



*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: July 18, 2006

RE: Nishakawa Standard Company / 099-22954-00041

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 permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

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

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

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

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

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

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

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

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



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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

*Mitchell E. Daniels, Jr.*  
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Indianapolis, Indiana 46204-2251  
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July 18, 2006

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

Re: **099-22954-00041**  
**First Minor Permit Modification to**  
**Part 70 No.: T 099-7539-00041**

Dear Mr. Hough:

Nishikawa Standard Company was issued a Part 70 Operating Permit T 099-7539-00041 on December 14, 1999 for a stationary rubber automotive weatherstripping coating source located at 501 High Road, Bremen, Indiana 46506. Pursuant to the provisions of 326 IAC 2-7-12 a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

- (a) The incorporation of the operation requirements applicable to the three (3) spray booths, identified as HS-5 (Service Parts Spray Booth), RS-8 (Honda Booth), and RS-9 (Chrysler Booth); and
- (b) The deletion of one (1) spray booth, identified as HS-3, which has been removed from service at the source;
- (c) A revision to the Emission Statement requirement due to the revisions of 326 IAC 2-6 (Emission Reporting), revised on March 27, 2004 and published in the Indiana Register on April 1, 2004;
- (d) The addition of a condition that incorporates the requirements of the credible evidence rule (62 Fed. Reg. 8314, Feb 24, 1997) and Section 113(a) of the Clean Air Act, 42 U.S.C. § 7413 (a); and
- (e) Updates and corrections to various conditions from Sections B, C, D.1 and D.2 of the permit documented in Changes 2 - 9 and 11 - 14 of the TSD.

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

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

Attachments - TSD and Permit  
MSS/MES

cc: File - Marshall County  
U.S. EPA, Region V  
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 OPERATING PERMIT 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.

Operation Permit No.: T 099-7539-00041	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: December 14, 1999

First Reopening 099-13416-00041, issued February 12, 2002  
First Administrative Amendment No.: 099-19162-00041, issued June 11, 2004

First Minor Permit Modification No.: 099-22954-00041	Pages Affected: Entire Permit
Original signed by:  Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: July 18, 2006

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## SECTION A

## SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary rubber automotive weatherstripping coating source.

Responsible Official: Plant Manager  
Source Address: 501 High Road, Bremen, Indiana 46506  
Mailing Address: Indiana & Morrow Streets, Topeka, Indiana 46571  
SIC Code: 3069  
County Location: Marshall  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Minor Source, under PSD Rules;  
Major Source, Section 112 of the Clean Air Act

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

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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)]

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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]

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

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

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

## **SECTION B GENERAL CONDITIONS**

### **B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]**

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled APermit Shield.@

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

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

### **B.3 Permit Term [326 IAC 2-7-5(2)] [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.4 Enforceability [326 IAC 2-7-7(a)]**

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

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

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

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

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

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

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

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

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

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

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAQ, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish copies of requested records directly to U.S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

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

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as no federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

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

- 
- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP=s shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

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.14 Permit Shield [326 IAC 2-7-15]**

- 
- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
  - (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the

conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:

- (1) The applicable requirements are included and specifically identified in this permit;  
or
  - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

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

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

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

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

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) An emergency as defined in 326 IAC 2-7-1(12); or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

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

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the responsible official as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

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

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

- (1) That this permit contains a material mistake.
- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

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

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due. [326 IAC 2-5-3]
  - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

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

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

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

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC 2-1.1 has been obtained;
  - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:
- Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

and

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

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

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

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

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:
  - (1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).
  - (2) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
    - (i) A brief description of the change within the source;
    - (ii) The date on which the change will occur;
    - (iii) Any change in emissions; and
    - (iv) Any permit term or condition that is no longer applicable as a result of the change.

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

- (c) Emission Trades [326 IAC 2-7-20(c)]

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

The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.22 Construction Permit Requirement [326 IAC 2]

A modification, construction, or reconstruction shall be approved if required by and in accordance with the applicable provisions of 326 IAC 2.

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

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.  
[326 IAC 2-7-6(6)]

B.24 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (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. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAQ, shall reserve the right to issue a new permit.

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.

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

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

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

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

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

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

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

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

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

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

Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment is are in operation.

**C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]**

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

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

All required notifications shall be submitted to:

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

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

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are 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) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

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

#### **C.8 Performance Testing [326 IAC 3-6]**

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

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

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

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

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

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

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

#### **C.9 Compliance Schedule [326 IAC 2-7-6(3)]**

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The Permittee:

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

#### **C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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Compliance with applicable requirements shall be documented as required by this permit. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

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

#### **C.11 Monitoring Methods [326 IAC 3]**

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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, or other approved methods as specified in this permit.

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

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

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on September 20, 1999.
- (b) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (e) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

#### **C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]**

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

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

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

#### **C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]**

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- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;

- (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP=s shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
    - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within  $\Delta$ normal@ parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

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

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

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

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

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

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

#### **C.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.

#### **C.17 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]**

- (a) With the exception of performance tests conducted in accordance with Section C - Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is

not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator=s standard operating procedures. Records of response steps taken shall indicate whether the

response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

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

**C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)]**

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- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements and Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

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

**Stratospheric Ozone Protection**

**C.20 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

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

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

## SECTION D.1

## FACILITY OPERATION CONDITIONS

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

- (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)]

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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)

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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

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S-1, S-2, S-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

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- (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

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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]

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- (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  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Nishikawa Standard Company  
Source Address: 501 High Road, Bremen, Indiana 46506  
Mailing Address: Indiana & Morrow Streets, Topeka, Indiana 46571  
Part 70 Permit No.: T 099-7539-00041

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Nishikawa Standard Company  
Source Address: 501 High Road, Bremen, Indiana 46506  
Mailing Address: Indiana & Morrow Streets, Topeka, Indiana 46571  
Part 70 Permit No.: T 099-7539-00041

**This form consists of 2 pages**

**Page 1 of 2**

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

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

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

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

**Page 2 of 2**

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

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

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

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

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

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

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

Source Name: Nishikawa Standard Company  
Source Address: 501 High Road, Bremen, Indiana 46506  
Mailing Address: Indiana & Morrow Streets, Topeka, Indiana 46571  
Part 70 Permit No.: T 099-7539-00041

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

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

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

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

Form Completed By: \_\_\_\_\_

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

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

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

Attach a signed certification to complete this report.

Indiana Department of Environmental Management  
Office of Air Quality

Technical Support Document (TSD) for a Part 70  
Minor Source 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
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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 <sub>10</sub>	attainment
PM <sub>2.5</sub>	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
1-hour Ozone	attainment
8-hour Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Marshall County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) Marshall County has been classified as attainment for PM<sub>2.5</sub>. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM<sub>2.5</sub> emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM<sub>2.5</sub> emissions, it has directed states to regulate PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions.
- (c) Marshall County has been classified as attainment or unclassifiable in Indiana for PM<sub>10</sub>, SO<sub>2</sub>, 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 <sub>10</sub>	4.41
SO <sub>2</sub>	1.00
VOC	114
CO	2.00
NO <sub>x</sub>	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
<b>TOTAL</b>	<b>32.5</b>

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

<b>Actual Emissions</b>
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The following table shows the actual emissions from the source. This information reflects the 2003 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	Not Reported
PM <sub>10</sub>	Not Reported
SO <sub>2</sub>	Not Reported
VOC	40.0
CO	Not Reported
NO <sub>x</sub>	Not Reported
HAPs	Not Reported

<b>Description of Proposed Modification</b>
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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 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 <sub>10</sub>	3.29
SO <sub>2</sub>	-
VOC	10.1
CO	-
NO <sub>x</sub>	-

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 <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>
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
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Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance determination requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

- (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
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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]**

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(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)]**

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(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]**

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**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)]**

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~~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).**

~~(e)~~ **(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:~~

~~$$E = 4.10 P^{0.67}$$
 where E = rate of emission in pounds per hour; and  
P = 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** emission rate from the welding, grinding and machining operations shall not exceed **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:

$$E = 4.10 P^{0.67}$$
 where E = rate of emission in pounds per hour; and  
P = 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
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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
<b>HS-5</b>													
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%
<b>RS-8</b>													
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%
<b>RS-9</b>													
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%

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

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)
<b>HS-5</b>										
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
<b>RS-8</b>										
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
<b>RS-9</b>										
FKWD	8.35	0.00079	420	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000
<b>Total State Potential Emissions</b>							<b>2.30</b>	<b>0.782</b>	<b>0.131</b>	<b>3.21</b>

**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