



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

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

DATE: July 12, 2007

RE: Sullair Corporation, Subsidiary of Hamilton Sundstrand / 091-23224-00017

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 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, 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 and IC 13-15-6-1 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 of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures  
FNPER.dot 03/23/06



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100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
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www.IN.gov/idem

## Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Sullair Corporation, Subsidiary of Hamilton Sundstrand  
3700 East Michigan Blvd.  
Michigan City, Indiana 46360**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 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.

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 FESOP under 326 IAC 2-8.

Operation Permit No.: F091-23224-00017	
Original signed by:  Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: July 12, 2007  Expiration Date: July 12, 2012

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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.4 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 2-8-3(b)]

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The Permittee owns and operates a stationary industrial air and gas compressor manufacturing.

Source Address:	3700 E. Michigan Blvd., Michigan City, Indiana 46360
Mailing Address:	3700 E. Michigan Blvd., Michigan City, Indiana 46360
General Source Phone Number:	219-879-5461
SIC Code:	3563
County Location:	LaPorte
Source Location Status:	Nonattainment for 8-hour ozone standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) spray paint booth, identified as Large Paint Booth, constructed prior to 1975 with a maximum throughput of 10 metal compressor parts per hour, equipped with electrostatic air atomized spray equipment and dry filters for particulate matter overspray control and exhausting through stacks 67, 68, 69, and 70.
- (b) One (1) spray paint booth, identified as Building 2 Paint Booth, constructed in 2003, with a maximum throughput of 20 metal compressor parts per hour, equipped with air atomization spray equipment and dry filters for particulate matter overspray control and exhausting through Stacks 2 through 11.
- (c) One (1) cold solvent cleaning system, constructed after July 1, 1990, with a maximum solvent usage of 48,907 pounds per year.
- (d) One (1) test cell building, consisting of nine (9) test bays and two (2) outdoor concrete test pads, constructed in 1993, accommodating portable internal combustion diesel oil-fired machines, with nine (9) test bays exhausting through Stacks 78, 79, 81, 82, 85, 86, 87, 89, 94, 95, 96, 97, 98, 99 and 100 and two (2) concrete test pads exhausting directly outside with a maximum capacity of 16.0 MMBtu/hr, total.

### A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

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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) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including, but not limited to four (4) boilers, identified as B-01 through B-04, constructed in 1993, with a maximum throughput of 0.175 MMBtu/hr, total. [326 IAC 6-2-4]

- (b) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (c) Brazing and welding operations. [326 IAC 6-3-2]
- (d) Air from test compressors, which are exhausted into the building and may contain trace levels of lubricating oil particulate. Particulate emissions are less than 0.1 pound per hour. [326 IAC 6-3-2]

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

## **SECTION B GENERAL CONDITIONS**

### **B.1 Definitions [326 IAC 2-8-1]**

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

### **B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]**

- 
- (a) This permit, F091-23224-00017, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

### **B.4 Enforceability [326 IAC 2-8-6]**

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

### **B.5 Severability [326 IAC 2-8-4(4)]**

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

### **B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

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

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

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- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]**

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" 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) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

**B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

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- (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 no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61- 53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]**

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IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) 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; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-8-12]

- (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 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air 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 the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61 - 53 IGCN 1003  
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 2-8-4(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
  - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
  - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
  - (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 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 material of substantial economic value.

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

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

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

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- (a) All terms and conditions of permits established prior to F091-23224-00017 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted
- (b) All previous registrations and permits are superseded by this permit.

**B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]**

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]**

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

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61 - 53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

The Quarterly Deviation and Compliance Monitoring Report does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating 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 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 2-8-8(a)]
- (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 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(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 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61 - 53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
  - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the

document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

**B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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  
MC 61 - 53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

**B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) 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 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61 - 53 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) 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.20 Source Modification Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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 FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

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

**B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61 - 53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

**B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

**B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][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.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

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

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

#### C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit of Volatile Organic Compounds (VOCs), Nitrogen Oxides (NO<sub>x</sub>) and PM<sub>10</sub>, from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period, each;
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

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

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

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

Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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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.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

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

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

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

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

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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- (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  
MC 61 - 52 IGCN 1003  
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

### **Testing Requirements [326 IAC 2-8-4(3)]**

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

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- (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  
MC 61 - 53 IGCN 1003  
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted

by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.10 Compliance Requirements [326 IAC 2-1.1-11]**

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

### **Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

#### **C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]**

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

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61 - 53 IGCN 1003  
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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

#### **C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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

#### **C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]**

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

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

### **Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

#### **C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

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

#### **C.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]**

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records; and/or
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
  - (1) monitoring data;
  - (2) monitor performance data, if applicable; and
  - (3) corrective actions taken.

#### **C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]**

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

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

#### **C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

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- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

#### **C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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  
MC 61 - 53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

### **Stratospheric Ozone Protection**

#### **C.19 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 EMISSIONS UNIT OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]: Spray paint booths and cold solvent cleaning system

- (a) One (1) spray paint booth, identified as Large Paint Booth, constructed prior to 1975 with a maximum throughput of 10 metal compressor parts per hour, equipped with electrostatic air atomized spray equipment and dry filters for particulate matter overspray control and exhausting through stacks 67, 68, 69, and 70.
- (b) One (1) spray paint booth, identified as Building 2 Paint Booth, constructed in 2003, with a maximum throughput of 20 metal compressor parts per hour, equipped with air atomization spray equipment and dry filters for particulate matter overspray control and exhausting through stacks 2 through 11.
- (c) One (1) cold solvent cleaning system, constructed after July 1, 1990, with a maximum solvent usage of 48,907 pounds per year.

(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 2-8-4(1)]

#### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4] [326 IAC 8-6-2(a)]

The total volatile organic compound (VOC) delivered to the coating applicators in the two (2) spray paint booths (Large Paint Booth and Building 2 Paint Booth), and the VOCs used in the one (1) cold solvent cleaning system shall be limited to less than 95.5 tons per twelve (12) consecutive month period. This limit in combination with Condition D.2.1 will limit the VOC emissions from the entire source to less than one hundred (100) tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply. This limit will also satisfy the requirements of 326 IAC 8-6-2(a).

#### D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

- (a) The amount of any single HAP delivered to the coating applicators in the two (2) spray paint booths (Large Paint Booth and Building 2 Paint Booth), and used at the one (1) cold solvent cleaning system shall be limited to less than 9.9 tons per twelve (12) consecutive month period. This will limit the individual HAP emissions from the entire source to less than ten (10) tons per year.
- (b) The combination of HAPs delivered to the coating applicators in the two (2) spray paint booths (Large Paint Booth and Building 2 Paint Booth), and the total HAPs used in the one (1) cold solvent cleaning system shall be less than 24.8 tons per twelve (12) consecutive month period. This in combination with Condition D.2.1 will limit the total HAP emissions from the entire source to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply.

#### D.1.3 Particulate Matter [326 IAC 2-8-4]

- (a) The coatings applied by the two (2) spray paint booths (Large Paint Booth and Building 2 Paint Booth) shall be limited such that total PM emissions shall not exceed 95.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The coatings applied by the two (2) spray paint booths (Large Paint Booth and Building 2 Paint Booth) shall be limited such that the total PM<sub>10</sub> emissions shall not exceed 95.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits, in combination with Condition D.2.1, D.3.1 and potential PM/PM<sub>10</sub> emissions from insignificant activities shall limit source-wide PM/PM<sub>10</sub> emission to less than one-hundred (100) tons per year and will render the requirements of 326 IAC 2-7 not applicable with respect to PM and PM<sub>10</sub>.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9, the owner or operator of the one (1) spray paint booth, identified as Building 2 Paint Booth, shall not allow the discharge into the atmosphere of VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicators, for air dried, forced warm air dried or extreme performance coatings.
- (b) Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of the one (1) spray paint booth, identified as Building 2 Paint Booth, during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.1.5 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating manufacturing processes 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 Volatile Organic Compounds (VOC) [326 IAC 8-3-2] [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of the cold solvent cleaning system shall ensure that the following requirements are met:
  - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38° C) (one hundred degrees Fahrenheit (100° F));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.
  - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38° C) (one hundred degree Fahrenheit (100° F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
  - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury of six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38° C) (one hundred degrees Fahrenheit (100° F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9° C) (one hundred twenty degrees Fahrenheit (120° F)):
- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
  - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
  - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon absorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of the cold solvent cleaning system shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.
- (c) Compliance with these conditions shall also ensure compliance with 326 IAC 8-3-2.

#### D.1.7 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

### Compliance Determination Requirements

#### D.1.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

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- (a) Compliance with the VOC usage limitation contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating and solvent manufacturers.
- (b) Compliance with the VOC content limit in Conditions D.1.4(a) shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

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

Where: A is the volume weighted average in pounds VOC per gallon less water as applied;  
C is the VOC content of the coating in pounds VOC per gallon less water as applied; and

U is the usage rate of the coating in gallons per day.

#### D.1.9 VOC Emissions

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- (a) Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.
- (b) Compliance with Condition D.1.4(a) shall be demonstrated within 30 days of the end of each day based on the total volatile organic compound usage for the day.

#### D.1.10 Hazardous Air Pollutants (HAPs)

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Compliance with the HAPs usage limitations contained in Condition D.1.2 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 and solvent manufacturers. Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the total single and total combination of HAPs usage for the twelve (12) month period.

#### D.1.11 Particulate Matter (PM/PM<sub>10</sub>) Emissions Determination

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Compliance with Conditions D.1.3 (a) and D.1.3 (b) shall be determined by calculating the PM/PM<sub>10</sub> emissions associated with each coating applied by the two spray paint booths (Large Paint Booth and Building 2 Paint Booth) using the following equation:

$$PM/PM_{10} = CU \times D \times W\%S \times (1-TE/100) \times (1-CE/100) \times 1/2000$$

Where:

- PM/PM<sub>10</sub> = The total PM/PM<sub>10</sub> emissions (ton/month) for a given coating.
- CU = The total coating used (gal coating/month) of a given coating.
- D = The density (lb coating/gal coating) of a given coating.
- W%S = The weight percent solids (lb solids/lb coating) of a given coating.
- TE = The transfer efficiency (%) of the spray applicators. This value shall equal 50% or a value determined from the most recent valid compliance demonstration.
- CE = The control efficiency (%) of the dry filters. This value shall equal 98% or a value determined from the most recent valid compliance demonstration.

The total PM/PM<sub>10</sub> emissions (ton/month) from spray paint booths (Large Paint Booth and Building 2 Paint Booth) is equal to the sum of the PM/PM<sub>10</sub> emissions associated with each coating applied by those booths.

#### D.1.12 Testing Requirements [326 IAC 2-1.1-11]

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- (a) The Permittee shall conduct performance tests to verify the transfer efficiency and particulate matter control efficiency requirements in Condition D.1.3(c) and (d).
- (b) No later than 180 days after issuance of F091-23224-00017, the Permittee shall conduct transfer efficiency testing on one (1) of the booths subject to Condition D.1.3. The testing shall be done on a booth that has not been tested in the past ten (10) years. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted using methods approved by the

Commissioner and in accordance with 326 IAC 3-6-3 and Section C - Performance Testing.

- (c) No later than 180 days after issuance of F091-23224-00017, the Permittee shall conduct control efficiency testing on the dry filters used by one (1) of the booths subject to Condition D.1.3. The testing shall be done on filters that have not been tested in the past ten (10) years. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted using methods approved by the Commissioner and in accordance with 326 IAC 3-6-3 and Section C - Performance Testing.

### **Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

#### **D.1.13 Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity and particulate 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 (64, 65, 67, 68, 69, 70 and 2 through 11) while one or more of the booths exhausting to that stack are in operations. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

#### **D.1.14 Record Keeping Requirement**

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- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.1.1, the HAP usage limits and the HAP emission limits established in Condition D.1.2.
- (1) The VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup and degreasing solvents;
  - (2) The cleanup solvent usage for each month;
  - (3) The degreasing solvent usage for each month;
  - (4) The total VOC, total individual HAP and total combination of HAPs usage for each month, and

- (5) The weight of VOCs and total HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to demonstrate compliance with the PM/PM<sub>10</sub> emission limits established in Condition D.1.3.
  - (1) The amount of each coating material used (as applied). Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (2) The density and weight percent solids of each coating material used (as applied).
- (c) To document compliance with Conditions D.1.4 (a) and (b), the Permittee shall maintain records in accordance with (1) through (3) below for the two (2) spray paint booths, identified as Large Paint Booth and Building 2 Paint Booth. Records maintained for (1) through (3) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits established in Conditions D.1.4 (a) and (b).
  - (1) The VOC content of each coating material and solvent used less water.
  - (2) The amount of coating material and solvent used on daily basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvent.
  - (3) The volume weighted average VOC content of the coatings used for each day.
- (d) To document compliance with Conditions D.1.3 and 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.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.15 Reporting Requirements

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A quarterly summary of the information to document compliance with Conditions D.1.1, D.1.2, and D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the report forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]: Test Cells

- (e) One (1) test cell building, consisting of nine (9) test bays and two (2) outdoor concrete test pads, constructed in 1993, accommodating portable internal combustion diesel oil-fired machines, with nine (9) test bays exhausting through Stacks 78, 79, 81, 82, 85, 86, 87, 89, 94, 95, 96, 97, 98, 99 and 100 and two (2) concrete test pads exhausting directly outside with a maximum capacity of 16.0 MMBtu/hr, total.

(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 2-8-4(1)]

#### D.2.1 FESOP Limits and PSD Minor Source Status [326 IAC 2-2] [326 IAC 2-8-4]

Pursuant to F091-5794-00017, issued December 10, 1996, the throughput of diesel fuel at the source shall not exceed 100,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month. The PM/PM<sub>10</sub> emissions from the test cell building shall not exceed 0.31 pound per MMBtu, the NOx emissions shall not exceed 4.41 pounds per MMBtu and the VOC emissions shall not exceed 0.4 pound per MMBtu. These limits in combination with Conditions D.1.1, D.1.3 and D.3.1 shall limit the potential to emit of VOC, PM<sub>10</sub> and NOx from the entire source to less than one-hundred (100) tons per year and shall make the requirements of 326 IAC 2-7, not applicable. Since this limits NOx emissions to less than 250 tons per twelve (12) consecutive month period, the requirements for 326 IAC 2-2, Prevention of Significant Deterioration, is also not applicable.

#### D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

### Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

#### D.2.3 Visible Emissions Notations

- (a) Visible emission notations of the test bays stack exhausts shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

## **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-26]**

### **D.2.4 Record Keeping Requirements**

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- (a) To document compliance with Condition D.2.3, the Permittee shall maintain records of the amount of diesel fuel used each month and the monthly average heating value of the fuel.
- (b) To document compliance with Condition D.2.4, the Permittee shall maintain a daily record of visible emission notations of the test bays stacks exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (i.e. the process did not operate that day).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### **D.2.5 Reporting Requirements**

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A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.3

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including, but not limited to four (4) boilers, identified as B-01 through B-04, constructed in 1993, with a maximum throughput of 0.175 MMBtu/hr, total. [326 IAC 6-2-4]
- (c) Brazing and welding operations. [326 IAC 6-3-2]
- (d) Air from test compressors, which are exhausted into the building and may contain trace levels of lubricating oil particulate. Particulate emissions are less than 0.1 pound 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 2-8-4(1)]

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

Pursuant to 326 IAC 6-2-4(a), for indirect heating units constructed after September 1, 1983 and having a total source heat input capacity less than 10 million British thermal units per hour, the PM emission shall not exceed 0.6 pounds per million British thermal unit. Therefore, the PM from the four (4) insignificant boilers (B-1 through B-4) is limited to 0.6 pound per million British thermal units.

#### D.3.2 Particulate Matter (PM) [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2(e), the PM from the insignificant brazing and welding and coating with spray cans shall not exceed 0.551 pound per hour when operating at a process weight rate of less than 100 pounds per hour. When operating at a process weight rate of 100 pounds per hour or more, the PM shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

- (b) Pursuant to 326 IAC 6-3-2(e), the particulate matter from the test compressors shall not exceed 0.551 pounds per hour when operating at a process weight rate of less than 100 pounds per hour. When operating at a process weight rate of 100 pounds per hour or more, the particulate matter shall not exceed the pounds per hour emission rate established as E in the following formula:

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

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

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Sullair Corporation, Subsidiary of Hamilton Sundstrand  
Source Address: 3700 E. Michigan Blvd., Michigan City, Indiana 46360  
Mailing Address: 3700 E. Michigan Blvd., Michigan City, Indiana 46360  
FESOP Permit No.: F091-23224-00017

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
MC 61 - 53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-0178  
Fax: 317-233-6865**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Sullair Corporation, Subsidiary of Hamilton Sundstrand  
Source Address: 3700 E. Michigan Blvd., Michigan City, Indiana 46360  
Mailing Address: 3700 E. Michigan Blvd., Michigan City, Indiana 46360  
FESOP Permit No.: F091-23224-00017

**This form consists of 2 pages**

**Page 1 of 2**

- |   |
|---|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none"><li>• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and</li><li>• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16</li></ul> |
|---|

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

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N 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:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

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

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

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

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

A certification is not required for this report.

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

### FESOP Quarterly Report

Source Name: Sullair Corporation, Subsidiary of Hamilton Sundstrand  
Source Address: 3700 E. Michigan Blvd., Michigan City, Indiana 46360  
Mailing Address: 3700 E. Michigan Blvd., Michigan City, Indiana 46360  
FESOP Permit No.: F091-23224-00017  
Facility: Two (2) spray paint booths (Large Paint Booth and Building 2 Paint Booth and one (1) cold solvent cleaning system)  
Parameter: VOC delivered to the applicators at the two (2) paint booths plus VOC usage at the solvent cleaning system  
Limit: Less than 95.5 tons per twelve (12) consecutive month period, total

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

Month	VOC (tons)	VOC (tons)	VOC (tons)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

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

Attach a signed certification to complete this report.

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

### FESOP Quarterly Report

Source Name: Sullair Corporation, Subsidiary of Hamilton Sundstrand  
 Source Address: 3700 E. Michigan Blvd., Michigan City, Indiana 46360  
 Mailing Address: 3700 E. Michigan Blvd., Michigan City, Indiana 46360  
 FESOP Permit No.: F091-23224-00017  
 Facility: Two (2) spray paint booths (Large Paint Booth and Building 2 Paint Booth and one (1) cold solvent cleaning system  
 Parameter: The worst case single HAP delivered to the coating applicators at the 2 spray paint booths and used at the solvent cleaning system  
 Limit: Less than 9.9 tons per twelve (12) consecutive month period, total

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

Month	Worst Case Individual HAP (tons)	Worst Case Individual HAP (tons)	Worst Case Individual HAP (tons)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

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

Attach a signed certification to complete this report.

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

### FESOP Quarterly Report

Source Name: Sullair Corporation, Subsidiary of Hamilton Sundstrand  
 Source Address: 3700 E. Michigan Blvd., Michigan City, Indiana 46360  
 Mailing Address: 3700 E. Michigan Blvd., Michigan City, Indiana 46360  
 FESOP Permit No.: F091-23224-00017  
 Facility: Two (2) spray paint booths (Large Paint Booth and Building 2 Paint Booth and one (1) cold solvent cleaning system)  
 Parameter: The combination of HAPs delivered to the coating applicators in the two (2) spray paint booths and the total HAPs used a the one (1) cold solvent cleaning system  
 Limit: Less than 24.8 tons per twelve (12) consecutive month period, total

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

Month	Total HAPs (tons)	Total HAPs (tons)	Total HAPs (tons)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

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

Attach a signed certification to complete this report.

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

**FESOP Quarterly Report**

Source Name: Sullair Corporation, Subsidiary of Hamilton Sundstrand  
Source Address: 3700 E. Michigan Blvd., Michigan City, Indiana 46360  
Mailing Address: 3700 E. Michigan Blvd., Michigan City, Indiana 46360  
FESOP Permit No.: F091-23224-00017  
Facility: Two (2) spray paint booths (Large Paint Booth and Building 2 Paint Booth and one (1) cold solvent cleaning system)  
Parameter: Total solids delivered to the applicators  
Limit: Less than 9,650 tons per twelve (12) consecutive month period

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

Month	Solids (tons)	Solids (tons)	Solids (tons)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

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

Attach a signed certification to complete this report.

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

### FESOP Quarterly Report

Source Name: Sullair Corporation, Subsidiary of Hamilton Sundstrand  
Source Address: 3700 E. Michigan Blvd., Michigan City, Indiana 46360  
Mailing Address: 3700 E. Michigan Blvd., Michigan City, Indiana 46360  
FESOP Permit No.: F091-23224-00017  
Facility: Test cell building  
Parameter: Diesel fuel throughput  
Limit: Less than 100,000 gallons per twelve (12) consecutive month period

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

Month	Fuel Throughput (gallons)	Fuel Throughput (gallons)	Fuel Throughput (gallons)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 COMPLIANCE DATA SECTION  
 FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Sullair Corporation, Subsidiary of Hamilton Sundstrand  
 Source Address: 3700 E. Michigan Blvd., Michigan City, Indiana 46360  
 Mailing Address: 3700 E. Michigan Blvd., Michigan City, Indiana 46360  
 FESOP Permit No.: F091-23224-00017

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

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

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

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 Federally Enforceable State Operating Permit  
(FESOP) Renewal

**Source Background and Description**

<b>Source Name:</b>	<b>Sullair Corporation, Subsidiary of Hamilton Sundstrand</b>
<b>Source Location:</b>	<b>3700 East Michigan Blvd., Michigan City, IN 46360</b>
<b>County:</b>	<b>LaPorte</b>
<b>SIC Code:</b>	<b>3563</b>
<b>Permit Renewal No.:</b>	<b>F091-23224-00017</b>
<b>Permit Reviewer:</b>	<b>Marcia Earl</b>

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Sullair Corporation, Subsidiary of Hamilton Sundstrand relating to the operation of a stationary industrial air and gas compressor manufacturing source.

**History**

On June 13, 2006, Sullair Corporation, Subsidiary of Hamilton Sundstrand submitted an application to the OAQ requesting to renew their operating permit. Sullair Corporation, Subsidiary of Hamilton Sundstrand was issued a Federally Enforceable Operating Permit (FESOP) on March 12, 2002.

**Permitted Emission Units and Pollution Control Equipment**

- (a) One (1) spray paint booth, identified as Large Paint Booth, constructed prior to 1975 with a maximum throughput of 10 metal compressor parts per hour, equipped with electrostatic air atomized spray equipment and dry filters for particulate matter overspray control and exhausting through stacks 67, 68, 69, and 70.
- (b) One (1) spray paint booth, identified as Building 2 Paint Booth, constructed in 2003, with a maximum throughput of 20 metal compressor parts per hour, equipped with air atomization spray equipment and dry filters for particulate matter overspray control and exhausting through Stacks 2 through 11.
- (c) One (1) cold solvent cleaning system, constructed after July 1, 1990, with a maximum solvent usage of 48,907 pounds per year.
- (d) One (1) test cell building, consisting of nine (9) test bays and two (2) outdoor concrete test pads, constructed in 1993, accommodating portable internal combustion diesel oil-fired machines, with nine (9) test bays exhausting through Stacks 78, 79, 81, 82, 85, 86, 87, 89, 94, 95, 96, 97, 98, 99 and 100 and two (2) concrete test pads exhausting directly outside with a maximum capacity of 16.0 MMBtu/hr, total.

## Emission Units and Pollution Control Equipment Removed From the Source

One (1) spray paint booth, identified as Small Paint Booth, constructed in 1993 with a maximum throughput of 50 metal compressor parts per hour, equipped with electrostatic air atomized spray equipment and dry filters for PM overspray control and exhausting through Stacks 64 and 65. This Small Paint Booth was permanently removed from service in the 4th quarter of 2004.

## Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including, but not limited to four (4) boilers, identified as B-01 through B-04, constructed in 1993, with a maximum throughput of 0.175 MMBtu/hr, total. [326 IAC 6-2-4]
- (b) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to ten thousand five hundred (10,500) gallons, and dispensing less than or equal to two hundred thirty thousand (230,000) gallons per month.
- (c) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
- (d) Equipment used exclusively for filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.
- (e) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (f) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one percent (1%) by volume.
- (g) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (h) Antifreeze AST and portable compressor radiator filling operation; ethylene glycol; may qualify as a trivial activity with emissions less than one (1) pound per day.
- (i) Ten (10) metal grinding machines that use machining oil as a cutting fluid; a small amount of particulate matter (PM) may be emitted as oil mist.
- (j) Coating with spray cans with VOC emissions less than 15.0 pounds per day.
- (k) Brazing and welding operations. [326 IAC 6-3-2]
- (l) High-pressure steam washers for cleaning metals, using only non-VOC, non-HAP materials.
- (m) One (1) potassium hydrate stripping operation, using only non-VOC, non-HAP materials.
- (n) Air from test compressors, which are exhausted into the building and may contain trace levels of lubricating oil particulate. Particulate emissions are less than 0.1 pound per hour. [326 IAC 6-3-2]
- (o) Handheld orbital sanders which are used for fine sanding of slight imperfections in the product metal work that may be identified during the manufacturing stages. These sanders are exhausted through a manifold system to a small local filtration unit as a means of eliminating worker exposure to the sanding materials. The filtration unit, having negligible emissions, exhausts inside the workroom.

### Existing Approvals

Since the issuance of the FESOP 091-14964-00017 on March 12, 2002, the source has constructed or has been operating under the following approvals as well:

- (a) First Significant Permit Revision 091-16955-00017 issued on June 6, 2003
- (b) Second Significant Permit Revision 091-17892-00017 issued on December 2, 2003

### Enforcement Issue

There are no enforcement actions pending.

### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
67 through 70	Large Paint Booth	34	3.0	15,000	77°
2 through 11	Building 2 Paint Booth	25	2.5	9,750	77°
78,79,81,82,85,86,87,89,94,95,96,97, 98, 99, 100	Test Cell Building	26	0.29	50	150°

### Emission Calculations

See Appendix A, pages 1 - 7 of this document for detailed emission calculations.

### County Attainment Status

The source is located in LaPorte County.

Pollutant	Status
PM <sub>2.5</sub>	Attainment
PM <sub>10</sub>	Attainment
SO <sub>2</sub>	Attainment
NO <sub>x</sub>	Attainment
8 hour Ozone	Moderate Non-Attainment
CO	Attainment
Lead	Attainment

- (a) LaPorte County has been classified as unclassifiable or 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.
- (b) 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 the ozone standards. LaPorte

County has been designated as non-attainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements of 326 IAC 2-3, Emission Offset.

- (c) LaPorte County has been classified as attainment or unclassifiable for CO, SO<sub>2</sub>, PM<sub>10</sub>, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1, and revoking the one-hour ozone standard in Indiana.
- (e) 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 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD or Emission Offset applicability.

**Unrestricted Potential Emissions**

This table reflects the unrestricted potential emissions of the source.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	125.67
PM-10	125.67
SO <sub>2</sub>	20.32
VOC	186.68
CO	66.68
NO <sub>x</sub>	309.05

HAPs	Unrestricted Potential Emissions (tons/yr)
Xylenes	35.33
Toluene	5.32
MIBK	21.61
Ethylbenzene	8.12
Methanol	1.12
Glycol Ethers	12.28
1,1,1-Trichlorethane	0.12
Perchlorethylene	0.12
Benzene	0.069
1,3 Butadiene	0.003
Formaldehyde	0.087
Acetaldehyde	0.057
Acrolein	0.007
Naphthalene	0.006
Total	84.25

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM<sub>10</sub>, volatile organic compounds (VOC), and nitrogen oxide (NOx) is equal to or greater than 100 tons per year. This source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to limit their emissions of PM<sub>10</sub>, VOCs and NOx to less than Title V levels, therefore the source will be issued a FESOP.

- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM, SO<sub>2</sub>, and CO are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. However, the source has agreed to limit their single HAP emissions and total HAP emissions below Title V limits. Therefore, the source will be issued a FESOP.
- (d) Pursuant to 326 IAC 2-7-2(e), all fugitive emissions are included in the determination of Part 70 applicability.

**Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the 1996 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	Not reported
PM10	1
SO2	1
VOC	17
CO	2
NOx	9
HAP	Not reported

**Potential to Emit After Issuance**

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP 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	NOx	HAPS
Two (2) spray paint booths (Large Paint Booth, Building 2 Paint Booth)	< 95.5	< 95.5	-	< 71.0	-	-	< 9.17
Degreasing	-	-	-	24.50	-	-	0.73
Test Cells	< 2.12	< 2.12	1.99	2.47	6.51	30.2	0.026
Natural Gas Combustion Source	-	-	-	-	0.1	-	-
Total	less than 100	less than 100	1.99	less than 100	6.61	30.2	less than 25 tons total HAPs

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (< 250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) 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.

### **Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit for this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20, 40 CFR Part 61 and 40 CFR Part 63) included in this permit for this source.
- (c) This source is not subject to the requirements of 40 CFR 63 Subpart T, (National Emission Standards for Halogenated Solvent Cleaning), which is incorporated by reference as 326 IAC 20. This source's cold solvent cleaning system does not use halogenated solvents in total concentration of greater than five percent (5%) by weight.
- (d) This source is not subject to the requirements of 40 CFR 63 Subpart M, (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products), which is incorporated by reference as 326 IAC 20. This source has limited its HAPs emissions to less than 10 tons per year of any single HAP and less than 25 tons per year of total HAPs.
- (e) This source is not subject to the requirements of 40 CFR 63 Subpart Z, (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines), which is incorporated by reference as 326 IAC 20. This source has limited its HAP emissions to less than 10 tons per year of any single HAP and less than 25 tons per year of total HAPs. The engines used in the test cell building are not reciprocating internal combustion engines (RICE), they are internal combustion engines (ICE).
- (f) This source is not subject to the requirements of 40 CFR 63, Subpart D, (National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters), which is incorporated by reference as 326 IAC 20. This source has limited its HAPs emissions to less than 10 tons per year of any single HAP and less than 25 tons per year of total HAPs.
- (g) This source is not subject to the requirements of 40 CFR 63, Subpart P, (National Emission Standards for Hazardous Air Pollutants for Engine Test Cells/Stands), which is incorporated by reference as 326 IAC 20. This source has limited its HAPs emissions to less than 10 tons per year of any single HAP and less than 25 tons per year of total HAPs.
- (h) This source is a FESOP source and is not a major Part 70 source. Therefore, the requirements of 40 CFR Subpart 64 (Compliance Assurance Monitoring), are not included in this permit.

### **State Rule Applicability – Entire Source**

#### **326 IAC 2-2 (Prevention of Significant Deterioration (PSD))**

LaPorte County has been designated as non-attainment for the 8-hour ozone standard and attainment for all other criteria pollutants; this source is not one of the twenty-eight (28) listed source categories. Although the uncontrolled potential to emit (PTE) of NO<sub>x</sub> is in excess of 250 tons per year, the source has agreed to limit its NO<sub>x</sub> emissions to less than one hundred (100) tons per year. Therefore, 326 IAC 2-2 (PSD) is not applicable.

326 IAC 2-3 (Emission Offset)

This source has opted to continue to operate under 326 IAC 2-8 (FESOP) rules. The source-wide potential VOC and NO<sub>x</sub> emissions will each be limited to less than one hundred (100) tons per year as part of this FESOP Renewal. Therefore, this source is considered a minor source under 326 IAC 2-3 (Emission Offset).

326 IAC 2-6 (Emission Reporting)

This source is located in LaPorte County and it is not required to operate under a Part 70 Permit, because the Permittee has taken limits under 326 IAC 2-8 (FESOP). Therefore, 326 IAC 2-6 is not applicable.

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, PM<sub>10</sub>, VOC, and NO<sub>x</sub> emissions shall be limited to less than one (100) tons per year. In addition, the amount of any single HAP shall be limited to less than ten (10) tons per year and the combination of HAPs shall be limited to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-7 are not applicable.

- (a) Pursuant to F091-5794-00017, issued December 10, 1996, the throughput of diesel fuel at the source shall not exceed 100,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month. The PM/PM<sub>10</sub> emissions from the test cell building shall not exceed 0.31 pound per MMBtu, the NO<sub>x</sub> emissions shall not exceed 4.41 pounds per MMBtu and the VOC emissions shall not exceed 0.4 pound per MMBtu.
- (b) The amount of VOCs delivered to the applicators at the two (2) spray paint booths (Large Paint Booth and Building 2 Paint Booth), and the VOCs used at the one (1) cold solvent cleaning system, shall be limited to less than 95.5 tons per twelve (12) consecutive month period, total. This limit, in combination with the VOC limit for the test cells above, will limit the potential to emit of VOC from the entire source to less than 100 tons per year and shall make the requirements of 326 IAC 2-7, not applicable.
- (c) HAP emissions will be limited as follows:
  - (1) The worst case single HAP (e.g. Xylene, MIBK, and Glycol Ethers) delivered to the coating applicators at the two (2) spray paint booths (Large Paint Booth and Building 2 Paint Booth), and used at the one (1) cold solvent cleaning system shall be less than 9.9 tons per twelve (12) consecutive month period, total. Therefore, the requirements of 326 IAC 2-7 are not applicable.
  - (2) The combination of HAPs delivered to the coating applicators in the two (2) spray paint booths (Large Paint Booth and Building 2 Paint Booth), and the total HAPs used in the one (1) cold solvent cleaning system shall be less than 24.8 tons per twelve (12) consecutive month period. This will limit the combination of HAPs from the entire source to less than 25 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 are not applicable.
- (d) Pursuant to F091-5794-00017 issued December 10, 1996, the solids delivered to the applicators at the two (2) spray paint booths (Large Paint Booth and Building 2 Paint Booth) shall be limited to less than 9,650 tons per twelve (12) consecutive month period. Based on a fifty percent (50%) transfer efficiency and a control efficiency of ninety-eight (98%), when using dry filters, this throughput limit is equivalent to PM<sub>10</sub> emissions of less than 95.5 tons per year from the two (2) spray paint booths and less than 100 tons per year from the total of all facilities at this source, when operating the dry filters at all times when the two (2) spray paint booths are in operations. Therefore, the requirements of 326 IAC 2-7 are not applicable. As a result of this PM<sub>10</sub> limit, and since PM is equal to PM<sub>10</sub> at

the two (2) spray paint booths, the PM emissions from the entire source will be limited to less than 100 tons per year.

- (e) These limits listed above shall limit the potential to emit of VOC, PM<sub>10</sub> and NO<sub>x</sub> from the entire source to less than 100 tons per year and shall make the requirements of 326 IAC 2-7, not applicable. Since this limits NO<sub>x</sub> emissions to less than 250 tons per twelve (12) consecutive month period, the requirements for 326 IAC 2-2, Prevention of Significant Deterioration, is also not applicable.

#### 326 IAC 5-1 (Opacity Limitations)

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 the 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.

#### 326 IAC 6-4 (Fugitive Dust Emissions)

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).

### **State Rule Applicability – Surface Coating**

#### 326 IAC 2-4.1-1 (New Source Toxics Control)

The surface coating operation will emit greater than ten (10) tons per year for a single HAP and/or greater than twenty-five (25) tons per year for a combination of HAPs; however, the source has agreed to limit their surface coating operation to less than ten (10) tons per year of any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1-1 is not applicable.

#### 326 IAC 2-8 and 326 IAC 2-2 (FESOP and Prevention of Significant Deterioration (PSD))

Particulate Matter PM/PM<sub>10</sub> emissions determination shall be determined by calculating the PM/PM<sub>10</sub> emissions associated with each coating applied by the two (2) spray paint booths (Large Paint Booth and Building 2 Paint Booth) using the following equation:

$$PM/PM_{10} = CU \times D \times W\%S \times (1-TE/100) \times (1-CE/100) \times 1/2000$$

Where:

- PM/PM<sub>10</sub> = The total PM/PM<sub>10</sub> emissions (ton/month) for a given coating.
- CU = The total coating used (gal coating/month) of a given coating.
- D = The density (lb coating/gal coating) of a given coating.
- W%S = The weight percent solids (lb solids/lb coating) of a given coating.
- TE = The transfer efficiency (%) of the spray applicators. This value shall equal 50% or a value determined from the most recent valid compliance demonstration.

CE = The control efficiency (%) of the dry filters. This value shall equal 98% or a value determined from the most recent valid compliance demonstration.

The total PM/PM<sub>10</sub> emissions (ton/month) from spray paint booths (Large Paint Booth and Building 2 Paint Booth) is equal to the sum of the PM/PM<sub>10</sub> emissions associated with each coating applied by those booths.

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

Pursuant to 326 IAC 6-3-2(d), the particulate matter (PM) from the two (2) spray paint booths shall be controlled by using dry filters, the Permittee shall operate the control devices in accordance with manufacturer's specifications.

The dry filters shall be in operation at all times the Large Paint Booth and Building 2 Paint Booth are in operation.

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

(a) The requirements of 326 IAC 8-2-9 are not applicable to the Large Paint Booth, because it was constructed before January 1, 1980.

(b) One (1) spray paint booth, identified as Building 2 Paint Booth, has a potential VOC emissions greater than 15 pounds per day. Therefore, the one (1) spray paint booth is subject to the requirements of 326 IAC 8-2-9, Miscellaneous Metal Coating. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the one (1) spray paint booth, identified as Building 2 Paint Booth, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings, forced warm air dried, or extreme performance coatings.

Solvent sprayed from application equipment during clean-up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

$$A = [ \sum c X U ] / \sum U$$

Where: A is the volume weighted average in pounds VOC per gallon less water as applied;  
C is the VOC content of the coating in pounds VOC per gallon less water as applied; and  
U is the usage rate of the coating in gallons per day.

### 326 IAC 8-3 (Organic Solvent Degreasing Operations)

The one (1) cold solvent cleaning system was constructed after July 1, 1990 and does not have a remote solvent reservoir. Therefore, the requirements of 326 IAC 8-3-2, Organic Solvent Degreasing Operations: Cold Cleaner Operation and 326 IAC 8-3-5, Organic Solvent Degreasing Operations: Cold Cleaner Degreaser Operation and Control, are applicable. Compliance with 326 IAC 8-3-5 will satisfy the requirements 326 IAC 8-3-2.

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of the cold cleaner degreaser shall ensure that the following requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

- (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38° C) (one hundred degrees Fahrenheit (100° F));
  - (B) The solvent is agitated; or
  - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty eight degrees Celsius (38° C) (one hundred degrees Fahrenheit (100° F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty eight degrees Celsius (38° C) (one hundred degrees Fahrenheit (100° F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9° C) (one hundred twenty degrees Fahrenheit (120° F)):
- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
  - (B) A water cover when solvent used is insoluble in, and heavier than, water.
  - (C) Other systems demonstrated equivalent control such as a refrigerated chiller or carbon absorption. Such systems shall be submitted to the US EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of the cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

#### 326 IAC 8-6 (Organic Solvent Emission Limitations)

The one (1) spray paint booth, identified as Large Paint Booth, was constructed prior to 1975, but the exact construction date is unknown. Therefore, construction of this source may have commenced after October 7, 1974, and did commence prior to January 1, 1980. The potential

emissions from this source are greater than 100 tons per year. Therefore, the requirements of 326 IAC 8-6 are applicable. Since the potential to emit VOC is limited to less than 100 tons per year, pursuant to 327 IAC 2-8-4 (FESOP), the FESOP limit satisfies the requirements of 326 IAC 8-6-2(a).

### State Rule Applicability – Insignificant Activities

#### 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

The four (4) natural gas-fired boilers, (B-01 through B-04), all constructed after September 21, 1983, must comply with the requirements of 326 IAC 6-2-4. The emission limitations are based on the following equation given in 326 IAC 6-2-4

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

The heat input capacity of the natural gas-fired boilers (B-01 through B-04) is 0.175 MMBtu/hr total.

$$Pt = 1.09/(0.175)^{0.26} = 1.72 \text{ lb/MMBtu heat input.}$$

Pursuant to 326 IAC 6-2-4(a), for Q less than ten (10) MMBtu/hr, Pt shall not exceed 0.6. Therefore, the particulate matter emissions from the natural gas-fired boilers (B-01 through B-04) is limited to 0.6 pound per MMBtu heat input total.

Based on AP-42 emission factors, the particulate matter emissions from each of the natural gas-fired boilers (B-01 through B-04) is as follows:

$$1.9 \text{ lb PM /mmcf} \times \text{mmcf}/1,000 \text{ MMBtu} = 0.0019 \text{ lb PM/MMBtu.}$$

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

- (a) Pursuant to 326 IAC 6-3-2(e), the particulate matter from the insignificant brazing, welding and coating with spray cans shall not exceed 0.551 pound per hour when operating at a process weight rate of less than 100 pounds per hour. When operating at a process weight rate of 100 pounds per hour or more, the particulate matter shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

- (b) Pursuant to 326 IAC 6-3-2(e), the particulate matter from the test compressors shall not exceed 0.551 pounds per hour when operating at a process weight rate of less than 100

pounds per hour. When operating at a process weight rate of 100 pounds per hour or more, the particulate matter shall not exceed the pounds per hour emission rate established as E in the following formula:

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

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

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

The requirements of 326 IAC 8-2-9 are not applicable to the insignificant coating with spray cans because the potential to emit VOC is less than 15 pounds per day.

#### Testing

- (a) The Permittee shall conduct performance tests to verify the transfer efficiency and particulate matter control efficiency requirements in Condition D.1.3.
- (b) No later than 180 days after issuance of F091-23224-00017, the Permittee shall conduct transfer efficiency testing on one (1) of the booths subject to Condition D.1.3. The testing shall be done on a booth that has not been tested in the past ten (10) years. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted using methods approved by the Commissioner and in accordance with 326 IAC 3-6-3 and Section C - Performance Testing.
- (c) No later than 180 days after issuance of F091-23224-00017, the Permittee shall conduct control efficiency testing on the dry filters used by one (1) of the booths subject to Condition D.1.3. The testing shall be done on filters that have not been tested in the past ten (10) years. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted using methods approved by the Commissioner and in accordance with 326 IAC 3-6-3 and Section C - Performance Testing.

#### Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-8 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 2-8-4. 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) The compliance monitoring requirements applicable to this source are as follows:

- (1) The two (2) spray paint booths (Large Paint Booth and Building 2 Paint Booth) have the following compliance monitoring requirements:
  - (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 paint booth stacks (2 through 11) and (67 through 70) while booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances, shall be considered a deviation from this permit.
  - (B) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the dry filters for the two (2) paint booths, must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Process) and 326 IAC 2-8 (FESOP).

- (2) The test cell building has the following compliance monitoring requirements:

To document compliance with Condition D.2.3, the Permittee shall maintain a daily record of visible emission notations of the test bays stacks (78, 79, 81, 82, 85, 86, 87, 89, 94, 95, 96, 97, 98, 99 and 100) exhausts. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, “normal” means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the test bays must operate properly to ensure compliance with 326 IAC 2-8 (FESOP).

## Recommendation

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

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

An administratively complete FESOP renewal application for the purposes of this review was received on June 13, 2006.

### **Conclusion**

The operation of this stationary industrial air and gas compressor manufacturing source shall be subject to the conditions of the FESOP 091-23224-00017.

**Appendix A: Emission Units**

**Company Name:** Sullair Corporation, Subsidiary of Hamilton Sundstrand  
**Address City Zip:** 3700 East Michigan Blvd., Michigan City, IN 46360  
**Permit Number:** F091-23224-00017  
**Reviewer:** Marcia Earl  
**Date:** October 18, 2006

**Uncontrolled Emissions**

Emission Units	PM	PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	HAPs
Paint Booths (Large Paint Booth and Building 2 Paint Booths)	103.95	103.95	0.00	0.00	136.95	0.00	83.24
Degreasing	0.00	0.00	0.00	0.00	24.50	0.00	0.73
Test Cells Building	21.72	21.72	20.32	309.05	25.23	66.58	0.281
Natural Gas Combustion Source	0.00	0.00	0.00	0.00	0.00	0.10	0.00
<b>Totals</b>	125.67	125.67	20.32	309.05	186.68	66.68	* 84.251

**Controlled Emissions**

Emission Units	PM	PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	HAPs
Paint Booths (Large Paint Booth and Building 2 Paint Booths)	< 95.5	< 95.5	0.00	0.00	< 95.5	0.00	< 9.17
Degreasing			0.00	0.00		0.00	0.73
Test Cell Building	< 2.12	< 2.12	1.99	30.2	< 2.47	6.51	0.026
Natural Gas Combustion Source	0.00	0.00	0.00	0.00	0.00	0.1	0.00
<b>Totals</b>	less than 100	less than 100	1.99	30.20	less than 100	6.61	* less than 10 tons single HAP and less than 25 tons total HAPS

Assuming PM Emissions = PM<sub>10</sub> Emissions

\* Xylene, MIBK, and Glycol Ethers from the surface coating operation have the potential to emit over 10 tons per year for a single HAP.



**Appendix A: Emission Calculations**  
**HAP Emission Calculations from Surface Coating**

**Company Name:** Sullair Corporation, Subsidiary of Hamilton Sundstrand  
**Address City IN Zip:** 3700 East Mighigan Blvd., Michigan City, IN 46360  
**Permit Number:** F091-23224-00017  
**Permit Reviewer:** Marcia Earl  
**Date:** October 18, 2006

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MIBK	Weight % Ethylbenzene	Weight % Methanol	Weight % Glycol Ethers	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	MIBK Emmisions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Methanol Emissions (tons/yr)	Glycol Ethers Emissions (ton/yr)	Total Emissions (ton/yr)
<b>Large Paint Booth</b>																
Sullair Global Green	9.16	0.310000	10.00	20.00%	0.00%	0.00%	5.00%	0.00%	5.00%	24.87	0.00	0.00	6.22	0.00	6.22	37.31
SW Custom Colors	9.9	0.170000	10.00	0.00%	0.00%	17.00%	0.00%	0.00%	5.00%	0.00	0.00	12.53	0.00	0.00	3.69	16.22
<b>Building 2 Paint Booth</b>																
3.5 Sullair Green Primer	11.49	0.050000	20.00	15.00%	0.00%	4.00%	3.00%	0.00%	0.00%	7.55	0.00	2.01	1.51	0.00	0.00	11.07
Special Paints	9	0.050000	20.00	0.00%	0.00%	17.00%	0.00%	0.00%	6.00%	0.00	0.00	6.70	0.00	0.00	2.37	9.07
White Primer	10.91	0.050000	20.00	0.00%	3.00%	0.00%	0.00%	0.00%	0.00%	0.00	1.44	0.00	0.00	0.00	0.00	1.44
Xylene	7.17	0.002850	20.00	85.00%	0.00%	0.00%	15.00%	0.00%	0.00%	1.52	0.00	0.00	0.27	0.00	0.00	1.79
Lacquer Thinner	7.25	0.240000	1.00	15.00%	50.00%	5.00%	0.00%	15.00%	0.00%	1.12	3.73	0.37	0.00	1.12	0.00	6.34

Total State Potential Emissions 35.06    5.17    21.61    8.00    1.12    12.28    83.24

**METHODOLOGY**

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

**Appendix A: Emission Calculations  
 Degreasing Operation  
 VOC and HAP Emission Calculations**

**Company Name: Sullair Corporation, Subsidiary of Hamilton Sundstrand  
 Address City IN Zip: 3700 East Michigan Blvd., Michigan City, IN 46360  
 Permit Number: F091-23224-00017  
 Permit Reviewer: Marcia Earl  
 Date: October 18, 2006**

Material	Maximum Consumption (lbs/yr)	Weight % VOC	Weight % Xylene	Weight % Toluene	Weight % Ethylbenzene	Weight % 1,1,1-Trichlorethane	Weight % Perchloroethylene	VOC Emissions (tons/yr)	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	Ethylbenzene Emissions (tons/yr)	1,1,1-Trichlorethane Emissions (tons/yr)	Perchloroethylene Emissions (tons/yr)	Total HAPs Emissions (tons/yr)	
Degreasing	48,907	100.00%	1.00%	0.50%	0.50%	0.50%	0.50%	24.50	0.25	0.12	0.12	0.12	0.12	0.73	
Total State Potential Emissions								<b>TOTALS:</b>	<b>(tons/yr)</b>	<b>24.50</b>	<b>0.25</b>	<b>0.12</b>	<b>0.12</b>	<b>0.12</b>	<b>0.73</b>

**METHODOLOGY**

VOC/HAPs emission rate (tons/yr = Material Usage (lbs/hr) \* Weight % VOC/HAP \* 8760 hrs/yr \* 1 ton/2000lbs

**METHODOLOGY**

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

**Appendix A: Emission Calculations  
Internal Combustion Engines - Diesel Fuel  
Turbine (>250 and <600 HP)  
Reciprocating**

**Test Cell Building**

**Company Name:** Sullair Corporation, Subsidiary of Hamilton Sundstrand  
**Address City IN Zip:** 3700 East Michigan Blvd., Michigan City, IN 46360  
**Permit Number:** F091-23224-00017  
**Reviewer:** Marcia Earl  
**Date:** October 18, 2006

**Emissions calculated based on heat input capacity (MMBtu/hr)**

Total  
Heat Input Capacity  
MM Btu/hr

16.0

Emission Factor in lb/MMBtu	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	0.31	0.31	0.29	4.41	0.4	0.95
Potential Emission in tons/yr	21.72	21.72	20.32	309.05	25.23	66.58

Emission Factor in lb/MMBtu	Hazardous Air Pollutant (HAP)								
	Benzene	Toluene	Xylenes	1,3 - Butadiene	Formaldehyde	Acetaldehyde	Acrolein	Naphthalene	Total
	0.000933	0.000409	0.000285	0.0000391	0.00118	0.000767	0.0000925	0.0000848	
Potential Emission in tons/yr	0.069	0.030	0.021	0.003	0.087	0.057	0.007	0.006	0.281

**Methodology**

Potential Throughput (hp-hr/yr) = hp \* 8760 hr/yr

Use a conversion factor of 7,000 Btu per hp-hr to convert from horsepower to Btu/hr, unless the source gives you a source-specific brake-specific fuel consumption. (AP-42, Footnote a, Table 3.3-1)

Emission Factors are from AP42 (Supplement B 10/96), Table 3.3-2

Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] \* 8760 hr/yr / (2,000 lb/ton )

Emission (tons/yr) = [Potential Throughput (hp-hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton )

\*PM emission factors are assumed to be equivalent to PM10 emission factors. No information was given regarding which method was used to determine the factor or the fraction of PM10 which is condensable.

**Appendix A: Emissions Calculations  
 Natural Gas Combustion Only  
 MM BTU/HR <100  
 four (4) boilers (B-01 - B-04)**

**Company Name:** Sullair Corporation, Subsidiary of Hamilton Sundstrand  
**Address City IN Zip:** 3700 East Michigan Blvd., Michigan City, IN 46360  
**Permit Number:** F091-23224-00017  
**Reviewer:** Marcia Earl  
**Date:** October 18, 2006

Heat Input Capacity  
 MMBtu/hr

Potential Throughput  
 MMCF/yr

0.175

1.5

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	**see below	5.5	84.0
Potential Emission in tons/yr	0.0	0.0	0.0	0.0	0.0	0.1

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**four (4) boilers (B-01 - B-04)**

**HAPs Emissions**

**Company Name:** Sullair Corporation, Subsidiary of HamiltonSundstrand  
**Address City IN Zip:** 3700 East Michigan Blvd., Michigan City, IN 46360  
**Permit Number:** F091-23224-00017  
**Reviewer:** Marcia Earl  
**Date:** October 30, 2006

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.610E-06	9.198E-07	5.749E-05	1.380E-03	2.606E-06

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	3.833E-07	8.432E-07	1.073E-06	2.913E-07	1.610E-06

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu      MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton