total	
		Single	Total	Single	Total	Single	Total
Month 1	Line 5 Adh. App. Booth						
	Line 7 Adh. App. Booth						
Month 2	Line 5 Adh. App. Booth						
	Line 7 Adh. App. Booth						
Month 3	Line 5 Adh. App. Booth						
	Line 7 Adh. App. Booth						

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this month.
Deviation has been reported on:

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: GDX Automotive North America, Inc.
Source Address: One General Street, Wabash, Indiana 46992
Mailing Address: One General Street, Wabash, Indiana 46992
Part 70 Permit No.: T169-5650-00004
Facility: Line 1 adhesive application booth, Line 3 booths (spray and adhesive), Line 5 adhesive application booth, Line 7 adhesive application booth, Line 10 primer spray booth and NBC/JS27 Offline primer spray booth
Parameter: VOC usages
Limit: VOC usages in the Line 1 adhesive application booth, the Line 2 booths (spray and adhesive), the Line 5 adhesive application booth, the Line 7 adhesive application booth, Line 3 booths (topcoat, primer and adhesive), Line 10 primer spray booth and NBC/JS27 Offline primer spray booth shall each be limited to less than 25 tons per twelve (12) consecutive month period.

YEAR:

Month	Facilities	VOC Usages This Month	VOC Usages Previous 11 Months	VOC Usages 12 Months Total
Month 1	Line 1 Adh. App. Booth			
	Line 2 Booths (Spray & Adh.)			
	Line 5 Adh. App. Booth			
	Line 7 Adh. App. Booth			
	Line 3 Booths (Topcoat, Primer & Adh.)			
	Line 10 Primer Booth			
	NBC/JS27 Primer Booth			
Month 2	Line 1 Adh. App. Booth			
	Line 2 Booths (Spray & Adh.)			
	Line 5 Adh. App. Booth			
	Line 7 Adh. App. Booth			
	Line 3 Booths (Topcoat, Primer & Adh.)			
	Line 10 Primer Booth			
	NBC/JS27 Primer Booth			
Month 3	Line 1 Adh. App. Booth			
	Line 2 Booths (Spray & Adh.)			
	Line 5 Adh. App. Booth			
	Line 7 Adh. App. Booth			
	Line 3 Booths (Topcoat, Primer & Adh.)			
	Line 10 Primer Booth			
	NBC/JS27 Primer Booth			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:
Submitted by:
Title / Position:
Signature:
Date:
Phone:

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: GDX Automotive North America, Inc.
Source Address: One General Street, Wabash, Indiana 46992
Mailing Address: One General Street, Wabash, Indiana 46992
Part 70 Permit No.: T169-5650-00004
Facility: Surface Coating Operation
Parameter: VOC
Limit: Less than 185 tons per 12 consecutive month period with compliance determined at the end of each month.

YEAR:

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

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

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

Attach a signed certification to complete this report.

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

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: GDX Automotive North America, Inc.
Source Address: One General Street, Wabash, Indiana 46992
Mailing Address: One General Street, Wabash, Indiana 46992
Part 70 Permit No.: T169-5650-00004

Months: _____ to _____ Year: _____

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

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

Form Completed By:

Title/Position:

Date:

Phone:

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Significant Source Modification and Significant Permit Modification.

Source Description and Location

Source Name:	**GDX Automotive North America, Inc.**
Source Location:	**One General Street, Wabash, Indiana 46992**
County:	**Wabash**
SIC Code:	**3089**
Operation Permit No.:	**T169-5650-00004**
Operation Permit Issuance Date:	**April 15, 2002**
Significant Source Modification No.:	**169-22326-00004**
Significant Permit Modification No.:	**169-22381-00004**
Permit Reviewer:	**Alic Bent/EVP**

Existing Approvals

The source was issued a Part 70 Operating Permit T169-5650-00004 on April 15, 2002. The source has since received the following approvals:

(a) First Administrative Amendment No.: 169-16057-00004, issued on June 10, 2002;

(b) Second Administrative Amendment No.: 169-17150-00004, issued on May 8, 2003;

(c) First Significant Permit Modification No.: 169-17370-00004, issued on December 29, 2003;

(d) Third Administrative Amendment No.: 169-19567-00004, issued on September 20, 2004;

(e) First Minor Permit Modification No.: 169-19267-00004, issued on October 13, 2004;

(f) Fourth Administrative Amendment No.: 169-20170-00004, issued on October 19, 2004;

(i) Fifth Administrative Amendment No.: 169-21488-00004, issued on August 10, 2005; and

(j) Sixth Administrative Amendment No.: 169-21959-00004, issued on December 2, 2005

County Attainment Status

The source is located in Wabash County.

Pollutant	Status
PM10	Attainment
PM2.5	Attainment
SO_2	Attainment
NO_2	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Wabash County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) Wabash County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions.

(c) Wabash County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(d) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Source Status

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

Pollutant	Emissions (tons/year)
PM	114.25
PM10	114.25
SO_2	0.04
VOC	245.42
CO	5.33
NO_x	9.99

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because

no regulated pollutant is emitted at a rate of 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 First Minor Permit Modification No.: 169-19267-00004, issued on October 13, 2004.

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:

HAP=s	Potential To Emit (tons/year)
Xylene	Greater than 10
Toluene	Greater than 10
Ethylene Benzene	Greater than 10
MIBK	Greater than 10
MEK	Greater than 10
TOTAL	Greater than 25

This existing source is a major source of HAPs, as defined in 40 CFR 63.41, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

Actual Emissions

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

Pollutant	Actual Emissions (tons/year)
PM	No data
PM10	1
SO_2	0
VOC	87
CO	3
NO_x	3
HAP (specify)	No data

Background and Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a significant source modification and significant permit modification application, submitted by GDX Automotive North America, Inc. on December 7, 2005, relating to the following:

(a) Removing Line 9 plastic parts adhesive prep application station, Department 350 RCT brush application operations, one (1) Finishing Area 239 topcoat booth and Finishing Area 239 Barwell Plug Presses and RCT Operations.

(b) Modifying existing surface coating operations (Line 2 Adhesive, Line 3 Primer, Line 3 topcoat and Line 3 Adhesive) to spray coat new products.

(c) Adding one (1) Line 6 topcoat booth, utilizing HVLP application method, with a maximum capacity of 1.75 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack L6-3.

(d) Adding Extrusion Line 10, consisting of the following:
- (1) Two (2) Line 10 rubber extruders, with a total maximum capacity of 1000 pounds rubber extruded per hour;
- (2) Four (4) Line 10 natural gas fired hot air curing ovens, each rated at 1.0 million British thermal units per hour (mmBtu/hr), exhausting to one (1) stack (L10-1-4);
- (3) Three (3) microwave zone ovens, each rated at 0.17 million BTU per hour, exhausting through stack L10-8-10;
- (4) One (1) Line 10 adhesive application booth, utilizing brush-and-wipe methods, with a maximum capacity of 1 gallon of coating per hour, used to coat rubber parts, exhausting through stack L10-5;
- (5) One (1) Line 10 primer booth, utilizing HVLP application method, with a maximum capacity of 1 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack L10-6; and
- (6) One (1) Line 10 topcoat booth, utilizing HVLP application method, with a maximum capacity of 1 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack L10-7.

(e) Adding NBC/JS27 Coating Line, consisting of the following:
- (1) One (1) NBC/JS27 Coating Line primer spray booth, utilizing HVLP application method, with a maximum capacity of 1 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack N-1;
- (2) One (1) NBC/JS27 Coating Line topcoat spray booth, utilizing HVLP application method, with a maximum capacity of 2 gallons of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack N-2; and
- (3) Three (3) NBC/JS27 Coating Line Post Flock Adhesive Stations (1, 2 and 3), each with a maximum capacity of 0.4 gallon of coating per hour, used to coat rubber parts, exhausting through stacks N-3, N-4 and N-5, respectively.

(f) Adding U222 Finishing Area, consisting of the following:
- (1) One (1) U222 Finishing Area primer spray booth, utilizing HVLP application method, with a maximum capacity of 0.61 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack FA-5; (relocated from Finishing Area 239)
- (2) One (1) U222 Finishing Area topcoat spray booth, utilizing HVLP application method, with a total maximum capacity of 0.83 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack FA-7; (relocated from Finishing Area 239)
- (3) Three (3) U222 Finishing Area Post Flock Adhesive Stations (1, 2 and 3), each with a maximum capacity of 0.4 gallon of coating per hour, used to coat rubber parts, exhausting through stacks FA-1, FA-2 and FA-3, respectively;
- (4) Two (2) U222 Finishing Area gas catalytic ovens (1 and 2), each rated at 0.29 million British thermal units per hour (mmBtu/hr), exhausting to stacks FA-4 and FA-6, respectively; and
- (5) One (1) U222 Finishing Area gas catalytic oven (3), rated at 1.152 million British thermal units per hour (mmBtu/hr), exhausting to stack FA-8.

(g) Adding three (3) Combining Adhesive Stations (1, 2 and 3), each with a maximum capacity of 0.5 gallon of coating per hour, used to coat rubber parts, exhausting through stacks C-1, C-2 and C-3, respectively.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
L3-6	Line 6 Topcoat Booth	27	1	2500	Ambient
L10-1	Line 10 Hot Air Oven 1	27	1	1200	< 500
L10-2	Line 10 Hot Air Oven 2	27	1	1200	< 500
L10-3	Line 10 Hot Air Oven 3	27	1	1200	< 500
L10-4	Line 10 Hot Air Oven 4	27	1	1200	< 500
L10-5	Line 10 Flock Adhesive	27	1	900	Ambient
L10-6	Line 10 Primer Booth	27	1	2500	Ambient
L10-7	Line 10 Topcoat Booth	27	1	2500	Ambient
L10-8	Line 10 Microwave Zone Oven 1	27	1	1200	< 500
L10-9	Line 10 Microwave Zone Oven 2	27	1	1200	< 500
L10-10	Line 10 Microwave Zone Oven 3	27	1	1200	< 500
N-1	NBC/JS27 Offline Primer	27	1	2500	Ambient
N-2	NBC/JS27 Offline Topcoat	27	1	2500	Ambient
N-3	NBC/JS27 Adhesive 1	27	0.5	450	Ambient
N-4	NBC/JS27 Adhesive 2	27	0.5	450	Ambient
N-5	NBC/JS27 Adhesive 3	27	0.5	450	Ambient
FA-1	U222 Adhesive 1	27	0.5	450	Ambient
FA-2	U222 Adhesive 2	27	0.5	450	Ambient
FA-3	U222 Adhesive 3	27	0.5	450	Ambient
FA-4	U222 Catalytic Oven 1	27	1	1200	< 500
FA-6	U222 Catalytic Oven 2	27	1	1200	< 500
FA-8	U222 Catalytic Oven 3	27	1	1200	< 500
C-1	Combining Adhesive 1	27	0.33	200	Ambient
C-2	Combining Adhesive 2	27	0.33	200	Ambient
C-3	Combining Adhesive 3	27	0.33	200	Ambient

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 Athe 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 due to the modification before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	PTE of Modified Emission Units Before Modification (tons/year)	PTE of Modified Emission Units After Modification (tons/year)	Net Difference (tons/year)
PM	7.02	3.22	-3.80
PM10	7.02	3.22	-3.80
SO_2	0.00	0.00	0.00
VOC	89.34	130.32	40.98
CO	0.00	0.00	0.00
NO_X	0.00	0.00	0.00
HAPs	Single HAP >10 Total HAPs >25	Single HAP >10 Total HAPs >25	Single HAP >10 Total HAPs >25

Pollutant	PTE New Emission Units (tons/year)	Net Increase to PTE of Modified Emission Units (tons/year)	Total PTE for New and Modified Units (tons/year)
PM	16.42	0.00	16.42
PM10	16.42	0.00	16.42
SO_2	0.02	0.00	0.02
VOC	179.34	40.98	220.32
CO	2.30	0.00	2.30
NO_X	2.73	0.00	2.73
HAPs	Single HAP >10 Total HAPs >25	Single HAP >10 Total HAPs >25	Single HAP >10 Total HAPs >25

This source modification is subject to 326 IAC 2-7-10.5(f)(4)(D) because it is a modification that has a potential to emit greater than 25 tons per year of VOC. Additionally, the Significant Source Modification will be incorporated into the Part 70 Operating Permit through a Significant Permit Modification issued pursuant to 326 IAC 2-7-12(d) because new limitations and standards are required to be added to the existing Title V permit.

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 modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

	Potential to Emit (tons/year)						
Process/Emission Unit	**PM**	**PM10**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**
Line 2 Flock Adhesive (modified)	0.00	0.00	0.00		0.00	0.00	Single HAP < 10 Total HAPs < 25
Line 3 Primer Booth (modified)	0.00	0.00	0.00		0.00	0.00	Single HAP > 10 Total HAPs > 25
Line 3 Topcoat Booth (modified)	0.00	0.00	0.00		0.00	0.00	Single HAP > 10 Total HAPs > 25
Line 3 Flock Adhesive (modified)	0.00	0.00	0.00		0.00	0.00	Single HAP < 10 Total HAPs < 25
U222 Topcoat Booth (modified)	0.17	0.17	0.00		0.00	0.00	Single HAP < 10 Total HAPs < 25
Line 6 Topcoat Booth	4.44	4.44	0.00		0.00	0.00	3.29
Line 10 Primer Booth	0.00	0.00	0.00	(2)	0.00	0.00	Single HAP > 10 Total HAPs > 25
Line 10 Topcoat Booth	3.80	3.80	0.00		0.00	0.00	Single HAP < 10 Total HAPs < 25
Line 10 Flock Adhesive	0.00	0.00	0.00		0.00	0.00	Single HAP < 10 Total HAPs < 25
Three (3) U222 Post Flock Adhesive Stations (1,2 and 3)	0.00	0.00	0.00		0.00		Single HAP > 10 Total HAPs > 25
NBC/JS27 Offline Primer	0.00	0.00	0.00		0.00	0.00	Single HAP > 10 Total HAPs > 25
NBC/JS27 Offline Topcoat	7.97	7.97	0.00		0.00	0.00	0.00
Three (3) NBC/JS27 Offline Post Flock Adhesive Stations (1,2 and 3)	0.00	0.00	0.00		0.00	0.00	Single HAP < 10 Total HAPs < 25
Three (3) Combining Line 3 Adhesive Stations (1,2 and 3)	0.00	0.00	0.00		0.00	0.00	Single HAP < 10 Total HAPs < 25
Line 10 Extruder	0.00	0.00	0.00	8.49	0.00	0.00	4.40
Combustion	0.21	0.21	0.02	0.15	2.30	2.73	0.04
Total for Modification	16.59	16.59	0.02	193.64	2.30	2.73	Single HAP > 10 Total HAPs > 25
Total for Source After Modification	130.84	130.84	0.06	< 250	7.63	12.72	Single HAP > 10 Total HAPs > 25
Significant Level or Major Source Threshold	250	250	250	250	250	250	--

(1) VOC limit of less than 25 tons per year for Line 2 Flock Adhesive, Line 3 Primer Booth, Line 3 Topcoat Booth, Line 3 Flock Adhesive, Line 10 Primer Booth and NBC/JS27 Offline Primer Booth to avoid 326 IAC 8-1-6.
(2) VOC limit of less than 185 tons per year for all surface coating processes at the source to avoid 326 IAC 2-2.

This modification to an existing minor stationary source is not major because the emissions increase is less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the

PSD requirements do not apply.

Federal Rule Applicability Determination

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in this review.

(b) The degreasing operations are not subject to National Emissions Standard for Hazardous Air Pollutants (NESHAP), 40 CFR 63.460, Subpart T. The degreasing operations at the source do not use any halogenated solvent cleaners.

(c) This source is subject to the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63.4480, Subpart PPPP because the source is a major source of HAPs and the painting operation applies surface coating to plastic parts and products, as defined in 40 CFR 63.4481(a). Pursuant to 40 CFR 63.4481(a)(1), the surface coating operation includes storage containers and mixing vessels that are used to store and mix thinners, additives and/or cleaning materials. Therefore, the requirements of *National Emission Standards for Hazardous Air Pollutants for Plastic Parts and Products*, (40 CFR 63.4480, Subpart PPPP) are included in the permit.

Pursuant to 40 CFR 63.4482, this source is an existing affected source because the construction of the source commenced prior to April 19, 2004 and the source is not reconstructed. Pursuant to this rule, as an existing affected source the Permittee must comply with 40 CFR 63, Subpart PPPP on and after April 19, 2007. Since this rule has a future compliance date, the specific details of the rule and how the permittee will demonstrate compliance are not provided in the permit. The Permittee shall submit an application for a significant permit modification at least nine months prior to the April 19, 2007 compliance date that will specify the option or options for the emission limitations and standards and methods for determining compliance chosen by the Permittee. At that time, the Department will include the specific details of the rule and how the Permittee will demonstrate compliance. In addition, pursuant to 40 CFR 63, Subpart PPPP, the Permittee shall submit the requisite notifications and reports pursuant to Subpart PPPP and 40 CFR 63, Subpart A, and such are contained in the permit.

(d) 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)
Line 2 Flock Adhesive - VOC	None	Y	31.40	N/A	100	N	N
Line 3 Primer Booth - VOC	None	Y	31.89	N/A	100	N	N
Line 3 Topcoat Booth - VOC	None	Y	28.43	N/A	100	N	N
Line 3 Topcoat Booth - PM10	Dry filter	N	4.65	0.93	100	N	N
Line 3 Flock Adhesive - VOC	None	Y	31.40	N/A	100	N	N
Line 6 Topcoat Booth - PM10	Dry filter	N	4.44	0.89	100	N	N
Line 6 Topcoat Booth - VOC	None	N	15.18	N/A	100	N	N
Line 10 Extruder - VOC	None	N	8.49	N/A	100	N	N
Line 10 Primer Booth - VOC	None	Y	31.89	N/A	100	N	N
Line 10 Topcoat Booth - PM10	Dry filter	N	3.80	0.76	100	N	N
Line 10 Topcoat Booth - VOC	None	N	4.82	N/A	100	N	N
Line 10 Flock Adhesive - VOC	None	N	20.94	N/A	100	N	N
U222 Topcoat Booth - PM10	Dry filter	N	2.10	0.42	100	N	N
U222 Topcoat Booth - VOC	None	N	7.20	N/A	100	N	N
Three (3) U222 Post Flock Adhesive Stations (1,2 and 3) - VOC	None	N	7.01 each	N/A	100	N	N
NBC/JS27 Offline Primer - VOC	None	Y	31.89	N/A	100	N	N
NBC/JS27 Offline Topcoat - PM10	Dry filter	N	7.97	1.25	100	N	N
NBC/JS27 Offline Topcoat - VOC	None	N	2.66	N/A	100	N	N
Three (3) NBC/JS27 Offline Post Flock Adhesive Stations (1,2 and 3) - VOC	None	N	7.01 each	N/A	100	N	N
Three (3) Combining Line 3 Adhesive Stations (1,2 and 3) - VOC	None	N	7.09 each	N/A	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the new units as part of this modication.

State Rule Applicability Determination

326 IAC 2-2 (Prevention of Significant Deterioration)
This modification to an existing minor stationary source, which is not one of the 28 listed source categories, is not major because the source-wide use of VOC shall be less than 250 tons per 12 consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable. The source will still be a minor source after this modification.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
Pursuant to 326 IAC 2-4.1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of any combination of HAPs, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). The source has PTE single HAP and total HAPs greater than 10 and 25 tons per year, respectively. However, this source is subject to the National Emissions Standards for Hazardous Air

Pollutants 40 CFR Part 63, Subpart PPPP. Pursuant to 326 IAC 2-4.1-1(b)(2), the source is not subject to the requirements of 326 IAC 2-4.1.

326 IAC 6-3-2(d) (Particulate)

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating operations (Extrusion Line 6 topcoat spray booth, Extrusion Line 10 primer and topcoat spray booths, and NBC/JS27 coating line primer and topcoat spray booths) shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

326 IAC 8-1-6 (General Reduction Requirements)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, and which have potential volatile organic compound (VOC) emissions of 25 tons per year or more and are not otherwise regulated by other provisions of article 8. The potential to emit VOC from the new and modified units are as follows:

Date of Construction	Facility	PTE of VOC (tons/yr)	Reason 326 IAC 8-1-6 is not applicable
1987	Line 2 Flock Adhesive (modified)	31.40	The PTE of VOC is limited to less than 25 tons per year
1991	Line 3 Primer Booth (modified)	31.89	The PTE of VOC is limited to less than 25 tons per year
1991	Line 3 Topcoat Booth (modified)	28.43	The PTE of VOC is limited to less than 25 tons per year
1999	Line 3 Flock Adhesive (modified)	31.40	The PTE of VOC is limited to less than 25 tons per year
1991	U222 Topcoat Booth (modified)	7.20	The PTE of VOC is less than 25 tons per year
	Line 6 Topcoat Booth (new)	15.18	The PTE of VOC is less than 25 tons per year
	Line 10 Extruder (new)	8.49	The PTE of VOC is less than 25 tons per year
	Line 10 Primer Booth (new)	31.89	The PTE of VOC is limited to less than 25 tons per year
	Line 10 Topcoat Booth (new)	4.82	The PTE of VOC is less than 25 tons per year
	Line 10 Flock Adhesive (new)	20.94	The PTE of VOC is less than 25 tons per year
	Three (3) U222 Post Flock Adhesive Stations (1,2 and 3) (new)	7.01 each	The PTE VOC of each booth is less than 25 tons per year
	NBC/JS27 Offline Primer (new)	31.89	The PTE of VOC is limited to less than 25 tons per year
	NBC/JS27 Offline Topcoat (new)	2.66	The PTE of VOC is less than 25 tons per year
	Three (3) NBC/JS27 Offline Post Flock Adhesive Stations (1,2 and 3) (new)	7.01 each	The PTE VOC of each booth is less than 25 tons per year
	Three (3) Combining Line 3 Adhesive Stations (1,2 and 3) (new)	7.09 each	The PTE VOC of each booth is less than 25 tons per year

Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

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

1. The surface coating operations have applicable compliance monitoring conditions as specified below:

   (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the stacks of the surface coating operations at the source (which include: the U222 Finishing Area topcoat spray booth, Extrusion Line 3 primer spray booth, Extrusion Line 6 topcoat spray booth, Extrusion Line 10 primer and topcoat spray booths, and NBC/JS27 coating line primer and topcoat spray booths) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

   (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T169-5650-00004. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

1. The descriptive information in Sections A.2 and D.2 have been revised to reflect the addition of one (1) Line 6 topcoat booth, Extrusion Line 10, the NBC/JS27 Coating Line and the U222 Finishing Area. A primer spray booth and a topcoat booth were relocated from Finishing Area 239 to U222 Finishing Area. Line 9 plastic parts adhesive prep application station and Department 350 RCT brush application operations were removed from the plant:

(h) Extrusion Line 6, constructed in 1978 and 1985, consisting of**:**
- **(1)** two (2) extruders**;** ~~and~~
- **(2)** one (1) liquid salt curing bath, with a maximum capacity of 1,000 pounds per hour and exhausting to two (2) stacks (L6-1 and 2); **and**
- **(3)** **one (1) Line 6 topcoat booth, utilizing HVLP application method, with a maximum capacity of 1.75 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack L6-3.**

~~(j) Department 350 RCT brush application with a maximum capacity of 3 gallons per day, exhausting inside the building;~~

~~(k) One (1) HVLP coating operation for Finishing Area 239, constructed in 1989, using dry filters as particulate control and exhausting to one stack (FA-1);~~

~~(l) Line 9 plastic parts adhesive prep application station using a roller application system, constructed in 1998, with a maximum capacity of 3 gallons per day of adhesive prep and exhausting to stack L9-1;~~

(k) Extrusion Line 10, consisting of the following:
- **(1) Two (2) Line 10 rubber extruders, with a total maximum capacity of 1000 pound rubber extruded per hour;**
- **(2) Four (4) Line 10 natural gas fired hot air curing ovens, each rated at 1.0 million British thermal units per hour (mmBtu/hr), exhausting to one (1) stack (L10-1-4);**
- **(3) Three (3) microwave zone ovens, each rated at 0.17 million BTU per hour, exhausting through stack L10-8-10;**
- **(4) One (1) Line 10 adhesive application booth, utilizing brush-and-wipe methods, with a maximum capacity of 1 gallon of coating per hour, used to coat rubber parts, exhausting through stack L10-5;**
- **(5) One (1) Line 10 primer booth, utilizing HVLP application method, with a maximum capacity of 1 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack L10-6; and**
- **(6) One (1) Line 10 topcoat booth, utilizing HVLP application method, with a maximum capacity of 1 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack L10-7.**

(l) NBC/JS27 Coating Line, consisting of the following:
- **(1) One (1) NBC/JS27 Coating Line primer spray booth, utilizing HVLP application method, with a maximum capacity of 1 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack N-1;**

(2) One (1) NBC/JS27 Coating Line topcoat spray booth, utilizing HVLP application method, with a maximum capacity of 2 gallons of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack N-2; and

(3) Three (3) NBC/JS27 Coating Line Post Flock Adhesive Stations (1, 2 and 3), each with a maximum capacity of 0.4 gallon of coating per hour, used to coat rubber parts, exhausting through stacks N-3, N-4 and N-5, respectively.

(m) U222 Finishing Area, consisting of the following:

(1) One (1) U222 Finishing Area primer spray booth, utilizing HVLP application method, with a maximum capacity of 0.61 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack FA-5; (relocated from Finishing Area 239)

(2) One (1) U222 Finishing Area topcoat spray booth, utilizing HVLP application method, with a total maximum capacity of 0.83 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack FA-7; (relocated from Finishing Area 239)

(3) Three (3) U222 Finishing Area Post Flock Adhesive Stations (1, 2 and 3), each with a maximum capacity of 0.4 gallon of coating per hour, used to coat rubber parts, exhausting through stacks FA-1, FA-2 and FA-3, respectively;

(4) Two (2) U222 Finishing Area gas catalytic ovens (1 and 2), each rated at 0.29 million British thermal units per hour (mmBtu/hr), exhausting to stacks FA-4 and FA-6, respectively; and

(5) One (1) U222 Finishing Area gas catalytic oven (3), rated at 1.152 million British thermal units per hour (mmBtu/hr), exhausting to stack FA-8.

(n) Three (3) Combining Adhesive Stations (1, 2 and 3), each with a maximum capacity of 0.5 gallon of coating per hour, used to coat rubber and plastic parts, exhausting through stacks C-1, C-2 and C-3, respectively.

2. The following conditions in Section D.2 and the corresponding reporting forms of the Title V operating permit have been revised to reflect the addition of one (1) Line 6 topcoat booth, Extrusion Line 10, the NBC/JS27 Coating Line and the U222 Finishing Area. A primer spray booth and a topcoat booth were relocated from Finishing Area 239 to U222 Finishing Area. Line 9 plastic parts adhesive prep application station and Department 350 RCT brush application operations were removed from the plant:

D.2.1 New Source Toxics Control [326 IAC 2-4.1-1]

(a) Any change or modification which may increase actual usage of any single HAP and any combination of HAPs, to greater than 10 and 25 tons per year, respectively, before add-on controls, shall require OAQ's prior approval before such change can take place, for each of the:

(1) Line 3 Extruders;
(2) Line 4 Extruders;
(3) Line 5 Extruder;
(4) Line 6 Extruders;
(5) HVLP Honda Coating Booth
~~(6) Department 350 RCT brush application;~~
~~(7)~~**(6)** Line 4 topcoat spray booth;
~~(8)~~**(7)** Line 3 adhesive application booth**.**~~; and~~
~~(9) Line 9 adhesive prep application booth.~~

(b) Single HAP and total HAPs usages for each of the following HAPs emitting facilities:
(1) Line 5 adhesive application booth; and
(2) Line 7 adhesive application booth.
shall be limited, to less than 10 and 25 tons per twelve (12) consecutive month period, rolled on a monthly basis, respectively, so that the requirements of 326 IAC 2-4.1-1 do not apply

3. The 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. Condition D.2.2 - Particulate Matter (PM) has been deleted.

~~D.2.2 Particulate Matter (PM) [326 IAC 6-3-2]~~

~~Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the Line 1 On-Line topcoat spray booth, Line 3 On-Line HVLP spray booth, Line 4 topcoat spray booth, and Finishing Area 239 HVLP coating operation shall not exceed allowable PM emission rate based on the following equation:~~

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

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

D.2.2 PSD Minor Limit [326 IAC 2-2]

The use of VOC, including coatings, dilution solvents, and cleaning solvents for the surface coating processes shall be limited to less than 185 tons per 12 consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the source-wide potential to emit of VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.2.3 General Volatile Organic Compound Reduction Requirements [326 IAC 8-1-6]

(a) Any change or modification which may increase potential usage of VOC for each of the
(1) Banbury Mills and Mixers;
(2) Line 1 Extruders;
(3) Line 2 Extruders;
(4) Line 3 Extruders;
(5) Line 4 Extruders;
(6) Line 5 Extruder;
(7) Line 6 Extruders;
(8) HVLP Honda Coating Booth
~~(9) Department 350 RCT brush application;~~
(10)**(9)** Line 4 topcoat spray booth;
(11)**(10)** Line 1 On-Line topcoat spray booth;
(12)**(11)** Line 3 adhesive application booth; and
~~(13) Line 9 adhesive prep application booth;~~

to greater than 25 tons per year, before add-on controls, shall require OAQ's prior approval before such change can take place.

(b) VOC usage **for each of the following facilities** shall be limited to less than 25 tons per twelve (12) consecutive month period, ~~rolled on a monthly basis~~ **with compliance determined at the end of each month** so that the requirements of 326 IAC 8-1-6 do not apply~~, in the following~~:

(1) Line 1 adhesive application booth;
(2) Line 2 adhesive booth;
(3) Line 3 booths (two (2) HVLP spray booths **and adhesive application booth**);
(4) Line 5 adhesive application booth; ~~and~~
(5) Line 7 adhesive application booth~~.~~;
(6) Line 10 primer spray booth; and
(7) NBC/JS27 Offline primer spray booth.

These usage limits will limit VOC emissions to less than 25 tons per year for each of the facilities listed above. Therefore, the requirements of 326 IAC 8-1-6 do not apply. The VOC usage limits shall also limit source wide VOC emissions to less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 do not apply.

(c) Pursuant to CP169-4072-00004, issued on February 13, 1995, and 326 IAC 8-1-6, the extruded rubber flocking for Line 5, HVLP coating operations (**U222** ~~P207~~ Finishing Area ~~239~~ Primer Booth and ~~insignificant P207~~ **U222** topcoat booth~~s~~) ~~and wipe /cleaning (Finishing Area 239)~~ shall use Best Available Control Technology (BACT). The BACT determined which shall be used at this facility is:
(1) Drip and wipe method for extruded rubber flocking;
(2) Wipe method for extruded rubber wipe/cleaning; and
(3) HVLP application method for spray coating of primer and decorative topcoat.

D.2.5 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating operations (Line 1 On-Line topcoat spray booth, the U222 Finishing Area primer and topcoat spray booth, Extrusion Line 3 primer and topcoat spray booths, one (1) Line 4 topcoat spray booth, Extrusion Line 6 topcoat spray booth, Extrusion Line 10 primer and topcoat spray booths, and NBC/JS27 coating line primer and topcoat spray booths) shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

~~D.2.7 VOC and HAPs Emissions~~

~~Compliance with Conditions D.2.1 and D.2.3(a) and (b) shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound and hazardous air pollutant usage at each facility for the most recent twelve (12) month period.~~

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

~~The dry filters for PM control shall be in operation and control emissions from the surface coating operations at the source (which include: Line 1 On-Line topcoat spray booth, the Finishing Area 239 HVLP coating operation, Extrusion Line 3 HVLP spray booths, and one (1) Line 4 topcoat spray booth, at all times that the surface coating operations at the source (which include: Line 1 On-Line topcoat spray booth, the one (1) HVLP coating operation for Finishing Area 239, Extrusion Line 3 HVLP spray booths, one (1) Line 4 topcoat spray booth, and one (1) HVLP coating operation for Finishing Area 239), are in operation.~~

4. The monitoring condition has been revised to reflect the new Condition C.14 - Response to Excursions or Exceedances, and to remove the additional inspections for the Preventive Maintenance Plan.

D.2.~~9~~**7** 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 **stacks of the** surface coating operations at the source (which include: Line 1 On-Line topcoat spray booth, the **U222** Finishing Area ~~239 HVLP~~ **primer and topcoat spray booth** ~~coating operation~~, Extrusion Line 3 ~~HVLP spray booths, and one (1) Line 3~~ **primer and** topcoat spray booth**s, Line 4 topcoat spray booth, Extrusion Line 6 topcoat spray booth, Extrusion Line 10 primer and topcoat spray booths, and NBC/JS27 coating line primer and topcoat spray booths**) ~~stacks~~ 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 this permit.~~ **If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.**

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. ~~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 this permit.~~ **When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.**

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

D.2.~~10~~**8** Record Keeping Requirements

(a) To document compliance with Conditions D.2.1**, D.2.2** and D.2.3(a) and (b), the Permittee shall maintain records in accordance with (1) through ~~(5)~~**(4)** below. Records maintained for (1) through ~~(5)~~**(4)** shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and/or the VOC and HAPs emission limits established in Conditions D.2.1**, D.2.2** and D.2.3(a) and (b). **Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.**

(1) The amount and VOC and HAPs 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)~~**(2)** The cleanup solvent usage for each month;

~~(4)~~**(3)** The total VOC, single HAP and total HAPs usages for each month; and

~~(5)~~**(4)** The weight of VOCs, single HAP and total HAPs emitted for each compliance period.

(b) To document compliance with Condition D.2.~~9~~**7**, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections~~, and those additional inspections prescribed by the Preventive Maintenance Plan~~.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.~~11~~**9** Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1(b)**, D.2.2** and D.2.3(b) 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 not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

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

Part 70 Quarterly Report

Source Name: GDX Automotive North America, Inc.
Source Address: One General Street, Wabash, Indiana 46992
Mailing Address: One General Street, Wabash, Indiana 46992
Part 70 Permit No.: T169-5650-00004
Facility: Line 1 adhesive application booth, Line 3 booths (spray and adhesive), Line 5 adhesive application booth, ~~and~~ Line 7 adhesive application booth**, Line 10 primer spray booth and NBC/JS27 Offline primer spray booth**
Parameter: VOC usages
Limit: VOC usages in the Line 1 adhesive application booth, the Line 2 booths (spray and adhesive), the Line 5 adhesive application booth, the Line 7 adhesive application booth, **Line 3 booths (topcoat, primer and adhesive), Line 10 primer spray booth and NBC/JS27 Offline primer spray booth** shall each be limited to less than 25 tons per twelve (12) consecutive month period.

YEAR:

Month	Facilities	VOC Usages This Month	VOC Usages Previous 11 Months	VOC Usages 12 Months Total
Month 1	Line 1 Adh. App. Booth			
	Line 2 Booths (Spray & Adh.)			
	Line 5 Adh. App. Booth			
	Line 7 Adh. App. Booth			
	Line 3 Booths (Topcoat, Primer & Adh.)			
	Line 10 Primer Booth			
	NBC/JS27 Primer Booth			
Month 2	Line 1 Adh. App. Booth			
	Line 2 Booths (Spray & Adh.)			
	Line 5 Adh. App. Booth			
	Line 7 Adh. App. Booth			
	Line 3 Booths (Topcoat, Primer & Adh.)			
	Line 10 Primer Booth			
	NBC/JS27 Primer Booth			
Month 3	Line 1 Adh. App. Booth			
	Line 2 Booths (Spray & Adh.)			
	Line 5 Adh. App. Booth			
	Line 7 Adh. App. Booth			
	Line 3 Booths (Topcoat, Primer & Adh.)			
	Line 10 Primer Booth			
	NBC/JS27 Primer Booth			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:
Submitted by:
Title / Position:
Signature:
Date:
Phone:

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: GDX Automotive North America, Inc.
Source Address: One General Street, Wabash, Indiana 46992
Mailing Address: One General Street, Wabash, Indiana 46992
Part 70 Permit No.: T169-5650-00004
Facility: Surface Coating Operation
Parameter: VOC
Limit: Less than 185 tons per 12 consecutive month period with compliance determined at the end of each month.

YEAR:

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

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

☐ **Deviation/s occurred in this quarter.**
Deviation has been reported on:

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

Attach a signed certification to complete this report.

5. Section A.3(b)(3) – one (1) P207 Finishing area 239 topcoat spray booth was relocated to U222

Finishing Area and the other P207 Finishing area 239 topcoat spray booth removed from the plant, and Section A.3(b)(6) - Finishing Area 239 Barwell Plug Presses and RCT Operations were removed from the plant.

~~(3) P207 Finishing area 239, consisting of two (2) topcoat spray booths; [326 IAC 6-3-2(c)] (covered under C.1)~~

~~(6) Plug Presses and RCT Operations. [326 IAC 6-3-2(c)] (covered under C.1)~~

6. The following changes have been made to Section A.1.

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 rubber **and plastic** products manufacturing operation.

Responsible Official: Randy Shepherd, ~~Operations~~ **Plant** Manager

7. The address for IDEM on the cover page and throughout the permit have been revised to reflect the most current address.

8. Conditions B.2, B.7, B.9 (now re-numbered B.8), B.14 (now re-numbered B.13) and B.17 have been revised and Condition B.3 has been added to the permit to further address and clarify the permit term and the term of the conditions. Condition B.4 (Termination of Right to Operate) has been moved and re-numbered B.14. All other Section B conditions have been re-numbered accordingly.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] **[326 IAC 2-7-4(a)(1)(D)] [IC 15-13-6(a)]**

(a) This permit**, T169-5650-00004,** is issued for a fixed term of five (5) years from the ~~original~~ **issuance** date **of this permit**, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date **of this permit**.

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

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

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

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

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

B.7 Duty to ~~Supplement and~~ Provide Information ~~[326 IAC 2-7-4(b)]~~ [326 IAC 2-7-5(6)(E)] ~~[326 IAC2-7-6(6)]~~

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

~~Indiana Department of Environmental Management~~

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

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

~~(b)~~ **(a)** The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

~~(c)~~ **(b) For information furnished by the Permittee to IDEM, OAQ, t**~~T~~he Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.~~9~~**8** Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. **One (1) certification may cover multiple forms in one (1) submittal.**

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

B.1~~4~~**3** Prior Permits Superseded [326 IAC 2-1.1-9.5] **[326 IAC 2-7-10.5]**

(a) All terms and conditions of ~~previous~~ permits **established prior to T085-6040-00009 and** issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised **under 326 IAC 2-7-10.5**, or

(3) deleted **under 326 IAC 2-7-10.5.**
~~by this permit.~~

(b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this **Part 70 operating** permit.

B.**1**4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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

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

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

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

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

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

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

~~(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.~~

B.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] **[326 IAC 2-7-8(e)]**

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204**-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)~~ **(1)** Submitted at least nine (9) months prior to the date of the expiration of this permit; and

~~(B)~~ **(2)** If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

9. The following was added to clarify that sources can add an electric generator or similar device for a few months without seeking a modification. An engine no longer meets the definition of "nonroad engine" once it remains at the source for 12 consecutive months, or a shorter period of time for a unit located at a seasonal source.

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

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

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

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

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

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

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

10. Condition B.8 (Compliance with Permit Conditions) has been removed from the B section and has been added to the Part 70 title page instead.

~~B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]~~

~~(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for:~~

~~(1) Enforcement action;~~

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

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

~~(b) Noncompliance with any provisions of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.~~

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

~~(d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.~~

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

GDX Automotive North America
One General Street
Wabash, Indiana 46992

(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; 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.

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

11. For clarity, additional rule cites have been added to Condition B.22 Inspection and Entry.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

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

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, h**~~H~~ave access to and copy any records that must be kept under the conditions of this permit;

(c) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, i**~~I~~nspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, s**~~S~~ample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As **authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, u**~~U~~tilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

12. Upon further review, IDEM, OAQ has determined that it is not necessary to include a condition requiring a preventive maintenance plan in each individual Section D of the permit. Rather, a general condition will be placed in Section B of the permit, which will apply to the entire source. Conditions D.1.2 and D.2.5 have been removed from the permit, and item (a) in Section B has been revised. Additionally, IDEM, OAQ has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, IDEM has deleted paragraph (b) of Section B – Preventive Maintenance, and has amended the Section B – Emergency Provisions condition as follows:

B.1~~1~~**0** 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, t~~**T**he Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, ~~including the following information on each facility:~~ **for the source as described in 326 IAC 1-6-3. At a minimum, the PMPs shall include:**

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

~~(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.~~

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

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

B.1~~2~~**1** Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

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

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (asks for Compliance Section)
Facsimile Number: 317-233-5967

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204**-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). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) **The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions.** However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

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

~~D.1.2 Preventive Maintenance Plan~~
~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.~~

~~D.2.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~
~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of the permit, is required for this facility and any control devices.~~

13. IDEM, OAQ has clarified the Condition B.20 (Operational Flexibility) as follows:

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

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions, which exceed the ~~emissions allowable under~~ **limitations provided in** this~~,~~ permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

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

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

(5) The Permittee maintains records on-site**, on a rolling five (5) year basis,** which document~~, on a rolling five (5) year basis,~~ all such changes and emission~~s~~ ~~trading~~ **trades** that are subject to 326 IAC 2-7-20(b), (c), or (e)**.** ~~and makes~~ **The Permittee shall make** such records available, upon reasonable request, for public review.

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

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

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

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

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade **emissions** increases and decreases ~~in emissions in~~ **at** the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this

permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

14. Section B.24 has been revised to include the recent changes regarding the phone number for the Permittee to call on annual fee payment.

B.24 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. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-**4230** ~~0425~~ (ask for OAQ, ~~Technical Support and Modeling Section~~ **Billing, Licensing and Training Section**), to determine the appropriate permit fee.

15. Indiana was required to incorporate credible evidence provisions into state rules consistent with the SIP call published by U.S. EPA in 1997 (62 FR 8314). Indiana has incorporated the credible evidence provision in 326 IAC 1-1-6. This rule was effective March 16, 2005; therefore, the condition reflecting this rule is incorporated into the Part 70 permit as follows:

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] **[326 IAC 1-1-6]**

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

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

16. The 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. Conditions C.1 and D.4.1 have been revised.

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) ~~p~~**P**ounds per ~~h~~**H**our [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.~~

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

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (~~Process Operations~~ **Particulate Emission Limitations for Manufacturing Processes**), the **allowable** particulate ~~matter (PM)~~ **emission rate** from the

rubber product manufacturing operation shall be limited by the following:

17. IDEM, OAQ has decided that it is best to have the requirement of operating control equipment at all times be placed under compliance determination in the specific D conditions, and remove Condition C.6.

~~C.6 Operation of Equipment [326 IAC 2-7-6(6)]~~
~~Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.~~

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

C.~~12~~**11** ~~Pressure Gauge and Other~~ Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) ~~Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed~~ **When required by an condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device** shall have a scale such that the expected ~~normal~~ **maximum** reading **for the normal range** shall be no less than twenty percent (20%) of full scale ~~and be accurate within plus or minus two percent (±2%) of full scale reading~~.

~~(b) Whenever a condition in this permit requires the measurement of a flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.~~

~~(c)~~ **(b)** The Permittee may request **that** the IDEM, OAQ approve the use of ~~a pressure gauge or other~~ **an** instrument that does not meet the above specifications provided the Permittee can demonstrate **that** an alternative ~~pressure gauge or other~~ instrument specification will adequately ensure compliance with permit conditions requiring the measurement of ~~pressure drop or other~~ **the** parameters.

19. IDEM, OAQ has reconsidered the requirement to develop and follow a Compliance Response Plan. The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated. The Section D conditions that refer to this condition have been revised to reflect the new condition title, and the following changes have been made to the Section C condition:

C.~~15~~**14** ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances** [326 IAC 2-7-5] [326 IAC 2-7-6]

~~(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM upon request. The CRP shall be prepared~~

~~within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:~~

~~(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.~~

~~(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) to include such response steps taken.~~

~~The OMM Plan (or Parametric Monitoring and SMM Plan) shall be submitted within the time frames specified by the applicable 40 CFR60/63 requirement.~~

~~(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:~~

~~(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan); or~~

~~(2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.~~

~~(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.~~

~~(4) Failure to take reasonable response steps shall be considered a deviation from the permit.~~

~~(c) The Permittee is not required to take any further response steps for any of the following reasons:~~

~~(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.~~

~~(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.~~

~~(3) An automatic measurement was taken when the process was not operating.~~

~~(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.~~

~~(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.~~

~~(e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.~~

~~(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.~~

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records;

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

20. Paragraph (a) of the Broken or Failed Baghouse condition has been deleted. For multi-compartment baghouses, the permit will not specify what actions the Permittee needs to take in response to a broken bag. However, a requirement has been added to Condition D.1.2 requiring the Permittee to notify IDEM if a broken bag is detected and the control device will not be repaired for more than ten (10) days. This notification allows IDEM to take any appropriate actions if the emission unit will continue to operate for a long period of time while the control device is not operating in optimum condition.

D.1.~~3~~**2** Particulate Control

(a) The baghouses (BH02 - BH08 and BH10); used in conjunction with the Banbury Mills and Compound handling for PM control shall be in operation at all times when the Banbury Mills and Compound handling are in operation.

(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

21. Upon further review, IDEM has determined that once per day monitoring of the control device (or of visible emission notations) is generally sufficient to ensure proper operation of the control device. IDEM has also determined that monitoring these parameters once per day is sufficient to satisfy the requirements of the Part 70 rules at 326 IAC 2-7-5 and 326 IAC 2-7-6.

D.1.~~4~~**3** Visible Emissions Notations

(a) Visible emission notations of the Banbury Mills stacks (BH02, BH03, BH04, BH05) and Compound handling (BH06, BH07, BH08, BH10) exhaust shall be performed once per ~~shift~~ **day** during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.~~
If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.~~5~~**4** Parametric Monitoring

The Permittee shall record the pressure drop across baghouses (BH02 - BH08 and BH10); used in conjunction with the Banbury Mills and Compound handling, at least once per ~~shift~~ **day** when the Banbury Mills and Compound handling are in operation. When for any one reading, the pressure drop across the baghouses (BH02 - BH08 and BH10) is outside the normal range of 1 and 10 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- ~~Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances**. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - ~~Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances** shall be considered a ~~violation of~~ **deviation from** this permit.

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

22. Upon further review, IDEM has determined that it is the Permittee's responsibility to include routine control device inspection requirements in the applicable preventive maintenance plan. Since the Permittee is in the best position to determine the appropriate frequency of control device inspections and the details regarding which components of the control device should be inspected, the conditions requiring control device inspections have been removed from the permit. In addition, the requirement to keep records of the inspections has been removed.

~~D.1.6 Baghouse Inspections~~

~~An inspection shall be performed each calender quarter of all bags (identified as BH02 - BH08 and BH10) controlling the Banbury Mills and Compound handling operations when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.~~

23. Paragraph (b) of this condition has been revised for those processes that operate in batch mode. The condition required an emission unit to be shut down immediately in case of baghouse failure. However, IDEM is aware there can be safety issues with shutting down a process in the middle of a batch. IDEM also realizes that in some situations, shutting down an emissions unit mid-process can cause equipment damage. Therefore, since it is not always possible to shut down a process with material remaining in the equipment, IDEM has revised the condition to state that in the case of baghouse failure, the feed to the process must be shut off immediately, and the process shall be shut down as soon as practicable.

D.1.~~7~~**5** Broken or Failed Bag Detection

~~In the event that bag failure has been observed:~~

~~(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~

~~(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~

(a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

D.1.8 Record Keeping Requirements

(a) To document compliance with Condition D.1.~~4~~**3**, the Permittee shall maintain records of visible emission notations of the Banbury Mills, stacks (BH02, BH03, BH04, BH05) and Compound handling, stacks (BH06, BH07, BH08, BH10) exhaust once per ~~shift~~ **day**.

(b) ~~To document compliance with Condition D.1.5, the Permittee shall maintain the following:~~

~~(1) Once per shift records of the following operational parameters during normal operation when venting to the atmosphere:~~

~~(A) Inlet and outlet differential static pressure; and~~

~~(B) Cleaning cycle operation.~~

~~(2) Documentation of the dates vents are redirected.~~

To document compliance with Condition D.1.4, the Permittee shall maintain records once per day of the pressure drop during normal operation.

~~(c) To document compliance with Condition D.1.6, the Permittee shall maintain records of the results of the inspections required under Condition D.1.6 and the dates the vents are redirected.~~

~~(d)~~**(c)** All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

24. Table of Contents section of the permit has been revised accordingly.

Conclusion and Recommendation

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 169-22326-00004 and Significant Permit Modification No. 169-22381-00004. The staff recommends to the Commissioner that this Part 70 Significant Source Modification and Significant Permit Modification be approved.

Appendix A: Emission Calculations

Company Name: GDX Automotive North America, Inc.
Address City IN Zip: One General Street, Wabash, IN 46992
Significant Source Modification: T169-22326-00004
Significant Permit Modification: T169-22381-00004
Reviewer: AB/EVP

Uncontrolled Potential Emissions (tons/year)

Emissions Generating Activity

Pollutant	Combustion	Ext. Line 10	Line 6 Topcoat Booth	Line 10 Primer Booth	Line 10 Topcoat Booth	Line 10 Flock Adhesive	U222 Post Flock Adhesive Stations (3)	NBC/JS27 Primer Booth	NBC/JS27 Topcoat Booth	Post Flock Adhesive Stations (3)	Line 3 Adhesive Stations (3)	Line 2 Adhesive Application	Line 3 Adhesive Application	Line 3 Topcoat Booth	Increase for Line 3 Primer Booth	U222 Topcoat Booth	TOTAL
PM	0.21	0.00	4.44	0.00	3.80	0.00	0.00	0.00	7.97	0.00	0.00	0.00	0.00	(3.53)	(2.20)	1.94	12.63
PM10	0.21	0.00	4.44	0.00	3.80	0.00	0.00	0.00	7.97	0.00	0.00	0.00	0.00	(3.53)	(2.20)	1.94	12.63
SO2	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02
NOx	2.73	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.73
VOC	0.15	8.49	15.18	31.89	4.82	20.94	21.03	31.89	2.66	21.02	21.27	5.26	13.86	27.50	6.38	(12.03)	220.31
CO	2.30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.30
total HAPs	0.04	4.40	3.29	31.89	1.46	21.90	19.61	31.89	0.00	6.53	10.62	3.08	15.77	18.15	22.75	(18.34)	173.04
worst case single HAP	(hexane) 0.04	0.00	(glycol ethers) 3.29	(xylene) 25.51	(glycol ethers) 1.05	(xylene) 9.82	(xylene) 10.89	(xylene) 25.51	0.00	(xylene) 3.63	(MEK) 10.62	(xylene) 1.64	(xylene) 5.65	(xylene) 19.08	(xylene) 24.7	(glycol ethers) 1.56	(xylene) 126.43

Total emissions based on rated capacity at 8,760 hours/year.

Controlled Potential Emissions (tons/year)

Emissions Generating Activity

Pollutant	Combustion	Ext. Line 10	Line 6 Topcoat Booth	Line 10 Primer Booth	Line 10 Topcoat Booth	Line 10 Flock Adhesive	U222 Post Flock Adhesive Stations (3)	NBC/JS27 Primer Booth	NBC/JS27 Topcoat Booth	Post Flock Adhesive Stations (3)	Line 3 Adhesive Stations (3)	Line 2 Adhesive Application	Line 3 Adhesive Application	Line 3 Topcoat Booth	Increase for Line 3 Primer Booth	U222 Topcoat Booth	TOTAL
PM	0.21	0.00	0.89	0.00	0.76	0.00	0.00	0.00	1.25	0.00	0.00	0.00	0.00	(0.73)	(0.52)	0.40	2.26
PM10	0.21	0.00	0.89	0.00	0.76	0.00	0.00	0.00	1.25	0.00	0.00	0.00	0.00	(0.73)	(0.52)	0.40	2.26
SO2	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02
NOx	2.73	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.73
VOC	0.15	8.49	15.18	< 25	4.82	20.94	21.03	< 25	2.66	21.02	21.27	< 25	< 25	< 25	< 25	(12.03)	< 250 source-wide
CO	2.30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.30
total HAPs	0.04	4.40	3.29	31.89	1.46	21.90	19.61	31.89	0.00	6.53	10.62	3.08	15.77	18.15	22.75	(18.34)	173.04
worst case single HAP	(hexane) 0.04	0.00	(glycol ethers) 3.29	(xylene) 25.51	(glycol ethers) 1.05	(xylene) 9.82	(xylene) 10.89	(xylene) 25.51	0.00	(xylene) 3.63	(MEK) 10.62	(xylene) 1.64	(xylene) 5.65	(xylene) 19.08	(xylene) 24.7	(glycol ethers) 1.56	(xylene) 52.36

Total emissions based on rated capacity at 8,760 hours/year.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations
Company Name: GDX Automotive North America, Inc.
Address City IN Zip: One General Street, Wabash, IN 46992
Significant Source Modification: T169-22326-00004
Significant Permit Modification: T169-22381-00004
Reviewer: AB/EVP

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Line 6- Topcoat Booth																
8370 UV	8.6	73.05%	50.0%	23.1%	0.0%	26.95%	1.75000	1.000	1.98	1.98	3.46	83.16	15.18	4.44	7.35	75%
State Potential Emissions			**Add worst case coating to all solvents**								**3.46**	**83.16**	**15.18**	**4.44**		

Limit Usage: PM	Limit Usage: VOC	Control Efficiency: VOC	Control Efficiency: PM	Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM
0.00%	0.00%	0.00%	80.00%	**3.46**	**83.16**	**15.18**	**0.89**

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Line 10- Primer Booth																
459X	7.3	100.00%	0.0%	100.0%	0.0%	0.00%	1.00000	1.000	7.28	7.28	7.28	174.72	31.89	0.00	#DIV/0!	75%
Line 10- Topcoat Booth																
EX-66-578	8.7	59.92%	47.2%	12.7%	0.0%	40.00%	1.00000	1.000	1.10	1.10	1.10	26.40	4.82	3.80	2.75	75%
Line 10- Flock Adhesive																
L618 mixture	7.9	60.35%	0.0%	60.4%	0.0%	39.90%	1.00000	1.000	4.78	4.78	4.78	114.71	20.94	0.00	11.98	100%
State Potential Emissions			**Add worst case coating to all solvents**								**13.16**	**315.83**	**57.64**	**3.80**		

Usage Limit For Line 10- Primer Spray Booth

Limit Usage: PM	Limit Usage: VOC	Control Efficiency: VOC	Control Efficiency: PM	Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM
0.00%	21.91%	0.00%	80.00%	**5.68**	**136.44**	**< 25**	**0.76**

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
U222 - Post Flock Adhesive Stations (3)																
852	8.3	48.25%	0.0%	48.3%	0.0%	51.75%	0.40000	1.000	4.00	4.00	1.60	38.40	7.01	0.00	7.73	100%
State Potential Emissions For Each Booth			**Add worst case coating to all solvents**								**1.60**	**38.40**	**7.01**	**0.00**		

Control Efficiency: VOC	Control Efficiency: PM	Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM
0.00%	80.00%	**1.60**	**38.40**	**7.01**	**0.00**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations
Company Name: GDX Automotive North America, Inc.
Address City IN Zip: One General Street, Wabash, IN 46992
Significant Source Modification: T169-22326-00004
Significant Permit Modification: T169-22381-00004
Reviewer: AB/EVP

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
NBC/JS27 Offline- Primer Booth																
459X	7.3	100.00%	0.0%	100.0%	0.0%	0.00%	1.00000	1.000	7.28	7.28	7.28	174.72	31.89	0.00	#DIV/0!	75%
NBC/JS27 Offline- Topcoat																
Autoseal 3443	8.5	57.38%	53.8%	3.6%	0.0%	42.63%	2.00000	1.000	0.30	0.30	0.61	14.55	2.66	7.97	0.13	75%
NBC/JS27 Offline- Post Flock Adhesive Stations (3)																
852	8.3	48.25%	0.0%	48.3%	0.0%	51.75%	0.40000	1.000	4.00	4.00	4.80	115.20	21.02	0.00	2.07	100%
State Potential Emissions			**Add worst case coating to all solvents**								**12.69**	**304.47**	**55.57**	**7.97**		

Usage Limit For NBC/JS27 Offline- Primer Spray Booth

Limit Usage: PM	Limit Usage: VOC	Control Efficiency: VOC	Control Efficiency: PM	Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM
0.00%	21.63%	0.00%	80.00%	**9.94**	**238.62**	**<25**	**1.25**

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Combining Line 3- Adhesive Stations (3)																
Tivolit	7.8	41.71%	0.0%	41.7%	0.0%	58.29%	0.50000	1.000	3.24	3.24	1.62	38.84	7.09	0.00	5.55	100%
State Potential Emissions For Each Booth			**Add worst case coating to all solvents**								**1.62**	**38.84**	**7.09**	**0.00**		

Control Efficiency: VOC	Control Efficiency: PM	Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM
0.00%	80.00%	**1.62**	**38.84**	**7.09**	**0.00**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

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

Company Name: GDX Automotive North America, Inc.
Address City IN Zip: One General Street, Wabash, IN 46992
Significant Source Modification: T169-22326-00004
Significant Permit Modification: T169-22381-00004
Reviewer: AB/EVP

Existing Emissions from Line 2 as Permitted in Part 70 Permit No. T169-5650-00004, Issued on April 15, 2002 *

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Line 2 - Adhesive Application Booth																
Flock Adhesive	8.3	48.00%	0.0%	48.0%	0.0%	45.40%	1.50000	1.000	3.98	3.98	5.97	143.25	26.14	0.00	8.76	100%
State Potential Emissions			**Add worst case coating to all solvents**								**5.97**	**143.25**	**26.14**	**0.00**		

Limit Usage: PM	Limit Usage: VOC	Control Efficiency: VOC	Control Efficiency: PM	Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM
0.00%	8.20%	0.00%	0.00%	**5.48**	**131.51**	**24.00**	**0.00**

New Emissions from Line 2 Due to New Coatings Being Used

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Line 2 - Adhesive Application Booth																
Flock Adhesive	7.9	60.35%	0.0%	60.4%	0.0%	39.90%	1.50000	1.000	4.78	4.78	7.17	172.07	31.40	0.00	11.98	100%
State Potential Emissions			**Add worst case coating to all solvents**								**7.17**	**172.07**	**31.40**	**0.00**		

Limit Usage: PM	Limit Usage: VOC	Control Efficiency: VOC	Control Efficiency: PM	Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM
0.00%	20.42%	0.00%	0.00%	**5.71**	**136.93**	**< 25**	**0.00**

Net Change in Emissions (ton/yr): **5.26** **0.00**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

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

Company Name: GDX Automotive North America, Inc.
Address City IN Zip: One General Street, Wabash, IN 46992
Significant Source Modification: T169-22326-00004
Significant Permit Modification: T169-22381-00004
Reviewer: AB/EVP

Existing Emissions from Line 3 as Permitted in Part 70 Permit No. T169-5650-00004, Issued on April 15, 2002 *

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Line 3 - Adhesive Application Booth																
Flock Adhesive	8.3	48.30%	0.0%	48.3%	0.0%	45.40%	0.00100	1000.000	4.00	4.00	4.00	96.10	17.54	0.00	8.82	100%
State Potential Emissions			**Add worst case coating to all solvents**								**4.00**	**96.10**	**17.54**	**0.00**		

Limit Usage: PM	Limit Usage: VOC	Control Efficiency: VOC	Control Efficiency: PM	Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM
0.00%	0.00%	0.00%	0.00%	**4.00**	**96.10**	**17.54**	**0.00**

New Emissions from Line 3 Due to New Coatings Being Used

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Line 3 - Adhesive Application Booth																
L618 Mixture	7.9	60.35%	0.0%	60.4%	0.0%	39.90%	1.50000	1.000	4.78	4.78	7.17	172.07	31.40	0.00	11.98	100%
State Potential Emissions			**Add worst case coating to all solvents**								**7.17**	**172.07**	**31.40**	**0.00**		

Limit Usage: PM	Limit Usage: VOC	Control Efficiency: VOC	Control Efficiency: PM	Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM
0.00%	20.42%	0.00%	0.00%	**5.71**	**136.93**	**< 25**	**0.00**

Net Change in Emissions (ton/yr): **13.86** **0.00**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

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

Company Name: GDX Automotive North America, Inc.
Address City IN Zip: One General Street, Wabash, IN 46992
Significant Source Modification: T169-22326-00004
Significant Permit Modification: T169-22381-00004
Reviewer: AB/EVP

Existing Emissions from Line 3 as Permitted in Part 70 Permit No. T169-5650-00004, Issued on April 15, 2002 *

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Line 3 - Topcoat Spray Booth																
Coating 8370A/8370C	8.9	4.75%	0.0%	4.8%	0.0%	45.40%	0.50000	1.000	0.42	0.42	0.21	5.08	0.93	4.65	0.93	75%
State Potential Emissions			**Add worst case coating to all solvents**								**0.21**	**5.08**	**0.93**	**4.65**		

Limit Usage: PM	Limit Usage: VOC	Control Efficiency: VOC	Control Efficiency: PM	Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM
0.00%	0.00%	0.00%	80.00%	**0.21**	**5.08**	**0.93**	**0.93**

New Emissions from Line 3 Due to New Coatings Being Used

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Line 3 - Topcoat Spray Booth																
VL203	7.5	86.42%	0.0%	86.4%	0.0%	13.58%	1.00000	1.000	6.49	6.49	6.49	155.76	28.43	1.12	47.79	75%
State Potential Emissions			**Add worst case coating to all solvents**								**6.49**	**155.76**	**28.43**	**1.12**		

Limit Usage: PM	Limit Usage: VOC	Control Efficiency: VOC	Control Efficiency: PM	Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM
0.00%	12.09%	0.00%	80.00%	**5.71**	**136.93**	**< 25**	**0.20**

Net Change in Emissions (ton/yr): **27.50** **-3.53**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

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

Company Name: GDX Automotive North America, Inc.
Address City IN Zip: One General Street, Wabash, IN 46992
Significant Source Modification: T169-22326-00004
Significant Permit Modification: T169-22381-00004
Reviewer: AB/EVP

Existing Emissions from Line 3 as Permitted in Part 70 Permit No. T169-5650-00004, Issued on April 15, 2002 *

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Line 3 - Primer Booth																
HS-33-EX-1	7.8	74.36%	0.0%	74.4%	0.0%	21.35%	1.00000	1.000	5.82	5.82	5.82	139.74	25.50	2.20	27.27	75%
State Potential Emissions			**Add worst case coating to all solvents**								**5.82**	**139.74**	**25.50**	**2.20**		
							Limit Usage: PM	Limit Usage: VOC	Control Efficiency: VOC	Control Efficiency: PM	Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM		
							0.00%	5.89%	0.00%	75.00%	**5.48**	**131.51**	**24.00**	**0.52**		

New Emissions from Line 3 Due to New Coatings Being Used

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Line 3 - Primer Booth																
459X	7.3	100.00%	0.0%	100.0%	0.0%	0.00%	1.00000	1.000	7.28	7.28	7.28	174.72	31.89	0.00	#DIV/0!	75%
State Potential Emissions			**Add worst case coating to all solvents**								**7.28**	**174.72**	**31.89**	**0.00**		
							Limit Usage: PM	Limit Usage: VOC	Control Efficiency: VOC	Control Efficiency: PM	Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM		
							0.00%	21.63%	0.00%	80.00%	**5.71**	**136.93**	**< 25**	**0.00**		

Net Change in Emissions (ton/yr): **6.38** **-2.20**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations
Company Name: GDX Automotive North America, Inc.
Address City IN Zip: One General Street, Wabash, IN 46992
Significant Source Modification: T169-22326-00004
Significant Permit Modification: T169-22381-00004
Reviewer: AB/EVP

Existing Emissions from Finishing Area 239 as Permitted in Part 70 Permit No. T169-5650-00004, Issued on April 15, 2002 *

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Finishing Area 239 Booth																
Chemlok 459X	7.2	96.50%	0.0%	96.5%	0.0%	3.00%	0.00029	2100.000	6.95	6.95	4.25	101.90	18.60	0.17	231.60	75%
Xylene	7.2	100.00%	0.0%	100.0%	0.0%	0.00%	0.00001	2100.000	7.20	7.20	0.14	3.45	0.63	0.00	#DIV/0!	75%
State Potential Emissions			**Add worst case coating to all solvents**								**4.39**	**105.36**	**19.23**	**0.17**		

Limit Usage: PM	Limit Usage: VOC	Control Efficiency: VOC	Control Efficiency: PM	Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM
0.00%	0.00%	0.00%	90.00%	**4.39**	**105.36**	**19.23**	**0.02**

New Emissions from U222 (Previously Finishing Area 239) Due to New Coatings Being Used

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
U222 Finishing Area - Topcoat Booth																
8370 UV	8.6	73.05%	50.0%	23.1%	0.0%	26.95%	0.83000	1.000	1.98	1.98	1.64	39.44	7.20	2.10	7.35	75%
State Potential Emissions			**Add worst case coating to all solvents**								**1.64**	**39.44**	**7.20**	**2.10**		

Limit Usage: PM	Limit Usage: VOC	Control Efficiency: VOC	Control Efficiency: PM	Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM
0.00%	0.00%	0.00%	80.00%	**1.64**	**39.44**	**7.20**	**0.42**

Net Change in Emissions (ton/yr):	**-12.03**	**1.94**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations
Company Name: GDX Automotive North America, Inc.
Address City IN Zip: One General Street, Wabash, IN 46992
Significant Source Modification: T169-22326-00004
Significant Permit Modification: T169-22381-00004
Reviewer: AB/EVP

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Glycol Ethers	Glycol Ethers Emissions (ton/yr)
Line 6- Topcoat Booth					
8370 UV	8.6	1.75000	1.000	5.00%	3.29

Total State Potential Emissions **3.29**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Ethylene Glycol	Weight % Glycol Ethers	Weight % MEK	Weight % MIBK	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Ethylene Glycol Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	MEK Emissions (ton/yr)	MIBK Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)
Line 10- Primer Booth																	
459X	7.3	1.00000	1.000	80.00%	0.00%	0.00%	0.00%	0.00%	0.00%	20.00%	25.51	0.00	0.00	0.00	0.00	0.00	6.38
Line 10- Topcoat Booth																	
EX-66-578	8.7	1.00000	1.000	0.00%	0.00%	1.08%	2.78%	0.00%	0.00%	0.00%	0.00	0.00	0.41	1.05	0.00	0.00	0.00
Line 10- Flock Adhesive																	
L618 Mixture	7.9	1.00000	1.000	28.30%	23.00%	0.00%	0.00%	4.00%	4.70%	3.10%	9.82	7.98	0.00	0.00	1.39	1.63	1.08

Total State Potential Emissions **35.33** **7.98** **0.41** **1.05** **1.39** **1.63** **7.45**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Ethylene Glycol	Weight % Glycol Ethers	Weight % MEK	Weight % MIBK	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Ethylene Glycol Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	MEK Emissions (ton/yr)	MIBK Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)
NBC/JS27 Offline- Primer Booth																	
459X	7.3	1.00000	1.000	80.00%	0.00%	0.00%	0.00%	0.00%	0.00%	20.00%	25.51	0.00	0.00	0.00	0.00	0.00	6.38
NBC/JS27 Offline- Topcoat Booth																	
Autoseal 3443	8.5	2.00000	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
NBC/JS27 Offline- Post Flock Adhesive Stations (3)																	
Adhesive 852	8.3	0.40000	1.000	25.00%	0.00%	0.00%	0.00%	0.00%	10.00%	10.00%	3.63	0.00	0.00	0.00	0.00	1.45	1.45

Total State Potential Emissions **36.40** **0.00** **0.00** **0.00** **0.00** **4.36** **10.73**

METHODOLOGY

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

Appendix A: Emission Calculations
HAP Emission Calculations
Company Name: GDX Automotive North America, Inc.
Address City IN Zip: One General Street, Wabash, IN 46992
Significant Source Modification: T169-22326-00004
Significant Permit Modification: T169-22381-00004
Reviewer: AB/EVP

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % MIBK	Weight % Ethylbenzene	Xylene Emissions (ton/yr)	MIBK Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)
U222- Post Flock Adhesive Stations (3)									
Adhesive 852	8.3	0.40000	1.000	25.00%	10.00%	10.00%	3.63	1.45	1.45
Total State Potential Emissions For Three (3) Booths							**10.89**	**4.36**	**4.36**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % MEK	MEK Emissions (ton/yr)
Combining Line 3- Adhesive Stations (3)					
Tivolit	7.8	0.50	1.00	20.83%	3.54
Total State Potential Emissions for three (3) booths					**10.62**

Existing Emissions from Finishing Area 239 as Permitted in Part 70 Permit No. T169-5650-00004, Issued on April 15, 2002 *

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)
Finishing Area 239 Booth							
Chemlok 459X	7.2	0.00029	2100.000	80.00%	20.00%	15.42	3.85
Xylene	7.2	0.00001	2100.000	100.00%	0.00%	0.63	0.00
						16.05	**3.85**

New Emissions from U222 (Previously Finishing Area 239) Due to New Coatings Being Used

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Glycol Ethers	Glycol Ethers Emissions (ton/yr)
U222- Topcoat Booth					
8370 UV	8.6	0.83000	1.000	5.00%	1.56
Total State Potential Emissions					**1.56**

METHODOLOGY

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

Appendix A: Emission Calculations
HAP Emission Calculations
Company Name: GDX Automotive North America, Inc.
Address City IN Zip: One General Street, Wabash, IN 46992
Significant Source Modification: T169-22326-00004
Significant Permit Modification: T169-22381-00004
Reviewer: AB/EVP

Existing Emissions from Line 2 Adhesive Application Booth as Permitted in Part 70 Permit No. T169-5650-00004, Issued on April 15, 2002 *

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MEK	Weight % 4,4' - Diphenylmethane diisocyanate	Weight % Methyl Isobutyl Ketone	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	MEK Emissions (ton/yr)	4,4' - Diphenylmethane diisocyanate Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)
Line 2 - Adhesive Application Booth															
Flock Adhesive	8.3	1.50000	1.000	25.00%	0.00%	0.00%	2.00%	10.00%	10.00%	13.62	0.00	0.00	1.09	5.45	5.45
Total State Potential Emissions										**13.62**	**0.00**	**0.00**	**1.09**	**5.45**	**5.45**

New Emissions from Line 2 Due to New Coatings Being Used

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MEK	Weight % 4,4' - Diphenylmethane diisocyanate	Weight % Methyl Isobutyl Ketone	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	MEK Emissions (ton/yr)	4,4' - Diphenylmethane diisocyanate Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)
Line 2 - Adhesive Application Booth															
L618 Mixture	7.9	1.50000	1.000	28.30%	23.00%	4.00%	0.00%	4.70%	3.10%	14.73	11.97	2.08	0.00	2.45	1.61
Total State Potential Emissions										**14.73**	**11.97**	**2.08**	**0.00**	**2.45**	**1.61**

Existing Emissions from Line 3 Adhesive Application Booth as Permitted in Part 70 Permit No. T169-5650-00004, Issued on April 15, 2002 *

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MEK	Weight % 4,4' - Diphenylmethane diisocyanate	Weight % Methyl Isobutyl Ketone	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	MEK Emissions (ton/yr)	4,4' - Diphenylmethane diisocyanate Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)
Line 3 - Adhesive Application Booth															
Flock Adhesive	8.3	0.00100	1000.000	25.00%	0.00%	0.00%	2.00%	10.00%	10.00%	9.08	0.00	0.00	0.73	3.63	3.63
Total State Potential Emissions										**9.08**	**0.00**	**0.00**	**0.73**	**3.63**	**3.63**

New Emissions from Line 3 Due to New Coatings Being Used

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MEK	Weight % 4,4' - Diphenylmethane diisocyanate	Weight % Methyl Isobutyl Ketone	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	MEK Emissions (ton/yr)	4,4' - Diphenylmethane diisocyanate Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)
Line 3 - Adhesive Application Booth															
L618 Mixture	7.9	1.50000	1.000	28.30%	23.00%	4.00%	0.00%	4.70%	3.10%	14.73	11.97	2.08	0.00	2.45	1.61
Total State Potential Emissions										**14.73**	**11.97**	**2.08**	**0.00**	**2.45**	**1.61**

METHODOLOGY

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

Appendix A: Emission Calculations
HAP Emission Calculations
Company Name: GDX Automotive North America, Inc.
Address City IN Zip: One General Street, Wabash, IN 46992
Significant Source Modification: T169-22326-00004
Significant Permit Modification: T169-22381-00004
Reviewer: AB/EVP

Existing Emissions from Line 3 Topcoat Booth as Permitted in Part 70 Permit No. T169-5650-00004, Issued on April 15, 2002 *

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Glycol Ethers	Glycol Ethers Emissions (ton/yr)
Topcoat Spray Booth for Line #3					
Coating 8370A/8370C	8.9	0.50000	1.000	4.75%	0.93
					0.93

New Emissions from Line 3 - Topcoat Booth Due to New Coatings Being Used

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Xylene Emissions (ton/yr)
Line 3- Topcoat Booth					
VL203	7.5	1.00000	1.000	58.00%	19.08
Total State Potential Emissions					**19.08**

Existing Emissions from Line 3 Primer Booth as Permitted in Part 70 Permit No. T169-5650-00004, Issued on April 15, 2002 *

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Methyl Isobutyl Ketone	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)
Line 3- Primer Booth											
HS-33-EX-1	7.8	1.00000	0.250	9.40%	50.70%	44.00%	2.40%	0.81	4.35	3.77	0.21
Total State Potential Emissions								**0.81**	**4.35**	**3.77**	**0.21**

New Emissions from Line 3 - Primer Booth Due to New Coatings Being Used

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Ethylene Glycol	Weight % Glycol Ethers	Weight % MEK	Weight % MIBK	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Ethylene Glycol Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	MEK Emissions (ton/yr)	MIBK Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)
Line 3- Primer Booth																	
459X	7.3	1.00000	1.000	80.00%	0.00%	0.00%	0.00%	0.00%	0.00%	20.00%	25.51	0.00	0.00	0.00	0.00	0.00	6.38
Total State Potential Emissions											**25.51**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**6.38**

METHODOLOGY

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

Appendix A: Emissions Calculations
Extrusion and Curing Emissions

Company Name: GDX Automotive North America, Inc.
Address City IN Zip: One General Street, Wabash, IN 46992
Significant Source Modification: T169-22326-00004
Significant Permit Modification: T169-22381-00004
Reviewer: AB/EVP

Emission Unit	Pollutant	Maximum Rate	Emission Factor	Emission Rate (lb/hr)	Maximum Uncontrolled Emissions	Control Efficiency	Maximum Controlled Emissions
Ext. Line 1- Extruder	PM	1000	2.67000E-08	0.0000	0.00	0.00%	0.00
	VOC	1000	3.95E-05	0.0395	0.17	0.00%	0.17
	HAPs	1000	2.99000E-05	0.0299	0.13	0.00%	0.13
Ext. Line 10- Curing	VOC	1000	1.90000E-03	1.9000	8.32	0.00%	8.32
	HAPs	1000	9.76000E-04	0.9760	4.27	0.00%	4.27

Notes:

Emission Factors from the Draft AP-42 Section 4.12

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Ovens

Company Name: GDX Automotive North America, Inc.
Address City IN Zip: One General Street, Wabash, IN 46992
SSM Number: T169-22326-00004
SPM Number: T169-22381-00004
Reviewer: AB/EVP

Four (4) Line 10 Oven Burners =	**4.0**	**MMBTU/hr**
Three (3) Line 10 Microwave Zone Burners =	**0.51000**	**MMBTU/hr**
Three (3) U222 Catalytic IR Ovens =	**1.72800**	**MMBTU/hr**

Total Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
6.238	54.6

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.21	0.21	0.02	2.73	0.15	2.30

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Ovens
HAPs Emissions

Company Name: GDX Automotive North America, Inc.
Address City IN Zip: One General Street, Wabash, IN 46992
SSM Number: T169-22326-00004
SPM Number: T169-22381-00004
Reviewer: AB/EVP

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	5.738E-05	3.279E-05	2.049E-03	4.918E-02	9.290E-05

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.366E-05	3.005E-05	3.825E-05	1.038E-05	5.738E-05

Methodology is the same as previous page.

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