



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

DATE: December 18, 2007

RE: GDX Automotive North America, Inc. / 169-23357-00004

FROM: Matthew Stuckey, Deputy Branch 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, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) 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, Suite N 501E, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

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

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

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



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Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

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

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

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

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

Operation Permit No.: T169-23357-00004	
Issued by: <i>Original signed by</i> Matt Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality	Issuance Date: December 18, 2007 Expiration Date: December 18, 2012

TABLE OF CONTENTS

A. SOURCE SUMMARY.....	6
A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]	
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]	
A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]	
A.4 Part 70 Permit Applicability [326 IAC 2-7-2]	
B. GENERAL CONDITIONS	10
B.1 Definitions [326 IAC 2-7-1]	
B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]	
B.3 Term of Conditions [326 IAC 2-1.1-9.5]	
B.4 Enforceability [326 IAC 2-7-7]	
B.5 Severability [326 IAC 2-7-5(5)]	
B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]	
B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]	
B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]	
B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]	
B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]	
B.11 Emergency Provisions [326 IAC 2-7-16]	
B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]	
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]	
B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]	
B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]	
B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]	
B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]	
B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]	
B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]	
B.20 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]	
B.21 Source Modification Requirement [326 IAC 2-7-10.5]	
B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]	
B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]	
B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]	

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

C. SOURCE OPERATION CONDITIONS 21

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

- C.1 Particulate Emission Limitations For Processes with Process Weight Rates
Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]
- C.2 Opacity [326 IAC 5-1]
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
- C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

- C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]
- C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]
- C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)]
[326 IAC 2-7-6(1)]

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

- C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]
- C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]
- C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

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

- C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)]
[326 IAC 2-6]
- C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
- C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

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

D.1. EMISSIONS UNIT OPERATION CONDITIONS..... 28

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

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

Compliance Determination Requirements

D.1.2 Particulate Control

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

D.1.3 Visible Emissions Notations

D.1.4 Parametric Monitoring

D.1.5 Broken or Failed Bag Detection

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

D.1.6 Record Keeping Requirements

D.2. EMISSIONS UNIT OPERATION CONDITIONS..... 31

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

D.2.1 PSD Minor Limit [326 IAC 2-2]

D.2.2 General Volatile Organic Compound Reduction Requirements [326 IAC 8-1-6]

D.2.3 Particulate [326 IAC 6-3-2(d)]

Compliance Determination Requirements

D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

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

D.2.5 Monitoring

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

D.2.6 Record Keeping Requirements

D.2.7 Reporting Requirements

D.3. EMISSIONS UNIT OPERATION CONDITIONS..... 37

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

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

E.1. NESHAP Requirements for Surface Coating of Plastic Parts and Products..... 38

**National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements
[326 IAC 2-7-5(1)]**

- E.1.1 General Provisions Relating to NESHAP Subpart PPPP [40 CFR Part 63, Subpart A]
- E.1.2 NESHAP Subpart PPPP Requirements [40 CFR Part 63, Subpart PPPP] [326 IAC 20-81]

Certification	73
Emergency Occurrence Report	74
Part 70 Usage Report	76
Part 70 Usage Report	78
Quarterly Deviation and Compliance Monitoring Report	80

SECTION A

SOURCE SUMMARY

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

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

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

Source Address:	One General Street, Wabash, Indiana 46992
Mailing Address:	P.O. Box 507, Wabash, Indiana 46992
General Source Phone Number:	(260) 569-5340
SIC Code:	3089
County Location:	Wabash
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Rules Major 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 2-7-4(c)(3)][326 IAC 2-7-5(15)]

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

- (a) Banbury Mills and Mixers, constructed in 1965 and permitted in 1980, consisting of three (3) Banbury Mixers and three (3) Banbury Mills, with a maximum capacity of 11,100 pounds per hour, using four (4) baghouses (BH02, BH03, BH04, BH05) as particulate control and exhausting to four (4) stacks (BH02, BH03, BH04, BH05).
- (b) Compound handling, constructed in 1984 and 1985, consisting of carbon black unloading, carbon black conveying, and weigh stations, with a maximum capacity of 15 tons per hour, using four (4) baghouses (BH06, BH07, BH08, BH10) as particulate control, exhausting to four (4) stacks (BH06, BH07, BH08, BH10).
- (c) Extrusion Line 1, consisting of the following:
 - (1) Two (2) Line 1 Extruders, constructed in 1969 and 1986, with a maximum total capacity of 1000 pounds per hour, and exhausting to the interior of the building.
 - (2) One (1) Line 1 natural gas hot air oven, constructed in 1986, with a rated heat input of 3.2 MMBtu/hr, and exhausting to stacks L1-1 through L1-5.
 - (3) One (1) Line 1 flock adhesive application booth, constructed in 1995, with a maximum capacity of 12.45 pounds per hour of adhesive, and exhausting to stack L1-7.
 - (4) One (1) Line 1 On-Line primer booth, constructed in 1997, equipped with two (2) HVLP spray guns, with a maximum capacity of 0.5 gallons of coating per hour, used to coat truck door seals, with dry filters as control, exhausting to one stack L1-6.
 - (5) Two (2) high velocity hot air natural gas ovens, each with a maximum rated heat input of 1.0 MMBtu/hr, constructed in 1999, exhausting to stack L1-8 & 9.
 - (6) One (1) topcoat booth at Line 1, using a maximum of 12.4 pounds of coating per day, exhausting to stack No. L1-17a.

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

- (e) Extrusion Line 3, consisting of the following:
 - (1) Two (2) Line 3 rubber extruders, constructed in 1999, with a total maximum capacity of 1000 pounds of rubber extruded per hour.
 - (2) Five (5) natural gas fired hot air ovens, constructed in 1999, each rated at 1.0 MMBTU per hour, exhausting through stacks/vents L3-1 through L3-5.
 - (3) One (1) Line 3 adhesive application booth, constructed in 1999, with a maximum capacity of 1 gallon of adhesive per hour, utilizing brush-and-wipe methods, exhausting through stack/vent L3-6.
 - (4) One (1) Line 3 primer spray booth, constructed in 1991, equipped with HVLP spray guns, with a maximum capacity of 1 gallon of coating per hour, used to coat truck door seals, with dry filters as control, exhausting to one stack L3-7.
 - (5) One (1) Line 3 topcoat booth, constructed in 1991, equipped with HVLP spray guns, with a maximum capacity of 1 gallon of coating per hour, used to coat truck door seals, with dry filters as control, exhausting to one stack L3-8.

- (f) Extrusion Line 4, consisting of the following:
 - (1) Two (2) extruders, constructed in 2001, with a combined maximum capacity of 1000 pounds of rubber per hour.
 - (2) One (1) electric molten salt curing oven, constructed in 2001, with a maximum capacity of 1000 pounds of rubber per hour, exhausting to five (5) stacks L4-1 through L4-5.
 - (3) One (1) Line 4 topcoat booth, constructed in 2000, with a maximum capacity of 0.64 gallons of coating per hour, used to coat truck door seals, utilizing HVLP application method, exhausting to stack L4-6.

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

- (h) Extrusion Line 6, constructed in 1978 and 1985, consisting of:
 - (1) Two (2) Line 6 extruders, constructed in 1978 and 1995, with a total maximum capacity of 1000 pounds of extruded rubber per hour.
 - (2) one (1) liquid salt curing bath, constructed in 1985, with a maximum capacity of 1,000 pounds per hour and exhausting to two (2) stacks L6-1 and 2.

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

- (j) Extrusion Line 8, consisting of the following:
 - (1) Two (2) Line 8 rubber extruders, constructed in 2006, with a total maximum capacity of 1000 pounds rubber extruded per hour.
 - (2) Four (4) Line 8 natural gas fired hot air curing ovens, constructed in 2006, each rated at 1.0 MMBtu/hr, exhausting to one (1) stack L8-1.
 - (3) Three (3) microwave zone ovens, constructed in 2006, each rated at 0.17 MMBtu/hr hour, exhausting through stack L8-8-10.
 - (4) One (1) Line 8 topcoat booth 1, constructed in 2006, utilizing HVLP application method, with a maximum capacity of 1 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack L8-6.
 - (5) One (1) Line 8 topcoat booth 2, constructed in 2006, utilizing HVLP application method, with a maximum capacity of 1 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack L8-7.

- (k) NBC Coating Line, consisting of the following:
 - (1) One (1) NBC Coating Line primer spray booth, constructed in 2006, utilizing HVLP application method, with a maximum capacity of 1 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack N-1.
 - (2) One (1) NBC Coating Line topcoat spray booth, constructed in 2006, utilizing HVLP application method, with a maximum capacity of 2 gallons of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack N-2.
 - (3) Two (2) NBC Coating Line Post Flock Adhesive Stations (2 and 3), constructed in 2006, each with a maximum capacity of 0.4 gallon of coating per hour, used to coat rubber parts, exhausting through stacks N-4 and N-5, respectively.

- (l) U222 Finishing Area, consisting of the following:
 - (1) One (1) U222 Finishing Area primer spray booth, constructed in 1989, utilizing HVLP application method, with a maximum capacity of 0.61 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack FA-5 (relocated from Finishing Area 239 in 2006).
 - (2) One (1) U222 Finishing Area topcoat spray booth, constructed in 1991, utilizing HVLP application method, with a total maximum capacity of 0.83 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack FA-7 (relocated from Finishing Area 239 in 2006).
 - (3) Three (3) U222 Finishing Area Post Flock Adhesive Stations (1, 2 and 3), constructed in 2006, each with a maximum capacity of 0.4 gallon of coating per hour, used to coat rubber parts, exhausting through stacks FA-1, FA-2 and FA-3, respectively.
 - (4) Two (2) U222 Finishing Area gas catalytic ovens (1 and 2), constructed in 2006, each rated at 0.29 MMBtu/hr, exhausting to stacks FA-4 and FA-6, respectively.
 - (5) One (1) U222 Finishing Area gas catalytic oven (3), constructed in 2006, rated at 1.152 MMBtu/hr, exhausting to stack FA-8.

Under NESHAP, Subpart PPPP, the Extrusion lines, NBC Coating line, U222 Finishing Area, and Plastic Part Adhesive line are considered as existing affected sources.

- (m) Three (3) Combining Adhesive Stations (1, 2 and 3), constructed in 2006, each with a maximum capacity of 0.5 gallon of coating per hour, used to coat rubber and plastic parts, exhausting through stacks C-1, C-2 and C-3, respectively.

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour;
 - (1) One (1) natural gas boiler, constructed in 2004, with maximum heat input capacity of 2.93 MMBtu per hour; providing process heat to the salt bath lines at the plant (Lines 4 and 6), exhausting to stack B1. [326 IAC 6-2-4]
- (b) Grinding and machining operation controlled with fabric filter, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations; [326 IAC 6-3-2]
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

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

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

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

SECTION B

GENERAL CONDITIONS

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

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

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

- (a) This permit, T169-23357-00004, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

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

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. 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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)][326 IAC 1-6-3]

- (a) 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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-0178 (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 2-7-5(3)(C)(ii) and must contain the following:

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
 - (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

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

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

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

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

- (a) All terms and conditions of permits established prior to T169-23357-00004 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
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 the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 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 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.

- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
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 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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

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

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

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

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

B.19 Permit Revision Under Economic Incentives and Other Programs
[326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

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

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
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 2-7-20(b),(c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

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

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

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

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

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

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

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

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

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

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

- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

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

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

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

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

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
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 the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
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 the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
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 the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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

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

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

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

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on July 2007.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

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

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

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

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; 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.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

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

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

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

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

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.

Stratospheric Ozone Protection

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

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

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Banbury Mills and Mixers, constructed in 1965 and permitted in 1980, consisting of three (3) Banbury Mixers and three (3) Banbury Mills, with a maximum capacity of 11,100 pounds per hour, using four (4) baghouses (BH02, BH03, BH04, BH05) as particulate control and exhausting to four (4) stacks (BH02, BH03, BH04, BH05).
- (b) Compound handling, constructed in 1984 and 1985, consisting of carbon black unloading, carbon black conveying, and weigh stations, with a maximum capacity of 15 tons per hour, using four (4) baghouses (BH06, BH07, BH08, BH10) as particulate control, exhausting to four (4) stacks (BH06, BH07, BH08, BH10).

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

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

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

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

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

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

The allowable emissions for each facility are as follows:

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

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

D.1.2 Particulate Control

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

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

D.1.3 Visible Emissions Notations

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

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

D.1.4 Parametric Monitoring

The Permittee shall record the pressure drop across baghouses (BH02 - BH08 and BH10) used in conjunction with the Banbury Mills and Compound handling, at least once per day when the Banbury Mills and Compound handling are in operation. When for any one reading, the pressure drop across the baghouses (BH02 - BH08 and BH10) is outside the normal range of 1.0 and 10.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

D.1.5 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (c) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

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

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.3, the Permittee shall maintain records of visible emission notations of the Banbury Mills, stacks (BH02, BH03, BH04, BH05) and Compound handling, stacks (BH06, BH07, BH08, BH10) exhaust once per day. 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).
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain records once per day of the pressure drop during normal operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (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.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (c) Extrusion Line 1, consisting of the following:
- (1) Two (2) Line 1 Extruders, constructed in 1969 and 1986, with a maximum total capacity of 1000 pounds per hour, and exhausting to the interior of the building.
 - (2) One (1) Line 1 natural gas hot air oven, constructed in 1986, with a rated heat input of 3.2 MMBtu/hr, and exhausting to stacks L1-1 through L1-5.
 - (3) One (1) Line 1 flock adhesive application booth, constructed in 1995, with a maximum capacity of 12.45 pounds per hour of adhesive, and exhausting to stack L1-7.
 - (4) One (1) Line 1 On-Line primer booth, constructed in 1997, equipped with two (2) HVLP spray guns, with a maximum capacity of 0.5 gallon of coating per hour, used to coat truck door seals, with dry filters as control, exhausting to one stack (L1-6)
 - (5) Two (2) high velocity hot air natural gas ovens, each with a maximum rated heat input of 1.0 MMBtu/hr, constructed in 1999, exhausting to stack L1-8 & 9.
 - (6) One (1) topcoat booth at Line 1, using a maximum of 12.4 pounds of coating per day, exhausting to stack No. L1-17a.
- (d) Extrusion Line 2, consisting of the following:
- (1) Two (2) Line 2 extruders, constructed in 1986 and 1987, with a total maximum capacity of 1000 pounds of extruded rubber per hour.
 - (2) One (1) 5.6 MMBtu/hr natural gas fired curing oven, constructed in 1986 and 1987, exhausting to six (6) stacks (L2-3 through L2-8).
 - (3) One (1) Line 2 drip and wipe adhesive application booth, constructed in 1986 and 1987, with a maximum capacity of 1.5 gallons of adhesive per hour, and exhausting to stack (L2-9).
- (e) Extrusion Line 3, consisting of the following:
- (1) Two (2) Line 3 rubber extruders, constructed in 1999, with a total maximum capacity of 1000 pounds of rubber extruded per hour.
 - (2) Five (5) natural gas fired hot air ovens, constructed in 1999, each rated at 1.0 MMBTU per hour, exhausting through stacks/vents L3-1 through L3-5.
 - (3) One (1) Line 3 adhesive application booth, constructed in 1999, with a maximum capacity of 1 gallon of adhesive per hour, utilizing brush-and-wipe methods, exhausting through stack/vent L3-6.
 - (4) One (1) Line 3 primer spray booth, constructed in 1991, equipped with HVLP spray guns, with a maximum capacity of 1 gallon of coating per hour, used to coat truck door seals, with dry filters as control, exhausting to one stack (L3-7).
 - (5) One (1) Line 3 topcoat booth, constructed in 1991, equipped with HVLP spray guns, with a maximum capacity of 1 gallon of coating per hour, used to coat truck door seals, with dry filters as control, exhausting to one stack (L3-8).
- (f) Extrusion Line 4, consisting of the following:
- (1) Two (2) extruders, constructed in 2001, with a combined maximum capacity of 1000 pounds of rubber per hour.
 - (2) One (1) electric molten salt curing oven, constructed in 2001, with a maximum capacity of 1000 pounds of rubber per hour, exhausting to five (5) stacks (L4-1 through L4-5).
 - (3) One (1) Line 4 spray booth, constructed in 2000, with a maximum capacity of 0.64 gallons of coating per hour, used to coat truck door seals, utilizing HVLP application method, exhausting to stack L4-6.

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

- (h) Extrusion Line 6, constructed in 1978 and 1985, consisting of:
 - (1) Two (2) Line 6 extruders, constructed in 1978 and 1995, with a total maximum capacity of 1000 pounds of extruded rubber per hour.
 - (2) one (1) liquid salt curing bath, constructed in 1985, with a maximum capacity of 1,000 pounds per hour and exhausting to two (2) stacks (L6-1 and 2).

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

- (j) Extrusion Line 8, consisting of the following:
 - (1) Two (2) Line 8 rubber extruders, constructed in 2006, with a total maximum capacity of 1000 pounds rubber extruded per hour.
 - (2) Four (4) Line 8 natural gas fired hot air curing ovens, constructed in 2006, each rated at 1.0 MMBtu/hr, exhausting to one (1) stack (L8-1).
 - (3) Three (3) microwave zone ovens, constructed in 2006, each rated at 0.17 MMBtu/hr, exhausting through stack L8-8-10.
 - (4) One (1) Line 8 topcoat booth 1, constructed in 2006, utilizing HVLP application method, with a maximum capacity of 1 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack L8-6.
 - (5) One (1) Line 8 topcoat booth, constructed in 2006, utilizing HVLP application method, with a maximum capacity of 1 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack L8-7.

- (k) NBC Coating Line, consisting of the following:
 - (1) One (1) NBC/JS27 Coating Line primer spray booth, constructed in 2006, utilizing HVLP application method, with a maximum capacity of 1 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack N-1.
 - (2) One (1) NBC/JS27 Coating Line topcoat spray booth, constructed in 2006, utilizing HVLP application method, with a maximum capacity of 2 gallons of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack N-2.
 - (3) Three (3) NBC/JS27 Coating Line Post Flock Adhesive Stations (1, 2 and 3), constructed in 2006, each with a maximum capacity of 0.4 gallon of coating per hour, used to coat rubber parts, exhausting through stacks N-3, N-4 and N-5, respectively.

- (l) U222 Finishing Area, consisting of the following:
 - (1) One (1) U222 Finishing Area primer spray booth, constructed in 1989, utilizing HVLP application method, with a maximum capacity of 0.61 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack FA-5 (relocated from Finishing Area 239 in 2006).
 - (2) One (1) U222 Finishing Area topcoat spray booth, constructed in 1991, utilizing HVLP application method, with a total maximum capacity of 0.83 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack FA-7 (relocated from Finishing Area 239 in 2006).
 - (3) Three (3) U222 Finishing Area Post Flock Adhesive Stations (1, 2 and 3), constructed in 2006, each with a maximum capacity of 0.4 gallon of coating per hour, used to coat rubber parts, exhausting through stacks FA-1, FA-2 and FA-3, respectively.

- (4) Two (2) U222 Finishing Area gas catalytic ovens (1 and 2), constructed in 2006, each rated at 0.29 MMBtu/hr, exhausting to stacks FA-4 and FA-6, respectively.
- (5) One (1) U222 Finishing Area gas catalytic oven (3), constructed in 2006, rated at 1.152 MMBtu/hr, exhausting to stack FA-8.

Under NESHAP Subpart P PPP the above surface coating operations are considered to be part of an existing affected source.

- (m) Three (3) Combining Adhesive Stations (1, 2 and 3), constructed in 2006, each with a maximum capacity of 0.5 gallon of coating per hour, used to coat rubber and plastic parts, exhausting through stacks C-1, C-2 and C-3, respectively.

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

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

D.2.1 PSD Minor Limit [326 IAC 2-2]

The use of VOC, including coatings, dilution solvents, and cleaning solvents for the list of spray booths listed in the following table shall be limited to less than 178 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the source-wide potential to emit of VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

Emission Unit	VOC (TPY)
Extrusion Line 1	178.00
Adhesive Application	
On-line Primer Booth (0.5 gal/hr)	
On-line Topcoat Booth (0.51 gal/hr)	
Extrusion Line 2	
Adhesive Application	
Extrusion Line 3	
Adhesive Application	
Primer Spray Booth	
Topcoat Booth	
Extrusion Line 4	
Topcoat Booth 1	
Topcoat Booth 2	
Extrusion Line 5	
Adhesive Application	
Extrusion Line 6	
Topcoat Booth	
Line #7 Adhesive Application	
Extrusion Line 8	
Topcoat Booth 1	
Topcoat Booth 2	
NBC	
Primer Spray Booth	
Topcoat Booth	
Post Flock Adhesive Stations (2)	
U222 Finishing Area	
Primer Spray Booth	
Topcoat Booth	
Post Flock Adhesive Stations (3)	
Combining Line Booths	
Insert Coating Booth	
Total	178.00

D.2.2 General Volatile Organic Compound Reduction Requirements [326 IAC 8-1-6]

(a) The use of VOC, including coatings, dilution solvents, and cleaning solvents for each of the following facilities shall be limited to less than 25.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month so that the requirements of 326 IAC 8-1-6 do not apply:

- (1) Line 1 Adhesive Application Booth;
- (2) Line 2 Adhesive Application Booth;
- (3) Line 3 Primer Spray Booth;
- (4) Line 3 Topcoat Spray Booth;
- (5) Line 5 Adhesive Application Booth;
- (6) Line 8 Primer Spray Booth; and
- (7) NBC/JS27 Offline Primer Spray Booth.

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

D.2.3 Particulate [326 IAC 6-3-2(d)]

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

Emission Unit
Extrusion Line 1
On-line Primer Booth (0.5 gal/hr)
On-line Topcoat Booth (0.51 gal/hr)
Extrusion Line 3
Primer Spray Booth
Topcoat Booth
Extrusion Line 4
Topcoat Booth 1
Topcoat Booth 2
Extrusion Line 6
Topcoat Booth
Extrusion Line 8
Topcoat Booth 1
Topcoat Booth 2
NBC
Primer Spray Booth
Topcoat Booth
U222 Finishing Area
Primer Spray Booth
Topcoat Booth
Combining Line Booths
Insert Coating Booth

Compliance Determination Requirements

D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

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

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

D.2.5 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating operations at the source stacks while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the

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

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

D.2.6 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.1, and D.2.2 the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Conditions D.2.1, and D.2.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The amount and VOC and HAPs content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) The cleanup solvent usage for each month;
 - (3) The total VOC usage for each month; and
 - (4) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.2.5, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.7 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1 and D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.3 FACILITY OPERATION CONDITIONS

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

- (a) One (1) natural gas fired boiler with maximum heat input capacity of 2.93 MMBtu per hour; providing process heat to the salt bath lines at the plant (Lines 4 and 6), exhausting to stack B1. [326 IAC 6-2-4]

(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) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (d)), particulate emissions from the 2.93 MMBtu/hr boiler shall in no case exceed 0.6 pounds of particulate matter per million British thermal units heat input.

SECTION E.1

FACILITY OPERATION CONDITIONS

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

- (a) Extrusion Line 1, consisting of the following:
 - (1) One (1) Line 1 flock adhesive application booth, constructed in 1995, with a maximum capacity of 12.45 pounds per hour of adhesive, and exhausting to stack L1-7.
 - (2) One (1) Line 1 On-Line primer booth, constructed in 1997, equipped with two (2) HVLP spray guns, with a maximum capacity of 0.5 gallons of coating per hour, used to coat truck door seals, with dry filters as control, exhausting to one stack L1-6.
 - (3) One (1) topcoat booth at Line 1, using a maximum of 12.4 pounds of coating per day, exhausting to stack No. L1-17a.

- (b) Extrusion Line 2, consisting of the following:
 - (1) One (1) Line 2 drip and wipe adhesive application booth, constructed in 1986 and 1987, with a maximum capacity of 1.5 gallons of adhesive per hour, and exhausting to stack L2-9.

- (c) Extrusion Line 3, consisting of the following:
 - (1) One (1) Line 3 adhesive application booth, constructed in 1999, with a maximum capacity of 1 gallon of adhesive per hour, utilizing brush-and-wipe methods, exhausting through stack/vent L3-6.
 - (2) One (1) Line 3 primer spray booth, constructed in 1991, equipped with HVLP spray guns, with a maximum capacity of 1 gallon of coating per hour, used to coat truck door seals, with dry filters as control, exhausting to one stack (L3-7).
 - (3) One (1) Line 3 topcoat booth, constructed in 1991, equipped with HVLP spray guns, with a maximum capacity of 1 gallon of coating per hour, used to coat truck door seals, with dry filters as control, exhausting to one stack (L3-8).

- (D) Extrusion Line 4, consisting of the following:
 - (1) One (1) Line 4 topcoat booth, constructed in 2000, with a maximum capacity of 0.64 gallons of coating per hour, used to coat truck door seals, utilizing HVLP application method, exhausting to stack L4-6.

- (E) Extrusion Line 5, constructed in 1989, consisting of:
 - (1) One (1) Line 5 drip and wipe adhesive application booth, constructed in 1989, with a maximum capacity of 1 gallon of adhesive per hour, exhausting to one (1) stack (L5-11).

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

- (G) Extrusion Line 8, consisting of the following:
 - (1) One (1) Line 8 topcoat booth 1, constructed in 2006, utilizing HVLP application method, with a maximum capacity of 1 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack L8-6.
 - (2) One (1) Line 8 topcoat booth 2, constructed in 2006, utilizing HVLP application method, with a maximum capacity of 1 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack L8-7.

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

- (H) NBC Coating Line, consisting of the following:
- (1) One (1) NBC Coating Line primer spray booth, constructed in 2006, utilizing HVLP application method, with a maximum capacity of 1 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack N-1.
 - (2) One (1) NBC Coating Line topcoat spray booth, constructed in 2006, utilizing HVLP application method, with a maximum capacity of 2 gallons of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack N-2.
 - (3) Two (2) NBC Coating Line Post Flock Adhesive Stations (2 and 3), constructed in 2006, each with a maximum capacity of 0.4 gallon of coating per hour, used to coat rubber parts, exhausting through stacks N-4 and N-5, respectively.
- (I) U222 Finishing Area, consisting of the following:
- (1) One (1) U222 Finishing Area primer spray booth, constructed in 1989, utilizing HVLP application method, with a maximum capacity of 0.61 gallons of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack FA-5. (relocated from Finishing Area 239 in 2006)
 - (2) Three (3) U222 Finishing Area Post Flock Adhesive Stations (1, 2 and 3), constructed in 2006, each with a maximum capacity of 0.4 gallons of coating per hour, used to coat rubber parts, exhausting through stacks FA-1, FA-2 and FA-3, respectively.
- (J) Three (3) Combining Adhesive Stations (1, 2 and 3), constructed in 2006, each with a maximum capacity of 0.5 gallon of coating per hour, used to coat rubber and plastic parts, exhausting through stacks C-1, C-2 and C-3, respectively.

Under NESHAP Subpart P PPP the above surface coating operations are considered to be part of an existing affected source.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

E.1.1 General Provisions Relating to NESHAP P PPP [40 CFR Part 63, Subpart A]

Pursuant to 40 CFR 63.4501, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, as specified in Table 2 of 40 CFR Part 63, Subpart P PPP in accordance with schedule in 40 CFR 63 Subpart P PPP.

E.1.2 NESHAP Subpart P PPP Requirements [40 CFR Part 63, Subpart P PPP] [326 IAC 20-81]

Pursuant to CFR Part 63, Subpart P PPP and 326 IAC 20-81, the Permittee shall comply with the provisions of 40 CFR Part 63.4480, as specified as follows:

Sec. 63.4480 What is the purpose of this subpart?

This subpart establishes national emission standards for hazardous air pollutants (NESHAP) for plastic parts and products surface coating facilities. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations.

Sec. 63.4481 Am I subject to this subpart?

(a) Plastic parts and products include, but are not limited to, plastic components of the following types of products as well as the products themselves: Motor vehicle parts and accessories for automobiles, trucks, recreational vehicles; sporting and recreational goods; toys; business machines; laboratory and medical equipment; and household and other consumer products. Except as provided in paragraph (c) of this section, the source category to which this subpart applies is the surface coating of any plastic parts or products, as described in paragraph (a)(1) of this section, and it includes the subcategories listed in paragraphs (a)(2) through (5) of this section.

(1) Surface coating is the application of coating to a substrate using, for example, spray guns or dip tanks. When application of coating to a substrate occurs, then surface coating also includes associated activities, such as surface preparation, cleaning, mixing, and storage. However, these activities do not comprise surface coating if they are not directly related to the application of the coating. Coating application with handheld, non-refillable aerosol containers, touch-up markers, marking pens, or the application of paper film or plastic film which may be pre-coated with an adhesive by the manufacturer are not coating operations for the purposes of this subpart.

(2) The general use coating subcategory includes all surface coating operations that are not automotive lamp coating operations, thermoplastic olefin (TPO) coating operations, or assembled on-road vehicle coating operations.

(3) The automotive lamp coating subcategory includes the surface coating of plastic components of the body of an exterior automotive lamp including, but not limited to, headlamps, tail lamps, turn signals, and marker (clearance) lamps; typical coatings used are reflective argent coatings and clear topcoats. This subcategory does not include the coating of interior automotive lamps, such as dome lamps and instrument panel lamps.

(4) The TPO coating subcategory includes the surface coating of TPO substrates; typical coatings used are adhesion promoters, color coatings, clear coatings and topcoats. The coating of TPO substrates on fully assembled on-road vehicles is not included in the TPO coating subcategory.

(5) The assembled on-road vehicle coating subcategory includes surface coating of fully assembled motor vehicles and trailers intended for on-road use, including, but not limited to: automobiles, light-duty trucks, heavy duty trucks, and busses that have been repaired after a collision or otherwise repainted; fleet delivery trucks; and motor homes and other recreational vehicles (including camping trailers and fifth wheels). This subcategory also includes the incidental coating of parts, such as radiator grilles, that are removed from the fully assembled on-road vehicle to facilitate concurrent coating of all parts associated with the vehicle. The assembled on-road vehicle coating subcategory does not include the surface coating of plastic parts prior to their attachment to an on-road vehicle on an original equipment manufacturer's (OEM) assembly line. The assembled on-road vehicle coating subcategory also does not include the use of adhesives, sealants, and caulks used in assembling on-road vehicles. Body fillers used to correct small surface defects and rubbing compounds used to remove surface scratches are not considered coatings subject to this subpart.

(b) You are subject to this subpart if you own or operate a new, reconstructed, or existing affected source, as defined in Sec. 63.4482, that uses 378 liters (100 gallons (gal)) per year, or more, of coatings that contain hazardous air pollutants (HAP) in the surface coating of plastic parts and products defined in paragraph (a) of this section; and that is a major source, is located at a major source, or is part of a major source of emissions of HAP. A major source of HAP emissions is any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit any single HAP at a rate of 9.07 megagrams (Mg) (10 tons) or more per year or any combination of HAP at a rate of 22.68 Mg (25 tons) or more per year. You do not need to include coatings that meet the definition of non-HAP coating contained in Sec. 63.4581 in determining whether you use 378 liters (100 gallons) per year, or more, of coatings in the surface coating of plastic parts and products.

(c) This subpart does not apply to surface coating or a coating operation that meets any of the criteria of paragraphs (c)(1) through (16) of this section.

(1) A coating operation conducted at a facility where the facility uses only coatings, thinners and other additives, and cleaning materials that contain no organic HAP, as determined according to Sec. 63.3941(a).

(2) Surface coating operations that occur at research or laboratory facilities, or is part of janitorial, building, and facility maintenance operations, or that occur at hobby shops that are operated for noncommercial purposes.

(3) The surface coating of plastic parts and products performed on-site at installations owned or operated by the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State) or the National Aeronautics and Space Administration, or the surface coating of military munitions manufactured by or for the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State).

(4) Surface coating where plastic is extruded onto plastic parts or products to form a coating.

(5) Surface coating of magnet wire.

(6) In-mold coating operations or gel coating operations in the manufacture of reinforced plastic composite parts that meet the applicability criteria for reinforced plastics composites production (subpart WWWW of this part).

(7) Surface coating of plastic components of wood furniture that meet the applicability criteria for wood furniture manufacturing (subpart JJ of this part).

(8) Surface coating of plastic components of large appliances that meet the applicability criteria for large appliance surface coating (subpart NNNN of this part).

(9) Surface coating of plastic components of metal furniture that meet the applicability criteria for metal furniture surface coating (subpart RRRR of this part).

(10) Surface coating of plastic components of wood building products that meet the applicability criteria for wood building products surface coating (subpart QQQQ of this part).

(11) Surface coating of plastic components of aerospace vehicles that meet the applicability criteria for aerospace manufacturing and rework (40 CFR part 63, subpart GG).

(12) Surface coating of plastic parts intended for use in an aerospace vehicle or component using specialty coatings as defined in appendix A to subpart GG of this part.

(13) Surface coating of plastic components of ships that meet the applicability criteria for shipbuilding and ship repair (subpart II of this part).

(14) Surface coating of plastic using a web coating process that meets the applicability criteria for paper and other web coating (subpart JJJJ of this part).

(15) Surface coating of fiberglass boats or parts of fiberglass boats (including, but not limited to, the use of assembly adhesives) where the facility meets the applicability criteria for boat manufacturing (subpart VVVV of this part), except where the surface coating of the boat is a post-mold coating operation performed on personal watercraft or parts of personal watercraft. This subpart does apply to post-mold coating operations performed on personal watercraft and parts of personal watercraft.

(16) Surface coating of plastic components of automobiles and light-duty trucks that meet the applicability criteria in Sec. 63.3082(b) of the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (40 CFR part 63, subpart IIII) at a facility that meets the applicability criteria in Sec. 63.3081(b).

(d) If your facility meets the applicability criteria in Sec. 63.3081(b) of the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (40 CFR part 63, subpart IIII) and you perform surface coating of plastic parts or products that meets both the applicability criteria in Sec. 63.3082(c) and the applicability criteria of this subpart, then for the surface coating of any or all of your plastic parts or products that meets the applicability criteria in Sec. 63.3082(c), you may choose to comply with the requirements of subpart IIII of this part in lieu of complying with this subpart. Surface coating operations on plastic parts or products not intended for use in automobiles or light-duty trucks (for example, parts for motorcycles or lawn mowers) cannot be made part of your affected source under subpart IIII of this part.

(e) If you own or operate an affected source that meets the applicability criteria of this subpart and at the same facility you also perform surface coating that meets the applicability criteria of any other final surface coating NESHAP in this part, you may choose to comply as specified in paragraph (e)(1), (2), or (3) of this section.

(1) You may have each surface coating operation that meets the applicability criteria of a separate NESHAP comply with that NESHAP separately.

(2) You may comply with the emission limitation representing the predominant surface coating activity at your facility, as determined according to paragraphs (e)(2)(i) and (ii) of this section. However, you may not establish assembled on-road vehicle or automotive lamp coating operations as the predominant activity. You must not consider any surface coating activity that is subject to the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (40 CFR part 63, subpart IIII) in determining the predominant surface coating activity at your facility.

(i) If a surface coating operation accounts for 90 percent or more of the surface coating activity at your facility (that is, the predominant activity), then compliance with the emission limitations of the predominant activity for all surface coating operations constitutes compliance with these and other applicable surface coating NESHAP. In determining predominant activity, you must include coating activities that meet the applicability criteria of other surface coating NESHAP and constitute more than 1 percent of total coating activities at your facility. Coating activities that meet the applicability criteria of other surface coating NESHAP but comprise less than 1 percent of coating activities need not be included in the determination of predominant activity but must be included in the compliance calculation.

(ii) You must use kilogram (kg) (pound (lb)) of solids used as a measure of relative surface coating activity over a representative period of operation. You may estimate the relative mass of coating solids used from parameters other than coating consumption and mass solids content (e.g., design specifications for the parts or products coated and the number of items produced). The determination of predominant activity must accurately reflect current and projected coating operations and must be verifiable through appropriate documentation. The use of parameters other than coating consumption and mass solids content must be approved by the Administrator. You may use data for any reasonable time period of at least 1 year in determining the relative amount of coating activity, as long as they represent the way the source will continue to operate in the future and are approved by the Administrator. You must determine the predominant activity at your facility and submit the results of that determination with the initial notification required by Sec. 63.4510(b). You must also determine predominant activity annually and include the determination in the next semi-annual compliance report required by Sec. 63.4520(a).

(3) You may comply with a facility-specific emission limit calculated from the relative amount of coating activity that is subject to each emission limit. If you elect to comply using the facility-specific emission limit alternative, then compliance with the facility-specific emission limit and the emission limitations in this subpart for all surface coating operations constitutes compliance with this subpart and other applicable surface coating NESHAP. The procedures for calculating the facility-specific emission limit are specified in Sec. 63.4490. In calculating a facility-specific emission limit, you must include coating activities that meet the applicability criteria of other surface coating NESHAP and constitute more than 1 percent of total coating activities at your facility. You must not consider any surface coating activity that is subject to the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (40 CFR part 63, subpart IIII) in determining a facility-specific emission limit for your facility. Coating activities that meet the applicability

criteria of other surface coating NESHAP but comprise less than 1 percent of total coating activities need not be included in the calculation of the facility-specific emission limit but must be included in the compliance calculations.

Sec. 63.4482 What parts of my plant does this subpart cover?

(a) This subpart applies to each new, reconstructed, and existing affected source within each of the four subcategories listed in Sec. 63.4481(a).

(b) The affected source is the collection of all of the items listed in paragraphs (b)(1) through (4) of this section that are used for surface coating of plastic parts and products within each subcategory.

(1) All coating operations as defined in Sec. 63.4581;

(2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

(3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and

(4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

(d) An affected source is reconstructed if you meet the criteria as defined in Sec. 63.2.

(e) An affected source is existing if it is not new or reconstructed.

Sec. 63.4483 When do I have to comply with this subpart?

The date by which you must comply with this subpart is called the compliance date. The compliance date for each type of affected source is specified in paragraphs (a) through (c) of this section. The compliance date begins the initial compliance period during which you conduct the initial compliance demonstration described in Sec. Sec. 63.4540, 63.4550, and 63.4560.

(b) For an existing affected source, the compliance date is the date 3 years after April 19, 2004.

(d) You must meet the notification requirements in Sec. 63.4510 according to the dates specified in that section and in subpart A of this part. Some of the notifications must be submitted before the compliance dates described in paragraphs (a) through (c) of this section.

Sec. 63.4490 What emission limits must I meet?

(b) For an existing affected source, you must limit organic HAP emissions to the atmosphere from the affected source to the applicable limit specified in paragraphs (b)(1) through (4) of this section, except as specified in paragraph (c) of this section, determined according to the requirements in Sec. 63.4541, Sec. 63.4551, or Sec. 63.4561.

(1) For each existing general use coating affected source, limit organic HAP emissions to no more than 0.16 kg (0.16 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period.

Sec. 63.4491 What are my options for meeting the emission limits?

You must include all coatings (as defined in Sec. 63.4581), thinners and/or other additives, and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in Sec. 63.4490. To make this determination, you must use at least one of the three compliance options listed in paragraphs (a) through (c) of this section. You may apply any of the compliance options to an individual coating operation, or to multiple coating operations as a group, or to the entire affected source. You may use different compliance options for different coating operations, or at different times on the same coating operation. You may employ different compliance options when different coatings are applied to the same part, or when the same coating is applied to different parts. However, you may not use different compliance options at the same time on the same coating operation. If you switch between compliance options for any coating operation or group of coating operations, you must document this switch as required by Sec. 63.4530(c), and you must report it in the next semiannual compliance report required in Sec. 63.4520.

(a) Compliant material option. Demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit in Sec. 63.4490, and that each thinner and/or other additive, and cleaning material used contains no organic HAP. You must meet all the requirements of Sec. Sec. 63.4540, 63.4541, and 63.4542 to demonstrate compliance with the applicable emission limit using this option.

(b) Emission rate without add-on controls option. Demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit in Sec. 63.4490, calculated as a rolling 12-month emission rate and determined on a monthly basis. You must meet all the requirements of Sec. Sec. 63.4550, 63.4551, and 63.4552 to demonstrate compliance with the emission limit using this option.

Sec. 63.4492 What operating limits must I meet?

(a) For any coating operation(s) on which you use the compliant material option or the emission rate without add-on controls option, you are not required to meet any operating limits.

Sec. 63.4493 What work practice standards must I meet?

(a) For any coating operation(s) on which you use the compliant material option or the emission rate without add-on controls option, you are not required to meet any work practice standards.

Sec. 63.4500 What are my general requirements for complying with this subpart?

(a) You must be in compliance with the emission limitations in this subpart as specified in paragraphs (a)(1) and (2) of this section.

(1) Any coating operation(s) for which you use the compliant material option or the emission rate without add-on controls option, as specified in Sec. 63.4491(a) and (b), must be in compliance with the applicable emission limit in Sec. 63.4490 at all times.

(b) You must always operate and maintain your affected source, including all air pollution control and monitoring equipment you use for purposes of complying with this subpart, according to the provisions in Sec. 63.6(e)(1)(i).

Sec. 63.4501 What parts of the General Provisions apply to me?

Table 2 to this subpart shows which parts of the General Provisions in Sec. Sec. 63.1 through 63.15 apply to you.

Sec. 63.4510 What notifications must I submit?

(a) General. You must submit the notifications in Sec. Sec. 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to you by the dates specified in those sections, except as provided in paragraphs (b) and (c) of this section.

(b) Initial notification. You must submit the initial notification required by Sec. 63.9(b) for a new or reconstructed affected source no later than 120 days after initial startup or 120 days after April 19, 2004, whichever is later. For an existing affected source, you must submit the initial notification no later than 1 year after April 19, 2004. If you are using compliance with the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (subpart IIII of this part) as provided for under Sec. 63.4481(d) to constitute compliance with this subpart for any or all of your plastic parts coating operations, then you must include a statement to this effect in your initial notification, and no other notifications are required under this subpart in regard to those plastic parts coating operations. If you are complying with another NESHAP that constitutes the predominant activity at your facility under Sec. 63.4481(e)(2) to constitute compliance with this subpart for your plastic parts coating operations, then you must include a statement to this effect in your initial notification, and no other notifications are required under this subpart in regard to those plastic parts coating operations.

(c) Notification of compliance status. You must submit the notification of compliance status required by Sec. 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in Sec. 63.4540, Sec. 63.4550, or Sec. 63.4560 that applies to your affected source. The notification of compliance status must contain the information specified in paragraphs (c)(1) through (11) of this section and in Sec. 63.9(h).

(1) Company name and address.

(2) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

(3) Date of the report and beginning and ending dates of the reporting period. The reporting period is the initial compliance period described in Sec. 63.4540, Sec. 63.4550, or Sec. 63.4560 that applies to your affected source.

(4) Identification of the compliance option or options specified in Sec. 63.4491 that you used on each coating operation in the affected source during the initial compliance period.

(5) Statement of whether or not the affected source achieved the emission limitations for the initial compliance period.

(6) If you had a deviation, include the information in paragraphs (c)(6)(i) and (ii) of this section.

(i) A description and statement of the cause of the deviation.

(ii) If you failed to meet the applicable emission limit in Sec. 63.4490, include all the calculations you used to determine the kg (lb) organic HAP emitted per kg (lb) coating solids used. You do not need to submit information provided by the materials' suppliers or manufacturers, or test reports.

(7) For each of the data items listed in paragraphs (c)(7)(i) through (iv) of this section that is required by the compliance option(s) you used to demonstrate compliance with the emission limit, include an example of how you determined the value, including calculations and supporting data. Supporting data may include a copy of the information provided by the supplier or manufacturer of the example coating or material, or a summary of the results of testing conducted according to Sec. 63.4541(a), (b), or (c). You do not need to submit copies of any test reports.

(i) Mass fraction of organic HAP for one coating, for one thinner and/or other additive, and for one cleaning material.

(ii) Mass fraction of coating solids for one coating.

(iii) Density for one coating, one thinner and/or other additive, and one cleaning material, except that if you use the compliant material option, only the example coating density is required.

(iv) The amount of waste materials and the mass of organic HAP contained in the waste materials for which you are claiming an allowance in Equation 1 of Sec. 63.4551.

(8) The calculation of kg (lb) organic HAP emitted per kg (lb) coating solids used for the compliance option(s) you used, as specified in paragraphs (c)(8)(i) through (iii) of this section.

(i) For the compliant material option, provide an example calculation of the organic HAP content for one coating, using Equation 1 of Sec. 63.4541.

(ii) For the emission rate without add-on controls option, provide the calculation of the total mass of organic HAP emissions for each month; the calculation of the total mass of coating solids used each month; and the calculation of the 12-month organic HAP emission rate using Equations 1 and 1A through 1C, 2, and 3, respectively, of Sec. 63.4551.

Sec. 63.4520 What reports must I submit?

(a) Semiannual compliance reports. You must submit semiannual compliance reports for each affected source according to the requirements of paragraphs (a)(1) through (7) of this section. The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in paragraph (a)(2) of this section.

(1) Dates. Unless the Administrator has approved or agreed to a different schedule for submission of reports under Sec. 63.10(a), you must prepare and submit each semiannual compliance report according to the dates specified in paragraphs (a)(1)(i) through (iv) of this section. Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

(i) The first semiannual compliance report must cover the first semiannual reporting period which begins the day after the end of the initial compliance period described in Sec. 63.4540, Sec. 63.4550, or Sec. 63.4560 that applies to your affected source and ends on June 30 or December 31, whichever date is the first date following the end of the initial compliance period.

(ii) Each subsequent semiannual compliance report must cover the subsequent semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

(iii) Each semiannual compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

(iv) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR part 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the date specified in paragraph (a)(1)(iii) of this section.

(2) Inclusion with title V report. Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 40 CFR part 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a semiannual compliance report pursuant to this section along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the semiannual compliance report includes all required information concerning deviations from any emission limitation in this subpart, its submission will be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a semiannual compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.

(3) General requirements. The semiannual compliance report must contain the information specified in paragraphs (a)(3)(i) through (vii) of this section, and the information specified in paragraphs (a)(4) through (7) and (c)(1) of this section that is applicable to your affected source.

(i) Company name and address.

(ii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

(iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

(iv) Identification of the compliance option or options specified in Sec. 63.4491 that you used on each coating operation during the reporting period. If you switched between compliance options during the reporting period, you must report the beginning and ending dates for each option you used.

(v) If you used the emission rate without add-on controls or the emission rate with add-on controls compliance option (Sec. 63.4491(b) or (c)), the calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period.

(vi) If you used the predominant activity alternative (Sec. 63.4490(c)(1)), include the annual determination of predominant activity if it was not included in the previous semi-annual compliance report.

(vii) If you used the facility-specific emission limit alternative (Sec. 63.4490(c)(2)), include the calculation of the facility-specific emission limit for each 12-month compliance period during the 6-month reporting period.

(4) No deviations. If there were no deviations from the emission limitations in Sec. Sec. 63.4490, 63.4492, and 63.4493 that apply to you, the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period. If you used the emission rate with add-on controls option and there were no periods during which the continuous parameter monitoring systems (CPMS) were out-of-control as specified in Sec. 63.8(c)(7), the semiannual compliance report must include a statement that there were no periods during which the CPMS were out-of-control during the reporting period.

(5) Deviations: Compliant material option. If you used the compliant material option and there was a deviation from the applicable organic HAP content requirements in Sec. 63.4490, the semiannual compliance report must contain the information in paragraphs (a)(5)(i) through (iv) of this section.

(i) Identification of each coating used that deviated from the applicable emission limit, and each thinner and/or other additive, and cleaning material used that contained organic HAP, and the dates and time periods each was used.

(ii) The calculation of the organic HAP content (using Equation 1 of Sec. 63.4541) for each coating identified in paragraph (a)(5)(i) of this section. You do not need to submit background data supporting this calculation (e.g., information provided by coating suppliers or manufacturers, or test reports).

(iii) The determination of mass fraction of organic HAP for each thinner and/or other additive, and cleaning material identified in paragraph (a)(5)(i) of this section. You do not need to submit background data supporting this calculation (e.g., information provided by material suppliers or manufacturers, or test reports).

(iv) A statement of the cause of each deviation.

(6) Deviations: Emission rate without add-on controls option. If you used the emission rate without add-on controls option and there was a deviation from the applicable emission limit in Sec. 63.4490, the semiannual compliance report must contain the information in paragraphs (a)(6)(i) through (iii) of this section.

(i) The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit in Sec. 63.4490.

(ii) The calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred. You must submit the calculations for Equations 1, 1A through 1C, 2, and 3 of Sec. 63.4551; and if applicable, the calculation used to determine mass of organic HAP in waste materials according to Sec. 63.4551(e)(4). You do not need to submit background data supporting these calculations (e.g., information provided by materials suppliers or manufacturers, or test reports).

(iii) A statement of the cause of each deviation.

Sec. 63.4530 What records must I keep?

You must collect and keep records of the data and information specified in this section. Failure to collect and keep these records is a deviation from the applicable standard.

(a) A copy of each notification and report that you submitted to comply with this subpart, and the documentation supporting each notification and report. If you are using the predominant activity alternative under Sec. 63.4490(c), you must keep records of the data and calculations used to determine the predominant activity. If you are using the facility-specific emission limit alternative under Sec. 63.4490(c), you must keep records of the data used to calculate the facility-specific emission limit for the initial compliance demonstration. You must also keep records of any data used in each annual predominant activity determination and in the calculation of the facility-specific emission limit for each 12-month compliance period included in the semi-annual compliance reports.

(b) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the mass fraction of coating solids for each coating. If you conducted testing to determine mass fraction of organic HAP, density, or mass fraction of coating solids, you must keep a copy of the complete test report. If you use information provided to you by the manufacturer or supplier of the material that was based on testing, you must keep the summary sheet of results provided to you by the manufacturer or supplier. You are not required to obtain the test report or other supporting documentation from the manufacturer or supplier.

(c) For each compliance period, the records specified in paragraphs (c)(1) through (4) of this section.

(1) A record of the coating operations on which you used each compliance option and the time periods (beginning and ending dates and times) for each option you used.

(2) For the compliant material option, a record of the calculation of the organic HAP content for each coating, using Equation 1 of Sec. 63.4541.

(3) For the emission rate without add-on controls option, a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 1, 1A through 1C, and 2 of Sec. 63.4551 and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to Sec. 63.4551(e)(4); the calculation of the total mass of coating solids used each month using Equation 2 of Sec. 63.4551; and the calculation of each 12-month organic HAP emission rate using Equation 3 of Sec. 63.4551.

(d) A record of the name and mass of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If you are using the compliant material option for all coatings at the source, you may maintain purchase records for each material used rather than a record of the mass used.

(e) A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period.

(f) A record of the mass fraction of coating solids for each coating used during each compliance period.

(g) If you use an allowance in Equation 1 of Sec. 63.4551 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to Sec. 63.4551(e)(4), you must keep records of the information specified in paragraphs (g)(1) through (3) of this section.

(1) The name and address of each TSDF to which you sent waste materials for which you use an allowance in Equation 1 of Sec. 63.4551, a statement of which subparts under 40 CFR parts 262, 264, 265, and 266 apply to the facility; and the date of each shipment.

(2) Identification of the coating operations producing waste materials included in each shipment and the month or months in which you used the allowance for these materials in Equation 1 of Sec. 63.4551.

(3) The methodology used in accordance with Sec. 63.4551(e)(4) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each month; and the methodology to determine the mass of organic HAP contained in these waste materials. This must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment.

Sec. 63.4531 In what form and for how long must I keep my records?

(a) Your records must be in a form suitable and readily available for expeditious review, according to Sec. 63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database.

(b) As specified in Sec. 63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) You must keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to Sec. 63.10(b)(1). You may keep the records off-site for the remaining 3 years.

Sec. 63.4540 By what date must I conduct the initial compliance demonstration?

You must complete the initial compliance demonstration for the initial compliance period according to the requirements in Sec. 63.4541. The initial compliance period begins on the applicable compliance date specified in Sec. 63.4483 and ends on the last day of the 12th month following the compliance date. If the compliance date occurs on any day other than the first day of a month, then the initial compliance period extends through that month plus the next 12 months. The initial compliance demonstration includes the calculations according to Sec. 63.4541 and supporting documentation showing that during the initial compliance period, you used no coating with an organic HAP content that exceeded the applicable emission limit in Sec. 63.4490, and that you used no thinners and/or other additives, or cleaning materials that contained organic HAP as determined according to Sec. 63.4541(a).

Sec. 63.4541 How do I demonstrate initial compliance with the emission limitations?

You may use the compliant material option for any individual coating operation, for any group of coating operations in the affected source, or for all the coating operations in the affected source. You must use either the emission rate without add-on controls option or the emission rate with add-on controls option for any coating operation in the affected source for which you do not use this option. To demonstrate initial compliance using the compliant material option, the coating operation or group of coating operations must use no coating with an organic HAP content that exceeds the applicable emission limits in Sec. 63.4490 and must use no thinner and/or other additive, or cleaning material that contains organic HAP as determined according to this section. Any coating operation for which you use the compliant material option is not required to meet the operating limits or work practice standards required in Sec. Sec. 63.4492 and 63.4493, respectively. You must conduct a separate initial compliance demonstration for each general use coating, TPO coating, automotive lamp coating, and assembled on-road vehicle coating affected source unless you are demonstrating compliance with a predominant activity or facility-specific emission limit as provided in Sec. 63.4490(c). If you are demonstrating compliance with a predominant activity or facility-specific emission limit as provided in Sec. 63.4490(c), you must demonstrate that all coating operations included in the predominant activity determination or calculation of the facility-specific emission limit comply with that limit. You must meet all the requirements of this section. Use the procedures in this section on each coating, thinner and/or other additive, and cleaning material in the condition it is in when it is received from its manufacturer or supplier and prior to any alteration. You do not need to redetermine the organic HAP content of coatings, thinners and/or other additives, and cleaning materials that are reclaimed on-site (or reclaimed off-site if you have documentation showing that you received back the exact same materials that were sent off-site) and reused in the coating operation for which you use the compliant material option, provided these materials in their condition as received were demonstrated to comply with the compliant material option.

(a) Determine the mass fraction of organic HAP for each material used. You must determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during the compliance period by using one of the options in paragraphs (a)(1) through (5) of this section.

(1) Method 311 (appendix A to 40 CFR part 63). You may use Method 311 for determining the mass fraction of organic HAP. Use the procedures specified in paragraphs (a)(1)(i) and (ii) of this section when performing a Method 311 test.

(i) Count each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, you do not have to count it. Express the mass fraction of each organic HAP you count as a value truncated to four places after the decimal point (e.g., 0.3791).

(ii) Calculate the total mass fraction of organic HAP in the test material by adding up the individual organic HAP mass fractions and truncating the result to three places after the decimal point (e.g., 0.763).

(2) Method 24 (appendix A to 40 CFR part 60). For coatings, you may use Method 24 to determine the mass fraction of nonaqueous volatile matter and use that value as a substitute for mass fraction of organic HAP. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, you may use the alternative method contained in appendix A to this subpart, rather than Method 24. You may use the volatile fraction that is emitted, as measured by the alternative method in appendix A to this subpart, as a substitute for the mass fraction of organic HAP.

(3) Alternative method. You may use an alternative test method for determining the mass fraction of organic HAP once the Administrator has approved it. You must follow the procedure in Sec. 63.7(f) to submit an alternative test method for approval.

(4) Information from the supplier or manufacturer of the material. You may rely on information other than that generated by the test methods specified in paragraphs (a)(1) through (3) of this section, such as manufacturer's formulation data, if it represents each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, you do not have to count it. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, you may rely on manufacturer's data that expressly states the organic HAP or volatile matter mass fraction emitted. If there is a disagreement between such information and results of a test conducted according to paragraphs (a)(1) through (3) of this section, then the test method results will take precedence unless, after consultation you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

(5) Solvent blends. Solvent blends may be listed as single components for some materials in data provided by manufacturers or suppliers. Solvent blends may contain organic HAP which must be counted toward the total organic HAP mass fraction of the materials. When test data and manufacturer's data for solvent blends are not available, you may use the default values for the mass fraction of organic HAP in these solvent blends listed in Table 3 or 4 to this subpart. If you use the tables, you must use the values in Table 3 for all solvent blends that match Table 3 entries according to the instructions for Table 3, and you may use Table 4 only if the solvent blends in the materials you use do not match any of the solvent blends in Table 3 and you know only whether the blend is aliphatic or aromatic. However, if the results of a Method 311 (appendix A to 40 CFR part 63) test indicate higher values than those listed on Table 3 or 4 to this subpart, the Method 311 results will take precedence unless, after consultation you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

(b) Determine the mass fraction of coating solids for each coating. You must determine the mass fraction of coating solids (kg (lb) of coating solids per kg (lb) of coating) for each coating used during the compliance period by a test, by information provided by the supplier or the manufacturer of the material, or by calculation, as specified in paragraphs (b)(1) through (3) of this section.

(1) Method 24 (appendix A to 40 CFR part 60). Use Method 24 for determining the mass fraction of coating solids. For reactive adhesives in which some of the liquid fraction reacts to form solids, you may use the alternative method contained in appendix A to this subpart, rather than Method 24, to determine the mass fraction of coating solids.

(2) Alternative method. You may use an alternative test method for determining the solids content of each coating once the Administrator has approved it. You must follow the procedure in Sec. 63.7(f) to submit an alternative test method for approval.

(3) Information from the supplier or manufacturer of the material. You may obtain the mass fraction of coating solids for each coating from the supplier or manufacturer. If there is disagreement between such information and the test method results, then the test method results will take precedence unless, after consultation you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

(c) Calculate the organic HAP content of each coating. Calculate the organic HAP content, kg (lb) organic HAP emitted per kg (lb) coating solids used, of each coating used during the compliance period using Equation 1 of this section:

$$H_c = \frac{W_c}{S_c} \quad (\text{Eq. 1})$$

Where:

H_c = Organic HAP content of the coating, kg (lb) of organic HAP emitted per kg (lb) coating solids used.

W_c = Mass fraction of organic HAP in the coating, kg organic HAP per kg coating, determined according to paragraph (a) of this section.

S_c = Mass fraction of coating solids, kg coating solids per kg coating, determined according to paragraph (b) of this section.

(d) Compliance demonstration. The calculated organic HAP content for each coating used during the initial compliance period must be less than or equal to the applicable emission limit in Sec. 63.4490; and each thinner and/or other additive, and cleaning material used during the initial compliance period must contain no organic HAP, determined according to paragraph (a) of this section. You must keep all records required by Sec. Sec. 63.4530 and 63.4531. As part of the notification of compliance status required in Sec. 63.4510, you must identify the coating operation(s) for which you used the compliant material option and submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the initial compliance period because you used no coatings for which the organic HAP content exceeded the applicable emission limit in Sec. 63.4490, and you used no thinners and/or other additives, or cleaning materials that contained organic HAP, determined according to the procedures in paragraph (a) of this section.

Sec. 63.4542 How do I demonstrate continuous compliance with the emission limitations?

(a) For each compliance period to demonstrate continuous compliance, you must use no coating for which the organic HAP content (determined using Equation 1 of Sec. 63.4541) exceeds the applicable emission limit in Sec. 63.4490, and use no thinner and/or other additive, or cleaning material that contains organic HAP, determined according to Sec. 63.4541(a). A compliance period consists of 12 months. Each month, after the end of the initial compliance period described in Sec. 63.4540, is the end of a compliance period consisting of that month and the preceding 11 months. If you are complying with a facility-specific emission limit under Sec. 63.4490(c), you must also perform the calculation using Equation 1 in Sec. 63.4490(c)(2) on a monthly basis using the data from the previous 12 months of operation.

(b) If you choose to comply with the emission limitations by using the compliant material option, the use of any coating, thinner and/or other additive, or cleaning material that does not meet the criteria specified in paragraph (a) of this section is a deviation from the emission limitations that must be reported as specified in Sec. Sec. 63.4510(c)(6) and 63.4520(a)(5).

(c) As part of each semiannual compliance report required by Sec. 63.4520, you must identify the coating operation(s) for which you used the compliant material option. If there were no deviations from the applicable emission limit in Sec. 63.4490, submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because you used no coatings for which the organic HAP content exceeded the applicable emission limit in Sec. 63.4490, and you used no thinner and/or other additive, or cleaning material that contained organic HAP, determined according to Sec. 63.4541(a).

(d) You must maintain records as specified in Sec. Sec. 63.4530 and 63.4531.

Sec. 63.4550 By what date must I conduct the initial compliance demonstration?

You must complete the initial compliance demonstration for the initial compliance period according to the requirements of Sec. 63.4551. The initial compliance period begins on the applicable compliance date specified in Sec. 63.4483 and ends on the last day of the 12th month following the compliance date. If the compliance date occurs on any day other than the first day of a month, then the initial compliance period extends through the end of that month plus the next 12 months. You must determine the mass of organic HAP emissions and mass of coating solids used each month and then calculate an organic HAP emission rate at the end of the initial compliance period. The initial compliance demonstration includes the calculations according to Sec. 63.4551 and supporting documentation showing that during the initial compliance period the organic HAP emission rate was equal to or less than the applicable emission limit in Sec. 63.4490

Sec. 63.4551 How do I demonstrate initial compliance with the emission limitations?

You may use the emission rate without add-on controls option for any individual coating operation, for any group of coating operations in the affected source, or for all the coating operations in the affected source. You must use either the compliant material option or the emission rate with add-on controls option for any coating operation in the affected source for which you do not use this option. To demonstrate initial compliance using the emission rate without add-on controls option, the coating operation or group of coating operations must meet the applicable emission limit in Sec. 63.4490, but is not required to meet the operating limits or work practice standards in Sec. Sec. 63.4492 and 63.4493, respectively. You must conduct a separate initial compliance demonstration for each general use, TPO, automotive lamp, and assembled on-road vehicle coating operation unless you are demonstrating compliance with a predominant activity or facility-specific emission limit as provided in Sec. 63.4490(c). If you are demonstrating compliance with a predominant activity or facility-specific emission limit as provided in Sec. 63.4490(c), you must demonstrate that all coating operations included in the predominant activity determination or calculation of the facility-specific emission limit comply with that limit. You must meet all the requirements of this section. When calculating the organic HAP emission rate according to this section, do not include any coatings, thinners and/or other additives, or cleaning materials used on coating operations for which you use the compliant material option or the emission rate with add-on controls option. You do not need to redetermine the mass of organic HAP in coatings, thinners and/or other additives, or cleaning materials that have been reclaimed on-site (or reclaimed off-site if you have documentation showing that you received back the exact same materials that were sent off-site) and reused in the coating operation for which you use the emission rate without add-on controls option. If you use coatings, thinners and/or other additives, or cleaning materials that have been reclaimed on-site, the amount of each used in a month may be reduced by the amount of each that is reclaimed. That is, the amount used may be calculated as the amount consumed to account for materials that are reclaimed.

(a) Determine the mass fraction of organic HAP for each material. Determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each month according to the requirements in Sec. 63.4541(a).

(b) Determine the mass fraction of coating solids. Determine the mass fraction of coating solids (kg (lb) of coating solids per kg (lb) of coating) for each coating used during each month according to the requirements in Sec. 63.4541(b).

(c) Determine the density of each material. Determine the density of each liquid coating, thinner and/or other additive, and cleaning material used during each month from test results using ASTM Method D1475-98, "Standard Test Method for Density of Liquid Coatings, Inks, and Related Products" (incorporated by reference, see Sec. 63.14), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475-98 and other such information sources, the test results will take precedence unless, after consultation you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct. If you purchase materials or monitor consumption by weight instead

of volume, you do not need to determine material density. Instead, you may use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, 1C, and 2 of this section.

(d) Determine the volume of each material used. Determine the volume (liters) of each coating, thinner and/or other additive, and cleaning material used during each month by measurement or usage records. If you purchase materials or monitor consumption by weight instead of volume, you do not need to determine the volume of each material used. Instead, you may use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, 1C, and 2 of this section.

(e) Calculate the mass of organic HAP emissions. The mass of organic HAP emissions is the combined mass of organic HAP contained in all coatings, thinners and/or other additives, and cleaning materials used during each month minus the organic HAP in certain waste materials. Calculate the mass of organic HAP emissions using Equation 1 of this section.

$$H_e = A + B + C - R_w \quad (\text{Eq. 1})$$

Where:

H_e = Total mass of organic HAP emissions during the month, kg.

A = Total mass of organic HAP in the coatings used during the month, kg, as calculated in Equation 1A of this section.

B = Total mass of organic HAP in the thinners and/or other additives used during the month, kg, as calculated in Equation 1B of this section.

C = Total mass of organic HAP in the cleaning materials used during the month, kg, as calculated in Equation 1C of this section.

R_w = Total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSDF for treatment or disposal during the month, kg, determined according to paragraph (e)(4) of this section. (You may assign a value of zero to R_w if you do not wish to use this allowance.)

(1) Calculate the kg organic HAP in the coatings used during the month using Equation 1A of this section:

$$A = \sum_{i=1}^m (\text{Vol}_{c,i}) (D_{c,i}) (W_{c,i}) \quad (\text{Eq. 1A})$$

Where:

A = Total mass of organic HAP in the coatings used during the month, kg.

$\text{Vol}_{c,i}$ = Total volume of coating, i, used during the month, liters.

$D_{c,i}$ = Density of coating, i, kg coating per liter coating.

$W_{c,i}$ = Mass fraction of organic HAP in coating, i, kg organic HAP per kg coating. For reactive adhesives as defined in Sec. 63.4581, use the mass fraction of organic HAP that is emitted as determined using the method in appendix A to this subpart.

m = Number of different coatings used during the month.

(2) Calculate the kg of organic HAP in the thinners and/or other additives used during the month using Equation 1B of this section:

$$B = \sum_{j=1}^n (\text{Vol}_{t,j}) (D_{t,j}) (W_{t,j}) \quad (\text{Eq. 1B})$$

Where:

B = Total mass of organic HAP in the thinners and/or other additives used during the month, kg.

$\text{Vol}_{t,j}$ = Total volume of thinner and/or other additive, j, used during the month, liters.

$D_{t,j}$ = Density of thinner and/or other additive, j, kg per liter.

$W_{t,j}$ = Mass fraction of organic HAP in thinner and/or other additive, j, kg organic HAP per kg thinner and/or other additive. For reactive adhesives as defined in Sec. 63.4581, use the mass fraction of organic HAP that is emitted as determined using the method in appendix A to this subpart.
 n = Number of different thinners and/or other additives used during the month.

(3) Calculate the kg organic HAP in the cleaning materials used during the month using Equation 1C of this section:

$$C = \sum_{k=1}^p (\text{Vol}_{s,k}) (D_{s,k}) (W_{s,k}) \quad (\text{Eq. 1C})$$

Where:

C = Total mass of organic HAP in the cleaning materials used during the month, kg.

$\text{Vol}_{s,k}$ = Total volume of cleaning material, k, used during the month, liters.

$D_{s,k}$ = Density of cleaning material, k, kg per liter.

$W_{s,k}$ = Mass fraction of organic HAP in cleaning material, k, kg organic HAP per kg material.

p = Number of different cleaning materials used during the month.

(4) If you choose to account for the mass of organic HAP contained in waste materials sent or designated for shipment to a hazardous waste TSDF in Equation 1 of this section, then you must determine the mass according to paragraphs (e)(4)(i) through (iv) of this section.

(i) You may only include waste materials in the determination that are generated by coating operations in the affected source for which you use Equation 1 of this section and that will be treated or disposed of by a facility that is regulated as a TSDF under 40 CFR part 262, 264, 265, or 266. The TSDF may be either off-site or on-site. You may not include organic HAP contained in wastewater.

(ii) You must determine either the amount of the waste materials sent to a TSDF during the month or the amount collected and stored during the month and designated for future transport to a TSDF. Do not include in your determination any waste materials sent to a TSDF during a month if you have already included them in the amount collected and stored during that month or a previous month.

(iii) Determine the total mass of organic HAP contained in the waste materials specified in paragraph (e)(4)(ii) of this section.

(iv) You must document the methodology you use to determine the amount of waste materials and the total mass of organic HAP they contain, as required in Sec. 63.4530(g). If waste manifests include this information, they may be used as part of the documentation of the amount of waste materials and mass of organic HAP contained in them.

(f) Calculate the total mass of coating solids used. Determine the total mass of coating solids used, kg, which is the combined mass of coating solids for all the coatings used during each month, using Equation 2 of this section:

$$M_{st} = \sum_{i=1}^m (\text{Vol}_{c,i}) (D_{c,i}) (M_{s,i}) \quad (\text{Eq. 2})$$

Where:

M_{st} = Total mass of coating solids used during the month, kg.

$\text{Vol}_{c,i}$ = Total volume of coating, i, used during the month, liters.

$D_{c,i}$ = Density of coating, i, kgs per liter coating, determined according to Sec. 63.4551(c).

$M_{s,i}$ = Mass fraction of coating solids for coating, i, kgs solids per kg coating, determined according to Sec. 63.4541(b).

m = Number of coatings used during the month.

(g) Calculate the organic HAP emission rate. Calculate the organic HAP emission rate for the compliance period, kg (lb) organic HAP emitted per kg (lb) coating solids used, using Equation 3 of this section:

$$H_{yr} = \frac{\sum_{y=1}^n H_e}{\sum_{y=1}^n M_{st}} \quad (\text{Eq. 3})$$

Where:

H_{yr} = Average organic HAP emission rate for the compliance period, kg organic HAP emitted per kg coating solids used.

H_e = Total mass of organic HAP emissions from all materials used during month, y, kg, as calculated by Equation 1 of this section.

M_{st} = Total mass of coating solids used during month, y, kg, as calculated by Equation 2 of this section.

y = Identifier for months.

n = Number of full or partial months in the compliance period (for the initial compliance period, n equals 12 if the compliance date falls on the first day of a month; otherwise n equals 13; for all following compliance periods, n equals 12).

(h) Compliance demonstration. The organic HAP emission rate for the initial compliance period calculated using Equation 3 of this section must be less than or equal to the applicable emission limit for each subcategory in Sec. 63.4490 or the predominant activity or facility-specific emission limit allowed in Sec. 63.4490(c). You must keep all records as required by Sec. Sec. 63.4530 and 63.4531. As part of the notification of compliance status required by Sec. 63.4510, you must identify the coating operation(s) for which you used the emission rate without add-on controls option and submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the initial compliance period because the organic HAP emission rate was less than or equal to the applicable emission limit in Sec. 63.4490, determined according to the procedures in this section.

Sec. 63.4552 How do I demonstrate continuous compliance with the emission limitations?

(a) To demonstrate continuous compliance, the organic HAP emission rate for each compliance period, determined according to Sec. 63.4551(a) through (g), must be less than or equal to the applicable emission limit in Sec. 63.4490. A compliance period consists of 12 months. Each month after the end of the initial compliance period described in Sec. 63.4550 is the end of a compliance period consisting of that month and the preceding 11 months. You must perform the calculations in Sec. 63.4551(a) through (g) on a monthly basis using data from the previous 12 months of operation. If you are complying with a facility-specific emission limit under Sec. 63.4490(c), you must also perform the calculation using Equation 1 in Sec. 63.4490(c)(2) on a monthly basis using the data from the previous 12 months of operation.

(b) If the organic HAP emission rate for any 12-month compliance period exceeded the applicable emission limit in Sec. 63.4490, this is a deviation from the emission limitation for that compliance period and must be reported as specified in Sec. Sec. 63.4510(c)(6) and 63.4520(a)(6).

(c) As part of each semiannual compliance report required by Sec. 63.4520, you must identify the coating operation(s) for which you used the emission rate without add-on controls option. If there were no deviations from the emission limitations, you must submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the applicable emission limit in Sec. 63.4490, determined according to Sec. 63.4551(a) through (g).

(d) You must maintain records as specified in Sec. Sec. 63.4530 and 63.4531.

Sec. 63.4560 By what date must I conduct performance tests and other initial compliance demonstrations?

(b) Existing affected sources. For an existing affected source, you must meet the requirements of paragraphs (b)(1) through (3) of this section.

(2) You must develop and begin implementing the work practice plan required by Sec. 63.4493 no later than the compliance date specified in Sec. 63.4483.

(3) You must complete the initial compliance demonstration for the initial compliance period according to the requirements of Sec. 63.4561. The initial compliance period begins on the applicable compliance date specified in Sec. 63.4483 and ends on the last day of the 12th month following the compliance date. If the compliance date occurs on any day other than the first day of a month, then the initial compliance period extends through the end of that month plus the next 12 months. You must determine the mass of organic HAP emissions and mass of coatings solids used each month and then calculate an organic HAP emission rate at the end of the initial compliance period. The initial compliance demonstration includes the results of emission capture system and add-on control device performance tests conducted according to Sec. Sec. 63.4564, 63.4565, and 63.4566; results of liquid-liquid material balances conducted according to Sec. 63.4561(j); calculations according to Sec. 63.4561 and supporting documentation showing that during the initial compliance period the organic HAP emission rate was equal to or less than the applicable emission limit in Sec. 63.4490; the operating limits established during the performance tests and the results of the continuous parameter monitoring required by Sec. 63.4568; and documentation of whether you developed and implemented the work practice plan required by Sec. 63.4493.

Sec. 63.4561 How do I demonstrate initial compliance?

(a) You may use the emission rate with add-on controls option for any coating operation, for any group of coating operations in the affected source, or for all of the coating operations in the affected source. You may include both controlled and uncontrolled coating operations in a group for which you use this option. You must use either the compliant material option or the emission rate without add-on controls option for any coating operation in the affected source for which you do not use the emission rate with add-on controls option. To demonstrate initial compliance, the coating operation(s) for which you use the emission rate with add-on controls option must meet the applicable emission limitations in Sec. Sec. 63.4490, 63.4492, and 63.4493. You must conduct a separate initial compliance demonstration for each general use, TPO, automotive lamp, and assembled on-road vehicle coating operation, unless you are demonstrating compliance with a predominant activity or facility-specific emission limit as provided in Sec. 63.4490(c). If you are demonstrating compliance with a predominant activity or facility-specific emission limit as provided in Sec. 63.4490(c), you must demonstrate that all coating operations included in the predominant activity determination or calculation of the facility-specific emission limit comply with that limit. You must meet all the requirements of this section. When calculating the organic HAP emission rate according to this section, do not include any coatings, thinners and/or other additives, or cleaning materials used on coating operations for which you use the compliant material option or the emission rate without add-on controls option. You do not need to redetermine the mass of organic HAP in coatings, thinners and/or other additives, or cleaning materials that have been reclaimed onsite (or reclaimed off-site if you have documentation showing that you received back the exact same materials that were sent off-site) and reused in the coatings operation(s) for which you use the emission rate with add-on controls option. If you use coatings, thinners and/or other additives, or cleaning materials that have been reclaimed on-site, the amount of each used in a month may be reduced by the amount of each that is reclaimed. That is, the amount used may be calculated as the amount consumed to account for materials that are reclaimed.

(b) Compliance with operating limits. Except as provided in Sec. 63.4560(a)(4), and except for solvent recovery systems for which you conduct liquid-liquid material balances according to the requirements of paragraph (j) of this section, you must establish and demonstrate continuous compliance during the initial compliance period with the operating limits required by Sec. 63.4492, using the procedures specified in Sec. Sec. 63.4567 and 63.4568.

(c) Compliance with work practice requirements. You must develop, implement, and document your implementation of the work practice plan required by Sec. 63.4493 during the initial compliance period, as specified in Sec. 63.4530.

(d) Compliance with emission limits. You must follow the procedures in paragraphs (e) through (n) of this section to demonstrate compliance with the applicable emission limit in Sec. 63.4490 for each affected source in each subcategory.

(e) Determine the mass fraction of organic HAP, density, volume used, and mass fraction of coating solids. Follow the procedures specified in Sec. 63.4551(a) through (d) to determine the mass fraction of organic HAP, density, and volume of each coating, thinner and/or other additive, and cleaning material used during each month; and the mass fraction of coating solids for each coating used during each month.

(k) Calculate the total mass of coating solids used. Determine the total mass of coating solids used, kg, which is the combined mass of coating solids for all the coatings used during each month in the coating operation or group of coating operations for which you use the emission rate with add-on controls option, using Equation 2 of Sec. 63.4551.

(l) Calculate the mass of organic HAP emissions for each month. Determine the mass of organic HAP emissions, kg, during each month, using Equation 4 of this section:

$$H_{HAP} = H_e - \sum_{i=1}^q (H_{C,i}) - \sum_{j=1}^r (H_{CSR,j}) \quad (\text{Eq. 4})$$

Where:

H_{HAP} = Total mass of organic HAP emissions for the month, kg.

H_e = Total mass of organic HAP emissions before add-on controls from all the coatings, thinners and/or other additives, and cleaning materials used during the month, kg, determined according to paragraph (f) of this section.

$H_{C,i}$ = Total mass of organic HAP emission reduction for controlled coating operation, i, not using a liquid-liquid material balance, during the month, kg, from Equation 1 of this section.

$H_{CSR,j}$ = Total mass of organic HAP emission reduction for coating operation, j, controlled by a solvent recovery system using a liquid-liquid material balance, during the month, kg, from Equation 3 of this section.

q = Number of controlled coating operations not controlled by a solvent recovery system using a liquid-liquid material balance.

r = Number of coating operations controlled by a solvent recovery system using a liquid-liquid material balance.

(m) Calculate the organic HAP emission rate for the compliance period. Determine the organic HAP emission rate for the compliance period, kg (lb) of organic HAP emitted per kg (lb) coating solids used, using Equation 5 of this section:

$$H_{\text{annual}} = \frac{\sum_{y=1}^n H_{\text{HAP},y}}{\sum_{y=1}^n M_{\text{st},y}} \quad (\text{Eq. 5})$$

Where:

H_{annual} = Organic HAP emission rate for the compliance period, kg organic HAP emitted per kg coating solids used.

$H_{\text{HAP},y}$ = Organic HAP emissions for month, y, kg, determined according to Equation 4 of this section.

$M_{\text{st},y}$ = Total mass of coating solids used during month, y, kg, from Equation 2 of Sec. 63.4551.

y = Identifier for months.

n = Number of full or partial months in the compliance period (for the initial compliance period, n equals 12 if the compliance date falls on the first day of a month; otherwise n equals 13; for all following compliance periods, n equals 12).

(n) Compliance demonstration. The organic HAP emission rate for the initial compliance period, calculated using Equation 5 of this section, must be less than or equal to the applicable emission limit for each subcategory in Sec. 63.4490 or the predominant activity or facility-specific emission limit allowed in Sec. 63.4490(c). You must keep all records as required by Sec. Sec. 63.4530 and 63.4531. As part of the notification of compliance status required by Sec. 63.4510, you must identify the coating operation(s) for which you used the emission rate with add-on controls option and submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the initial compliance period because the organic HAP emission rate was less than or equal to the applicable emission limit in Sec. 63.4490, and you achieved the operating limits required by Sec. 63.4492 and the work practice standards required by Sec. 63.4493.

Sec. 63.4563 How do I demonstrate continuous compliance with the emission limitations?

(a) To demonstrate continuous compliance with the applicable emission limit in Sec. 63.4490, the organic HAP emission rate for each compliance period, determined according to the procedures in Sec. 63.4561, must be equal to or less than the applicable emission limit in Sec. 63.4490. A compliance period consists of 12 months. Each month after the end of the initial compliance period described in Sec. 63.4560 is the end of a compliance period consisting of that month and the preceding 11 months. You must perform the calculations in Sec. 63.4561 on a monthly basis using data from the previous 12 months of operation. If you are complying with a facility-specific emission limit under Sec. 63.4490(c), you must also perform the calculation using Equation 1 in Sec. 63.4490(c)(2) on a monthly basis using the data from the previous 12 months of operation.

(b) If the organic HAP emission rate for any 12-month compliance period exceeded the applicable emission limit in Sec. 63.4490, this is a deviation from the emission limitation for that compliance period that must be reported as specified in Sec. Sec. 63.4510(c)(6) and 63.4520(a)(7).

(c) You must demonstrate continuous compliance with each operating limit required by Sec. 63.4492 that applies to you, as specified in Table 1 to this subpart, when the coating line is in operation.

(1) If an operating parameter is out of the allowed range specified in Table 1 to this subpart, this is a deviation from the operating limit that must be reported as specified in Sec. Sec. 63.4510(c)(6) and 63.4520(a)(7).

(2) If an operating parameter deviates from the operating limit specified in Table 1 to this subpart, then you must assume that the emission capture system and add-on control device were achieving zero efficiency during the time period of the deviation, unless you have other data indicating the actual efficiency of the emission capture system and add-on control device and the use of these data is approved by the Administrator.

(d) You must meet the requirements for bypass lines in Sec. 63.4568(b) for controlled coating operations for which you do not conduct liquid-liquid material balances. If any bypass line is opened and emissions are diverted to the atmosphere when the coating operation is running, this is a deviation that must be reported as specified in Sec. Sec. 63.4510(c)(6) and 63.4520(a)(7). For the purposes of completing the compliance calculations specified in Sec. Sec. 63.4561(h), you must treat the materials used during a deviation on a controlled coating operation as if they were used on an uncontrolled coating operation for the time period of the deviation as indicated in Equation 1 of Sec. 63.4561.

(e) You must demonstrate continuous compliance with the work practice standards in Sec. 63.4493. If you did not develop a work practice plan, or you did not implement the plan, or you did not keep the records required by Sec. 63.4530(i)(8), this is a deviation from the work practice standards that must be reported as specified in Sec. Sec. 63.4510(c)(6) and 63.4520(a)(7).

(f) As part of each semiannual compliance report required in Sec. 63.4520, you must identify the coating operation(s) for which you used the emission rate with add-on controls option. If there were no deviations from the emission limitations, submit a statement that you were in compliance with the emission limitations during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the applicable emission limit in Sec. 63.4490, and you achieved the operating limits required by Sec. 63.4492 and the work practice standards required by Sec. 63.4493 during each compliance period.

(j) You must maintain records as specified in Sec. Sec. 63.4530 and 63.4531.

Sec. 63.4564 What are the general requirements for performance tests?

(a) You must conduct each performance test required by Sec. 63.4560 according to the requirements in Sec. 63.7(e)(1) and under the conditions in this section, unless you obtain a waiver of the performance test according to the provisions in Sec. 63.7(h).

(1) Representative coating operation operating conditions. You must conduct the performance test under representative operating conditions for the coating operation. Operations during periods of startup, shutdown, or malfunction and during periods of nonoperation do not constitute representative conditions. You must record the process information that is necessary to document operating conditions during the test and explain why the conditions represent normal operation.

Sec. 63.4580 Who implements and enforces this subpart?

(a) This subpart can be implemented and enforced by us, the U.S. Environmental Protection Agency (EPA), or a delegated authority such as your State, local, or tribal agency. If the Administrator has delegated authority to your State, local, or tribal agency, then that agency (as well as the EPA) has the authority to implement and enforce this subpart. You should contact your EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to your State, local, or tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or tribal agency under subpart E of this part, the authorities contained in paragraph (c) of this section are retained by the Administrator and are not transferred to the State, local, or tribal agency.

(c) The authorities that will not be delegated to State, local, or tribal agencies are listed in paragraphs (c)(1) through (4) of this section:

(1) Approval of alternatives to the requirements in Sec. Sec. 63.4481 through 4483 and Sec. Sec. 63.4490 through 4493.

(2) Approval of major alternatives to test methods under Sec. 63.7(e)(2)(ii) and (f) and as defined in Sec. 63.90.

(3) Approval of major alternatives to monitoring under Sec. 63.8(f) and as defined in Sec. 63.90.

(4) Approval of major alternatives to recordkeeping and reporting under Sec. 63.10(f) and as defined in Sec. 63.90.

Sec. 63.4581 What definitions apply to this subpart?

Terms used in this subpart are defined in the CAA, in 40 CFR 63.2, and in this section as follows:

Additive means a material that is added to a coating after purchase from a supplier (e.g., catalysts, activators, accelerators).

Add-on control means an air pollution control device, such as a thermal oxidizer or carbon adsorber, that reduces pollution in an air stream by destruction or removal before discharge to the atmosphere.

Adhesive, adhesive coating means any chemical substance that is applied for the purpose of bonding two surfaces together. Products used on humans and animals, adhesive tape, contact paper, or any other product with an adhesive incorporated onto or in an inert substrate shall not be considered adhesives under this subpart.

Assembled on-road vehicle coating means any coating operation in which coating is applied to the surface of some component or surface of a fully assembled motor vehicle or trailer intended for on-road use including, but not limited to, components or surfaces on automobiles and light-duty trucks that have been repaired after a collision or otherwise repainted, fleet delivery trucks, and motor homes and other recreational vehicles (including camping trailers and fifth wheels). Assembled on-road vehicle coating includes the concurrent coating of parts of the assembled on-road vehicle that are painted off-vehicle to protect systems, equipment, or to allow full coverage. Assembled on-road vehicle coating does not include surface coating operations that meet the applicability criteria of the Automobiles and Light-Duty Trucks NESHAP. Assembled on-road vehicle coating also does not include the use of adhesives, sealants, and caulks used in assembling on-road vehicles.

Automotive lamp coating means any coating operation in which coating is applied to the surface of some component of the body of an exterior automotive lamp, including the application of reflective argent coatings and clear topcoats. Exterior automotive lamps include head lamps, tail lamps, turn signals, brake lights, and side marker lights. Automotive lamp coating does not include any coating operation performed on an assembled on-road vehicle.

Capture device means a hood, enclosure, room, floor sweep, or other means of containing or collecting emissions and directing those emissions into an add-on air pollution control device.

Capture efficiency or capture system efficiency means the portion (expressed as a percentage) of the pollutants from an emission source that is delivered to an add-on control device.

Capture system means one or more capture devices intended to collect emissions generated by a coating operation in the use of coatings or cleaning materials, both at the point of application and at subsequent points where emissions from the coatings and cleaning materials occur, such as flashoff, drying, or curing. As used in this subpart, multiple capture devices that collect emissions generated by a coating operation are considered a single capture system.

Cleaning material means a solvent used to remove contaminants and other materials, such as dirt, grease, oil, and dried or wet coating (e.g., depainting), from a substrate before or after coating application or from equipment associated with a coating operation, such as spray booths, spray guns, racks, tanks, and hangers. Thus, it includes any cleaning material used on substrates or equipment or both.

Coating means a material applied to a substrate for decorative, protective, or functional purposes. Such materials include, but are not limited to, paints, sealants, liquid plastic coatings, caulks, inks, adhesives, and maskants. Decorative, protective, or functional materials that consist only of protective oils for metal, acids, bases, or any combination of these substances, or paper film or plastic film which may be pre-coated with an adhesive by the film manufacturer, are not considered coatings for the purposes of this subpart. A liquid plastic coating means a coating made from fine particle-size polyvinyl chloride (PVC) in solution (also referred to as a plastisol).

Coating operation means equipment used to apply cleaning materials to a substrate to prepare it for coating application (surface preparation) or to remove dried coating; to apply coating to a substrate (coating application) and to dry or cure the coating after application; or to clean coating operation equipment (equipment cleaning). A single coating operation may include any combination of these types of equipment, but always includes at least the point at which a given quantity of coating or cleaning material is applied to a given part and all subsequent points in the affected source where organic HAP are emitted from the specific quantity of coating or cleaning material on the specific part. There may be multiple coating operations in an affected source. Coating application with handheld, non-refillable aerosol containers, touch-up markers, or marking pens is not a coating operation for the purposes of this subpart.

Coatings solids means the nonvolatile portion of the coating that makes up the dry film.

Continuous parameter monitoring system (CPMS) means the total equipment that may be required to meet the data acquisition and availability requirements of this subpart, used to sample, condition (if applicable), analyze, and provide a record of coating operation, or capture system, or add-on control device parameters.

Controlled coating operation means a coating operation from which some or all of the organic HAP emissions are routed through an emission capture system and add-on control device.

Deviation means any instance in which an affected source subject to this subpart, or an owner or operator of such a source:

- (1) Fails to meet any requirement or obligation established by this subpart including but not limited to, any emission limit or operating limit or work practice standard;
- (2) Fails to meet any term or condition that is adopted to implement an applicable requirement in this subpart and that is included in the operating permit for any affected source required to obtain such a permit; or
- (3) Fails to meet any emission limit, or operating limit, or work practice standard in this subpart during startup, shutdown, or malfunction, regardless of whether or not such failure is permitted by this subpart.

Emission limitation means the aggregate of all requirements associated with a compliance option including emission limit, operating limit, work practice standard, etc.

Enclosure means a structure that surrounds a source of emissions and captures and directs the emissions to an add-on control device.

Exempt compound means a specific compound that is not considered a VOC due to negligible photochemical reactivity. The exempt compounds are listed in 40 CFR 51.100(s).

Facility maintenance means the routine repair or renovation (including the surface coating) of the tools, equipment, machinery, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity.

General use coating means any coating operation that is not an automotive lamp, TPO, or assembled on-road vehicle coating operation.

Hobby shop means any surface coating operation, located at an affected source, that is used exclusively for personal, noncommercial purposes by the affected source's employees or assigned personnel.

Manufacturer's formulation data means data on a material (such as a coating) that are supplied by the material manufacturer based on knowledge of the ingredients used to manufacture that material, rather than based on testing of the material with the test methods specified in Sec. 63.4541. Manufacturer's formulation data may include, but are not limited to, information on density, organic HAP content, volatile organic matter content, and coating solids content.

Mass fraction of coating solids means the ratio of the mass of solids (also known as the mass of nonvolatiles) to the mass of a coating in which it is contained; kg of coating solids per kg of coating.

Mass fraction of organic HAP means the ratio of the mass of organic HAP to the mass of a material in which it is contained, expressed as kg of organic HAP per kg of material.

Month means a calendar month or a pre-specified period of 28 days to 35 days to allow for flexibility in recordkeeping when data are based on a business accounting period.

Non-HAP coating means, for the purposes of this subpart, a coating that contains no more than 0.1 percent by mass of any individual organic HAP that is an OSHA-defined carcinogen as specified in 29 CFR 1910.1200(d)(4) and no more than 1.0 percent by mass for any other individual HAP.

Organic HAP content means the mass of organic HAP emitted per mass of coating solids used for a coating calculated using Equation 1 of Sec. 63.4541. The organic HAP content is determined for the coating in the condition it is in when received from its manufacturer or supplier and does not account for any alteration after receipt. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, organic HAP content is the mass of organic HAP that is emitted, rather than the organic HAP content of the coating as it is received.

Permanent total enclosure (PTE) means a permanently installed enclosure that meets the criteria of Method 204 of appendix M, 40 CFR part 51, for a PTE and that directs all the exhaust gases from the enclosure to an add-on control device.

Personal watercraft means a vessel (boat) which uses an inboard motor powering a water jet pump as its primary source of motive power and which is designed to be operated by a person or persons sitting, standing, or kneeling on the vessel, rather than in the conventional manner of sitting or standing inside the vessel.

Plastic part and product means any piece or combination of pieces of which at least one has been formed from one or more resins. Such pieces may be solid, porous, flexible or rigid.

Protective oil means an organic material that is applied to metal for the purpose of providing lubrication or protection from corrosion without forming a solid film. This definition of protective oil includes, but is not limited to, lubricating oils, evaporative oils (including those that evaporate completely), and extrusion oils.

Reactive adhesive means adhesive systems composed, in part, of volatile monomers that react during the adhesive curing reaction, and, as a result, do not evolve from the film during use. These volatile components instead become integral parts of the adhesive through chemical reaction. At least 70 percent of the liquid components of the system, excluding water, react during the process.

Research or laboratory facility means a facility whose primary purpose is for research and development of new processes and products, that is conducted under the close supervision of technically trained personnel, and is not engaged in the manufacture of final or intermediate products for commercial purposes, except in a de minimis manner.

Responsible official means responsible official as defined in 40 CFR 70.2.

Startup, initial means the first time equipment is brought online in a facility.

Surface preparation means use of a cleaning material on a portion of or all of a substrate. This includes use of a cleaning material to remove dried coating, which is sometimes called depainting.

Temporary total enclosure means an enclosure constructed for the purpose of measuring the capture efficiency of pollutants emitted from a given source as defined in Method 204 of appendix M, 40 CFR part 51.

Thermoplastic olefin (TPO) means polyolefins (blends of polypropylene, polyethylene and its copolymers). This also includes blends of TPO with polypropylene and polypropylene alloys including, but not limited to, thermoplastic elastomer (TPE), TPE polyurethane (TPU), TPE polyester (TPEE), TPE polyamide (TPAE), and thermoplastic elastomer polyvinyl chloride (TPVC).

Thermoplastic olefin (TPO) coating means any coating operation in which the coatings are components of a system of coatings applied to a TPO substrate, including adhesion promoters, primers, color coatings, clear coatings and topcoats. Thermoplastic olefin coating does not include the coating of TPO substrates on assembled on-road vehicles.

Thinner means an organic solvent that is added to a coating after the coating is received from the supplier.

Total volatile hydrocarbon (TVH) means the total amount of nonaqueous volatile organic matter determined according to Methods 204 and 204A through 204F of appendix M to 40 CFR part 51 and substituting the term TVH each place in the methods where the term VOC is used. The TVH includes both VOC and non-VOC.

Uncontrolled coating operation means a coating operation from which none of the organic HAP emissions are routed through an emission capture system and add-on control device.

Volatile organic compound (VOC) means any compound defined as VOC in 40 CFR 51.100(s).

Wastewater means water that is generated in a coating operation and is collected, stored, or treated prior to being discarded or discharged.

Table 2 to Subpart PPPP of Part 63—Applicability of General Provisions to Subpart PPPP of Part 63

You must comply with the applicable General Provisions requirements according to the following table:

-Citation	Subject	Applicable to subpart PPPP	Explanation
§ 63.1(a)(1)-(14)	General Applicability.	Yes..	
§ 63.1(b)(1)-(3)	Initial Applicability Determination	Yes.....	Applicability to PPPP is also specified in §63.4481.
§ 63.1(c)(1)	Applicability After Standard Established.	Yes.....	
§ 63.1(c)(2)-(3)	Applicability of Permit Program for Area Sources.	No.....	Area sources are not subject to subpart PPPP.
§ 63.1(c)(4)-(5)	Extensions and Notifications.	Yes.....	
§ 63.1(e)	Applicability of Permit Program Before Relevant Standard is Set	Yes.....	
§ 63.2	Definitions.....	Yes.....	Additional Definitions are specified in § 63.3981
§ 63.1(a)-(c)	Units and Abbreviations.	Yes.....	
§ 63.4(a)(1)-(5)	Prohibited Activities.	Yes.....	
§ 63.4(b)-(c)	Circumvention/ Severability.	Yes.....	
§ 63.5(a)	Construction/ Reconstruction.	Yes.....	
§ 63.5(b)(1)-(6)	Requirements for Existing Newly Constructed, and Reconstructed Sources.	Yes.....	
§ 63.5(d)	Application for Approval of Construction/ Reconstruction.	Yes.....	
§ 63.5(e)	Approval of Construction/ Reconstruction.	Yes.....	
§ 63.5(f)	Approval of Construction/ Reconstruction Based on Prior State Review.	Yes.....	
§ 63.6(a)	Compliance With	Yes.....	

	Standards and Maintenance Requirements-Applicability.		
§ 63.6(b)(1)-(7)..	Compliance Dates for New and Reconstructed Sources.	Yes.....	Section 63.4483 specifies the compliance dates.
§ 63.6(c)(1)-(5)..	Compliance Dates for Existing Sources.	Yes.....	Section 63.4483 specifies the compliance dates.
§ 63.6(e)(1)-(2)..	Operation and Maintenance.	Yes.....	
§ 63.6(e)(3).....	Startup, Shutdown, and Malfunction Plan.	Yes...	Only sources using an add-on control device to comply with the standard must complete startup, shutdown, and malfunction plans.
§ 63.6(f)(1).....	Compliance Except During Startup, Shutdown, and Malfunction.	Yes....	Applies only to sources using an add-on control device to comply with the
	standard.		
§ 63.6(f)(2)-(3)..	Methods for Determining Compliance..	Yes.....	
§ 63.6(g)(1)-(3)..	Use of an Alternative Standard.	Yes.....	
§ 63.6(h).....	Compliance With Opacity/Visible Emission Standards.	No.....	Subpart PPPP does not establish opacity standards and does not require continuous opacity monitoring systems (COMS).
§ 63.6(i)(1)-(16).	Extension of Compliance.	Yes.....	
§ 63.6(j).....	Presidential Compliance Exemption.	Yes.....	
§ 63.7(a)(1).....	Performance Test Requirements-Applicability.	Yes.....	Applies to all affected sources.
	Additional requirements for performance testing		are specified in §§ 63.4564, 63.4565, and 63.4566.
§ 63.7(a)(2).....	Performance Test Requirements-Dates.	Yes.....	Applies only to performance tests for capture system and control device efficiency at sources using these to comply with the standard. Section 63.4560 specifies the schedule for performance test requirements that are earlier than those

	specified in §63.7(a)(2).
§ 63.7(a)(3).....Performance Tests Required By the Administrator.	Yes.....
§ 63.7(b)-(e).....Performance Test Requirements- Notification, Quality Assurance, Facilities Necessary for Safe Testing, Conditions During Test.	Yes.....Applies only to performance tests for capture system and add-on control device efficiency at sources using these to comply with the standard.
§ 63.7(f).....Performance Test Requirements-Use of Alternative Test Method.	Yes.... Applies to all test methods except those used to determine capture system efficiency.
§ 63.7(g)-(h).....Performance Test Requirements-Data Analysis, Recordkeeping, Reporting, Waiver of Test.	Yes.....Applies only to performance tests for capture system and add-on control device efficiency at sources using these to comply with the standard.
§ 63.8(a)(1)-(3)..Monitoring Requirements-Applicability.	Yes.....Applies only to monitoring of capture system and add-on control device efficiency at sources using these to comply with the standard. Additional requirements
for monitoring are specified in §63.4568.	
§ 63.8(a)(4)..... Additional Monitoring Requirements.	No..... Subpart PPPP does not have monitoring requirements for
flares.	
§ 63.8(b).....Conduct of Monitoring.	Yes....
§ 63.8(c)(1)-(3)..Continuous Monitoring Systems (CMS) Operation and Maintenance.	Yes.... Applies only to monitoring of capture system and add-on control device efficiency at sources using these to comply with the standard. Additional requirements for CMS operations and maintenance are specified in §63.4568.
§ 63.8(c)(4).....CMS.....	No.... § 63.4568 specifies the requirements for the operation of CMS for capture systems and add-on control

	devices at sources using these to comply.
§ 63.8(c)(5)..... COMS.....	No..... Subpart PPPP does not have opacity or visible emission standards.
§ 63.8(c)(6).....CMS Requirements.....	No..... Section 63.4568 specifies the requirements for monitoring systems for capture systems and add-on control devices at sources using these to comply.
§ 63.8(c)(7).....CMS Out-of-Control Periods.	Yes....
§ 63.8(c)(8)..... CMS Out-of-Control Periods and Reporting. of-	No.....§ 63.4520 requires reporting of CMS out-control periods.
§ 63.8(d)-(e).....Quality Control Program and CMS Performance Evaluation.	No.....Subpart PPPP does not require the use of continuous emissions monitoring systems.
§ 63.8(f)(1)-(5)..Use of an Alternative Monitoring Method.	Yes....
§ 63.8(f)(6).....Alternative to Relative Accuracy Test.	No..... Subpart PPPP does not require the use of continuous emissions monitoring systems.
§ 63.8(g)(1)-(5)..Data Reduction.....	No.....Sections 63.4567 and 63.4568 specify monitoring data reduction.
§ 63.9(a)-(d).....Notification Requirements.	Yes....
§ 63.9(e).....Notification of Performance Test.	Yes.....Applies only to capture system and add-on control device performance tests at sources using these to comply with the standard.
§ 63.9(f).....Notification of Visible Emissions/Opacity Test.	No.....Subpart PPPP does not have opacity or visible emissions standards.
§ 63.9(g)(1)-(3)..Additional Notifications When Using CMS.	No..... Subpart PPPP does not require the use of continuous emissions monitoring systems.
§ 63.9(h).....Notification of Compliance Status.	Yes.....Section 63.4510 Specifies the dates for

		submitting the notification of compliance status.
§ 63.9(i).....	Adjustment of Submittal Deadlines.	Yes.....
§ 63.9(j).....	Change in Previous Information.	Yes.....
§ 63.10(a).....	Recordkeeping/ Reporting-Applicability and General Information.	Yes.....
§ 63.10(b)(1).....	General Recordkeeping Requirements.	Yes.....Additional requirements are specified in §§ 63.4530 and 63.4531.
§ 63.10(b)(2) (vi) -(xi).....	Yes.....
§ 63.10(b)(2) (xii)	Records.....	Yes.....
§ 63.10(b)(2)(xiii).....	No..... Subpart PPPP does not require the use of continuous emissions monitoring systems.
§ 63.10(b)(2)(xiv)	Yes.....
§ 63.10(b)(3).....	Recordkeeping Requirements for Applicability Determinations.	Yes.....
§ 63.10(c)(1)-(6).....	Additional Recordkeeping Requirements for Sources with CMS.	Yes.....
§ 63.10(c) (7)-(8)	No.... The same records are required in
§63.3920(a)(7) .		
§ 63.10(c) (9)-(15).....	Yes....
§ 63.10(d)(1).....	General Reporting Requirements.	Yes.... Additional Requirements are specified in §63.4520.
§ 63.10(d)(2).....	Report of Performance Test Results.	Yes.....Additional requirements are specified in §63.4520(b).
§ 63.10(d)(3).....	Reporting Opacity or Visible Emissions Observations.	No..... Subpart PPPP does not require opacity or visible emissions observations.
§ 63.10(d)(4).....	Progress Reports for Sources With Compliance Extensions.	Yes.....
§ 63.10(d)(5).....	Startup, Shutdown, and Malfunction Reports.	Yes.....Applies only to add-on control devices at sources using these to comply with the standard.
§ 63.10(e) (1)-(2).....	Additional CMS Reports	No.....Subpart PPPP does not

		require the use of continuous emissions monitoring systems.
§ 63.10(e) (3).....Excess Emissions/CMS Performance Reports.	No.....	Section 63.4520 (b) specifies the contents of periodic compliance reports.
§ 63.10(e) (4).... COMS Data Reports.....	No.....	Subpart PPPP does not specify requirements for opacity or COMS.
§ 63.10(f).....Recordkeeping/Reporting Waiver.	Yes.....	
§ 63.11.....Control Device Requirements/Flares.	No.....	Subpart PPPP does not specify use of flares for compliance.
§ 63.12.....State Authority and Delegations.	Yes.....	
§ 63.13.....Addresses.....	Yes.....	
§ 63.14.....Incorporation by Reference.	Yes.....	
§ 63.15.....Availability of Information/Confidentiality.	Yes.....	

Table 3 to Subpart PPPP of Part 63—Default Organic HAP Mass Fraction for Solvents and Solvent Blends

You may use the mass fraction values in the following table for solvent blends for which you do not have test data or manufacturer's formulation data and which match either the solvent blend name or the chemical abstract series (CAS) number. If a solvent blend matches both the name and CAS number for an entry, that entry's organic HAP mass fraction must be used for that solvent blend. Otherwise, use the organic HAP mass fraction for the entry matching either the solvent blend name or CAS number, or use the organic HAP mass fraction from table 4 to this subpart if neither the name or CAS number match.

Solvent/solvent blend	CAS. No.	Average organic HAP mass fraction	Typical organic HAP, percent by mass
1. Toluene.....	108-88-3	1.0	Toluene.
2. Xylene(s)..... ethylbenzene.	1330-20-7	1.0	Xylenes,
3. Hexane.....	110-54-3	0.5	n-hexane.
4. n-Hexane.....	110-54-3	1.0	n-hexane.
5. Ethylbenzene.....	100-41-4	1.0	Ethylbenzene.
6. Aliphatic 140.....		0	None.
7. Aromatic 100..... cumene.		0.02	1% xylene, 1%
8. Aromatic 150.....		0.09	Naphthalene.
9. Aromatic naphtha..... cumene.	64742-95-6	0.02	1% xylene, 1%
10. Aromatic solvent.....	64742-94-5	0.1	Naphthalene.
11. Exempt mineral spirits..	8032-32-4	0	None.
12. Ligroines (VM & P).....	8032-32-4	0	None.
13. Lactol spirits.....	64742-89-6	0.15	Toluene.
14. Low aromatic white spirit..	64742-82-1	0	None.
15. Mineral spirits.....	64742-88-7	0.01	Xylenes.
16. Hydrotreated naphtha....	64742-48-9	0	None.
17. Hydrotreated light distillate.....	64742-47-8	0.001	Toluene.
18. Stoddard solvent.....	8052-41-3	0.01	Xylenes.
19. Super high-flash naphtha	64742-95-6	0.05	Xylenes.
20. Varsol ® solvent..... ethylbenzene.	8052-49-3	0.01	0.5% xylenes, 0.5%
21. VM & P naphtha..... xylene.	64742-89-8	0.06	3% toluene, 3%
22. Petroleum distillate mixture.....	68477-31-6	0.08	4% naphthalene, 4% biphenyl.

Table 4 to Subpart PPPP of Part 63—Default Organic HAP Mass Fraction for Petroleum Solvent Groups ^a

You may use the mass fraction values in the following table for solvent blends for which you do not have test data or manufacturer's formulation data.

Solvent type	Average organic HAP mass fraction	Typical organic HAP, percent by mass
Aliphatic ^b	0.03	1% Xylene, 1% Toluene, and 1% Ethylbenzene.
Aromatic ^c	0.06	4% Xylene, 1% Toluene, and 1% Ethylbenzene.

a Use this table only if the solvent blend does not match any of the solvent blends in Table 3 to this subpart by either solvent blend name or CAS number and you only know whether the blend is aliphatic or aromatic.

b Mineral Spirits 135, Mineral Spirits 150 EC, Naphtha, Mixed Hydrocarbon, Aliphatic Hydrocarbon, Aliphatic Naphtha, Naphthol Spirits, Petroleum Spirits, Petroleum Oil, Petroleum Naphtha, Solvent Naphtha, Solvent Blend.

c Medium-flash Naphtha, High-flash Naphtha, Aromatic Naphtha, Light Aromatic Naphtha, Light Aromatic Hydrocarbons, Aromatic Hydrocarbons, Light Aromatic Solvent.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: GDX Automotive North America, Inc.
Source Address: One General Street, Wabash, Indiana 46992
Mailing Address: P.O box 507, Wabash, Indiana 46992
Part 70 Permit No.: T169-23357-00004

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: GDx Automotive North America, Inc.
Source Address: One General Street, Wabash, Indiana 46992
Mailing Address: P.O box 507, Wabash, Indiana 46992
Part 70 Permit No.: T169-23357-00004

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
Part 70 Quarterly Report**

Source Name: GDX Automotive North America, Inc.
Source Address: One General Street, Wabash, Indiana 46992
Mailing Address: P.O box 507, Wabash, Indiana 46992
Part 70 Permit No.: T169-23357-00004
Facility: Line 1 Adhesive Application Booth, Line 2 Adhesive Application Booth, Line 3 Primer Spray Booth, Line 3 Topcoat Spray Booth, Line 5 Adhesive Application Booth, Line 8 Primer Spray Booth; and NBC/JS27 Offline Primer Spray Booth.
Parameter: VOC usage
Limit: VOC usage in the Line 1 Adhesive Application Booth, Line 2 Adhesive Application Booth, Line 3 Primer Spray Booth, Line 3 Topcoat Spray Booth, Line 5 Adhesive Application Booth, Line 8 Primer Spray Booth; and NBC/JS27 Offline Primer Spray Booth shall each be limited to less than 25.0 tons per twelve (12) consecutive month period.

YEAR:

Month	Facilities	VOC Usage This Month	VOC Usage Previous 11 Months	VOC Usage 12 Months Total
Month 1	Line 1 Adh. App. Booth			
	Line 2 Adh. App. Booth			
	Line 3 Booths (Topcoat & Primer)			
	Line 5 Adh. App. Booth			
	Line 8 Primer Booth			
	NBC/JS27 Primer Booth			
Month 2	Line 1 Adh. App. Booth			
	Line 2 Adh. App. Booth			
	Line 3 Booths (Topcoat & Primer)			
	Line 5 Adh. App. Booth			
	Line 8 Primer Booth			
	NBC/JS27 Primer Booth			
Month 3	Line 1 Adh. App. Booth			
	Line 2 Adh. App. Booth			
	Line 3 Booths (Topcoat & Primer)			
	Line 5 Adh. App. Booth			
	Line 8 Primer Booth			
	NBC/JS27 Primer Booth			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on:

Submitted by:

Title / Position:

Signature:

Date:

Phone:

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: GDX Automotive North America, Inc.
 Source Address: One General Street, Wabash, Indiana 46992
 Mailing Address: P.O box 507, Wabash, Indiana 46992
 Part 70 Permit No.: T169-23357-00004
 Facility: Surface Coating Operations listed under Condition D.2.1
 Parameter: VOC usage
 Limit: VOC usage shall be limited to less than 178 tons per 12 consecutive month period with compliance determined at the end of each month.

QUARTER :

YEAR:

Month		Column 1	Column 2	Column 1 + Column 2
		VOC Usage This Month	VOC Usage Previous 11 Months	VOC Usage 12 Month Total
Month 1	Extrusion Line 1			
	Adhesive Application			
	On-line Topcoat Booth#1 (0.5 gal/hr)			
	On-line Topcoat Booth#2 (0.51 gal/hr)			
	Extrusion Line 2			
	Adhesive Application			
	Extrusion Line 3			
	Adhesive Application			
	Primer Spray Booth			
	Topcoat Booth			
	Extrusion Line 4			
	Primer Spray Booth			
	Topcoat Booth			
	Extrusion Line 5			
	Adhesive Application			
	Extrusion Line 6			
	Topcoat Booth			
	Line #7 Adhesive Application			
	Extrusion Line 8			
	Primer Spray Booth			
	Topcoat Booth			
	Adhesive Application			
	NBC/JS27			
	Primer Spray Booth			
	Topcoat Booth			
	Post Flock Adhesive Stations (3)			
	U222 Finishing Area			
	Primer Spray Booth			
	Topcoat Booth			
	Post Flock Adhesive Stations (3)			
Combining Line Booths				
GT Spray Booth in 350 Area (Honda)				
Insert Coating Booth				

Month		Column 1	Column 2	Column 1 + Column 2
		VOC Usage This Month	VOC Usage Previous 11 Months	VOC Usage 12 Month Total
Month 2	Extrusion Line 1			
	Adhesive Application			
	On-line Topcoat Booth#1 (0.5 gal/hr)			
	On-line Topcoat Booth#2 (0.51 gal/hr)			
	Extrusion Line 2			
	Adhesive Application			
	Extrusion Line 3			
	Adhesive Application			
	Primer Spray Booth			
	Topcoat Booth			
	Extrusion Line 4			
	Primer Spray Booth			
	Topcoat Booth			
	Extrusion Line 5			
	Adhesive Application			
	Extrusion Line 6			
	Topcoat Booth			
	Line #7 Adhesive Application			
	Extrusion Line 8			
	Primer Spray Booth			
	Topcoat Booth			
	Adhesive Application			
	NBC/JS27			
	Primer Spray Booth			
	Topcoat Booth			
	Post Flock Adhesive Stations (3)			
	U222 Finishing Area			
	Primer Spray Booth			
Topcoat Booth				
Post Flock Adhesive Stations (3)				
Combining Line Booths				
GT Spray Booth in 350 Area (Honda)				
Insert Coating Booth				
Month 3	Extrusion Line 1			
	Adhesive Application			
	On-line Topcoat Booth#1 (0.5 gal/hr)			
	On-line Topcoat Booth#2 (0.51 gal/hr)			
	Extrusion Line 2			
	Adhesive Application			
	Extrusion Line 3			
	Adhesive Application			
	Primer Spray Booth			
	Topcoat Booth			
	Extrusion Line 4			
	Primer Spray Booth			
	Topcoat Booth			
	Extrusion Line 5			
	Adhesive Application			
	Extrusion Line 6			
	Topcoat Booth			
	Line #7 Adhesive Application			
	Extrusion Line 8			
	Primer Spray Booth			
	Topcoat Booth			
	Adhesive Application			
	NBC/JS27			
	Primer Spray Booth			
	Topcoat Booth			
	Post Flock Adhesive Stations (3)			
	U222 Finishing Area			
	Primer Spray Booth			
Topcoat Booth				
Post Flock Adhesive Stations (3)				
Combining Line Booths				
GT Spray Booth in 350 Area (Honda)				
Insert Coating Booth				

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on:

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: GDX Automotive North America, Inc.
 Source Address: One General Street, Wabash, Indiana 46992
 Mailing Address: P.O box 507, Wabash, Indiana 46992
 Part 70 Permit No.: T169-23357-00004

Months: _____ **to** _____ **Year:** _____

<p>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".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	GDx Automotive North America, Inc.
Source Location:	One General Street, Wabash, Indiana 46992
County:	Wabash
SIC Code:	3089
Operation Permit No.:	T169-5650-00004
Operation Permit Issuance Date:	April 15, 2002
Permit Renewal No.:	T169-23357-00004
Permit Reviewer:	Surya Ramaswamy / EVP

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from GDx Automotive North America, Inc. relating to the operation of a stationary rubber and plastic products manufacturing plant.

History

GDx Automotive North America, Inc. was issued a Part 70 Operating Permit Renewal, T169-5650-00004, on April 15, 2002. On 14 July, 2006, GDx Automotive North America, Inc. submitted an application to the OAQ requesting to renew its operating permit.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Banbury Mills and Mixers, constructed in 1965 and permitted in 1980, consisting of three (3) Banbury Mixers and three (3) Banbury Mills, with a maximum capacity of 11,100 pounds per hour, using four (4) baghouses (BH02, BH03, BH04, BH05) as particulate control and exhausting to four (4) stacks (BH02, BH03, BH04, BH05).
- (b) Compound handling, constructed in 1984 and 1985, consisting of carbon black unloading, carbon black conveying, and weigh stations, with a maximum capacity of 15 tons per hour, using four (4) baghouses (BH06, BH07, BH08, BH10) as particulate control, exhausting to four (4) stacks (BH06, BH07, BH08, BH10).
- (c) Extrusion Line 1, consisting of the following:
 - (1) Two (2) Line 1 Extruders, constructed in 1969 and 1986, with a maximum total capacity of 1000 pounds per hour, and exhausting to the interior of the building.
 - (2) One (1) Line 1 natural gas hot air oven, constructed in 1986, with a rated heat input of 3.2 MMBtu/hr, and exhausting to stacks L1-1 through L1-5.
 - (3) One (1) Line 1 flock adhesive application booth, constructed in 1995, with a maximum capacity of 12.45 pounds per hour of adhesive, and exhausting to stack L1-7.
 - (4) One (1) Line 1 On-Line primer booth, constructed in 1997, equipped with two (2) HVLP spray guns, with a maximum capacity of 0.5 gallons of coating per hour, used to coat truck door seals, with dry filters as control, exhausting to one stack L1-6.
 - (5) Two (2) high velocity hot air natural gas ovens, each with a maximum rated heat input of 1.0 MMBtu/hr, constructed in 1999, exhausting to stack L1-8 & 9.

- (6) One (1) topcoat booth at Line 1, using a maximum of 12.4 pounds of coating per day, exhausting to stack No. L1-17a.

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

- (e) Extrusion Line 3, consisting of the following:
 - (1) Two (2) Line 3 rubber extruders, constructed in 1999, with a total maximum capacity of 1000 pounds of rubber extruded per hour.
 - (2) Five (5) natural gas fired hot air ovens, constructed in 1999, each rated at 1.0 MMBTU per hour, exhausting through stacks/vents L3-1 through L3-5.
 - (3) One (1) Line 3 adhesive application booth, constructed in 1999, with a maximum capacity of 1 gallon of adhesive per hour, utilizing brush-and-wipe methods, exhausting through stack/vent L3-6.
 - (4) One (1) Line 3 primer spray booth, constructed in 1991, equipped with HVLP spray guns, with a maximum capacity of 1 gallon of coating per hour, used to coat truck door seals, with dry filters as control, exhausting to one stack L3-7.
 - (5) One (1) Line 3 topcoat booth, constructed in 1991, equipped with HVLP spray guns, with a maximum capacity of 1 gallon of coating per hour, used to coat truck door seals, with dry filters as control, exhausting to one stack L3-8.

- (f) Extrusion Line 4, consisting of the following:
 - (1) Two (2) extruders, constructed in 2001, with a combined maximum capacity of 1000 pounds of rubber per hour.
 - (2) One (1) electric molten salt curing oven, constructed in 2001, with a maximum capacity of 1000 pounds of rubber per hour, exhausting to five (5) stacks L4-1 through L4-5.
 - (3) One (1) Line 4 topcoat booth, constructed in 2000, with a maximum capacity of 0.64 gallons of coating per hour, used to coat truck door seals, utilizing HVLP application method, exhausting to stack L4-6.

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

- (h) Extrusion Line 6, constructed in 1978 and 1985, consisting of:
 - (1) Two (2) Line 6 extruders, constructed in 1978 and 1995, with a total maximum capacity of 1000 pounds of extruded rubber per hour.
 - (2) one (1) liquid salt curing bath, constructed in 1985, with a maximum capacity of 1,000 pounds per hour and exhausting to two (2) stacks L6-1 and 2.

- (i) One (1) Line 7 plastic parts adhesive application station using a brush application system with two (2) electric IR ovens, constructed in 1998, with a maximum capacity of coating 270 ft² of plastic products per hour, exhausting to three (3) stacks L7-1 through L7-3.
- (j) Extrusion Line 8, consisting of the following:
 - (1) Two (2) Line 8 rubber extruders, constructed in 2006, with a total maximum capacity of 1000 pounds rubber extruded per hour.
 - (2) Four (4) Line 8 natural gas fired hot air curing ovens, constructed in 2006, each rated at 1.0 MMBtu/hr, exhausting to one (1) stack L8-1.
 - (3) Three (3) microwave zone ovens, constructed in 2006, each rated at 0.17 MMBtu/hr hour, exhausting through stack L8-8-10.
 - (4) One (1) Line 8 topcoat booth 1, constructed in 2006, utilizing HVLP application method, with a maximum capacity of 1 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack L8-6.
 - (5) One (1) Line 8 topcoat booth 2, constructed in 2006, utilizing HVLP application method, with a maximum capacity of 1 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack L8-7.
- (k) NBC Coating Line, consisting of the following:
 - (1) One (1) NBC Coating Line primer spray booth, constructed in 2006, utilizing HVLP application method, with a maximum capacity of 1 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack N-1.
 - (2) One (1) NBC Coating Line topcoat spray booth, constructed in 2006, utilizing HVLP application method, with a maximum capacity of 2 gallons of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack N-2.
 - (3) Two (2) NBC Coating Line Post Flock Adhesive Stations (2 and 3), constructed in 2006, each with a maximum capacity of 0.4 gallon of coating per hour, used to coat rubber parts, exhausting through stacks N-4 and N-5, respectively.
- (l) U222 Finishing Area, consisting of the following:
 - (1) One (1) U222 Finishing Area primer spray booth, constructed in 1989, utilizing HVLP application method, with a maximum capacity of 0.61 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack FA-5 (relocated from Finishing Area 239 in 2006).
 - (2) One (1) U222 Finishing Area topcoat spray booth, constructed in 1991, utilizing HVLP application method, with a total maximum capacity of 0.83 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack FA-7 (relocated from Finishing Area 239 in 2006).
 - (3) Three (3) U222 Finishing Area Post Flock Adhesive Stations (1, 2 and 3), constructed in 2006, each with a maximum capacity of 0.4 gallon of coating per hour, used to coat rubber parts, exhausting through stacks FA-1, FA-2 and FA-3, respectively.
 - (4) Two (2) U222 Finishing Area gas catalytic ovens (1 and 2), constructed in 2006, each rated at 0.29 MMBtu/hr, exhausting to stacks FA-4 and FA-6, respectively.
 - (5) One (1) U222 Finishing Area gas catalytic oven (3), constructed in 2006, rated at 1.152 MMBtu/hr, exhausting to stack FA-8.

Under NESHAP, Subpart PPPP, the Extrusion lines, NBC Coating line, U222 Finishing Area, and Plastic Part Adhesive line are considered as existing affected sources.

- (m) Three (3) Combining Adhesive Stations (1, 2 and 3), constructed in 2006, each with a maximum capacity of 0.5 gallon of coating per hour, used to coat rubber and plastic parts, exhausting through stacks C-1, C-2 and C-3, respectively.

Unpermitted Emission Units and Pollution Control Equipment

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

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 (10) million Btu per hour;
 - (1) Fifty-two (52) natural gas fired heaters, each with less than or equal to 1.25 MMBtu per hour heat input.
 - (2) One (1) natural gas fired boiler, constructed in 2004, with maximum heat input capacity of 2.93 MMBtu per hour; providing process heat to the salt bath lines at the plant (Lines 4 and 6), exhausting to stack B1. [326 IAC 6-2-4]
- (b) One (1) 500 gallon gasoline storage tank.
- (c) One (1) 300 gallon diesel storage tank.
- (d) One (1) Natural draft cooling tower not regulated under a NESHAP.
- (e) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (f) Blowdown for any of the following; sight glass, boiler, compressors, pumps, and cooling tower.
- (g) Diesel generators not exceeding 1,600 horsepower.
- (h) Grinding and machining operation controlled with fabric filter, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations. [326 IAC 6-3-2]
- (i) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (j) Other activities or categories not previously identified with a potential to emit less than significant levels:
 - (1) Line 7 plastic extruders, flock system, and IR ovens;
 - (2) Line 9 plastic extruders;
 - (3) Maintenance Wood Shop: one (1) wheel sander, one (1) belt sander, one (1) router, one (1) radial arm saw, one (1) table saw, one (1) planer, one (1) bandsaw, and two (2) drill presses;
 - (4) Maintenance metal and mill wright shop: three (3) portable arc welders, parts cleaners, nine (9) grinders, fourteen (14) drill presses, ten (1) metal lathes, two (2) portable cutting torches, one (1) enclosed sandblaster, one (1) grinder/honer, one (1) jigsaw, one (1) bandsaw, and one (1) cutting wheel;
 - (5) Prototype Laboratory for research and development;
 - (6) Constant temperature laboratory for research and development;
 - (7) Mill laboratory for research and development;
 - (8) Research and new product development (Area 571);
 - (9) Development and Engineering center for research and development;
 - (10) Maintenance area 220 enclosed abrasive blast;
 - (11) Eight (8) Portable Inking Stations for use in the extrusion area;

- (12) Area 235 internal vacuum bags for flock material;
- (13) Area 207 Small quantity weigh station bag baler;
- (14) Area 207 Hy-Vac cleanup;
- (15) Area 207 12,000 gallon rubber mixing oil tanks (5);
- (16) Two (2) Barwell Extruders, exhausting inside the building; and
- (17) RCT application with a maximum capacity of one pound per hour of coating, with no stack, and exhausting to a carbon filter.

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

Existing Approvals

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

- (a) First Administrative Amendment No.: 169-16057-00004, issued on June 10, 2002;
- (b) Second Administrative Amendment No.: 169-17150-00004, issued on May 8, 2003;
- (c) First Significant Permit Modification No.: 169-17370-00004, issued on December 29, 2003;
- (d) Third Administrative Amendment No.: 169-19567-00004, issued on September 20, 2004;
- (e) First Minor Permit Modification No.: 169-19267-00004, issued on October 13, 2004;
- (f) Fourth Administrative Amendment No.: 169-20170-00004, issued on October 19, 2004;
- (g) Fifth Administrative Amendment No.: 169-21488-00004, issued on August 10, 2005;
- (h) Sixth Administrative Amendment No.: 169-21959-00004, issued on December 2, 2005;
- (i) First Interim No.: 169-22326I-00004, issued on December 22, 2005;
- (j) Second Significant Permit Modification No.: 169-22381-00004, issued on February 14, 2006; and
- (k) First Significant Source Modification No.: 169-22326-00004, issued on February 14, 2006.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Wabash County

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

- (a) Wabash County has been classified as unclassifiable or attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Wabash County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) Wabash County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (f) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 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 applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	130.22
PM-10	130.78
SO ₂	0.13
VOC	453.56
CO	18.42
NO _x	21.93

HAPs	tons/year
Single HAP	> 10
Total HAPs	> 25

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM₁₀ and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants 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. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (d) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Actual Emissions

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

Pollutant	Actual Emissions (tons/year)
PM	1.0
PM-10	0.0
SO ₂	0.0
VOC	87.0
CO	3.0
NO _x	3.0
HAP	Not Reported

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Potential to Emit After Issuance

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

Emission Unit	Potential to Emit (TPY)						
	PM	PM ₁₀	SO ₂	VOC	NO _x	CO	HAPs
Banbury							
Banbury #2 - Mixing & Milling	10.79	10.79	0.00	3.59	0.00	0.00	2.7
Banbury #3 - Mixing & Milling	10.79	10.79	0.00	3.59	0.00	0.00	2.7
Banbury #4 - Mixing & Milling	10.79	10.79	0.00	3.59	0.00	0.00	2.7
Compound Preparation							
Carbon Black Handling - Loading	38.11	38.11	0.00	0.00	0.00	0.00	0.0
Carbon Black Handling - Conveying	38.11	38.11	0.00	0.00	0.00	0.00	0.0
Weigh Stations 1 & 2	4.06	4.06	0.00	0.00	0.00	0.00	0.0
Barewell Extruders (2) - Insignificant							
	0.00	0.00	0.00	0.003	0.00	0.00	0.0
Extrusion Line 1							
Extruders	0.00	0.00	0.00	0.17	0.00	0.00	0.1
Hot Air Curing	0.00	0.00	0.00	8.32	0.00	0.00	2.6
Adhesive Application	0.00	0.00	0.00	*	0.00	0.00	24.4
On-line Primer Booth (0.5 gal/hr)	1.27	1.27	0.00	*	0.00	0.00	0.9
On-line Topcoat Booth (0.51 gal/hr)	1.31	1.31	0.00	*	0.00	0.00	1.0
Extrusion Line 2							
Extruders	0.00	0.00	0.00	0.17	0.00	0.00	0.1
Hot Air Curing	0.00	0.00	0.00	8.32	0.00	0.00	2.6
Adhesive Application	0.00	0.00	0.00	*	0.00	0.00	24.4
Extrusion Line 3							
Extruders	0.00	0.00	0.00	0.17	0.00	0.00	0.1
Hot Air Curing	0.00	0.00	0.00	8.32	0.00	0.00	2.6
Adhesive Application	0.00	0.00	0.00	*	0.00	0.00	20.5
Primer Spray Booth	0.00	0.00	0.00	*	0.00	0.00	25.0
Topcoat Booth	0.00	0.00	0.00	*	0.00	0.00	19.1
Extrusion Line 4							
Extruders	0.00	0.00	0.00	0.17	0.00	0.00	0.1
Salt Bath Curing	0.00	0.00	0.00	8.32	0.00	0.00	2.6
Spray Booth (Topcoat)	0.00	0.00	0.00	*	0.00	0.00	12.0
Extrusion Line 5							
Extruders	0.00	0.00	0.00	0.17	0.00	0.00	0.1
Hot Air Curing	0.00	0.00	0.00	8.32	0.00	0.00	2.6
Adhesive Application	0.00	0.00	0.00	*	0.00	0.00	24.4
Extrusion Line 6							
Extruders	0.00	0.00	0.00	0.17	0.00	0.00	0.1
Salt Bath Curing	0.00	0.00	0.00	8.32	0.00	0.00	2.6
Line #7 Adhesive Application							
	0.00	0.00	0.00	*	0.00	0.00	18.7
Extrusion Line 8							
Extruders	0.00	0.00	0.00	0.17	0.00	0.00	0.1
Salt Bath Curing	0.00	0.00	0.00	8.32	0.00	0.00	2.6
Topcoat Booth 1	0.00	0.00	0.00	*	0.00	0.00	25.0
Topcoat Booth 2	3.80	3.80	0.00	*	0.00	0.00	1.5
NBC							
Primer Spray Booth	0.00	0.00	0.00	*	0.00	0.00	49.9
Topcoat Booth	7.97	7.97	0.00	*	0.00	0.00	0.0
Post Flock Adhesive Stations (2)	0.00	0.00	0.00	*	0.00	0.00	20.6
U222 Finishing Area							
Primer Spray Booth	0.00	0.00	0.00	*	0.00	0.00	19.5
Topcoat Booth	2.10	2.10	0.00	*	0.00	0.00	1.6
Post Flock Adhesive Stations (3)	0.00	0.00	0.00	*	0.00	0.00	19.6
Combining Line Booths							
	0.00	0.00	0.00	*	0.00	0.00	0.0
Insert Coating Booth							
	0.00	0.00	0.00	*	0.00	0.00	0.5
Ovens							
	0.92	0.92	0.07	0.67	12.11	10.17	0.2
Natural Gas Combustion							
	0.19	0.75	0.06	0.54	9.83	8.26	0.2
Total	130.22	130.78	0.13	249.42	21.93	18.42	336.3

Note:

* Total VOC emissions from these operations are limited to less than 178 tons per year such that the total source wide VOC emissions are less than 250 tons per year to render 326 IAC 2-2 not applicable.

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

Federal Rule Applicability

- (a) 40 CFR 64, Compliance Assurance Monitoring:

This source does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1:

- (1) With the potential to emit before controls equal to or greater than the major source threshold;
- (2) That is subject to an emission limitation or standard; and
- (3) Uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to this source and not included in this permit.

- (b) 40 CFR 63, National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Plastic Parts & Products

This source is subject to the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63.4480, Subpart PPPP and 326 IAC 20-81 because the source is a major source of HAPs and the painting operation applies coatings to plastic parts and products, as defined in 40 CFR 63.4481(a). Pursuant to 40 CFR 63.4481(a)(1), the surface coating operation includes storage containers and mixing vessels that are used to store and mix thinners, additives and/or cleaning materials. Therefore, the requirements of National Emission Standards for Hazardous Air Pollutants for Plastic Parts and Products, (40 CFR 63.4480, Subpart PPPP) are included in the permit.

Pursuant to 40 CFR 63.4482, this source is an existing affected source because the construction of the source commenced prior to December 4, 2002 and the source is not reconstructed. The specific affected facilities include:

- (a) Extrusion Line 1, consisting of the following:
 - (1) One (1) Line 1 flock adhesive application booth, constructed in 1995, with a maximum capacity of 12.45 pounds per hour of adhesive, and exhausting to stack L1-7.
 - (2) One (1) Line 1 On-Line primer booth, constructed in 1997, equipped with two (2) HVLP spray guns, with a maximum capacity of 0.5 gallons of coating per hour, used to coat truck door seals, with dry filters as control, exhausting to one stack L1-6.
 - (3) One (1) topcoat booth at Line 1, using a maximum of 12.4 pounds of coating per day, exhausting to stack No. L1-17a.
- (b) Extrusion Line 2, consisting of the following:
 - (1) One (1) Line 2 drip and wipe adhesive application booth, constructed in 1986 and 1987, with a maximum capacity of 1.5 gallons of adhesive per hour, and exhausting to stack L2-9.

- (c) Extrusion Line 3, consisting of the following:
 - (1) One (1) Line 3 adhesive application booth, constructed in 1999, with a maximum capacity of 1 gallon of adhesive per hour, utilizing brush-and-wipe methods, exhausting through stack/vent L3-6.
 - (2) One (1) Line 3 primer spray booth, constructed in 1991, equipped with HVLP spray guns, with a maximum capacity of 1 gallon of coating per hour, used to coat truck door seals, with dry filters as control, exhausting to one stack L3-7.
 - (3) One (1) Line 3 topcoat booth, constructed in 1991, equipped with HVLP spray guns, with a maximum capacity of 1 gallon of coating per hour, used to coat truck door seals, with dry filters as control, exhausting to one stack L3-8.

- (d) Extrusion Line 4, consisting of the following:
 - (1) One (1) Line 4 topcoat booth, constructed in 2000, with a maximum capacity of 0.64 gallons of coating per hour, used to coat truck door seals, utilizing HVLP application method, exhausting to stack L4-6.

- (e) Extrusion Line 5, constructed in 1989, consisting of:
 - (1) One (1) Line 5 drip and wipe adhesive application booth, constructed in 1989, with a maximum capacity of 1 gallon of adhesive per hour, exhausting to one (1) stack L5-11.

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

- (g) Extrusion Line 8, consisting of the following:
 - (1) One (1) Line 8 topcoat booth 1, constructed in 2006, utilizing HVLP application method, with a maximum capacity of 1 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack L8-6.
 - (2) One (1) Line 8 topcoat booth 2, constructed in 2006, utilizing HVLP application method, with a maximum capacity of 1 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack L8-7.

- (h) NBC Coating Line, consisting of the following:
 - (1) One (1) NBC Coating Line primer spray booth, constructed in 2006, utilizing HVLP application method, with a maximum capacity of 1 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack N-1.
 - (2) One (1) NBC Coating Line topcoat spray booth, constructed in 2006, utilizing HVLP application method, with a maximum capacity of 2 gallons of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack N-2.
 - (3) Two (2) NBC Coating Line Post Flock Adhesive Stations (2 and 3), constructed in 2006, each with a maximum capacity of 0.4 gallon of coating per hour, used to coat rubber parts, exhausting through stacks N-4 and N-5, respectively.

- (i) U222 Finishing Area, consisting of the following:
 - (1) One (1) U222 Finishing Area primer spray booth, constructed in 1989, utilizing HVLP application method, with a maximum capacity of 0.61 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack FA-5 (relocated from Finishing Area 239 in 2006).
 - (2) One (1) U222 Finishing Area topcoat spray booth, constructed in 1991, utilizing HVLP application method, with a total maximum capacity of 0.83 gallon of coating per hour, used to coat rubber parts, with dry filters as control, exhausting through stack FA-7 (relocated from Finishing Area 239 in 2006).

- (3) Three (3) U222 Finishing Area Post Flock Adhesive Stations (1, 2 and 3), constructed in 2006, each with a maximum capacity of 0.4 gallon of coating per hour, used to coat rubber parts, exhausting through stacks FA-1, FA-2 and FA-3, respectively.

- (j) Three (3) Combining Adhesive Stations (1, 2 and 3), constructed in 2006, each with a maximum capacity of 0.5 gallon of coating per hour, used to coat rubber and plastic parts, exhausting through stacks C-1, C-2 and C-3, respectively.

Non applicable portions of the NESHAP will not be included in the permit. This source is subject to the following portions of Subpart PPPP.

- (a) 40 CFR 63.4480
- (b) 40 CFR 63.4481
- (c) 40 CFR 63.4482(a), (b), (d) and (e);
- (d) 40 CFR 63.4483(b) and (d);
- (e) 40 CFR 63.4490(b)(1);
- (f) 40 CFR 63.4491(a) and (b);
- (g) 40 CFR 63.4492(a);
- (h) 40 CFR 63.4493(a);
- (i) 40 CFR 63.4500(a)(1) and (b);
- (j) 40 CFR 63.4501;
- (k) 40 CFR 63.4510, except 40 CFR 63.4510(c)(8)(iii), (9), (10) and (11);
- (l) 40 CFR 63.4520, except 40 CFR 63.4520(a)(7), (b) and (c);
- (m) 40 CFR 63.4530, except 40 CFR 63.4530(c)(4), (h) and (i);
- (n) 40 CFR 63.4531;
- (o) 40 CFR 63.4540;
- (p) 40 CFR 63.4541;
- (q) 40 CFR 63.4542;
- (r) 40 CFR 63.4550;
- (s) 40 CFR 63.4551;
- (t) 40 CFR 63.4552;
- (u) 40 CFR 63.4560(b)(2) and (3);
- (v) 40 CFR 63.4561(a), (b), (c), (d), (e), (k), (l), (m) and (n);
- (w) 40 CFR 63.4563(a), (b), (c), (d), (e), (f) and (j);
- (x) 40 CFR 63.4564(a)(1);
- (y) 40 CFR 63.4580; and
- (z) 40 CFR 63.4581.

The provisions of 40 CFR 63 Subpart A – General Provisions apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart PPPP.

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63.4480, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants for Metal Parts and Products) (326 IAC 20-80) are not included in the permit since this source does not engage in surface coating of metal parts.

- (d) The requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c - 60.48c, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) are not included in the permit for one (1) natural fired boiler, with a maximum heat input capacity of 2.93 MMBtu per hour because the boiler's capacity is less than the rule applicability threshold of 10 MMBtu per hour.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The Permittee submitted a Preventive Maintenance Plan (PMP) on April 1, 1996. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not subject to 326 IAC 2-2 (PSD). This rule applies to sources with potential emissions of any criteria pollutant greater than or equal to 250 tons per year that is not one of the 28 source categories. The source was constructed in 1965, before the 326 IAC 2-2 applicability date of August 7, 1977, and is not one of the 28 source categories. The source has unlimited potential to emit of VOC greater than 250 tons per year. However, the source has always limited source-wide VOC emissions to less than 250 tons per year since it started the operation and will continue to limit coating and solvent usage for the following operations such that associated source-wide VOC emissions do not exceed 249.00 tons per year for a source wide VOC emission limit that is less than 250 tons per year. There have been no major modifications at the source; therefore, this is a minor source pursuant to 326 IAC 2-2, PSD.

The source shall comply with the following:

The use of VOC, including coatings, dilution solvents, and cleaning solvents for the list of spray booths listed in the following table shall be limited to less than 178.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Emission Unit	VOC (TPY)
Extrusion Line 1	178.00
Adhesive Application	
On-line Primer Booth (0.5 gal/hr)	
On-line Topcoat Booth (0.51 gal/hr)	
Extrusion Line 2	
Adhesive Application	
Extrusion Line 3	
Adhesive Application	
Primer Spray Booth	
Topcoat Booth	
Extrusion Line 4	
Topcoat Booth 1	
Topcoat Booth 2	
Extrusion Line 5	
Adhesive Application	
Extrusion Line 6	
Topcoat Booth	
Line #7 Adhesive Application	
Extrusion Line 8	
Topcoat Booth 1	
Topcoat Booth 2	
NBC	
Primer Spray Booth	
Topcoat Booth	
Post Flock Adhesive Stations (2)	
U222 Finishing Area	
Primer Spray Booth	
Topcoat Booth	
Post Flock Adhesive Stations (3)	
Combining Line Booths	
Insert Coating Booth	
Total	178.00

These VOC limits combined with unrestricted VOC emissions from Banbury Mills and Mixers, Compound Handling, Ovens, Natural Gas Combustion, Extrusions and Curing shall limit the source-wide potential to emit of VOC to less than 250 tons per year. Therefore, 326 IAC 2-2 (PSD) is not applicable and this source qualifies as a minor source under this rule.

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

Pursuant to 326 IAC 2-4.1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of any combination of HAPs, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). The source has a PTE single HAP and total HAPs greater than 10 and 25 tons per year, respectively. However, this source is subject to the National Emissions Standards for Hazardous Air Pollutants 40 CFR Part 63, Subpart PPPP. Pursuant to 326 IAC 2-4.1-1(b)(2), therefore, the source is not subject to the requirements of 326 IAC 2-4.1.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted annually if the potential to emit of VOC is greater than 250 tons per year, otherwise the emission statement needs to be submitted triennially. For this source, the source-wide emissions of VOC are limited to less than 250 tons per year. Therefore, in accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2004 and every 3 years after. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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 Alternative Opacity Limitations), 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)

This source is subject to 326 IAC 6-4 for 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 – Individual Facilities

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

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

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

$$E = 4.10 P^{0.67}$$

where E = rate of allowable emissions in pounds per hour; and
 P = process weight rate in tons per hour

The allowable emissions for each facility are as follows:

Emission Unit	Process Weight Rate (tons/hr)	Uncontrolled PM Emissions (lb/hr)	Control Efficiency %	Controlled PM Emissions (lb/hr)	Allowable PM Emissions (326 IAC 6-3-2) (lb/hr)
Banbury Mills	5.55	10.27	99.00%	0.10	12.93
Compound Handling	15.00	18.36	99.00%	0.18	25.16

Based on the emission calculations, the source will be able to comply with the above limits without the use of controls.

- (b) The potential to emit of particulate emissions from: Grinding and machining operation, Maintenance Wood Shop, Maintenance metal and mill wright shop, P207 Finishing area, Maintenance area 220 enclosed abrasive blast, Area 207 Littleford day mixer, two (2) Barwell Extruders, Plastic extruders at Line 7 through 9, Portable Inking stations and the one (1) Plug Press and RCT application are less than 0.551 pounds per hour. Therefore, pursuant to 326 IAC 6-3-1(b)(14), each operation is exempt from particulate emission limitations for manufacturing processes (326 IAC 6-3-2).

326 IAC 6-3-2(d) (Particulate Emission Limitations, Work Practices, and Control Technologies))

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

Emission Unit
Extrusion Line 1
On-line Primer Booth (0.5 gal/hr)
On-line Topcoat Booth (0.51 gal/hr)
Extrusion Line 3
Primer Spray Booth
Topcoat Booth
Extrusion Line 4
Topcoat Booth 1
Topcoat Booth 2
Extrusion Line 6
Topcoat Booth
Extrusion Line 8
Topcoat Booth 1
Topcoat Booth 2
NBC
Primer Spray Booth
Topcoat Booth
U222 Finishing Area
Primer Spray Booth
Topcoat Booth
Combining Line Booths
Insert Coating Booth

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

The natural gas fired boiler, constructed in 2004, with a maximum operating capacity of 2.93 MMBtu per hour, is subject to the particulate matter limitations of 326 IAC 6-2-4. Pursuant to this rule, particulate emissions from indirect heating facilities constructed after September 21, 1983, shall be limited by the following equation:

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

where: Pt = maximum allowable particulate matter (PM) emitted per mmBtu heat input
Q = total source max. operation capacity rating (at the time when the boilers were constructed)

$$Pt = 1.09/2.93^{0.26} = 0.822 \text{ lbs PM/mmBtu}$$

However, pursuant to 326 IAC 6-2-4(a), Pt for indirect heating facilities constructed after 1983 with Q less than 10 MMBtu/hr shall not exceed 0.6 lbs PM/mmBtu, therefore the boiler is limited to 0.6 lbs PM/MMBtu.

Compliance calculation:

Potential PM Emission = 1.9 lb PM/mmCF * (1/1000) (mmCF/MMBtu) = 0.0019 lbs PM/MMBtu.
Potential PM Emission for boiler (0.0019 lbs PM/MMBtu) is less than allowable 0.60 lbs PM/MMBtu, therefore, the boiler will be able to comply with the requirements of 326 IAC 6-2-4.

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

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

Emission Unit	PTE of VOC	Limit	Reason 326 IAC 8-1-6 is not applicable
Banbury			
Banbury #2 - Mixing & Milling	3.59	NA	The PTE of VOC is less than 25 tons per year
Banbury #3 - Mixing & Milling	3.59	NA	The PTE of VOC is less than 25 tons per year
Banbury #4 - Mixing & Milling	3.59	NA	The PTE of VOC is less than 25 tons per year
Barewell Extruders (2) - Insignificant	0.003	NA	The PTE of VOC is less than 25 tons per year
Extrusion Line 1			
Extruders	0.17	NA	The PTE of VOC is less than 25 tons per year
Hot Air Curing	8.32	NA	The PTE of VOC is less than 25 tons per year
Adhesive Application	32.87	24.90	The PTE of VOC is limited to less than 25 tons per year
On-line Primer Booth (0.5 gal/hr)	4.34	NA	The PTE of VOC is less than 25 tons per year
On-line Topcoat Booth (0.51 gal/hr)	4.48	NA	The PTE of VOC is less than 25 tons per year
Extrusion Line 2			
Extruders	0.17	NA	The PTE of VOC is less than 25 tons per year
Hot Air Curing	8.32	NA	The PTE of VOC is less than 25 tons per year
Adhesive Application	31.40	24.90	The PTE of VOC is limited to less than 25 tons per year
Extrusion Line 3			
Extruders	0.17	NA	The PTE of VOC is less than 25 tons per year
Hot Air Curing	8.32	NA	The PTE of VOC is less than 25 tons per year
Adhesive Application	20.94	NA	The PTE of VOC is less than 25 tons per year
Primer Spray Booth	31.89	24.90	The PTE of VOC is limited to less than 25 tons per year
Topcoat Booth	28.43	24.90	The PTE of VOC is limited to less than 25 tons per year
Extrusion Line 4			
Extruders	0.17	NA	The PTE of VOC is less than 25 tons per year
Salt Bath Curing	8.32	NA	The PTE of VOC is less than 25 tons per year
Spray Booth (Topcoat)	15.76	NA	The PTE of VOC is less than 25 tons per year
Extrusion Line 5			
Extruders	0.17	NA	The PTE of VOC is less than 25 tons per year
Hot Air Curing	8.32	NA	The PTE of VOC is less than 25 tons per year
Adhesive Application	30.77	24.90	The PTE of VOC is limited to less than 25 tons per year
Extrusion Line 6			
Extruders	0.17	NA	The PTE of VOC is less than 25 tons per year
Salt Bath Curing	8.32	NA	The PTE of VOC is less than 25 tons per year
Line #7 Adhesive Application	23.04	NA	The PTE of VOC is less than 25 tons per year
Extrusion Line 8			
Extruders	0.17	NA	The PTE of VOC is less than 25 tons per year
Hot Air Curing	8.32	NA	The PTE of VOC is less than 25 tons per year
Topcoat Booth 1	31.89	24.90	The PTE of VOC is limited to less than 25 tons per year
Topcoat Booth 2	4.82	NA	The PTE of VOC is less than 25 tons per year
NBC			
Primer Spray Booth	31.89	24.90	The PTE of VOC is limited to less than 25 tons per year
Topcoat Booth	2.66	NA	The PTE of VOC is less than 25 tons per year
Post Flock Adhesive Stations (2)	21.02	NA	The PTE of VOC is less than 25 tons per year
U222 Finishing Area			
Primer Spray Booth	19.49	NA	The PTE of VOC is less than 25 tons per year
Topcoat Booth	7.20	NA	The PTE of VOC is less than 25 tons per year
Post Flock Adhesive Stations (3)	21.02	NA	The PTE of VOC is less than 25 tons per year
Combining Line Booths	24.78	NA	The PTE of VOC is less than 25 tons per year
Insert Coating Booth	0.48	NA	The PTE of VOC is less than 25 tons per year

Based on the above analysis, the VOC input usage to the Adhesive Application in Extrusion Line 1, Line 2, and Line 5, Primer Spray booth in Extrusion Line 3 and NBC Coating Line, Top Coat booth in Line 3 and Top coat Booth 1 in Line 8 shall be limited to less than 25.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 8-1-6 (BACT) do not apply.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential solvent VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source began operation prior to October 7, 1974; therefore, this rule does not apply.

Compliance Determination and Monitoring Requirements

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

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

The compliance monitoring requirements applicable to this source are as follows:

- (a) The Banbury Mills and Compound handling operations have applicable compliance determination conditions as specified below:
 - (1) Daily visible emission notations of the Banbury Mills and Compound handling stacks' (BH02, BH03, BH04, BH05, BH06, BH07, BH08, BH10) exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
 - (2) 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.
 - (3) 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.
 - (4) 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.
 - (5) 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.

- (6) The Permittee shall record the pressure drop across the baghouses (BH02, BH03, BH04, BH05, BH06, BH07, BH08, BH10) used in conjunction with the Banbury Mills and Compound handling at least once per day when the mixing lines are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 10.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

- (7) In the event that bag failure has been observed:

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

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

These monitoring conditions are necessary because to ensure compliance with 326 IAC 2-7 (Part 70).

- (b) The surface coating operations at the source have applicable compliance monitoring conditions as specified below:
- (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters for the surface coating operation. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation. If a condition exists which should result in a response step, the permittee failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

- (2) Monthly inspections shall be performed of the particulate 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 above mentioned surface coating operations must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations, Work Practices, and Control Technologies) and 326 IAC 2-7 (Part 70).

Recommendation

The staff recommends to the Commissioner that the Part 70 Operating Permit 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 application for the purposes of this review was received on 14 July 2006.

Conclusion

The operation of this rubber and plastic products manufacturing shall be subject to the conditions of the attached proposed Part 70 Operating Permit Renewal No. T169-23357-00004.

Company Name: GDx Automotive North America, Inc.
Address City IN Zip: One General Street, Wabash, IN 46992
Title V: T169-23357-00004
Reviewer: Surya Ramaswamy / EVP
Date: 12/18/07

Potential Emission Summary

Emission Unit	Potential to Emit (TPY)						
	PM	PM ₁₀	SO ₂	VOC	NO _x	CO	HAPs
Banbury							
Banbury #2 - Mixing & Milling	10.79	10.79	0.00	3.59	0.00	0.00	2.71
Banbury #3 - Mixing & Milling	10.79	10.79	0.00	3.59	0.00	0.00	2.71
Banbury #4 - Mixing & Milling	10.79	10.79	0.00	3.59	0.00	0.00	2.71
Compound Preparation							
Carbon Black Handling - Loading	38.11	38.11	0.00	0.00	0.00	0.00	0.00
Carbon Black Handling - Conveying	38.11	38.11	0.00	0.00	0.00	0.00	0.00
Weigh Stations 1 & 2	4.06	4.06	0.00	0.00	0.00	0.00	0.00
Barewell Extruders (2) - Insignificant							
	0.00	0.00	0.00	0.003	0.00	0.00	0.03
Extrusion Line 1							
Extruders	0.00	0.00	0.00	0.17	0.00	0.00	0.13
Hot Air Curing	0.00	0.00	0.00	8.32	0.00	0.00	2.61
Adhesive Application	0.00	0.00	0.00	32.87	0.00	0.00	32.19
On-line Primer Booth (0.5 gal/hr)	1.27	1.27	0.00	4.34	0.00	0.00	0.94
On-line Topcoat Booth (0.51 gal/hr)	1.31	1.31	0.00	4.48	0.00	0.00	0.98
Extrusion Line 2							
Extruders	0.00	0.00	0.00	0.17	0.00	0.00	0.13
Hot Air Curing	0.00	0.00	0.00	8.32	0.00	0.00	2.61
Adhesive Application	0.00	0.00	0.00	31.40	0.00	0.00	30.75
Extrusion Line 3							
Extruders	0.00	0.00	0.00	0.17	0.00	0.00	0.13
Hot Air Curing	0.00	0.00	0.00	8.32	0.00	0.00	2.61
Adhesive Application	0.00	0.00	0.00	20.94	0.00	0.00	20.50
Primer Spray Booth	0.00	0.00	0.00	31.89	0.00	0.00	31.97
Topcoat Booth	0.00	0.00	0.00	28.43	0.00	0.00	19.08
Extrusion Line 4							
Extruders	0.00	0.00	0.00	0.17	0.00	0.00	0.13
Salt Bath Curing	0.00	0.00	0.00	8.32	0.00	0.00	2.61
Spray Booth (Topcoat)	0.00	0.00	0.00	15.76	0.00	0.00	12.02
Extrusion Line 5							
Extruders	0.00	0.00	0.00	0.17	0.00	0.00	0.13
Hot Air Curing	0.00	0.00	0.00	8.32	0.00	0.00	2.61
Adhesive Application	0.00	0.00	0.00	30.77	0.00	0.00	30.14
Extrusion Line 6							
Extruders	0.00	0.00	0.00	0.17	0.00	0.00	0.13
Salt Bath Curing	0.00	0.00	0.00	8.32	0.00	0.00	2.61
Line #7 Adhesive Application							
	0.00	0.00	0.00	23.04	0.00	0.00	18.73
Extrusion Line 8							
Extruders	0.00	0.00	0.00	0.17	0.00	0.00	0.13
Hot Air Curing	0.00	0.00	0.00	8.32	0.00	0.00	2.61
Topcoat Booth 1	0.00	0.00	0.00	31.89	0.00	0.00	31.97
Topcoat Booth 2	3.80	3.80	0.00	4.82	0.00	0.00	1.46
NBC							
Primer Spray Booth	0.00	0.00	0.00	31.89	0.00	0.00	63.95
Topcoat Booth	7.97	7.97	0.00	2.66	0.00	0.00	0.00
Post Flock Adhesive Stations (2)	0.00	0.00	0.00	14.02	0.00	0.00	14.09
U222 Finishing Area							
Primer Spray Booth	0.00	0.00	0.00	19.49	0.00	0.00	19.47
Topcoat Booth	2.10	2.10	0.00	7.20	0.00	0.00	1.56
Post Flock Adhesive Stations (3)	0.00	0.00	0.00	21.02	0.00	0.00	19.63
Combining Line Booths							
	0.00	0.00	0.00	24.78	0.00	0.00	0.00
Insert Coating Booth							
	0.00	0.00	0.00	0.48	0.00	0.00	0.54
Ovens							
	0.92	0.92	0.07	0.67	12.11	10.17	0.23
Natural Gas Combustion							
	0.19	0.75	0.06	0.54	9.83	8.26	0.19
Total	130.22	130.78	0.13	453.56	21.93	18.42	377.71

Company Name: **GDX Automotive North America, Inc.**
 Address City IN Zip: **One General Street, Wabash, IN 46992**
 Title V: **T169-23357-00004**
 Reviewer: **Surya Ramaswamy / EVP**
 Date: **12/18/07**

Limited Emission Summary

Emission Unit	Potential to Emit (TPY)						
	PM	PM ₁₀	SO ₂	VOC	NO _x	CO	HAPs
Banbury							
Banbury #2 - Mixing & Milling	10.79	10.79	0.00	3.59	0.00	0.00	2.7
Banbury #3 - Mixing & Milling	10.79	10.79	0.00	3.59	0.00	0.00	2.7
Banbury #4 - Mixing & Milling	10.79	10.79	0.00	3.59	0.00	0.00	2.7
Compound Preparation							
Carbon Black Handling - Loading	38.11	38.11	0.00	0.00	0.00	0.00	0.0
Carbon Black Handling - Conveying	38.11	38.11	0.00	0.00	0.00	0.00	0.0
Weigh Stations 1 & 2	4.06	4.06	0.00	0.00	0.00	0.00	0.0
Barewell Extruders (2) - Insignificant							
	0.00	0.00	0.00	0.003	0.00	0.00	0.0
Extrusion Line 1							
Extruders	0.00	0.00	0.00	0.17	0.00	0.00	0.1
Hot Air Curing	0.00	0.00	0.00	8.32	0.00	0.00	2.6
Adhesive Application	0.00	0.00	0.00	*	0.00	0.00	24.4
On-line Primer Booth (0.5 gal/hr)	1.27	1.27	0.00	*	0.00	0.00	0.9
On-line Topcoat Booth (0.51 gal/hr)	1.31	1.31	0.00	*	0.00	0.00	1.0
Extrusion Line 2							
Extruders	0.00	0.00	0.00	0.17	0.00	0.00	0.1
Hot Air Curing	0.00	0.00	0.00	8.32	0.00	0.00	2.6
Adhesive Application	0.00	0.00	0.00	*	0.00	0.00	24.4
Extrusion Line 3							
Extruders	0.00	0.00	0.00	0.17	0.00	0.00	0.1
Hot Air Curing	0.00	0.00	0.00	8.32	0.00	0.00	2.6
Adhesive Application	0.00	0.00	0.00	*	0.00	0.00	20.5
Primer Spray Booth	0.00	0.00	0.00	*	0.00	0.00	25.0
Topcoat Booth	0.00	0.00	0.00	*	0.00	0.00	19.1
Extrusion Line 4							
Extruders	0.00	0.00	0.00	0.17	0.00	0.00	0.1
Salt Bath Curing	0.00	0.00	0.00	8.32	0.00	0.00	2.6
Spray Booth (Topcoat)	0.00	0.00	0.00	*	0.00	0.00	12.0
Extrusion Line 5							
Extruders	0.00	0.00	0.00	0.17	0.00	0.00	0.1
Hot Air Curing	0.00	0.00	0.00	8.32	0.00	0.00	2.6
Adhesive Application	0.00	0.00	0.00	*	0.00	0.00	24.4
Extrusion Line 6							
Extruders	0.00	0.00	0.00	0.17	0.00	0.00	0.1
Salt Bath Curing	0.00	0.00	0.00	8.32	0.00	0.00	2.6
Line #7 Adhesive Application							
	0.00	0.00	0.00	*	0.00	0.00	18.7
Extrusion Line 8							
Extruders	0.00	0.00	0.00	0.17	0.00	0.00	0.1
Salt Bath Curing	0.00	0.00	0.00	8.32	0.00	0.00	2.6
Topcoat Booth 1	0.00	0.00	0.00	*	0.00	0.00	25.0
Topcoat Booth 2	3.80	3.80	0.00	*	0.00	0.00	1.5
NBC							
Primer Spray Booth	0.00	0.00	0.00	*	0.00	0.00	49.9
Topcoat Booth	7.97	7.97	0.00	*	0.00	0.00	0.0
Post Flock Adhesive Stations (2)	0.00	0.00	0.00	*	0.00	0.00	20.6
U222 Finishing Area							
Primer Spray Booth	0.00	0.00	0.00	*	0.00	0.00	19.5
Topcoat Booth	2.10	2.10	0.00	*	0.00	0.00	1.6
Post Flock Adhesive Stations (3)	0.00	0.00	0.00	*	0.00	0.00	19.6
Combining Line Booths							
	0.00	0.00	0.00	*	0.00	0.00	0.0
Insert Coating Booth							
	0.00	0.00	0.00	*	0.00	0.00	0.5
Ovens							
	0.92	0.92	0.07	0.67	12.11	10.17	0.2
Natural Gas Combustion							
	0.19	0.75	0.06	0.54	9.83	8.26	0.2
Total	130.22	130.78	0.13	249.42	21.93	18.42	336.3

Note:

* Total VOC emissions from these operations are limited to less than 178 tons per year such that the total source wide VOC emissions are less than 250 tons per year to render the 326 IAC 2-2 not applicable.

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

Company Name: **GDX Automotive North America, Inc.**
Address City IN Zip: **One General Street, Wabash, IN 46992**
Title V: **T169-23357-00004**
Reviewer: **Surya Ramaswamy / EVP**
Date: **12/18/07**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	
Line 1 - Flock Adhesive Application Booth																	
L618 Mix	7.9	60.35%	0.0%	60.4%	0.0%	39.90%	0.00157	1000.000	4.78	4.78	7.50	180.10	32.87	0.00	11.98	100%	
Potential Emissions Add worst case coating to all solvents											7.50	180.10	32.87	0.00			
				Limit Usage:		Limit Usage:		Control Efficiency:		Limit Usage:		Limit Usage:		Limit Usage:		Limit Usage:	
				PM		VOC		VOC		PM		VOC lbs per Hour		VOC lbs per Day		VOC tons per Year	
				0.00%		24.24%		0.00%		0.00%		5.68		136.44		24.90	
<hr/>																	
Line 1 - On-line Primer Booth (0.5 gal/hr)																	
Topcoat 8370UV	8.6	73.05%	50.0%	23.1%	0.0%	26.95%	0.00050	1000.000	1.98	1.98	0.99	23.76	4.34	1.27	7.35	75%	
Potential Emissions Add worst case coating to all solvents											0.99	23.76	4.34	1.27			
				Limit Usage:		Limit Usage:		Control Efficiency:		Limit Usage:		Limit Usage:		Limit Usage:		Limit Usage:	
				PM		VOC		VOC		PM		VOC lbs per Hour		VOC lbs per Day		VOC tons per Year	
				0.00%		0.00%		0.00%		75.00%		0.99		23.76		4.34	
<hr/>																	
Line 1 - On-line Topcoat Booth (0.51 gal/hr)																	
Topcoat 8370UV	8.6	73.05%	50.0%	23.1%	0.0%	26.95%	0.00052	1000.000	1.98	1.98	1.02	24.57	4.48	1.31	7.35	75%	
Potential Emissions Add worst case coating to all solvents											1.02	24.57	4.48	1.31			
				Limit Usage:		Limit Usage:		Control Efficiency:		Limit Usage:		Limit Usage:		Limit Usage:		Limit Usage:	
				PM		VOC		VOC		PM		VOC lbs per Hour		VOC lbs per Day		VOC tons per Year	
				0.00%		0.00%		0.00%		75.00%		1.02		24.57		4.48	
<hr/>																	
Line 2 - Drip and Wipe Adhesive Application Booth																	
L618 Mix	7.9	60.35%	0.0%	60.4%	0.0%	39.90%	1.50000	1.000	4.78	4.78	7.17	172.07	31.40	0.00	11.98	100%	
Potential Emissions Add worst case coating to all solvents											7.17	172.07	31.40	0.00			
				Limit Usage:		Limit Usage:		Control Efficiency:		Limit Usage:		Limit Usage:		Limit Usage:		Limit Usage:	
				PM		VOC		VOC		PM		VOC lbs per Hour		VOC lbs per Day		VOC tons per Year	
				0.00%		20.71%		0.00%		0.00%		5.68		136.44		24.90	
<hr/>																	
Line 3 - Adhesive Application Booth																	
L618 Mixture	7.9	60.35%	0.0%	60.4%	0.0%	39.90%	1.00000	1.000	4.78	4.78	4.78	114.71	20.94	0.00	11.98	100%	
Potential Emissions Add worst case coating to all solvents											4.78	114.71	20.94	0.00			
				Limit Usage:		Limit Usage:		Control Efficiency:		Limit Usage:		Limit Usage:		Limit Usage:		Limit Usage:	
				PM		VOC		VOC		PM		VOC lbs per Hour		VOC lbs per Day		VOC tons per Year	
				0.00%		0.00%		0.00%		0.00%		4.78		114.71		20.94	

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

Company Name: **GDX Automotive North America, Inc.**
 Address City IN Zip: **One General Street, Wabash, IN 46992**
 Title V: **T169-23357-00004**
 Reviewer: **Surya Ramaswamy / EVP**
 Date: **12/18/07**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	
Line 3 - Topcoat Spray Booth																	
VL203	7.5	86.42%	0.0%	86.4%	0.0%	13.58%	1.00000	1.000	6.49	6.49	6.49	155.76	28.43	1.12	47.79	75%	
Potential Emissions Add worst case coating to all solvents											6.49	155.76	28.43	1.12			
									Limit Usage: PM	Limit Usage: VOC	Control Efficiency: VOC		Limit Usage: PM	Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM
									0.00%	12.41%	0.00%		80.00%	5.68	136.44	24.90	0.20
Line 3 - Primer Booth																	
VL203	7.3	100.00%	0.0%	100.0%	0.0%	0.00%	1.00000	1.000	7.28	7.28	7.28	174.72	31.89	0.00	#DIV/0!	75%	
Potential Emissions Add worst case coating to all solvents											7.28	174.72	31.89	0.00			
									Limit Usage: PM	Limit Usage: VOC	Control Efficiency: VOC		Limit Usage: PM	Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM
									0.00%	21.91%	0.00%		80.00%	5.68	136.44	24.90	0.00
Line 4 - Topcoat Spray Booth																	
459X	7.3	100.00%	0.0%	100.0%	0.0%	0.00%	0.34000	1.000	7.03	7.03	2.39	57.36	10.47	0.00	#DIV/0!	75%	
Potential Emissions Add worst case coating to all solvents											2.39	57.36	10.47	0.00			
									Limit Usage: PM	Limit Usage: VOC	Control Efficiency: VOC		Limit Usage: PM	Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM
									0.00%	0.00%	0.00%		80.00%	2.39	57.36	< 25	0.00
Line 4 - Topcoat Spray Booth																	
8370UV	8.6	73.05%	50.0%	23.1%	0.0%	26.95%	0.61000	1.000	1.98	1.98	1.21	28.99	5.29	1.55	7.35	75%	
Potential Emissions Add worst case coating to all solvents											1.21	28.99	5.29	1.55			
									Limit Usage: PM	Limit Usage: VOC	Control Efficiency: VOC		Limit Usage: PM	Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM
									0.00%	0.00%	0.00%		80.00%	1.21	28.99	< 25	0.31

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

Company Name: **GDX Automotive North America, Inc.**
 Address City IN Zip: **One General Street, Wabash, IN 46992**
 Title V: **T169-23357-00004**
 Reviewer: **Surya Ramaswamy / EVP**
 Date: **12/18/07**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	
Line 5 - Drip and Wipe Adhesive Application Booth																	
L618 Mix	7.9	60.35%	0.0%	60.4%	0.0%	39.90%	0.00147	1000.000	4.78	4.78	7.03	168.63	30.77	0.00	11.98	100%	
Potential Emissions Add worst case coating to all solvents											7.03	168.63	30.77	0.00			
				Limit Usage:		Limit Usage:		Control Efficiency:		Limit Usage:		Limit Usage:		Limit Usage:		Limit Usage:	
				PM		VOC		VOC		PM		VOC lbs per Hour		VOC lbs per Day		VOC tons per Year	
				0.00%		19.09%		0.00%		0.00%		5.68		136.44		24.90	
Line 7 - Adhesive Application Booth																	
Flock Lok 850	8.1	57.40%	0.0%	57.4%	0.0%	42.60%	1.11000	1.000	4.62	4.62	5.13	123.10	22.46	0.00	10.85	100%	
Potential Emissions Add worst case coating to all solvents											5.13	123.10	22.46	0.00			
				Limit Usage:		Limit Usage:		Control Efficiency:		Limit Usage:		Limit Usage:		Limit Usage:		Limit Usage:	
				PM		VOC		VOC		PM		VOC lbs per Hour		VOC lbs per Day		VOC tons per Year	
				0.00%		0.00%		0.00%		0.00%		5.13		123.10		22.46	

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

Company Name: **GDX Automotive North America, Inc.**
Address City IN Zip: **One General Street, Wabash, IN 46992**
Title V: **T169-23357-00004**
Reviewer: **Surya Ramaswamy / EVP**
Date: **12/18/07**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	
Line 7 - Adhesive Application Booth																	
Catalyst 9986	7.3	90.30%	0.0%	90.3%	0.0%	9.70%	0.02000	1.000	6.55	6.55	0.13	3.14	0.57	0.00	67.49	100%	
Potential Emissions Add worst case coating to all solvents											0.13	3.14	0.57	0.00			
									Limit Usage: PM	Limit Usage: VOC	Control Efficiency: VOC		Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM	
									0.00%	0.00%	0.00%		0.00%	3.14	0.57	0.00	
Line 8- Topcoat Booth #1																	
459X	7.3	100.00%	0.0%	100.0%	0.0%	0.00%	1.00000	1.000	7.28	7.28	7.28	174.72	31.89	0.00	#DIV/0!	75%	
Line 8- Topcoat Booth #2																	
EX-66-578	8.7	59.92%	47.2%	12.7%	0.0%	40.00%	1.00000	1.000	1.10	1.10	1.10	26.40	4.82	3.80	2.75	75%	
Potential Emissions Add worst case coating to all solvents											8.38	201.12	36.70	3.80			
Usage Limit For Line 10- Primer Spray Booth																	
									Limit Usage: PM	Limit Usage: VOC	Control Efficiency: VOC		Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM	
									0.00%	21.91%	0.00%		80.00%	5.68	136.44	< 25	0.76
U222 - Post Flock Adhesive Stations (3)																	
852	8.3	48.25%	0.0%	48.3%	0.0%	51.75%	0.40000	1.000	4.00	4.00	1.60	38.40	21.02	0.00	7.73	100%	
Potential Emissions For Each Booth Add worst case coating to all solvents											1.60	38.40	21.02	0.00			
									Control Efficiency: VOC		PM	Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM		
									0.00%		80.00%	1.60	38.40	21.02	0.00		
U222 Finishing Area - Topcoat Booth																	
8370 UV	8.6	73.05%	50.0%	23.1%	0.0%	26.95%	0.83000	1.000	1.98	1.98	1.64	39.44	7.20	2.10	7.35	75%	
Potential Emissions Add worst case coating to all solvents											1.64	39.44	7.20	2.10			
									Limit Usage: PM	Limit Usage: VOC	Control Efficiency: VOC		Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM	
									0.00%	0.00%	0.00%		80.00%	1.64	39.44	7.20	0.42

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

Company Name: **GDX Automotive North America, Inc.**
Address City IN Zip: **One General Street, Wabash, IN 46992**
Title V: **T169-23357-00004**
Reviewer: **Surya Ramaswamy / EVP**
Date: **12/18/07**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency		
U222 Finishing Area Primer Spray Booth																		
Chemlok 459X	7.3	100.00%	0.0%	100.0%	0.0%	3.00%	0.00029	2100.000	7.28	7.28	4.45	106.77	19.49	0.00	242.67	75%		
Potential Emissions Add worst case coating to all solvents											4.45	106.77	19.49	0.00				
										Limit Usage: PM	Limit Usage: VOC	Control Efficiency: VOC		Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM	
										0.00%	0.00%	0.00%		90.00%	4.45	106.77	19.49	0.00
NBC Offline- Primer Booth																		
459X	7.3	100.00%	0.0%	100.0%	0.0%	0.00%	1.00000	1.000	7.28	7.28	7.28	174.72	31.89	0.00	#DIV/0!	75%		
NBC Offline- Topcoat																		
Autoseal 3443	8.5	57.38%	53.8%	3.6%	0.0%	42.63%	2.00000	1.000	0.30	0.30	0.61	14.55	2.66	7.97	0.13	75%		
NBC Offline- Post Flock Adhesive Stations (2)																		
852	8.3	48.25%	0.0%	48.3%	0.0%	51.75%	0.40000	1.000	4.00	4.00	3.20	76.80	14.02	0.00	2.07	100%		
Potential Emissions Add worst case coating to all solvents											11.09	266.07	48.56	7.97				
										Usage Limit For NBC Offline- Primer Spray Booth								
										Limit Usage: PM	Limit Usage: VOC	Control Efficiency: VOC		Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM	
										0.00%	21.91%	0.00%		80.00%	8.66	207.77	<25	1.24
Combining Line 3- Adhesive Stations (3)																		
Tivolit	7.8	48.60%	0.0%	48.6%	0.0%	58.29%	0.50000	1.000	3.77	3.77	1.89	45.26	24.78	0.00	6.47	100%		
Potential Emissions For Each Booth Add worst case coating to all solvents											1.89	45.26	24.78	0.00				
										Control Efficiency: VOC		PM	Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM		
										0.00%	80.00%		1.89	45.26	24.78	0.00		
Insert Coating Operation (Insignificant)																		
Chemlok 6250	8.0	76.23%	0.0%	76.2%	0.0%	23.77%	0.01800	1.000	6.06	6.06	0.11	2.62	0.48	0.00	25.50	100%		
Potential Emissions For Each Booth Add worst case coating to all solvents											0.11	2.62	0.48	0.00				
										Control Efficiency: VOC		PM	Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM		
										0.00%	80.00%		0.11	2.62	0.48	0.00		

METHODOLOGY

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

HAPs

From Surface Coating Operations

Company Name: GDX Automotive North America, Inc.
 Address City IN Zip: One General Street, Wabash, IN 46992
 Title V: T169-23357-00004
 Reviewer: Surya Ramaswamy / EVP
 Date: 12/18/07

Potential HAP Emissions

Material	Density (Lb/Gal)	Gallons of (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MIBK	Weight % Ethylbenzene	Weight % Glycol Ethers	Weight % Other HAPs
Line 1 - Flock Adhesive Application Booth									
L618 Mix	7.92	0.00157	1000	28.30%	23.00%	4.70%	3.10%	-	
Line 1 - On Line Primer Booth									
Topcoat 8370UV	8.59	0.00050	1000	-	-	-	-	5.00%	
Line 1 - On Line Topcoat Booth									
Topcoat 8370UV	8.59	0.00052	1000	-	-	-	-	5.00%	
Line 2 - Flock Adhesive Application Booth									
L618 Mix	7.92	1.50000	1	28.30%	23.00%	4.70%	3.10%	-	
Line 3 - Flock Adhesive Application Booth									
L618 Mix	7.92	1.00000	1	28.30%	23.00%	4.70%	3.10%	-	
Line 3 - Topcoat Spray Booth									
VL203	7.51	1.00000	1	58.00%	0.00%	0.00%	0.00%	0.00%	
Line 3 - Primer Booth									
459X	7.3	1.00000	1	80.00%	-	-	20.00%	-	
Line 4 - Primer Booth									
459X	7.3	0.34000	1	80.00%	-	-	20.00%	-	
Line 4 - On Line Topcoat Booth									
Topcoat 8370UV	8.59	0.61000	1	-	-	-	-	5.00%	
Line 5 - Flock Adhesive Application Booth									
L618 Mix	7.92	0.00147	1000	28.30%	23.00%	4.70%	3.10%	-	
Line 7 - Flock Adhesive Application Booth									
Flock Lok 850	8.1	1.11000	1	25.00%	-	10.00%	10.00%	-	4,4' - Diphenylmethane diisocyanate
Catalyst 9986	7.3	0.02000	1	-	35.00%				0.02
Line 8 - Topcoat Booth #1									
459X	7.3	1.00000	1	80.00%	-	-	20.00%	-	
Line 8 - Topcoat Booth #2									
EX-66-578	8.66	1.00000	1					2.78%	Ethylene Glycol 1.08%
U222 - Post Flock Adhesive Stations (3)									
852	8.3	0.40000	1	25.00%	-	10.00%	10.00%		
U222 - On Line Topcoat Booth									
Topcoat 8370UV	8.59	0.83000	1	-	-	-	-	5.00%	
U222 - Primer Booth									
459X	7.3	0.00029	2100	80.00%	-	-	20.00%	-	
NBC Offline - Primer Booth									
459X	7.3	2.00000	1	80.00%	-	-	20.00%	-	
NBC Offline - Topcoat									
Autoseal 3443	8.5	0.40000	1	-	-	-	-	-	
NBC Offline - Post Flock Adhesive Stations (2)									
852	8.3	0.40000	1	25.00%	-	10.00%	10.00%		
Combining Line (3)									
Tivolit	7.8	0.50000	1	-	-	-	-	-	
Insert Coating Operation									
Chemlok 6250	8	0.01800	1	65.00%	-		15.00%		MDI 5.00%

HAPs

From Surface Coating Operations

Company Name: GDX Automotive North America, Inc.
 Address City IN Zip: One General Street, Wabash, IN 46992
 Title V: T169-23357-00004
 Reviewer: Surya Ramaswamy / EVP
 Date: 12/18/07

Potential HAP Emissions

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Xylene TPY	Toluene TPY	MIBK TPY	Ethylbenzene TPY	Glycol Ethers TPY	Other HAPs TPY
Line 1 - Flock Adhesive Application Booth									
L618 Mix	7.92	0.00157	1000	15.41	12.53	2.56	1.69	0.00	0.00
Line 1 - On Line Topcoat Booth 1									
Topcoat 8370UV	8.59	0.00050	1000	0.00	0.00	0.00	0.00	0.94	0.00
Line 1 - On Line Topcoat Booth 2									
Topcoat 8370UV	8.59	0.00052	1000	0.00	0.00	0.00	0.00	0.98	0.00
Line 2 - Flock Adhesive Application Booth									
L618 Mix	7.92	1.50000	1	14.73	11.97	2.45	1.61	0.00	0.00
Line 3 - Flock Adhesive Application Booth									
L618 Mix	7.92	1.00000	1	9.82	7.98	1.63	1.08	0.00	0.00
Line 3 - Topcoat Spray Booth									
VL203	7.51	1.00000	1	19.08	0.00	0.00	0.00	0.00	0.00
Line 3 - Primer Booth									
459X	7.3	1.00000	1	25.58	0.00	0.00	6.39	0.00	0.00
Line 4 - Primer Booth									
459X	7.3	0.34000	1	8.70	0.00	0.00	2.17	0.00	0.00
Line 4 - On Line Topcoat Booth									
Topcoat 8370UV	8.59	0.61000	1	0.00	0.00	0.00	0.00	1.15	0.00
Line 5 - Flock Adhesive Application Booth									
L618 Mix	7.92	0.00147	1000	14.43	11.73	2.40	1.58	0.00	0.00
Line 7 - Flock Adhesive Application Booth									
Flock Lok 850	8.1	1.11000	1	9.85	0.00	3.94	3.94	0.00	0.79
Catalyst 9986	7.3	0.02000	1	0.00	0.22	0.00	0.00	0.00	0.00
Line 8 - Topcoat Booth #1									
459X	7.3	1.00000	1	25.58	0.00	0.00	6.39	0.00	0.00
Line 8 - Topcoat Booth #2									
EX-66-578	8.66	1.00000	1	0.00	0.00	0.00	0.00	1.05	0.41
U222 - Post Flock Adhesive Stations (3)									
852	8.3	0.40000	1	10.91	0.00	4.36	4.36	0.00	0.00
U222 - On Line Topcoat Booth									
Topcoat 8370UV	8.59	0.83000	1	0.00	0.00	0.00	0.00	1.56	0.00
U222 - Primer Booth									
459X	7.3	0.00029	2100	15.58	0.00	0.00	3.89	0.00	0.00
NBC Offline - Primer Booth									
459X	7.3	2.00000	1	51.16	0.00	0.00	12.79	0.00	0.00
NBC Offline - Topcoat									
Autoseal 3443	8.5	0.40000	1	0.00	0.00	0.00	0.00	0.00	0.00
NBC Offline - Post Flock Adhesive Stations (2)									
852	8.3	0.40000	1	7.27	0.00	2.91	2.91	0.00	0.00
Combining Line (3)									
Tivolit	7.8	0.50000	1	0.00	0.00	0.00	0.00	0.00	0.00
Insert Coating Operation									
Chemlok 6250	8	0.01800	1	0.41	0.00	0.00	0.09	0.00	0.03
Total				228.49	44.43	20.24	48.91	5.68	1.23

HAPs

From Surface Coating Operations

Company Name: GDX Automotive North America, Inc.
Address City IN Zip: One General Street, Wabash, IN 46992
Title V: T169-23357-00004
Reviewer: Surya Ramaswamy / EVP
Date: 12/18/07

Limited HAP Emissions due to Limited VOC Emissions

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Xylene TPY	Toluene TPY	MIBK TPY	Ethylbenzene TPY	Glycol Ethers TPY	Other HAPs TPY
Line 1 - Flock Adhesive Application Booth									
L618 Mix	7.92	0.00157	1000	11.68	9.49	1.94	1.28	0.00	0.00
Line 1 - On Line Topcoat Booth 1									
Topcoat 8370UV	8.59	0.00050	1000	0.00	0.00	0.00	0.00	0.94	0.00
Line 1 - On Line Topcoat Booth 2									
Topcoat 8370UV	8.59	0.00052	1000	0.00	0.00	0.00	0.00	0.98	0.00
Line 2 - Flock Adhesive Application Booth									
L618 Mix	7.92	1.50000	1	11.68	9.49	1.94	1.28	0.00	0.00
Line 3 - Flock Adhesive Application Booth									
L618 Mix	7.92	1.00000	1	9.82	7.98	1.63	1.08	0.00	0.00
Line 3 - Topcoat Spray Booth									
VL203	7.51	1.00000	1	16.71	0.00	0.00	0.00	0.00	0.00
Line 3 - Primer Booth									
459X	7.3	1.00000	1	19.97	0.00	0.00	4.99	0.00	0.00
Line 4 - On Line Topcoat Booth									
459X	7.3	0.34000	1	8.70	0.00	0.00	2.17	0.00	0.00
Line 4 - On Line Topcoat Booth									
Topcoat 8370UV	8.59	0.61000	1	0.00	0.00	0.00	0.00	1.15	0.00
Line 5 - Flock Adhesive Application Booth									
L618 Mix	7.92	0.00147	1000	11.68	9.49	1.94	1.28	0.00	0.00
Line 7 - Flock Adhesive Application Booth									
Flock Lok 850	8.1	1.11000	1	9.85	0.00	3.94	3.94	0.00	0.79
Catalyst 9986	7.3	0.02000	1	0.00	0.22	0.00	0.00	0.00	0.00
Line 8 - Topcoat Booth #1									
459X	7.3	1.00000	1	19.97	0.00	0.00	4.99	0.00	0.00
Line 8 - Topcoat Booth #2									
EX-66-578	8.66	1.00000	1	0.00	0.00	0.00	0.00	1.05	0.41
U222 - Post Flock Adhesive Stations (3)									
852	8.3	0.40000	1	10.91	0.00	4.36	4.36	0.00	0.00
U222 - On Line Topcoat Booth									
Topcoat 8370UV	8.59	0.83000	1	0.00	0.00	0.00	0.00	1.56	0.00
U222 - Primer Booth									
459X	7.3	0.00029	2100	15.58	0.00	0.00	3.89	0.00	0.00
NBC Offline - Primer Booth									
459X	7.3	2.00000	1	39.95	0.00	0.00	9.99	0.00	0.00
NBC Offline - Topcoat									
Autoseal 3443	8.5	0.40000	1	0.00	0.00	0.00	0.00	0.00	0.00
NBC Offline - Post Flock Adhesive Stations (2)									
852	8.3	0.40000	1	7.27	0.00	2.91	2.91	0.00	0.00
Combining Line (3)									
Tivolit	7.8	0.50000	1	0.00	0.00	0.00	0.00	0.00	0.00
Insert Coating Operation									
Chemlok 6250	8	0.01800	1	0.41	0.00	0.00	0.09	0.00	0.03
Total				194.16	36.67	18.66	42.26	5.68	1.23

Appendix A: Emissions Calculations
MM BTU/HR <100
Natural Gas Combustion Units

Company Name: GDX Automotive North America, Inc.
Address City IN Zip: One General Street, Wabash, IN 46992
Title V: T169-23357-00004
Reviewer: Surya Ramaswamy / EVP
Date: 12/18/07

Heat Input Capacity

MMBtu/hr	196.5
22.4	

Thirty-Six (36) 0.12 mmBtu/hr natural gas units Two (2) 1.25 mmBtu/hr natural gas units
 One (1) 0.75 mmBtu/hr natural gas units One (1) 0.687 mmBtu/hr natural gas units
 Twelve (12) 0.9375 mmBtu/hr natural gas units One (1) 2.93 mmBtu/hr natural gas units

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.19	0.75	0.06	9.83	0.54	8.26

*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

HAPs - Organics

Emission Factor in lb/MMcf	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	0.00	0.00	0.01	0.18	0.00

HAPs - Metals

Emission Factor in lb/MMcf	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	0.00	0.00	0.00	0.00	0.00

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

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations

**Natural Gas Combustion Only
MM BTU/HR <100
Ovens**

Company Name: GDX Automotive North America, Inc.
Address City IN Zip: One General Street, Wabash, IN 46992
Title V: T169-23357-00004
Reviewer: Surya Ramaswamy / EVP
Date: 12/18/07

Three (3) Line 1 Oven Burners = 5.2 MMBTU/hr
One (1) Line 2 Curing Oven = 5.6 MMBTU/hr
Five (5) Line 3 Oven Burners = 5.0 MMBTU/hr
One (1) Line 5 Curing Oven = 5.6 MMBTU/hr
Four (4) Line 8 Oven Burners = 4.0 MMBTU/hr
Three (3) Line 8 Microwave Zone Burners = 0.5 MMBTU/hr
Three (3) U222 Catalytic IR Ovens = 1.7 MMBTU/hr

Total Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
27.638	242.1

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.92	0.92	0.07	12.11	0.67	10.17

*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

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	2.542E-04	1.453E-04	9.079E-03	2.179E-01	4.116E-04

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	6.053E-05	1.332E-04	1.695E-04	4.600E-05	2.542E-04

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

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
Process Operations**

Company Name: GDX Automotive North America, Inc.
Address City IN Zip: One General Street, Wabash, IN 46992
Title V: T169-23357-00004
Reviewer: Surya Ramaswamy / EVP
Date: 12/18/07

Emission Unit	Pollutant	Maximum Rate (lbs/hr)	Emission Factor (lb/lb processed)	Emission Rate (lb/hr)	Maximum Uncontrolled Emissions (tons/yr)	Control Efficiency (%)	Maximum Controlled Emissions (tons/yr)
Banbury Mills Banbury #2	PM/PM ₁₀	11100	2.22000E-04	2.4642	10.79	99.00%	0.11
	VOC	11100	7.38000E-05	0.8192	3.59	0.00%	3.59
	HAPs	11100	5.58000E-05	0.6194	2.71	0.00%	2.71
Banbury Mills Banbury #3	PM/PM ₁₀	11100	2.22000E-04	2.4642	10.79	99.00%	0.11
	VOC	11100	7.38000E-05	0.8192	3.59	0.00%	3.59
	HAPs	11100	5.58000E-05	0.6194	2.71	0.00%	2.71
Banbury Mills Banbury #4	PM/PM ₁₀	11100	2.22000E-04	2.4642	10.79	99.00%	0.11
	VOC	11100	7.38000E-05	0.8192	3.59	0.00%	3.59
	HAPs	11100	5.58000E-05	0.6194	2.71	0.00%	2.71
Compound Handling Carbon Black Unloading*	PM/PM ₁₀	15	0.58000	8.7000	38.11	99.00%	0.38
Compound Handling Carbon Black Conveying*	PM/PM ₁₀	15	0.58000	8.7000	38.11	98.00%	0.76
Compound Handling Weigh Stations*	PM/PM ₁₀	1.6	0.58000	0.9280	4.06	99.00%	0.04
Barwell Ext.- Barwell Extruder	PM/PM ₁₀	200	2.67000E-08	0.0000	0.00	0.00%	0.00
	VOC	200	3.52000E-06	0.0007	0.00	0.00%	0.00
	HAPs	200	2.99000E-05	0.0060	0.03	0.00%	0.03

Notes:

Emission Factors from the Draft AP-42 Section 4.12

*AP 42 5.3-6 Emission Factor 0.58 lb/ton - Carbon Black Transport

Appendix A: Emissions Calculations
Extrusion and Curing Emissions

Company Name: GDX Automotive North America, Inc.
Address City IN Zip: One General Street, Wabash, IN 46992
Title V: T169-23357-00004
Reviewer: Surya Ramaswamy / EVP
Date: 12/18/07

Extrusion and Curing - Criteria Pollutants and Total HAPs - Each Line
Rubber Extrusion Lines 1,2,3,4,5,6,8

Maximum Line Capacity (Each Line): 1000 lb rubber/hr

Pollutant	Extrusion			Rubber Curing		
	Emission Factor lb/lb rubber	lb/hr	Tons/year	Emission Factor lb/lb rubber	lb/hr	Tons/year
VOC	3.90E-05	0.04	0.171	1.90E-03	1.90	8.322
PM	2.67E-08	0.00003	0.000	-	-	-
Total HAP	2.95E-05	0.03	0.129	5.95E-04	0.60	2.608

HAP	Extrusion			Rubber Curing		
	Emission Factor lb/lb rubber	lb/hr	Tons/year	Emission Factor lb/lb rubber	lb/hr	Tons/year
1,1,1-Trichloroethane (Methyl Chloroform)	1.43E-08	0.00	0.000			
1,1-Dichloroethene (Vinylidene Chloride)	5.37E-08	0.00	0.000			
1,3-Butadiene	6.04E-08	0.00	0.000	1.24E-06	0.00	0.01
MIBK	6.80E-08	0.00	0.000			
Acetophenone	6.91E-09	0.00	0.000	2.13E-04	0.21	0.93
Aniline	4.13E-09	0.00	0.000	1.48E-07	0.00	0.00
Benzene		0.00	0.000	4.88E-05	0.05	0.21
Biphenyl		0.00	0.000	3.92E-07	0.00	0.00
bis-2-Ethylhexyl)phthalate		0.00	0.000	2.74E-07	0.00	0.00
Carbin Disulfide	1.50E-05	0.02	0.066			
Carbonyl Sulfide	1.20E-05	0.01	0.053			
Chloromethane	2.00E-08	0.00	0.000			
Chromium Compounds	2.72E-10	0.00	0.000			
Cumene	5.17E-08	0.00	0.000	8.08E-08	0.00	0.00
Di-n-butylphthalate	4.00E-09	0.00	0.000			
Dibenzofuran		0.00	0.000	2.10E-06	0.00	0.01
Dimethylphthalate		0.00	0.000	3.19E-08	0.00	0.00
Ethylbenzene	5.93E-08	0.00	0.000			
Methylene Chloride	2.58E-07	0.00	0.001	3.61E-06	0.00	0.02
m/p- Xylene	2.33E-07	0.00	0.001	4.28E-06	0.00	0.02
Naphthalene	1.46E-08	0.00	0.000	1.07E-06	0.00	0.00
Hexane	6.84E-07	0.00	0.003	2.66E-04	0.27	1.17
Isooctane	1.32E-07	0.00	0.001			
Nickel Compounds	2.08E-09	0.00	0.000			
O-Xylene	8.30E-08	0.00	0.000	4.92E-05	0.05	0.22
Phenol	1.71E-08	0.00	0.000	3.41E-07	0.00	0.00
Styrene	2.21E-08	0.00	0.000	4.25E-07	0.00	0.00
tetrachloroethene	4.15E-08	0.00	0.000			
Toluene	7.05E-07	0.00	0.003	4.37E-06	0.00	0.02
Total	2.95E-05			5.95E-04		

Emission factors used are for Hot Air Curing for EPDM sulfur cure rubber from draft AP-42 4.12. Hot Air Curing is done approximately at 400 °F and molten salt curing is performed at 320 °F - Salt Bath Curing for Lines 4 and 6 is assumed to have the same emissions as Hot Air Curing in the absence of any data of salt bath curing emissions. Extrusion emission factors are interpolated emission factors from draft AP-42 4.12 for EPDM sulfur cure. Extrusion and curing emission factors for Total Speciated Organics are used for VOC emissions rather than the emission factors for Method 25A VOC.