



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: May 18, 2006

RE: Nishakawa Standard / 099-22676-00041

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

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Indianapolis, Indiana 46204-2251
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May 18, 2006

Mr. Michael Hough
Nishikawa Standard Company
324 Morrow Street
Topeka, IN 46571

Re: **099-22676-00041**
Minor Source Modification to:
Part 70 Operating Permit No.: **T 099-7539-00041**

Dear Mr. Hough:

Nishikawa Standard Company was issued Part 70 Operating Permit T 099-7539-00041 on December 14, 1999 for stationary rubber automotive weatherstripping coating source located at 501 High Road, Bremen, Indiana 46506. An application to modify the source was received on February 14, 2006. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

- (a) One (1) spray booth, identified as Service Parts Spray Booth HS-5, equipped with one (1) manual spray gun and dry filters for overspray control, exhausting to Stack S-5, capacity: 120 automotive rubber parts per hour.

Insignificant Activities

- (b) One (1) spray booth, identified as Honda Booth RS-8, consisting of two (2) spray lines, identified as SWA and STX, sharing one (1) robotic spray gun, equipped with dry filters for overspray control, exhausting to Stack S-8, capacity: 33.65 rubber weather-stripping parts for automobile applications per hour for SWA and 42.88 rubber weather-stripping parts for automobile applications per hour for STX. [326 IAC 6-3-2]
- (c) One (1) spray booth, identified as Chrysler Booth RS-9, equipped with one (1) robotic spray gun, and dry filters for overspray control, exhausting to Stack S-9, capacity: 420 rubber weather-stripping parts for automobile applications per hour. [326 IAC 6-3-2]

The following construction conditions are applicable to the proposed project:

General Construction Conditions

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

2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

The source may begin construction and operation when the minor source modification has been issued. Operating conditions shall be incorporated into the Part 70 Operating Permit as a minor permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter contact Michael S. Schaffer, c/o OAQ, 100 North Senate Avenue, Indianapolis, Indiana 46204-2251, at 631-691-3395, ext. 23 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,
Original signed by

Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

MSS/MES

Attachments TSD and Permit

cc: File - Marshall County
Marshall County Health Department
Northern Regional Office
Air Compliance Section Inspector - Rick Reynolds
Compliance Branch
Administrative and Development Section
Technical Support and Modeling - Michele Boner
Michael Martin, Plant Manager - Nishikawa Standard Company



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PART 70 MINOR SOURCE MODIFICATION OFFICE OF AIR QUALITY

**Nishikawa Standard Company
501 High Road
Bremen, Indiana 46506**

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

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

First Minor Source Modification: 099-22676-00041	Sections Affected: A, B, C, D.1 and D.2
Original signed by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: May 18, 2006

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SECTION A

SOURCE SUMMARY

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

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

- (a) Three (3) spray booths, identified as HS-1, HS-2, and HS-4, each equipped with dry filters for overspray control, exhausted through Stacks S-1, S-2, and S-4 respectively, installed in 1989, capacity: 90 automotive rubber parts per hour, each.
- (b) One (1) spray booth, identified as Service Parts Spray Booth HS-5, equipped with one (1) manual spray gun and dry filters for overspray control, exhausting to Stack S-5, capacity: 120 automotive rubber parts per hour.
- (c) One (1) robot spray booth, identified as RS-7, equipped with dry filters for overspray control, exhausted through V-7, installed in 1994, increased capacity in 1995, capacity: 115 automotive rubber parts per hour.
- (d) One (1) vertical spray application booth, identified as AS-1, equipped with HVLP spray applicators and a dry filter system for overspray control, exhausted through Stack S-4, installed in 1999, capacity: 120 rubber weather-stripping parts for automobile applications per hour.
- (e) One (1) robot spray booth, identified as AS-2, equipped with HVLP spray applicators and dry filters for overspray control, installed in 1999 and modified in 2004, capacity: 120 rubber weather-stripping parts for automobile applications per hour.

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

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

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3-2]
- (c) Units emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP: structural and production welding, parts washer emissions, combined rubber curing, and hand brush-on applications of coating materials. [326 IAC 6-3-2]
- (d) One (1) spray line, identified as WB-1, equipped with one (1) manual spray gun, using spray filter arrestors as control and exhausting to Stack S-6, and one (1) infrared electric heater, capacity: 120 rubber weather-stripping parts for automobile applications per hour. [326 IAC 6-3-2]
- (e) One (1) spray booth, identified as Honda Booth RS-8, consisting of two (2) spray lines, identified as SWA and STX, sharing one (1) robotic spray gun, equipped with dry filters for overspray control, exhausting to Stack S-8, capacity: 33.65 rubber weather-stripping parts

for automobile applications per hour for SWA and 42.88 rubber weather-stripping parts for automobile applications per hour for STX. [326 IAC 6-3-2]

- (f) One (1) spray booth, identified as Chrysler Booth RS-9, equipped with one (1) robotic spray gun, and dry filters for overspray control, exhausting to Stack S-9, capacity: 420 rubber weather-stripping parts for automobile applications per hour. [326 IAC 6-3-2]

SECTION B GENERAL CONDITIONS

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

- (a) This permit, T 099-7539-00041 is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

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

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

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

and

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

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

- (2) The compliance status;
- (3) Whether compliance was continuous or intermittent;
- (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

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

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

Telephone Number: 317-233-0178 (ask for Compliance Section)

Facsimile Number: 317-233-6865

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e) failure to pay may result in administrative enforcement action, or revocation of this permit.

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

B.26 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [326 IAC 1-1-6]

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Matter 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.

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

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

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

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.

The statement must be submitted to:

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

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

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

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) Three (3) spray booths, identified as HS-1, HS-2, and HS-4, each equipped with dry filters for overspray control, exhausted through Stacks S-1, S-2, and S-4 respectively, installed in 1989, capacity: 90 automotive rubber parts per hour, each.
- (b) One (1) spray booth, identified as Service Parts Spray Booth HS-5, equipped with one (1) manual spray gun and dry filters for overspray control, exhausting to Stack S-5, capacity: 120 automotive rubber parts per hour.
- (c) One (1) robot spray booth, identified as RS-7, equipped with dry filters for overspray control, exhausted through V-7, installed in 1994, increased capacity in 1995, capacity: 115 automotive rubber parts per hour.
- (d) One (1) vertical spray application booth, identified as AS-1, equipped with HVLP spray applicators and a dry filter system for overspray control, exhausted through Stack S-4, installed in 1999, capacity: 120 rubber weather-stripping parts for automobile applications per hour.
- (e) One (1) robot spray booth, identified as AS-2, equipped with HVLP spray applicators and dry filters for overspray control, installed in 1999 and modified in 2004, capacity: 120 rubber weather-stripping parts for automobile applications per hour.

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (a) Pursuant to CP 099-4049-00041 issued on January 25, 1995, BACT will be the continued use of robots High Volume Low Pressure (HVLP) coating application equipment with no control equipment. NISCO shall make all efforts to explore viable option for the use of low VOC, water-based coatings to further reduce VOC emissions from the coating operations. Reports of findings shall be submitted to the OAQ at the end of each calendar year. When these coatings become available, NISCO shall substitute them for the current solvent-based coatings.

HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

- (b) Condition (4) of CP-099-2885-00041, issued on February 7, 1994, stated that the volatile organic compound content of the coatings delivered to the applicator shall be limited to 2.05 tons per month. This condition and its associated log in Condition (5) of CP-099-2885-00041 were not included in this permit since a subsequent BACT analysis was completed and pursuant to CP 099-4049-00041, BACT is as stated in D.1.1 (a), above.

D.1.2 Particulate [326 IAC 6-3-2(d)]

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

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

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

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC)

VOC content referenced in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.5 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S-1, S-2, S-4, S-5 and V-7) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.5, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.7 Reporting Requirements

A report of findings to explore viable option for the use of low VOC, water-based coatings to further reduce VOC emissions from the coating operations to document compliance with Condition D.1.1 shall be submitted to the address(es) listed in Section C - General Reporting Requirements, of this permit shall be submitted to the OAQ at the end of each calendar year.

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (c) Units emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP: structural and production welding, parts washer emissions, combined rubber curing, and hand brush-on applications of coating materials.
- (d) One (1) spray line, identified as WB-1, equipped with one (1) manual spray gun, using spray filter arrestors as control and exhausting to Stack S-6, and one (1) infrared electric heater, capacity: 120 rubber weather-stripping parts for automobile applications per hour. [326 IAC 6-3-2]
- (e) One (1) spray booth, identified as Honda Booth RS-8, consisting of two (2) spray lines, identified as SWA and STX, sharing one (1) robotic spray gun, equipped with dry filters for overspray control, exhausting to Stack S-8, capacity: 33.65 rubber weather-stripping parts for automobile applications per hour for SWA and 42.88 rubber weather-stripping parts for automobile applications per hour for STX. [326 IAC 6-3-2]
- (f) One (1) spray booth, identified as Chrysler Booth RS-9, equipped with one (1) robotic spray gun, and dry filters for overspray control, exhausting to Stack S-9, capacity: 420 rubber weather-stripping parts for automobile applications per hour. [326 IAC 6-3-2]

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

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

D.2.1 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

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

D.2.2 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Limitations for Manufacturing Processes), the particulate emission rate from the welding, grinding and machining operations shall not exceed particulate emission rate based on the following equation:

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

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

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

Indiana Department of Environmental Management
Office of Air Quality

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

Source Description and Location

Source Name:	Nishikawa Standard Company
Source Location:	501 High Road, Bremen, Indiana 46506
County:	Marshall
SIC Code:	3069
Operation Permit No.:	T 099-7539-00041
Operation Permit Issuance Date:	December 14, 1999
Minor Source Modification No.:	MSM 099-22676-00041
Minor Permit Modification No.:	MPM 099-22954-00041
Permit Reviewer:	Michael S. Schaffer

Existing Approvals

The source was issued a Part 70 Operating Permit T 099-7539-00041 on December 14, 1999. The source has since received the following approvals:

- (a) First Reopening No. (099-13416-00041) issued on February 12, 2002; and
- (b) First Administrative Amendment No. (099-19162-00041) issued on June 11, 2004.

County Attainment Status

The source is located in Marshall County.

Pollutant	Status
PM ₁₀	attainment
PM _{2.5}	attainment
SO ₂	attainment
NO ₂	attainment
1-hour Ozone	attainment
8-hour Ozone	attainment
CO	attainment
Lead	attainment

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

- (b) Marshall County has been classified as attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM_{2.5} emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions.
- (c) Marshall County has been classified as attainment or unclassifiable in Indiana for PM₁₀, SO₂, CO, and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Source Status

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

Pollutant	Emissions (tons/year)
PM	4.41
PM ₁₀	4.41
SO ₂	1.00
VOC	114
CO	2.00
NO _x	3.00

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated pollutant is emitted at a rate of two hundred and fifty (250) tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) These emissions are based upon the information provided on Page 6 of 9 in the TSD to T 099-7539-00041, issued on December 14, 1999 and on Page 1 of 5 in the cover letter to AAT 099-19162-00041, June 11, 2004.

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

HAPs	Potential To Emit (tons/year)
Xylene	1.09
Toluene	28.4
Phthalic Anhydride	0.434
Ethyl Benzene	0.179
Hydroquinone	0.217

HAPs	Potential To Emit (tons/year)
Glycol Ethers	2.15
Cyclohexane	0.070
TOTAL	32.5

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

Actual Emissions

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

Pollutant	Actual Emissions (tons/year)
PM	Not Reported
PM ₁₀	Not Reported
SO ₂	Not Reported
VOC	40.0
CO	Not Reported
NO _x	Not Reported
HAPs	Not Reported

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Nishikawa Standard Company on February 14, 2006, relating to removal of an automotive rubber parts spray booth and the addition of one (1) automotive rubber parts spray booth and two (2) insignificant rubber weather-stripping parts spray booths.

The following list, which includes the newly proposed emission units and pollution control devices, reflects changes that will be made to the significant and insignificant equipment lists in Conditions A.2 and A.3 of the Part 70 Operating Permit (deleted language as ~~strikeouts~~ and new language **bolded**):

- (a) ~~Four (4)~~ **Three (3)** spray booths, ~~known~~ **identified** as HS-1, HS-2, ~~HS-3,~~ and HS-4, each equipped with dry filters for overspray control, exhausted through **Stacks S-1, S-2, and through S-4** respectively, installed in 1989, capacity: 90 automotive rubber parts per hour, each.
- (b) **One (1) spray booth, identified as Service Parts Spray Booth HS-5, equipped with one (1) manual spray gun and dry filters for overspray control, exhausting to Stack S-5, capacity: 120 automotive rubber parts per hour.**
- ~~(b)~~ (c) One (1) robot spray booth, ~~known~~ **identified** as RS-7, equipped with dry filters for overspray control, exhausted through V-7, installed in 1994, increased capacity in 1995, capacity: 115 automotive rubber parts per hour.

- (d) One (1) vertical spray application booth, ~~known~~ **identified** as AS-1, equipped with HVLP spray applicators and a dry filter system for overspray control, exhausted through Stack S-4, installed in 1999, capacity: 120 rubber weather-stripping parts for automobile applications per hour.
- (e) One (1) robot spray booth, identified as AS-2, equipped with HVLP spray applicators and dry filters for overspray control, installed in 1999 and modified in 2004, capacity: 120 rubber weather-stripping parts for automobile applications per hour.

Insignificant Activities

- (e) **One (1) spray booth, identified as Honda Booth RS-8, consisting of two (2) spray lines, identified as SWA and STX, sharing one (1) robotic spray gun, equipped with dry filters for overspray control, exhausting to Stack S-8, capacity: 33.65 rubber weather-stripping parts for automobile applications per hour for SWA and 42.88 rubber weather-stripping parts for automobile applications per hour for STX. [326 IAC 6-3-2]**
- (f) **One (1) spray booth, identified as Chrysler Booth RS-9, equipped with one (1) robotic spray gun, and dry filters for overspray control, exhausting to Stack S-9, capacity: 420 rubber weather-stripping parts for automobile applications per hour. [326 IAC 6-3-2]**

Enforcement Issues

There are no pending enforcement actions.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S-5	Service Parts Spray Booth (HS-5)	6.60 above roof	2.25	10,000	Ambient
S-8	Honda Booth (RS-8)	5.20 above roof	2.50	8,500	Ambient
S-9	Chrysler Booth (RS-9)	5.20 above roof	2.50	8,500	Ambient

Emission Calculations

See Appendix A of this document for detailed emission calculations.

Permit Level Determination – Part 70

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

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

been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	3.29
PM ₁₀	3.29
SO ₂	-
VOC	10.1
CO	-
NO _x	-

HAPs	Potential To Emit (tons/year)
Toluene	2.30
Xylene	0.782
Cyclohexane	0.131
TOTAL	3.21

This source modification is subject to 326 IAC 2-7-10.5(d)(3)(B)(iii), which states that any modification with potential to emit that is less than twenty-five (25) tons of VOC per year, but equal or greater than ten (10) tons of VOC per year shall be performed as a minor source modification. Additionally, the modification will be incorporated into the Part 70 Operating Permit through a minor permit modification issued pursuant to 326 IAC 2-7-12(b)(1), because significant changes to the Part 70 Operating permit will not be required to perform this modification.

Permit Level Determination – PSD or Emission Offset

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

Process/Emission Unit	Potential to Emit (tons/year)					
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x
Surface Coating Booths (HS-1, HS-2, HS-4, HS-5, AST-1, AS-2, WB-1, RS-8, RS-9)	4.30	4.30	-	124 total (10.1 from proposed modification)	-	-
Other Insignificant Activities	3.00	3.00	1.00	10.0	2.00	3.00
Total For Entire Source	7.30	7.30	1.00	134	2.00	3.00
PSD Major Source Threshold	250	250	250	250	250	250

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

Federal Rule Applicability Determination

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (b) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subparts JJJJ, KKK, MMMM, PPPP, RRRR, and SSSS because this source only coats rubber parts.
- (c) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:
 - (1) has a potential to emit before or after controls equal to or greater than the major source threshold for the pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant; and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

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

Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
HS-5 - PM	Dry Filter	N	1.11	0.056	100	N	N
RS-8 - PM	Dry Filter	N	0.946	0.047	100	N	N
RS-9 - PM	Dry Filter	N	1.24	0.063	100	N	N

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

State Rule Applicability Determination

The following state rules are applicable to the source due to the modification:

326 IAC 2-2 and 2-3 (PSD and Emission Offset)

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

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

The operation of the three (3) proposed spray booths, identified as HS-5, RS-8, and RS-9, will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program,

this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially. The first report is due no later than July 1, 2007, and subsequent reports are due every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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

The source utilizes more than five (5) gallons of coating per day for the rubber surface coating process. Therefore, pursuant to 326 IAC 6-3-2(d), the rubber surface coating emission units at this source (HS-1, HS-2, HS-4, HS-5, AST-1, AS-2, WB-1, RS-8, RS-9) are subject to the following requirements:

Surface coating shall be controlled by a dry particulate filter or an equivalent control device and the source shall operate the dry particulate filter or equivalent control device in accordance with manufacturer's specifications.

Pursuant to 326 IAC 6-3-2(d)(3)(A), sources that operate according to a valid permit pursuant to 326 IAC 2-7, are exempt from the requirements of 326 IAC 6-3-2(d)(2).

326 IAC 8-1-6 (New facilities; general reduction requirements)

The potential to emit of VOC from the three (3) proposed spray booths, identified as HS-5, RS-8, and RS-9 is less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply to these proposed facilities.

Compliance Determination and Monitoring Requirements

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

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

- (a) There are no specific compliance determination requirements applicable to this modification.
- (b) The one (1) proposed spray booth, identified as Service Parts Spray Booth HS-5 has applicable compliance monitoring conditions as specified below:

Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (Stack S-5) the surface coating booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit. Monthly inspections shall be performed of the coating

emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit. Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T 099-7539-00041. Deleted language appears as ~~strikethroughs~~ and new language appears in bold:

Change 1:

The equipment list in Condition A.2 and the insignificant activity equipment list in Condition A.3 will be revised as follows:

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

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

- (a) ~~Four (4)~~ **Three (3)** spray booths, ~~known~~ **identified** as HS-1, HS-2, ~~HS-3,~~ and HS-4, each equipped with dry filters for overspray control, exhausted through **Stacks S-1, S-2, and through S-4** respectively, installed in 1989, capacity: 90 automotive rubber parts per hour, each.
- (b) **One (1) spray booth, identified as Service Parts Spray Booth HS-5, equipped with one (1) manual spray gun and dry filters for overspray control, exhausting to Stack S-5, capacity: 120 automotive rubber parts per hour.**
- ~~(b)~~ (c) One (1) robot spray booth, ~~known~~ **identified** as RS-7, equipped with dry filters for overspray control, exhausted through V-7, installed in 1994, increased capacity in 1995, capacity: 115 automotive rubber parts per hour.
- ~~(c)~~ (d) One (1) vertical spray application booth, ~~known~~ **identified** as AS-1, equipped with HVLP spray applicators and a dry filter system for overspray control, exhausted through Stack S-4, installed in 1999, capacity: 120 rubber weather-stripping parts for automobile applications per hour.
- ~~(d)~~ (e) One (1) robot spray booth, identified as AS-2, equipped with HVLP spray applicators and dry filters for overspray control, installed in 1999 and modified in 2004, capacity: 120 rubber weather-stripping parts for automobile applications per hour.

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

- (d) One (1) spray line, identified as WB-1, equipped with one (1) manual spray gun, using spray filter arrestors as control and exhausting to Stack S-6, and one (1) infrared electric heater, capacity: 120 rubber weather-stripping parts for automobile applications per hour. **[326 IAC 6-3-2]**

- (e) **One (1) spray booth, identified as Honda Booth S-8, consisting of two (2) spray lines, identified as SWA and STX, sharing one (1) robotic spray gun, equipped with dry filters for overspray control, exhausting to Stack S-8, capacity: 33.65 rubber weather-stripping parts for automobile applications per hour for SWA and 42.88 rubber weather-stripping parts for automobile applications per hour for STX. [326 IAC 6-3-2]**
- (f) **One (1) spray booth, identified as Chrysler Booth RS-9, equipped with one (1) robotic spray gun, and dry filters for overspray control, exhausting to Stack S-9, capacity: 420 rubber weather-stripping parts for automobile applications per hour. [326 IAC 6-3-2]**

Change 2:

Condition B.3 (Permit Term) will be revised for clarification as follows:

- B.3 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]
- (a) This permit, **T 099-7539-00041** is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. **Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.**
 - (b) **If IDEM, OAQ, upon receiving a timely and complete renewal application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.**

Change 3:

Condition B.10(b) will be revised to clarify that the certification form may cover more than one (1) document that is submitted as follows:

- B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. **One (1) certification may cover multiple forms in one (1) submittal.**

Change 4:

The term "in letter form" has been removed from Condition B.11(a) Annual Compliance Certification as follows:

- B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]
- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted ~~in letter form~~ no later than July 1 of each year to:

Change 5:

The term "health-based" has been removed Condition B.13(b) and the phone and facsimile numbers for the Compliance Section that are listed in Condition B.13(b)(4) have been revised as follows:

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

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

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

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

Telephone Number: 317-233-~~5674~~ **0178** (ask for Compliance Section)

Facsimile Number: 317-233-5967 **6865**

Change 6:

The OAQ, Technical Support and Modeling Section listed in Condition B.25(c) should now be the OAQ, Billing, Licensing, and Training Section. Therefore, Condition B.25(c) will be revised as follows:

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

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

Change 7:

In accordance with the credible evidence rule (62 Fed. Reg. 8314, Feb 24, 1997); Section 113(a) of the Clean Air Act, 42 U.S.C. Section 7413 (a); and a letter from the United States Environmental Protection Agency (USEPA) to IDEM, OAQ dated May, 18 2004, all permits must address the use of credible evidence; otherwise, U.S. EPA will object to the permits. The following language will be incorporated into the permit to address credible evidence as Condition B.26:

B.26 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [326 IAC 1-1-6]

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

Change 8:

The 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. As a result Condition C.1 has been revised as follows:

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

~~Pursuant to 326 IAC 6-3-2(e), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a~~

~~maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.~~

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

Change 9:

The following revisions were made to Condition C.16 (Emission Statement Condition) to incorporate the revisions to 326 IAC 2-6 that became effective on March 27, 2004. The revised rule was published in the Indiana Register on April 1, 2004. Since this source is located in Lawrence County and operates under the thresholds listed in 326 IAC 2-6-3(1), the source will now be required to submit an emission statement every three (3) years by July 1 of each year.

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

(a) ~~The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:~~ **In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:**

- (1) Indicate **estimated** actual emissions of ~~criteria~~ **all** pollutants ~~from the source, in compliance with 326 IAC 2-6 (Emission Reporting) listed in 326 IAC 2-6-4(a);~~
- (2) Indicate **estimated** actual emissions of ~~other~~ regulated pollutants **as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule")** from the source, for purposes of Part 70 fee assessment.

~~(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:~~

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management Quality
100 North Senate Avenue, P. O. Box 6045
Indianapolis, Indiana 46204-2251 6-6045

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

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

Change 10:

The equipment description boxes for Sections D.1 and D.2 will be revised as follows:

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) ~~Four (4)~~ **Three (3)** spray booths, ~~known~~ **identified** as HS-1, HS-2, ~~HS-3~~, and HS-4, each equipped with dry filters for overspray control, exhausted through **Stacks S-1, S-2, and through S-4** respectively, installed in 1989, capacity: 90 automotive rubber parts per hour, each.
- (b) **One (1) spray booth, identified as Service Parts Spray Booth HS-5, equipped with one (1) manual spray gun and dry filters for overspray control, exhausting to Stack S-5, capacity: 120 automotive rubber parts per hour.**
- ~~(b)~~ (c) One (1) robot spray booth, ~~known~~ **identified** as RS-7, equipped with dry filters for overspray control, exhausted through V-7, installed in 1994, increased capacity in 1995, capacity: 115 automotive rubber parts per hour.
- ~~(c)~~ (d) One (1) vertical spray application booth, ~~known~~ **identified** as AS-1, equipped with HVLP spray applicators and a dry filter system for overspray control, exhausted through Stack S-4, installed in 1999, capacity: 120 rubber weather-stripping parts for automobile applications per hour.
- ~~(d)~~ (e) One (1) robot spray booth, identified as AS-2, equipped with HVLP spray applicators and dry filters for overspray control, installed in 1999 and modified in 2004, capacity: 120 rubber weather-stripping parts for automobile applications per hour.

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

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (c) Units emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP: structural and production welding, parts washer emissions, combined rubber curing, and hand brush-on applications of coating materials.
- (d) One (1) spray line, identified as WB-1, equipped with one (1) manual spray gun, using spray filter arrestors as control and exhausting to Stack S-6, and one (1) infrared electric heater, capacity: 120 rubber weather-stripping parts for automobile applications per hour. **[326 IAC 6-3-2]**
- (e) **One (1) spray booth, identified as Honda Booth RS-8, consisting of two (2) spray lines, identified as SWA and STX, sharing one (1) robotic spray gun, equipped with dry filters for overspray control, exhausting to Stack S-8, capacity: 33.65 rubber weather-stripping parts for automobile applications per hour for SWA and 42.88 rubber weather-stripping parts for automobile applications per hour for STX. [326 IAC 6-3-2]**

- (f) **One (1) spray booth, identified as Chrysler Booth RS-9, equipped with one (1) robotic spray gun, and dry filters for overspray control, exhausting to Stack S-9, capacity: 420 rubber weather-stripping parts for automobile applications per hour. [326 IAC 6-3-2]**

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

Change 11:

As stated in Change 9, the 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. As a result, Conditions D.1.2 and D.2.2 will be revised and Condition D.1.6 will be deleted as follows:

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(e) (d)]

- ~~(a) The particulate matter (PM) from the one (1) robotic spray booth (RS-7), four (4) hand spray booths (HS-1, HS-2, HS-3 and HS-4) as well as the two (2) spray application booths (AS-1 and AS-2) shall not exceed the pound per hour emission rate established as E in the following formula:~~

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

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

- ~~(b) Condition 4a in CP 099-4049-00041 issued on January 25, 1995 that established a 0.9 pound per hour PM allowable emission rate for the robotic spray booth (RS-7) is not carried through to the proposed permit because there is a variable process weight rate.~~

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

~~D.1.6 Particulate Matter (PM)~~

~~The dry filters for PM control shall be in operation at all times when any of the seven (7) spray booths (HS-1, HS-4, RS-7, AS-1 and AS-2) are in operation.~~

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

- (a) Pursuant to 326 IAC 6-3-2 (**Process Operations Particulate Limitations for Manufacturing Processes**), the ~~allowable PM particulate~~ **allowable PM particulate** emission rate from the welding, grinding and machining operations shall not exceed ~~allowable PM particulate~~ **allowable PM particulate** emission rate based on the following equation:

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

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

- ~~(b) Any change or modification that increases the coating used at the one (1) spray line, identified as WB-1, to five (5) gallons per day or more shall cause the spray line to become subject to 326 IAC 6-3, and shall require prior IDEM, OAQ, approval.~~
- (b) Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating, shall be controlled by a dry particulate filter or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.**

Change 12:

As a result of the changes to this source's equipment list, the revisions to Conditions D.1.2 and D.2.2, and the deletion Condition D.1.6, Conditions D.1.4 and D.2.3 will be deleted and Conditions D.1.7(a) and D.1.8(a) (now Conditions D.1.5(a) and D.1.6) will be revised as follows:

~~D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)]~~

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

~~D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)]~~

~~The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facilities are in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.2.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.~~

D.1.7 5 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S-1, S-2, ~~S-3~~, S-4, S-5 and V-7) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.1.8 6 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.6 ~~5~~ and D.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

Change 13:

The letterhead of the permit has been revised to indicate the new Governor and the new Commissioner of IDEM. The P.O. Box in the address of the OAQ has been deleted throughout the permit and the ZIP code has been revised as follows:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management **Quality**
100 North Senate Avenue, ~~P.O. Box 6045~~
Indianapolis, Indiana 46204-2251 ~~6-6045~~

Change 14:

The term "OAM" has been replaced with OAQ throughout the Part 70 Operating Permit.

Conclusion and Recommendation

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 099-22676-00041 and Minor Permit Modification No. 099-22954-00041. The staff recommends to the Commissioner that this Part 70 Minor Source Modification and Minor Permit Modification be approved.

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

**Company Name: Nishikawa Standard Company
Address City IN Zip: 501 High Street, Bremen, Indiana 46506
Permit Numbers: MSM 099-22676, MPM 099-22954
Pit ID: 099-00041
Reviewer: Michael S. Schaffer
Application Date: February 14, 2006**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Solids	Weight % Water	Weight % Organics	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
HS-5													
FKZ	6.73	73.00%	27.00%	0.00%	73.0%	0.00328	120	4.91	1.93	46.3	8.46	1.10	65%
FUM	7.38	98.30%	1.70%	0.00%	98.3%	0.00030	120	7.25	0.26	6.24	1.14	0.01	65%
Toluene (cleanup)	7.24	100.00%	0.00%	0.00%	100.00%	0.00004	120	7.24	0.04	0.905	0.165	0.00	65%
RS-8													
FKWA (SWA)	8.68	1.90%	20.30%	0.00%	1.90%	0.00457	33.65	0.16	0.03	0.609	0.111	0.416	65%
FKWA (STX)	8.68	1.90%	20.30%	0.00%	1.90%	0.00457	42.88	0.16	0.03	0.776	0.142	0.530	65%
RS-9													
FKWD	8.35	1.00%	29.17%	0.00%	1.00%	0.00079	420	0.08	0.03	0.667	0.122	1.24	65%

State Potential Emissions	Add worst case coating to all solvents	95.00%	Uncontrolled	2.31	55.5	10.1	3.29
			Controlled	2.31	55.5	10.1	0.164

METHODOLOGY

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

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

Company Name: Nishikawa Standard Company
Address City IN Zip: 501 High Street, Bremen, Indiana 46506
Permit Number: MSM 099-22676, MPM 099-22954
Pit ID: 099-00041
Permit Reviewer: Michael S. Schaffer
Application Date: February 14, 2006

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Toluene	Weight % Xylene	Weight % Cyclohexane	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Cyclohexane Emissions (ton/yr)	Total Emissions (ton/yr)
HS-5										
FKZ	6.73	0.00328	120	10.13%	6.75%	1.13%	1.17	0.782	0.131	2.09
FUM	7.38	0.00030	120	83.00%	0.00%	0.00%	0.962	0.000	0.000	0.962
Toluene (cleanup)	7.24	0.00004	120	100.00%	0.00%	0.00%	0.165	0.000	0.000	0.165
RS-8										
FKWA (SWA)	8.68	0.00457	33.65	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000
FKWA (STX)	8.68	0.00457	42.88	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000
RS-9										
FKWD	8.35	0.00079	420	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000
Total State Potential Emissions							2.30	0.782	0.131	3.21

METHODOLOGY

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