



*Mitchell E. Daniels, Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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

TO: Interested Parties / Applicant  
DATE: March 28, 2006  
RE: Vibration Control Technologies, LLC/ 113-22521-00080  
FROM: Nisha Sizemore  
Chief, Permits Branch  
Office of Air Quality

**Notice of Decision: Approval - Effective Immediately**

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this approval 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) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures  
FNPER-MOD.dot 1/10/05



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
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Mr. Steve Sperlazza  
Vibration Control Technologies.  
1496 Gerber Street  
Ligonier, IN 46767

March 28, 2006

Re: 113-22521-00080  
Second Minor Permit Revision to  
MSOP 113-16637-00080

Dear Mr. Sperlazza:

Vibration Control Technologies LLC, was issued a Minor Source Operating permit (MSOP) on October 26, 2004 for the production of fabricated metal products. A letter requesting changes to this permit was received on January 3, 2006. Pursuant to the provisions of 326 IAC 2-6.1-6 a minor permit revision to this permit is hereby approved as described in the attached Technical Support Document.

This Minor Permit Revision 113-22521-00080 is needed to incorporate the changes made in the Addendum to the Technical Support Document (TSD) for MSOP Renewal No. 113-16637-00080.

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions  
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 (Revocation), 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.

Pursuant to 326 IAC 2-6.1-6, this permit shall be revised by incorporating the minor permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this revision and the following revised permit pages to the front of the original permit.

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 Surya Ramaswamy, c/o OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204-2251, or at 973-575-2555, extension 3216, or dial 1-800-451-6027, and ask for extension 3-6878.

Sincerely,  
Original signed by

Nysa James, Section Chief  
Permits Branch  
Office of Air Quality

Attachments  
KSR/EVP

cc: File – Noble County  
U.S. EPA, Region V  
Noble County Health Department  
Northern Regional Office  
Air Compliance Section Inspector  
Compliance Data Section  
Administrative and Development  
Technical Support and Modeling - Michele Boner



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## MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**Vibration Control Technologies, LLC  
1496 Gerber Street  
Ligonier, Indiana 46767**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP113-16637-00080	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: October 26, 2004  Expiration Date: October 26, 2009

First Minor Permit Revision No.: MSOP MPR 113-21996-00080, issued on December 27, 2005

Second Minor Permit Revision No.: MSOP MPR 113-22521-00080	Pages affected: 17, 21, 23, 28, 29, 31, and 32
Original signed by: Nysa James, Section Chief Office of Air Quality	Issuance Date: March 28, 2006  Expiration Date: October 26, 2009

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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 and A.2 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 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

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The Permittee owns and operates automobile parts production plant for machining and surface coating of auto parts.

Authorized Individual: Plant Manager  
Source Address: 1496 Gerber Street, Ligonier, IN 46767  
Mailing Address: same as above  
General Source Phone: (260) 894-7199  
SIC Code: 3499  
County Location: Noble  
Source Location Status: Attainment for all criteria pollutants  
Source Status: Minor Source Operating Permit  
Minor Source, under PSD Rules;  
Minor Source, Section 112 of the Clean Air Act

### A.2 Emissions Units and Pollution Control Equipment Summary

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This stationary source is approved to construct and operate the following emissions units and pollution control devices:

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

- (a) One (1) Ford 6.8 Assembly Cell line, consisting of:
  - (1) One (1) adhesive roll coater, with a maximum capacity of 105 machined metal parts per hour, and exhausting to stack S-9.
  - (2) One (1) NMP washer, with a maximum capacity of 105 machined metal parts per hour, exhausting to general ventilation.
  - (3) One (1) spray booth, identified as P-1, with a maximum capacity of 105 machined metal parts per hour, using dry filters as particulate matter control, and exhausting to stack S-10.
- (b) One (1) Ford 5.4 line, consisting of:
  - (1) One (1) adhesive roll coater, with a maximum capacity of 105 machined metal parts per hour, and exhausting to general ventilation.
  - (2) One (1) NMP washer, with a maximum capacity of 105 machined metal parts per hour, and exhausting to stack S-7.
  - (3) One (1) spray booth, identified as P-2, with a maximum capacity of 105 machined metal parts per hour, using dry filters as control, and exhausting to stack S-8.

- (c) One (1) Honda Civic Assembly line:
  - (1) One (1) spray booth, with a maximum capacity of 100 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-15.
  - (2) One (1) spray booth, with a maximum capacity of 100 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-14.
  - (3) One (1) brush coater or timing mark station, with a maximum capacity of 100 units per hour, and exhausting to the atmosphere.
- (d) One (1) Honda BPX Line #1 Assembly Cell:
  - (1) One (1) spray shadow booth, with a maximum capacity of 92 units per hour, and exhausting to the stack S-17.
  - (2) One (1) spray final booth, with a maximum capacity of 92 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-18.
  - (3) One (1) brush coater or timing mark station, with a maximum capacity of 92 units per hour, and exhausting to the atmosphere.
- (e) One (1) Honda Compact Assembly Cell:
  - (1) One (1) spray shadow booth, with a maximum capacity of 92 units per hour, and exhausting to the stack S-19.
  - (2) One (1) spray final booth, with a maximum capacity of 92 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-20.
  - (3) One (1) brush coater or timing mark station, with a maximum capacity of 92 units per hour, and exhausting to the atmosphere.
- (f) One (1) Ford 2.5 Duratec/DMD line, consisting of:
  - (1) One (1) adhesive roll coater, with a maximum capacity of 85 machined metal parts per hour, and exhausting to general ventilation.
  - (2) One (1) NMP washer, with a maximum capacity of 85 machined metal parts per hour, and exhausting to stack S-2.
  - (3) One (1) dip tank, with a maximum capacity of 85 machined metal parts per hour, using dry filters as particulate matter control, and exhausting to stack S-1.
- (g) One mechanical shot blaster, with a maximum capacity of 80 lb/hr of parts, and exhausting to the atmosphere.
- (h) One (1) Ford 4.0 Redesign Line:
  - (1) One (1) adhesive spray booth, with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-4.
  - (2) One (1) spray booth, with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-6.

- (3) Four (4) rubber molding presses, with a maximum capacity of 81 lb/hr each, exhausting to stack S-5.
- (i) One (1) Ford I4 Assembly line:
  - (1) One (1) spray booth, with a maximum capacity of 105 machined metal parts per hour, and exhausting to the stack S-11.
- (j) Three (3) natural gas-fired heaters, rated at 0.32 million British thermal units (MMBTU) per hour each.
- (k) Two (2) natural gas-fired heaters, rated at 0.2 million British thermal units (MMBTU) per hour each.
- (l) One (1) natural gas-fired heaters, rated at 0.1 million British thermal units (MMBTU) per hour each.
- (m) Four (4) natural gas-fired sealer tank heaters, rated at 0.3 million British thermal units (MMBTU) per hour each.
- (n) Four (4) natural gas-fired wash tank heaters, rated at 0.4 million British thermal units (MMBTU) per hour each.
- (o) One (1) Nissan Assembly Cell:
  - (1) One (1) spray booth, with a maximum capacity of 60 units per hour, and exhausting to the stack S-16.
  - (2) One (1) brush coater or timing mark station, with a maximum capacity of 60 units per hour, and exhausting to the atmosphere.
- (p) One (1) D 35 Assembly Cell line:
  - (1) One (1) spray booth, constructed in 2002, coating metal with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, exhausting to the stack S-12;
  - (2) Four (4) rubber molding presses , with two (2) units constructed in 2002, and the two (2) new units to be constructed in 2006, with a maximum capacity of 58.5 lb/hr each, exhausting to stacks S-13 ,S-21 and S-22;
  - (3) One (1) primer booth, to be constructed in 2006, coating metal with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, exhausting through general ventilation;
  - (4) One (1) adhesive booth, to be constructed in 2006, coating metal with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, exhausting through general ventilation;
  - (5) Two (2) shadow booths, to be constructed in 2006, coating metal with a total maximum capacity of 100 parts/hr, using dry filters as particulate matter control, exhausting through general ventilation; and
  - (6) Two (2) final booths, to be constructed in 2006, coating metal with a total maximum capacity of 100 parts/hr, using dry filters as particulate matter control, exhausting through general ventilation.

- (q) One (1) Ford 3.0 Vulcan Cell:
  - (1) One (1) dip tank, with a maximum capacity of 85 units per hour, and exhausting to stack S-3.

## **SECTION B GENERAL CONDITIONS**

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

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

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

### **B.2 Definitions**

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

### **B.3 Effective Date of the Permit [IC13-15-5-3]**

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

### **B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]**

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Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit 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.

### **B.5 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]**

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

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

### **B.6 Modification to Permit [326 IAC 2]**

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Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

### **B.7 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

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- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

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

- (d) The notification 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.

#### B.8 Preventive Maintenance Plan [326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days (this time frame is determined on a case by case basis but no more than ninety (90) days) after issuance of this permit, including the following information on each emissions unit:
- (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, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

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

- (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) A copy of the PMP's 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 PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) 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.9 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

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- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.

- (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, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.

**B.10 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC13-17-3-2][IC 13-30-3-1]**

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

**B.11 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]**

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Pursuant to [326 IAC 2-6.1-6(d)(3)]:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

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

**B.12 Annual Fee Payment [326 IAC 2-1.1-7]**

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

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

### 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 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

### C.3 Opacity [326 IAC 5-1]

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

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

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

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

C.5 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, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

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 an "authorized individual" 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

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

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- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. 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, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ (and local agency) not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, (and local agency), 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.7 Compliance Requirements [326 IAC 2-1.1-11]

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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

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

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

### C.9 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

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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.

## Record Keeping and Reporting Requirements

### C.10 Malfunctions Report [326 IAC 1-6-2]

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Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

### C.11 General Record Keeping Requirements [326 IAC 2-6.1-5]

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- (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 when operation begins.

### C.12 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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- (a) 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, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) 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.

- (c) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).
  
- (d) 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.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Emissions Unit Description:

One (1) Ford 6.8 line, consisting of:

- (a) One (1) adhesive roll coater, with a maximum capacity of 105 machined metal parts per hour, and exhausting to stack S-9.
- (b) One (1) NMP washer, with a maximum capacity of 105 machined metal parts per hour, exhausting to general ventilation.
- (c) One (1) spray booth, identified as P-1, with a maximum capacity of 105 machined metal parts per hour, using dry filters as particulate matter control, and exhausting to stack S-10.

One (1) Ford 5.4 line, consisting of:

- (d) One (1) adhesive roll coater, with a maximum capacity of 105 machined metal parts per hour, using no control, and exhausting to stack S-12.
- (e) One (1) NMP washer, with a maximum capacity of 105 machined metal parts per hour, using no control, and exhausting to stack S-7.
- (f) One (1) spray booth, identified as P-2, with a maximum capacity of 105 machined metal parts per hour, using dry filters as control, and exhausting to stack S-8.

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

### Emission Limitations and Standards

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

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere VOC in excess of, for air dried or forced warm air dried coatings, three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicators at the Ford 6.8 and 5.4 line spray booths and adhesive roll coaters.

#### D.1.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of P-1 and P-2 during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

#### D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee of NMP washer cold cleaning facilities on the Ford 6.8 and Ford 5.4 Lines shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;

- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

#### D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

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- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
  - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.
  - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
  - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent is used is insoluble in, and heavier than, water.

- (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
  - (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

#### D.1.5 Particulate [326 IAC 6-3-2(d)]

- (a) Particulate from the surface coating manufacturing processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
  - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
  - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

#### D.1.6 Preventive Maintenance Plan [326 IAC 1-6-3]

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

### **Compliance Determination Requirements**

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

Compliance with the VOC content contained in condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) 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.

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

In order to comply with condition D.1.5, the dry filters for PM control shall be in operation and control emissions from the spray booths P-1 and P-2 at all times that the spray booths are in operation.

#### D.1.9 Training Requirements

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- (a) In order to comply with condition D.1.5 the Permittee shall implement an operator-training program.
  - (1) All spray booth operators or employees that perform maintenance at the surface coating facilities shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
  - (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.
  - (3) All operators shall be given refresher training annually.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

#### **Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**

##### D.1.10 Record Keeping Requirements

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- (a) In order to comply with condition D.1.1, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be maintained on a monthly basis and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.1.1.
  - (1) The VOC content of each coating material and solvent used less water; and
  - (2) The coatings and solvents applied during each month, purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the coating or solvent type.
- (b) In order to comply with Condition D.1.9, the Permittee shall maintain a copy of the operator-training program, all training records including the list of trained operators, and the additional measures prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Emissions Unit Description:

One (1) Honda Civic line, consisting of:

- (a) One (1) spray booth, with a maximum capacity of 100 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-15.
- (b) One (1) spray booth, with a maximum capacity of 100 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-14.
- (c) One (1) brush coater or timing mark station, with a maximum capacity of 100 units per hour, and exhausting to the atmosphere.

One (1) Honda BPX Line #1 Assembly Cell:

- (d) One (1) spray shadow booth, with a maximum capacity of 92 units per hour, and exhausting to the stack S-17.
- (e) One (1) spray final booth, with a maximum capacity of 92 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-18.
- (f) One (1) brush coater or timing mark station, with a maximum capacity of 92 units per hour, and exhausting to the atmosphere.

One (1) Honda Compact Assembly Cell:

- (g) One (1) spray shadow booth, with a maximum capacity of 92 units per hour, and exhausting to the stack S-19.
- (h) One (1) spray final booth, with a maximum capacity of 92 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-20.
- (i) One (1) brush coater or timing mark station, with a maximum capacity of 92 units per hour, and exhausting to the atmosphere.

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

### Emission Limitations and Standards

#### D.2.1 Particulate [326 IAC 6-3-2(d)]

- (a) Particulate from the surface coating manufacturing processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
  - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

- (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

#### D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

### Compliance Determination Requirements

#### D.2.3 Particulate Matter (PM)

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In order to comply with condition D.2.1, the dry filters for PM control shall be in operation and control emissions from the spray booths at all times that the spray booths are in operation.

#### D.2.4 Training Requirements

---

- (a) In order to comply with condition D.2.1 the Permittee shall implement an operator-training program.
  - (1) All spray booth operators or employees that perform maintenance at the surface coating facilities shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
  - (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.
  - (3) All operators shall be given refresher training annually.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

### Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

#### D.2.5 Record Keeping Requirements

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- (a) In order to comply with Condition D.2.4, the Permittee shall maintain a copy of the operator-training program, all training records including the list of trained operators, and the additional measures prescribed by the Preventive Maintenance Plan.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.3

## FACILITY OPERATION CONDITIONS

### Emissions Unit Description:

One (1) Ford 2.5 Duratec/DMD line, consisting of:

- (a) One (1) adhesive roll coater, with a maximum capacity of 85 machined metal parts per hour, and exhausting to general ventilation.
- (b) One (1) NMP washer, with a maximum capacity of 85 machined metal parts per hour, and exhausting to stack S-2.
- (c) One (1) dip tank, with a maximum capacity of 85 machined metal parts per hour, using dry filters as particulate matter control, and exhausting to stack S-1.

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

### Emission Limitations and Standards

#### D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee of NMP washer cold cleaning facilities on the Ford 2.5 Duratec/DMD line shall:

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

#### D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
  - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
  - (B) The solvent is agitated; or

- (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
  - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
  - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
  - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
  - (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

#### D.3.3 Preventive Maintenance Plan [326 IAC 1-6-3]

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

## SECTION D.4

## FACILITY OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One enclosed mechanical shot blaster, with a maximum capacity of 80 lb/hr of parts, using baghouse as control, and exhausting to the atmosphere.

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

### Emission Limitations and Standards

#### D.4.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2]

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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.

### Compliance Determination Requirement

#### D.4.2 Particulate Control

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In order to comply with D.4.1, the baghouse for particulate control shall be in operation and control emissions from the mechanical shot blasting operation at all times that the machine is in operation.

## SECTION D.5

## FACILITY OPERATION CONDITIONS

### Emissions Unit Description:

One (1) Ford 4.0 Redesign Line consisting of::

- (a) One (1) adhesive spray booth, with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-4.
- (b) One (1) spray booth, with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-6.
- (c) Four (4) rubber molding presses, with a maximum capacity of 81 lb/hr each, exhausting to stack S-5.

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

### Emission Limitations and Standards

#### D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere VOC in excess of, for air dried or forced warm air dried coatings, three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicators at the Ford 4.0 Redesign line spray booths.

#### D.5.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of the two (2) spray booths during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

#### D.5.3 Particulate [326 IAC 6-3-2(d)]

- (a) Particulate from the surface coating manufacturing processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
  - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
  - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

#### D.5.4 Preventive Maintenance Plan [326 IAC 1-6-3]

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

### Compliance Determination Requirements

#### D.5.5 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

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Compliance with the VOC content contained in condition D.5.1 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.

#### D.5.6 Particulate Matter (PM)

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In order to comply with condition D.5.3, the dry filters for PM control shall be in operation and control emissions from the two (2) spray booths at all times that the spray booths are in operation.

#### D.5.7 Training Requirements

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- (a) In order to comply with condition D.5.3 the Permittee shall implement an operator-training program.
- (1) All spray booth operators or employees that perform maintenance at the surface coating facilities shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
  - (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.
  - (3) All operators shall be given refresher training annually.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

### Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

#### D.5.8 Record Keeping Requirements

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- (a) In order to comply with condition D.5.1, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be maintained on a monthly basis and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.5.1.
- (1) The VOC content of each coating material and solvent used less water; and
  - (2) The coatings and solvents applied during each month, purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the coating or solvent type.

- (b) In order to comply with Condition D.5.7, the Permittee shall maintain a copy of the operator-training program, all training records including the list of trained operators, and the additional measures prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.6 FACILITY OPERATION CONDITIONS

### Emissions Unit Description:

One (1) D 35 Assembly Cell line consisting of:

- (1) One (1) spray booth, constructed in 2002, coating metal with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, exhausting to the stack S-12;
- (2) Four (4) rubber molding presses, with two (2) units constructed in 2002, and the two (2) new units to be constructed in 2006, with a maximum capacity of 58.5 lb/hr each, exhausting to stacks S-13, S-21 and S-22;
- (3) One (1) primer booth, to be constructed in 2006, coating metal with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, exhausting through general ventilation;
- (4) One (1) adhesive booth, to be constructed in 2006, coating metal with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, exhausting through general ventilation;
- (5) Two (2) shadow booths, to be constructed in 2006, coating metal with a total maximum capacity of 100 parts/hr, using dry filters as particulate matter control, exhausting through general ventilation; and
- (6) Two (2) final booths, to be constructed in 2006, coating metal with a total maximum capacity of 100 parts/hr, using dry filters as particulate matter control, exhausting through general ventilation.

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

### Emission Limitations and Standards

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

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere VOC in excess of, for air dried or forced warm air dried coatings, three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicators at spray booths of the D 35 Assembly Cell line.

#### D.6.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of the one (1) spray booth, one (1) primer booth, one (1) adhesive booth, two (2) shadow booths and (2) two final booths during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

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

- (a) Particulate from the surface coating manufacturing processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

- (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

#### D.6.4 Preventive Maintenance Plan [326 IAC 1-6-3]

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

### **Compliance Determination Requirements**

#### D.6.5 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content contained in Condition D.6.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) 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.

#### D.6.6 Training Requirements

- (a) In order to comply with condition D.6.3 the Permittee shall implement an operator-training program.
  - (1) All spray booth operators or employees that perform maintenance at the surface coating facilities shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
  - (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.
  - (3) All operators shall be given refresher training annually.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

### **Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**

#### D.6.7 Record Keeping Requirements

- (a) In order to comply with condition D.6.1, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be maintained on a monthly basis and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.6.1.

- (1) The VOC content of each coating material and solvent used less water; and
  - (2) The coatings and solvents applied during each month, purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the coating or solvent type.
- (b) In order to comply with Condition D.6.6, the Permittee shall maintain a copy of the operator-training program, all training records including the list of trained operators, and the additional measures prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH**

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

<b>Company Name:</b>	<b>Vibration Control Technologies, LLC (VCT)</b>
<b>Address:</b>	<b>1496 Gerber Street</b>
<b>City:</b>	<b>Ligonier, IN 46767</b>
<b>Phone #:</b>	<b>(260) 894-7199</b>
<b>MSOP #:</b>	<b>113-16637-00080</b>

I hereby certify that VCT is  still in operation.  
 no longer in operation.

I hereby certify that VCT is  in compliance with the requirements of MSOP 113-16637-00080.  
 not in compliance with the requirements of MSOP 113-16637-00080.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

<b>Noncompliance:</b>

**MALFUNCTION REPORT**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
FAX NUMBER - 317 233-5967**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6  
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?\_\_\_\_\_, 25 TONS/YEAR SULFUR DIOXIDE ?\_\_\_\_\_, 25 TONS/YEAR NITROGEN OXIDES?\_\_\_\_\_, 25 TONS/YEAR VOC ?\_\_\_\_\_, 25 TONS/YEAR HYDROGEN SULFIDE ?\_\_\_\_\_, 25 TONS/YEAR TOTAL REDUCED SULFUR ?\_\_\_\_\_, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?\_\_\_\_\_, 25 TONS/YEAR FLUORIDES ?\_\_\_\_\_, 100TONS/YEAR CARBON MONOXIDE ?\_\_\_\_\_, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?\_\_\_\_\_, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?\_\_\_\_\_, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?\_\_\_\_\_, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?\_\_\_\_\_. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION \_\_\_\_\_.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC \_\_\_\_\_ OR, PERMIT CONDITION # \_\_\_\_\_ AND/OR PERM LIMIT OF \_\_\_\_\_

THIS INCIDENT MEETS THE DEFINITION OF >MALFUNCTION= AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: Vibration Control Technologies, LLC PHONE NO. (260) 894-7199  
LOCATION: (CITY AND COUNTY) Ligonier Noble  
PERMIT NO. 113-16637-00080 AFS PLANT ID: 113-00080 AFS POINT ID: \_\_\_\_\_ INSP: MDH  
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: \_\_\_\_\_

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/19\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/19\_\_\_\_ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: \_\_\_\_\_

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:  
CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_  
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_  
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_  
INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

**Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.**

**326 IAC 1-6-1 Applicability of rule**

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

**326 IAC 1-2-39 "Malfunction" definition**

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

**\*Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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

Technical Support Document (TSD) for a Minor Source Operating Permit Revision

**Source Background and Description**

<b>Source Name:</b>	<b>Vibration Control Technologies, LLC</b>
<b>Source Location:</b>	<b>1496 Gerber Street, Ligonier, Indiana 46767</b>
<b>County:</b>	<b>Noble</b>
<b>SIC Code:</b>	<b>3499</b>
<b>Operation Permit No.:</b>	<b>MSOP 113-16637-00080</b>
<b>Operation Permit Issuance Date:</b>	<b>October 26, 2004</b>
<b>Permit Revision No.:</b>	<b>MSOP Minor Permit Revision 113-22521-00080</b>
<b>Permit Reviewer:</b>	<b>Surya Ramaswamy/EVP</b>

First Minor Permit Revision 113-21996-00080 was issued to Vibration Control Technologies, LLC, on December 27, 2005, without incorporating the changes made in the Addendum to the Technical Support Document (TSD) for MSOP Renewal No. 113-16637-00080, issued on October 26, 2004. Therefore this Minor Permit Revision 113-22521-00080 is needed to incorporate the changes made in Addendum to the Technical Support Document (TSD) for MSOP Renewal No. 113-16637-00080.

**Permitted Emission Units and Pollution Control Equipment**

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

- (a) One (1) Ford 6.8 Assembly Cell line, consisting of:
  - (1) One (1) adhesive roll coater, with a maximum capacity of 105 machined metal parts per hour, and exhausting to stack S-9.
  - (2) One (1) NMP washer, with a maximum capacity of 105 machined metal parts per hour, exhausting to general ventilation.
  - (3) One (1) spray booth, identified as P-1, with a maximum capacity of 105 machined metal parts per hour, using dry filters as particulate matter control, and exhausting to stack S-10.
- (b) One (1) Ford 5.4 line, consisting of:
  - (1) One (1) adhesive roll coater, with a maximum capacity of 105 machined metal parts per hour, and exhausting to general ventilation.
  - (2) One (1) NMP washer, with a maximum capacity of 105 machined metal parts per hour, and exhausting to stack S-7.
  - (3) One (1) spray booth, identified as P-2, with a maximum capacity of 105 machined metal parts per hour, using dry filters as control, and exhausting to stack S-8.
- (c) One (1) Honda Civic Assembly line:
  - (d) One (1) spray booth, with a maximum capacity of 100 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-15.

- (2) One (1) spray booth, with a maximum capacity of 100 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-14.
- (3) One (1) brush coater or timing mark station, with a maximum capacity of 100 units per hour, and exhausting to the atmosphere.
- (d) One (1) Honda BPX Line #1 Assembly Cell:
  - (1) One (1) spray shadow booth, with a maximum capacity of 92 units per hour, and exhausting to the stack S-17.
  - (2) One (1) spray final booth, with a maximum capacity of 92 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-18.
  - (3) One (1) brush coater or timing mark station, with a maximum capacity of 92 units per hour, and exhausting to the atmosphere.
- (e) One (1) Honda Compact Assembly Cell:
  - (1) One (1) spray shadow booth, with a maximum capacity of 92 units per hour, and exhausting to the stack S-19.
  - (2) One (1) spray final booth, with a maximum capacity of 92 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-20.
  - (3) One (1) brush coater or timing mark station, with a maximum capacity of 92 units per hour, and exhausting to the atmosphere.
- (f) One (1) Ford 2.5 Duratec/DMD line, consisting of:
  - (1) One (1) adhesive roll coater, with a maximum capacity of 85 machined metal parts per hour, and exhausting to general ventilation.
  - (2) One (1) NMP washer, with a maximum capacity of 85 machined metal parts per hour, and exhausting to stack S-2.
  - (3) One (1) dip tank, with a maximum capacity of 85 machined metal parts per hour, using dry filters as particulate matter control, and exhausting to stack S-1.
- (g) One mechanical shot blaster, with a maximum capacity of 80 lb/hr of parts, and exhausting to the atmosphere.
- (h) One (1) Ford 4.0 Redesign Line:
  - (1) One (1) adhesive spray booth, with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-4.
  - (2) One (1) spray booth, with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-6.
  - (3) Four (4) rubber molding presses, with a maximum capacity of 81 lb/hr each, exhausting to stack S-5.
- (i) One (1) Ford I4 Assembly line:

- (1) One (1) spray booth, with a maximum capacity of 105 machined metal parts per hour, and exhausting to the stack S-11.
- (j) Three (3) natural gas-fired heaters, rated at 0.32 million British thermal units (MMBTU) per hour each.
- (k) Two (2) natural gas-fired heaters, rated at 0.2 million British thermal units (MMBTU) per hour each.
- (l) One (1) natural gas-fired heaters, rated at 0.1 million British thermal units (MMBTU) per hour each.
- (m) Four (4) natural gas-fired sealer tank heaters, rated at 0.3 million British thermal units (MMBTU) per hour each.
- (n) Four (4) natural gas-fired wash tank heaters, rated at 0.4 million British thermal units (MMBTU) per hour each.
- (o) One (1) Nissan Assembly Cell:
  - (1) One (1) spray booth, with a maximum capacity of 60 units per hour, and exhausting to the stack S-16.
  - (2) One (1) brush coater or timing mark station, with a maximum capacity of 60 units per hour, and exhausting to the atmosphere.
- (p) One (1) D 35 Assembly Cell line:
  - (1) One (1) spray booth, constructed in 2002, coating metal with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, exhausting to the stack S-12;
  - (2) Four (4) rubber molding presses , with two (2) units constructed in 2002, and the two (2) new units to be constructed in 2006, with a maximum capacity of 58.5 lb/hr each, exhausting to stacks S-13 ,S-21 and S-22;
  - (3) One (1) primer booth, to be constructed in 2006, coating metal with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, exhausting through general ventilation;
  - (4) One (1) adhesive booth, to be constructed in 2006, coating metal with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, exhausting through general ventilation;
  - (5) Two (2) shadow booths, to be constructed in 2006, coating metal with a total maximum capacity of 100 parts/hr, using dry filters as particulate matter control, exhausting through general ventilation; and
  - (6) Two (2) final booths, to be constructed in 2006, coating metal with a total maximum capacity of 100 parts/hr, using dry filters as particulate matter control, exhausting through general ventilation.
- (q) One (1) Ford 3.0 Vulcan Cell:
  - (1) One (1) dip tank, with a maximum capacity of 85 units per hour, and exhausting to stack S-3.

### **Unpermitted Emission Units and Pollution Control Equipment**

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

### **Existing Approvals**

The source has been operating under previous approvals including, but not limited to, the following:

MSOP 113-16637-00080, issued on October 26, 2004.

MPR 113-21996-00080, issued on December 27, 2005.

All conditions from previous approvals were incorporated into this permit.

### **Justification for the Revision**

The MSOP is being modified through a Minor Permit Revision. This revision is being performed based on the following justification:

First Minor Permit Revision 113-21996-00080 was issued without incorporating the changes made in the Addendum to the Technical Support Document (TSD) for MSOP Renewal No. 113-16637-00080. Therefore this Minor Permit Revision 113-22521-00080 is needed to incorporate the changes made in Addendum to the Technical Support Document (TSD) for MSOP Renewal No. 113-16637-00080.

### **Enforcement Issue**

There are no enforcement actions pending.

### **Recommendation**

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

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

A complete application for the purposes of this review was received on January 6, 2006.

### **Emission Calculations**

The permit modification will not result in any new emissions.

### **Potential To Emit Before Controls (Modification)**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as the maximum capacity of a stationary source 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.

There is no change in uncontrolled potential to emit due to this modification.

### County Attainment Status

The source is located in Noble County.

Pollutant	Status
PM-2.5	Attainment
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
1-hr Ozone	Attainment
8-hr 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 emissions and NOx are considered when evaluating the rule applicability relating to ozone. Noble County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Noble 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 PM 2.5 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 surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.
- (c) Noble County has been classified as attainment in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

### Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	6.83
PM-10	7.00
SO <sub>2</sub>	0.02
VOC	17.7
CO	2.58
NO <sub>x</sub>	3.07
Single HAP	4.08
Combination HAPs	8.05

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.
- (b) These emissions are based upon operating permit MSOP113-16637-00080 issued on October 26, 2004.

## Part 70 Permit Determination

### 326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit SPR113-22521-00080, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons per year.

This status is based on all the air approvals issued to the source. This status has been verified by the OAQ inspector assigned to the source.

## Federal Rule Applicability

There are no new federal rules applicable to this permit modification, as the changes presented herein do not involve construction of a new emissions unit, nor the modification or reconstruction of an existing emissions unit.

## State Rule Applicability – Entire Source

There are no new state rules applicable to this permit modification, as the changes presented herein do not involve construction of a new emissions unit, nor the modification or reconstruction of an existing emissions unit.

## State Rule Applicability – Individual Facilities

There are no new state rules applicable to this permit modification, as the changes presented herein do not involve construction of a new emissions unit, nor the modification or reconstruction of an existing emissions unit.

## Proposed Changes ( From Addendum to TSD for MSOP 113-16637-00080)

1. IDEM agrees that the VOC usage record keeping requirements in Conditions D.1.9 (a) (now changed to D.1.10 (a)), D.5.7 (a) (now changed to D.5.8 (a)) and D.6.6 (a) (now changed to D.6.7 (a)) are not needed to demonstrate compliance with Conditions D.1.1, D.5.1 and D.6.1 respectively. Presently, the requirements of 326 IAC 8-2-9 apply to Ford 6.8, Ford 5.4, Ford 4.0 Redesign lines and D 35 Assembly Cell lines. For surface coating operations, the coatings used at the source are 326 IAC 8-2-9 compliant i.e. discharge of VOC from the surface coating of miscellaneous metal parts and products is less than 3.5 pounds of VOC per gallon of coating. The Permittee shall not use any extreme performance coating that exceeds the 3.5 lb/gal threshold. The Permittee shall maintain records of the coatings applied during each month, VOC content of each coating material as applied, purchase orders, invoices, and material safety data sheets necessary to verify the coating type. Condition reference numbers are also changed to incorporate changes from other comments. The permit is revised as follows as a result of this comment:

### D.1.10 Record Keeping Requirements

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- (a) In order to comply with condition D.1.1, the Permittee shall maintain records in accordance with (1) ~~through and (4) (2)~~ below. Records maintained for (1) ~~through and (4) (2)~~ shall be ~~taken as stated below~~ **maintained on a monthly basis** and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.1.1.

- (1) The VOC content of each coating material and solvent used less water-; **and**

- (2) ~~The amount of coating material and solvent used on monthly basis.~~
  - (A) ~~Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.~~
  - (B) ~~Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~  
**The coatings and solvents applied during each month, purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the coating or solvent type**
- (3) ~~The monthly cleanup solvent usage; and~~
- (4) ~~The total VOC usage for each month.~~

#### D.5.8 Record Keeping Requirements

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- (a) In order to comply with condition D.5.1, the Permittee shall maintain records in accordance with (1) through ~~and (4)~~ **(2)** below. Records maintained for (1) through ~~and (4)~~ **(2)** shall be ~~taken as stated below~~ **maintained on a monthly basis** and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.5.1.
  - (1) The VOC content of each coating material and solvent used less water-; **and**
  - (2) ~~The amount of coating material and solvent used on monthly basis.~~
    - (A) ~~Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.~~
    - (B) ~~Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~  
**The coatings and solvents applied during each month, purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the coating or solvent type**
  - (3) ~~The monthly cleanup solvent usage; and~~
  - (4) ~~The total VOC usage for each month.~~

#### D.6.7 Record Keeping Requirements

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- (a) In order to comply with Condition D.6.1, the Permittee shall maintain records in accordance with (1) through ~~and (4)~~ **(2)** below. Records maintained for (1) through ~~and (4)~~ **(2)** shall be ~~taken as stated below~~ **maintained on a monthly basis** and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.6.1.
  - (1) The VOC content of each coating material and solvent used less water-; **and**
  - (2) ~~The amount of coating material and solvent used on monthly basis.~~
    - (A) ~~Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.~~
    - (B) ~~Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~

**The coatings and solvents applied during each month, purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the coating or solvent type**

~~(3) The monthly cleanup solvent usage; and~~

~~(4) The total VOC usage for each month.~~

2. The record keeping requirements in Conditions D.10 (b) (renumbered from D.1.9 (b)), D.2.5 (a) (renumbered from D.2.4 (a)), D.5.8 (b) (renumbered from D.5.7 (b)) and D.6.7 (b) (renumbered from D.6.6 (b)) ensure that the waterwash and dry filters must operate properly to ensure compliance with 326 IAC 6-3-2 (d). The following operator-training programs and related recordkeeping requirements shall be sufficient to ensure the proper operation of control equipment associated with surface coating booths. Hence the record keeping requirements in Conditions D.1.10 (b), D.2.5 (a), D.5.8 (b) and D.6.7 (b) are deleted from the permit and the operator training program requirements are included as Compliance Determination in Sections D.1, D.2, D.5 and D.6.

Conditions D.1.10 (b), D.2.5 (a), D.5.8 (b) and D.6.7 (b) are removed from the permit and replaced with requirements for operator-training programs and related recordkeeping requirements:

~~(b) In order to comply with Condition D.5.3, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.~~

### **Compliance Determination Requirements**

#### **D.1.9 Training Requirements**

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- (a) In order to comply with Condition D.1.5 the Permittee shall implement an operator-training program.
- (1) All spray booth operators or employees that perform maintenance at the surface coating facilities shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
- (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.
- (3) All operators shall be given refresher training annually.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

#### **D.1.910 Record Keeping Requirements**

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- (b) In order to comply with Condition D.1.9, the Permittee shall maintain a copy of the operator-training program, all training records including the list of trained operators, and the additional measures prescribed by the Preventive Maintenance Plan.

IDEM, OAQ also has decided to make the following change to the permit:

1. A clarification of the term "Calendar Year" has been added to section (d) of C.12 General Reporting Requirements.
  - (d) 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.**

### **Conclusion**

The construction and operation of this Assembly Cell line shall be subject to the conditions of the MSOP Minor Permit Revision 113-22521-00080.