



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: January 2, 2007
RE: Key Plastics, LLC / 009-23555-00018
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot 03/23/06



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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT OFFICE OF AIR QUALITY

**Key Plastics, LLC - Hartford City
1615 West McDonald Street
Hartford City, Indiana 47348**

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

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

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F009-23555-00018	
Issued by: Original signed by Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: January 2, 2007 Expiration Date: January 2, 2012

TABLE OF CONTENTS

SECTION A	SOURCE SUMMARY	5
A.1	General Information [326 IAC 2-8-3(b)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3	Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]	
A.4	FESOP Applicability [326 IAC 2-8-2]	
SECTION B	GENERAL CONDITIONS	8
B.1	Definitions [326 IAC 2-8-1]	
B.2	Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3	Term of Conditions [326 IAC 2-1.1-9.5]	
B.4	Enforceability [326 IAC 2-8-6]	
B.5	Severability [326 IAC 2-8-4(4)]	
B.6	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.7	Duty to Provide Information [326 IAC 2-8-4(5)(E)]	
B.8	Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.9	Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]	
B.10	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.11	Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]	
B.12	Emergency Provisions [326 IAC 2-8-12]	
B.13	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.14	Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]	
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	
B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]	
B.17	Permit Renewal [326 IAC 2-8-3(h)]	
B.18	Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]	
B.19	Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]	
B.20	Source Modification Requirement [326 IAC 2-8-11.1]	
B.21	Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC13-30-3-1]	
B.22	Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
B.23	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]	
B.24	Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]	
SECTION C	SOURCE OPERATION CONDITIONS.....	17
	Emission Limitations and Standards [326 IAC 2-8-4(1)]	
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2	Overall Source Limit [326 IAC 2-8]	
C.3	Opacity [326 IAC 5-1]	
C.4	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6	Fugitive Dust Emissions [326 IAC 6-4]	
C.7	Stack Height [326 IAC 1-7]	
C.8	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
	Testing Requirements [326 IAC 2-8-4(3)]	
C.9	Performance Testing [326 IAC 3-6]	
	Compliance Requirements [326 IAC 2-1.1-11]	
C.10	Compliance Requirements [326 IAC 2-1.1-11]	

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

- C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]
- C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]
- C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

- C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
- C.16 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]
- C.17 Actions Related to Noncompliance Demonstrated by a Stack Test Federally Enforceable State Operating Permit

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

- C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]
- C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

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

SECTION D.1 FACILITY OPERATION CONDITIONS

Seven (7) automated coating booths and the one (1) manual spray 25

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

- D.1.1 VOC Limitation [326 IAC 2-8]
- D.1.2 HAP Limitations [326 IAC 2-8] [326 IAC 2-4.1]
- D.1.3 Best Available Control Technology (BACT) and Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]
- D.1.4 Particulate [326 IAC 6-3-2(d)]
- D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.1.6 HAP Usage Limitations
- D.1.7 Testing Requirements
- D.1.8 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)
- D.1.9 Particulate Control
- D.1.10 VOC and HAP Control
- D.1.11 Regenerative Thermal Oxidizer Temperature
- D.1.12 Duct Pressure or Fan Amperage Parametric Monitoring

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

- D.1.13 Dry Filter Monitoring
- D.1.14 Water Pan Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

- D.1.15 Record Keeping Requirements
- D.1.16 Reporting Requirements

SECTION D.2 FACILITY OPERATION CONDITIONS

One (1) natural gas fired boiler (< 10 MMBtu/hr)..... 32

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

D.2.1 Particulate [326 IAC 6-2-4]

Certification Form 33

Emergency Occurrence Form..... 34

Quarterly Report Form..... 36-39

Quarterly Deviation and Compliance Monitoring Report Form 40

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 2-8-3(b)]

The Permittee owns and operates a stationary multi-stage coating source that coats automobile door handles/housings.

Authorized Individual:	Plant Manager
Source Address:	1615 West McDonald Street, Hartford City, IN 47348
Mailing Address:	1615 West McDonald Street, Hartford City, IN 47348
General Source Phone Number:	(765) 348-7300
SIC Code:	3714
County Location:	Blackford
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act

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

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

- (a) One (1) manual sample spray coating booth, installed in 1993, identified as EU22, with a maximum capacity of 40 units per hour, utilizing electrostatic air atomized spray applications, with dry filters as controls, and exhausting through one (1) stack identified as Stack No. 10;
- (b) A plastic parts washing (water-based) and painting system, installed in 1993 and modified in 2004 including:
 - (1) Two (2) base coat paint booths, identified as No. 1 and No. 2 base coat booths, each with a maximum capacity of 10,800 units per hour, and operating in series with respect to one another;
 - (2) One (1) pearl coat paint booth, with a maximum capacity of 10,800 units per hour;
 - (3) One (1) prime paint coating booth with a maximum capacity of 10,800 units per hour;
 - (4) Two (2) clear paint coating booths, each with a maximum capacity of 10,800 units per hour, and operating in series with respect to one another;
 - (5) One (1) clear paint coating booth, identified as Clear 1, constructed in 2005 with a maximum capacity of 10,800 units per hour and exhausting to one (1) stack S11;

The seven (7) automated coating booths that make up the plastic parts painting system are each equipped with electrostatic air atomization spray equipment and water wash and/or dry filter for particulate overspray controls and VOC/HAP emissions are controlled by a regenerative thermal oxidizer.

- (6) One (1) natural gas fired regenerative thermal oxidizer, with a maximum heat input rate of 5.2 MMBtu per hour and exhausting to Stack No. 11. The exhaust streams from the three (3) clear coat booths and the No. 1 base coat booth are ducted to the recirculating air house. Sixty percent (60%) of the exhaust streams from the prime coat booth, pearl coat booth, and No. 2 base coat booth are ducted to a regenerative thermal oxidizer exhausting to Stack No. 11 to control emissions of volatile organic compounds. The remaining forty percent (40%) of process air entering the recirculation house is mixed with preheated fresh air and recycled back to the paint booths. The prime and final bake oven exhausts are ducted directly to a thermal oxidizer stack identified as Stack No. 11 to control emissions of volatile organic compounds.

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

This stationary source also includes 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 British thermal units (MMBtu) per hour:
 - (1) One (1) natural gas fired boiler, installed in 1993, with a maximum heat input rate of 0.84 MMBtu per hour, and exhausting to one (1) stack identified as Stack No. 9 [326 IAC 6-2];
 - (2) One (1) natural gas fired air make-up unit, with a maximum heat input rate of 3.30 MMBtu per hour;
 - (3) One (1) natural gas fired burner with a maximum heat input rate of 1.00 MMBtu per hour which preheats fresh air coming into the air recirculation house;
 - (4) One (1) natural gas fired make-up unit with a maximum heat input rate of 0.26 MMBtu per hour;
 - (5) Ten (10) radiant tube heaters firing natural gas, each with a maximum heat input rate of 0.13 MMBtu per hour, and respectively exhausting to stacks identified as Stacks Nos. 12A through 12J;
 - (6) One (1) natural gas fired space heater with a maximum heat input rate 0.10 MMBtu per hour and exhausting to one (1) stack identified as Stack No. 14;
 - (7) One (1) natural gas fired HVAC system with a maximum heat input rate of 0.35 MMBtu per hour firing natural gas, and exhausting to one (1) stack identified as Stack No. 14;
 - (8) One (1) natural gas 8-inch Tube-O-Flame, located at Stage No. 2, with a maximum heat input rate of 1.00 MMBtu per hour, and exhausting to one (1) stack identified as Stack No. 2;
 - (9) One (1) natural gas 6-inch Tube-O-Flame, located at Stage No. 3, with a maximum heat input rate of 0.60 MMBtu per hour and exhausting to one (1) stack identified as Stack No. 3;

- (10) One (1) natural gas dry-off oven with a maximum heat input rate of 0.60 MMBtu per hour, and exhausting to one (1) stack identified as No. 5;
- (11) One (1) natural gas fired prime bake oven with a maximum heat input rate of 0.80 MMBtu per hour; and
- (12) One (1) natural gas fired final bake oven consisting of a radiant heating portion and a direct heating portion with maximum heat input rates of 0.40 MMBtu per hour and 0.80 MMBtu per hour, respectively.

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

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

SECTION B GENERAL CONDITIONS

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

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 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, F009-23555-00018, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

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

B.9 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.10 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent 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
Indianapolis, Indiana 46204-2251

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

The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

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

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
 - (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

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

- (a) All terms and conditions of permits established prior to F009-23555-00018 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

- (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
Indianapolis, Indiana 46204-2251

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

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

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

Request for renewal shall be submitted to:

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

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

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

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

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

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

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

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

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

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

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

- (b) **Emission Trades [326 IAC 2-8-15(c)]**
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) **Alternative Operating Scenarios [326 IAC 2-8-15(a)]**
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC13-30-3-1]

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

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

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

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

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

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

B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][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 2-8-4(1)]

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

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

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

C.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

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

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

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

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

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

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

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

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

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

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

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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
Indianapolis, Indiana 46204-2251

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

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

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

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

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

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

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

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

C.14 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 shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

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

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) 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.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.16 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

- (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
- (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (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.17 Actions Related to Noncompliance Demonstrated by a Stack Test Federally Enforceable State Operating Permit

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

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

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

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (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.19 General Reporting Requirements [326 IAC 2-8-4(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

C.20 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 FACILITY OPERATION CONDITIONS

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

- (a) One (1) manual sample spray coating booth, installed in 1993, identified as EU22, with a maximum capacity of 40 units per hour, utilizing electrostatic air atomized spray applications, with dry filters as controls, and exhausting through one (1) stack identified as Stack No. 10;
- (b) A plastic parts washing (water-based) and painting system, installed in 1993 and modified in 2004 including:
 - (1) Two (2) base coat paint booths, identified as No. 1 and No. 2 base coat booths, each with a maximum capacity of 10,800 units per hour, and operating in series with respect to one another;
 - (2) One (1) pearl coat paint booth, with a maximum capacity of 10,800 units per hour;
 - (3) One (1) prime paint coating booth with a maximum capacity of 10,800 units per hour;
 - (4) Two (2) clear paint coating booths, each with a maximum capacity of 10,800 units per hour, and operating in series with respect to one another;
 - (5) One (1) clear paint coating booth, identified as Clear 1, constructed in 2005 with a maximum capacity of 10,800 units per hour and exhausting to one (1) stack S11;

The seven (7) automated coating booths that make up the plastic parts painting system are each equipped with electrostatic air atomization spray equipment and water wash and/or dry filter for particulate overspray controls and VOC/HAP emissions are controlled by a regenerative thermal oxidizer.

- (6) One (1) natural gas fired regenerative thermal oxidizer, with a maximum heat input rate of 5.2 MMBtu per hour and exhausting to Stack No. 11. The exhaust streams from the three (3) clear coat booths and the No. 1 base coat booth are ducted to the recirculating air house. Sixty percent (60%) of the exhaust streams from the prime coat booth, pearl coat booth, and No. 2 base coat booth are ducted to a regenerative thermal oxidizer exhausting to Stack No. 11 to control emissions of volatile organic compounds. The remaining forty percent (40%) of process air entering the recirculation house is mixed with preheated fresh air and recycled back to the paint booths. The prime and final bake oven exhausts are ducted directly to a thermal oxidizer stack identified as Stack No. 11 to control emissions of volatile organic compounds.

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

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

D.1.1 VOC Limitation [326 IAC 2-8]

- (a) The minimum overall control efficiency of the regenerative thermal oxidizer for the seven (7) automated coating booths shall be 80.75% or greater for VOCs.

- (b) The total input of VOCs to the seven (7) automated coating booths and the one (1) manual spray booth, including clean-up solvents, shall be limited to less than 511.32 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Source-wide emissions are limited such that the emissions of VOCs, including emissions from all insignificant activities, are less than one hundred (100) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with the VOC and overall control efficiency limitation shall render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70 Permits) not applicable.

D.1.2 HAP Limitations [326 IAC 2-8] [326 IAC 2-4.1]

- (a) The total input of any single HAP to the seven (7) automated coating booths and the one (1) manual spray booth, including clean-up solvents, shall be limited by Condition D.1.6 (Equation 1) such that HAP emissions from the source are limited to less than ten (10) tons per twelve (12) consecutive month period for any single HAP, with compliance determined at the end of each month.
- (b) The input of total combined HAPs to the seven (7) automated coating booths and the one (1) manual spray booth, including clean-up solvents, shall be limited by Condition D.1.6 (Equation 2) such that the total combined HAP emissions from the source are limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with the HAP limitations and overall control efficiency for the regenerative thermal oxidizer for the seven (7) automated coating booths shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 20 (Hazardous Air Pollutants) not applicable. Compliance with this limit shall also make the source an area source and render 40 CFR Part 63, Subpart PPPP- National Emission Standards for Hazardous Air Pollutants: Surface Coating Plastic Parts and Products not applicable.

D.1.3 Best Available Control Technology (BACT) and Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

- (a) Any change or modification which may increase potential VOC usage to twenty-five (25) tons per year or more from the one (1) manual spray booth, identified as EU22, shall require prior approval from the Office of Air Quality (OAQ) before such change can occur.
- (b) The VOC content delivered to the applicator of the clear paint coating booth, identified as Clear 1, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.
- (c) Pursuant to OP#: T009-7508-00018 and OP#: T009-17595-00018, the BACT requirements for the six (6) coating booths (not including Clear 1 coating booth) are as follows:
 - (1) The regenerative thermal oxidizer and the fans moving the exhaust fumes from the six (6) automated coating booths of the plastic parts painting system, the prime bake oven and the final bake oven to the thermal oxidizer shall be in operation at all times that one of the six (6) automated coating booths, the prime bake oven or the final bake oven is operated, and that the water curtain and dry filters that control particulate matter emissions shall be operating and in place at all times that the system is in operation.

- (2) The fans shall operate within an established fan amperage range and the regenerative thermal oxidizer shall operate above a minimum operating temperature, as determined by the most recent test, that is demonstrated to achieve 80.75% overall control efficiency of the volatile organic compounds (VOC) emitted from the parts being coated and baked.
- (3) The regenerative thermal oxidizer and air recirculation system shall continue to be operated after the painting operations cease for at least the minimum period of time, as determined by the most recent test, demonstrated to purge the recirculation air systems residual VOC content through the thermal oxidizer and reduce the VOC concentration in the recirculated air to ambient levels.
- (4) The input of VOC to the plastic parts painting system and the usage of cleanup solvent for the plastic parts painting system shall be limited to 1,164 tons used per twelve (12) consecutive month period. This limitation will prevent the VOC emissions from the plastic parts painting system being greater than 224.4 tons per year. This limitation is based upon the use of a regenerative thermal oxidizer with an overall control efficiency of 80.75%.

D.1.4 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the seven (7) automated coating booths and the one (1) manual spray booth shall be controlled by dry particulate filters and/or water washes. The source shall operate the control device in accordance with manufacturer's specifications.

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the seven (7) automated coating booths and the one (1) manual spray booth and any control devices.

Compliance Determination Requirements

D.1.6 HAP Usage Limitations

Compliance with the HAP emission limits in Condition D.1.2 shall be determined by the following equations:

Equation 1: Single HAP Input Limit

$$D = (E * (1 - C)) + F + G < 10 \text{ tons per year}$$

Where

- D = Single worst case HAP emissions in tons per twelve (12) consecutive month period
- E = Single HAP usage in tons per twelve (12) consecutive month period from the seven (7) automated coating booths
- F = Single HAP usage in tons per twelve (12) consecutive month period from the manual spray booth
- G = Single worst case HAP emissions in tons per twelve (12) consecutive month period from clean-up solvents
- C = Overall control efficiency of the RTO controlling the seven (7) automated coating booths determined in the latest stack test

Equation 2: Total Combined HAP Input Limit

$$J = (K * (1 - C)) + L + M < 24.85 \text{ tons per year}$$

Where

- J = Combined HAP emissions in tons per twelve (12) consecutive month period
K = Combined HAP usage in tons per twelve (12) consecutive month period from the seven (7) automated coating booths
L = Combined HAP usage in tons per twelve (12) consecutive month period from manual spray booth
M = Combined HAP emissions in tons per twelve (12) consecutive month period from clean-up solvents
C = Overall control efficiency of the RTO controlling the seven (7) automated coating booths determined in the latest stack test

Until the initial stack testing is performed for the regenerative thermal oxidizer for the seven (7) automated coating booths, an overall control efficiency of 80.75% shall be used in Equations (1) and (2). Upon completion of the initial stack test for the regenerative thermal oxidizer for the seven (7) automated coating booths and in accordance with Condition D.1.7(b).

D.1.7 Testing Requirements

- (a) In order to demonstrate compliance with Conditions D.1.1 and D.1.3(c), the Permittee shall conduct a performance test to verify VOC control efficiency of the regenerative thermal oxidizer, for the seven (7) automated spray booths, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.
- (b) In order to demonstrate compliance with Condition D.1.2, within 180 days of issuance of the FESOP the Permittee shall conduct a performance test to verify HAP control efficiencies of the regenerative thermal oxidizer, for the seven (7) automated spray booths, utilizing methods as approved by the Commissioner. The test shall be for the HAP used at the source, which has the lowest destruction efficiency as determined by the manufacturer and approved by IDEM. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.1.8 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

Compliance with the VOC/HAP content and usage/emission limitations contained in Conditions D.1.1, D.1.2, and D.1.3(c), shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.9 Particulate Control

The dry filters and/or water washes for particulate control shall be in operation and control emissions from the seven (7) automated coating booths and the one (1) manual spray booth at all times that any one of the coating booths is in operation.

D.1.10 VOC and HAP Control

In order to comply with Conditions D.1.1, D.1.2, and D.1.3(c), the thermal oxidizer for VOC and HAP control shall be in operation and control emissions from the seven (7) automated coating booths at all times that any one of the coating booths is in operation.

D.1.11 Regenerative Thermal Oxidizer Temperature

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as an hourly average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the hourly average temperature of the thermal oxidizer is below 1400°F. An hourly average temperature that is below 1400°F 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.
- (b) The Permittee shall determine the hourly average temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.1, D.1.2, and D.1.3(c), as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the hourly average temperature of the thermal oxidizer is below the hourly average temperature as observed during the compliant stack test. An hourly average temperature that is below the hourly average temperature as observed during the compliant stack test 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.

D.1.12 Duct Pressure or Fan Amperage Parametric Monitoring

- (a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.1, D.1.2, and D.1.3(c), as approved by IDEM.
- (b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

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

D.1.13 Dry Filter 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 one (1) manual surface coating booth and the seven (7) automated surface coating booths 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.

D.1.14 Water Pan Monitoring

- (a) Daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the seven (7) automated surface coating booths 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 2-8-4(3)] [326 IAC 2-8-16]

D.1.15 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.3(c), 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 and the VOC emission limits established in Conditions D.1.1 and D.1.3(c). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period:
 - (1) The VOC content of each coating material and solvent used less water;
 - (2) The amount of coating material and solvent used on a monthly basis;
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (3) The monthly cleanup solvent usage; and
 - (4) The total VOC usage for each month.

- (b) To document compliance with Condition D.1.2, 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 HAP usage and HAP emission limits established in Condition D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The HAP content of each coating material and solvent used less water;
 - (2) The amount of coating material and solvent used on a monthly basis;
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (3) The monthly cleanup solvent usage; and
 - (4) The total HAP usage for each month.
- (c) The continuous temperature records (on an hourly average basis) for the thermal oxidizer and the hourly average temperature used to demonstrate compliance during the most recent compliant stack test.
- (d) Daily records of the duct pressure or fan amperage.
- (e) To document compliance with Conditions D.1.13 and D.1.14, the Permittee shall maintain a log of weekly overspray observations, weekly observations of the water level in the pans, and daily and monthly inspections.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.16 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1, D.1.2, and D.1.3(c) 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal units (MMBtu) per hour:
 - (1) One (1) natural gas fired boiler, installed in 1993, with a maximum heat input rate of 0.84 MMBtu per hour, and exhausting to one (1) stack identified as Stack No. 9 [326 IAC 6-2].

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

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

D.2.1 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the particulate matter emissions from the boiler with a 0.84 MMBtu per hour heat input shall be limited to 0.60 pounds per MMBtu heat input.

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

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

Source Name: Key Plastics, LLC – Hartford City
Source Address: 1615 West McDonald Street, Hartford City, IN 47348
Mailing Address: 1615 West McDonald Street, Hartford City, IN 47348
FESOP No.: F009-23555-00018

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Key Plastics, LLC – Hartford City
Source Address: 1615 West McDonald Street, Hartford City, IN 47348
Mailing Address: 1615 West McDonald Street, Hartford City, IN 47348
FESOP No.: F009-23555-00018

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 Describe:
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

FESOP Quarterly Report

Source Name: Key Plastics, LLC – Hartford City
 Source Address: 1615 West McDonald Street, Hartford City, IN 47348
 Mailing Address: 1615 West McDonald Street, Hartford City, IN 47348
 FESOP No.: F009-23555-00018
 Facility: The seven (7) automated coating booths and the one (1) manual spray booth
 (including clean-up solvents)
 Parameter: VOC usage (tons per twelve (12) consecutive month period)
 Limit: VOC input/usage is limited to less than 511.32 tons per twelve (12) consecutive
 month period, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
	VOC Usage	VOC Usage	VOC Usage
Month 1			
Month 2			
Month 3			

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

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Key Plastics, LLC – Hartford City
 Source Address: 1615 West McDonald Street, Hartford City, IN 47348
 Mailing Address: 1615 West McDonald Street, Hartford City, IN 47348
 FESOP No.: F009-23555-00018
 Facility: The one (1) automated coating booth, identified as Clear 1
 Parameter: VOC usage (tons per twelve (12) consecutive month period)
 Limit: VOC input/usage is limited to less than 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
	VOC Usage	VOC Usage	VOC Usage
Month 1			
Month 2			
Month 3			

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

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Key Plastics, LLC – Hartford City
 Source Address: 1615 West McDonald Street, Hartford City, IN 47348
 Mailing Address: 1615 West McDonald Street, Hartford City, IN 47348
 FESOP No.: F009-23555-00018
 Facility: The seven (7) automated coating booths and the one (1) manual spray booth (including clean-up solvents)
 Parameter: Single worst case HAP emissions (tons per twelve (12) consecutive month period)
 Limit: Single worst case HAP emissions are limited by Condition D.1.6 (Equation 1) of the permit per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
	Single HAP	Single HAP	Single HAP
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
 Deviation has been reported on:

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Key Plastics, LLC – Hartford City
 Source Address: 1615 West McDonald Street, Hartford City, IN 47348
 Mailing Address: 1615 West McDonald Street, Hartford City, IN 47348
 FESOP No.: F009-23555-00018
 Facility: The seven (7) automated coating booths and the one (1) manual spray booth (including clean-up solvents)
 Parameter: Total HAP emissions (tons per twelve (12) consecutive month period)
 Limit: Total HAP emissions are limited by Condition D.1.6 (Equation 2) of the permit per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
	Total HAPs	Total HAPs	Total HAPs
Month 1			
Month 2			
Month 3			

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

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

Attach a signed certification to complete this report.

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Key Plastics, LLC – Hartford City
 Source Address: 1615 West McDonald Street, Hartford City, IN 47348
 Mailing Address: 1615 West McDonald Street, Hartford City, IN 47348
 FESOP No.: F009-23555-00018

Months: _____ to _____ Year: _____

Page 1 of 2

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

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit
(FESOP)

Source Background and Description

Source Name:	Key Plastics, LLC – Hartford City
Source Location:	1615 W. McDonald Street, Hartford City, IN 47348
County:	Blackford
SIC Code:	3714
Operation Permit No.:	T009-17595-00018
Operation Permit Issuance Date:	March 31, 2004
FESOP No.:	F009-23555-00018
Permit Reviewer:	Tanya White/EVP

The Office of Air Quality (OAQ) has reviewed a FESOP application from Key Plastics, LLC relating to the operation of a stationary multi-stage coating source that coats automobile door handles/housings.

History

On August 24, 2006, the Office of Air Quality (OAQ) received a permit application from Key Plastics, LLC requesting a transition of their Part 70 Operating Permit (T009-17595-00018) to a Federally Enforceable State Operating Permit (FESOP). The source will take federally enforceable limits on air emissions from the source to become a minor source under the Part 70 permitting program and an area source of hazardous air pollutants (HAPs). As such, emissions of volatile organic compounds (VOCs) are limited to less than 100 tons per year and PM-10 will be controlled to less than 100 tons per year, emissions of any single HAP will be limited below 10 tons per year, and the source-wide emissions of total combined HAPs will be limited below 25 tons per year.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) manual sample spray coating booth, installed in 1993, identified as EU22, with a maximum capacity of 40 units per hour, utilizing electrostatic air atomized spray applications, with dry filters as controls, and exhausting through one (1) stack identified as Stack No. 10;
- (b) A plastic parts washing (water-based) and painting system, installed in 1993 and modified in 2004 including:
 - (1) Two (2) base coat paint booths, identified as No. 1 and No. 2 base coat booths, each with a maximum capacity of 10,800 units per hour, and operating in series with respect to one another;
 - (2) One (1) pearl coat paint booth, with a maximum capacity of 10,800 units per hour;
 - (3) One (1) prime paint coating booth with a maximum capacity of 10,800 units per hour;

- (4) Two (2) clear paint coating booths, each with a maximum capacity of 10,800 units per hour, and operating in series with respect to one another;
- (5) One (1) clear paint coating booth, identified as Clear 1, constructed in 2005 with a maximum capacity of 10,800 units per hour and exhausting to one (1) stack S11;

The seven (7) automated coating booths that make up the plastic parts painting system are each equipped with electrostatic air atomization spray equipment and water wash and/or dry filter for particulate overspray controls and VOC/HAP emissions are controlled by a regenerative thermal oxidizer.

- (6) One (1) natural gas fired regenerative thermal oxidizer, with a maximum heat input rate of 5.2 MMBtu per hour and exhausting to Stack No. 11. The exhaust streams from the three (3) clear coat booths and the No. 1 base coat booth are ducted to the recirculating air house. Sixty percent (60%) of the exhaust streams from the prime coat booth, pearl coat booth, and No. 2 base coat booth are ducted to a regenerative thermal oxidizer exhausting to Stack No. 11 to control emissions of volatile organic compounds. The remaining forty percent (40%) of process air entering the recirculation house is mixed with preheated fresh air and recycled back to the paint booths. The prime and final bake oven exhausts are ducted directly to a thermal oxidizer stack identified as Stack No. 11 to control emissions of volatile organic compounds.

Unpermitted Emission Units and Pollution Control Equipment

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

Insignificant Activities

This source has 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 British thermal units (MMBtu) per hour:
 - (1) One (1) natural gas fired boiler, installed in 1993, with a maximum heat input rate of 0.84 MMBtu per hour, and exhausting to one (1) stack identified as Stack No. 9 [326 IAC 6-2];
 - (2) One (1) natural gas fired air make-up unit, with a maximum heat input rate of 3.30 MMBtu per hour;
 - (3) One (1) natural gas fired burner with a maximum heat input rate of 1.00 MMBtu per hour which preheats fresh air coming into the air recirculation house;
 - (4) One (1) natural gas fired make-up unit with a maximum heat input rate of 0.26 MMBtu per hour;
 - (5) Ten (10) radiant tube heaters firing natural gas, each with a maximum heat input rate of 0.13 MMBtu per hour, and respectively exhausting to stacks identified as Stacks Nos. 12A through 12J;
 - (6) One (1) natural gas fired space heater with a maximum heat input rate 0.10 MMBtu per hour and exhausting to one (1) stack identified as Stack No. 14;
 - (7) One (1) natural gas fired HVAC system with a maximum heat input rate of 0.35 MMBtu per hour firing natural gas, and exhausting to one (1) stack identified as Stack No. 14;

- (8) One (1) natural gas 8-inch Tube-O-Flame, located at Stage No. 2, with a maximum heat input rate of 1.00 MMBtu per hour, and exhausting to one (1) stack identified as Stack No. 2;
- (9) One (1) natural gas 6-inch Tube-O-Flame, located at Stage No. 3, with a maximum heat input rate of 0.60 MMBtu per hour and exhausting to one (1) stack identified as Stack No. 3;
- (10) One (1) natural gas dry-off oven with a maximum heat input rate of 0.60 MMBtu per hour, and exhausting to one (1) stack identified as No. 5;
- (11) One (1) natural gas fired prime bake oven with a maximum heat input rate of 0.80 MMBtu per hour; and
- (12) One (1) natural gas fired final bake oven consisting of a radiant heating portion and a direct heating portion with maximum heat input rates of 0.40 MMBtu per hour and 0.80 MMBtu per hour, respectively.

Existing Approvals

The source has been operating under the previous Part 70 Operating Permit T009-17595-00018 issued on March 31, 2004, and the following amendments and revisions:

- (a) Title V Interim 009-203281-00018 issued on December 16, 2004;
- (b) First Significant Source Modification 009-20328-00018 issued on January 26, 2005; and
- (c) First Significant Permit Modification 009-19881-00018 issued on March 17, 2005.

All conditions from previous approvals were incorporated into this FESOP except conditions related to National Emission Standards for Hazardous Air Pollutants (NESHAPs), Plastics Parts Surface Coating 40 CFR Part 63, Subpart PPPP and conditions related to Part 70 Operating Permits. Conditions related to 40 CFR Part 63, Subpart PPPP were removed from the permit because this source has accepted a self-imposed limit on HAP emissions to become a minor source of HAPs. Therefore the requirements of 40 CFR 63, Subpart PPPP are no longer applicable. Conditions related to Part 70 Operating Permits were removed from the permit because the source has accepted a self-imposed limit on emissions of VOC to become a minor source under the Part 70 Operating Permits. Therefore the requirements of Part 70 Operating Permits are no longer applicable. The source will be issued a Federally Enforceable State Operating Permit.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (inches)	Flow Rate (acfm)	Temperature (°F)
S11	Seven Automatic Spray Booths	30	40	16,759	300

Recommendation

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

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

An administratively complete FESOP application for the purposes of this review was received on August 24, 2006.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 to 8).

Potential to Emit

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

Pollutant	Potential to Emit (tons/yr)
PM	1,249.33
PM-10	1,249.75
SO ₂	0.04
VOC	1,720.39
CO	6.09
NO _x	7.25

HAPs	Potential to Emit (tons/yr)
Xylene	Greater than 10
Hexane	Greater than 10
Toluene	Greater than 10
Methanol	Greater than 10
Ethyl Benzene	Greater than 10
MIK	Greater than 10
Total HAPs	Greater than 25

- (a) The potential to emit of VOCs and PM-10 is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 2-7. The source will be issued a FESOP because the source will limit its emissions of VOC below the Title V levels and the controlled emissions of PM-10 are less than Title V levels.
- (b) The potential to emit of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit 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. The source will be issued a FESOP because the source will limit its HAP emissions below the Title V levels.

- (c) **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 particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source has opted to become a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source’s potential to emit is based on the emission units included in the original permit.

Process/emission unit	Potential To Emit (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	Single HAPs	Total HAPs
Surface Coating Operations	24.98 ⁽⁴⁾	24.98 ⁽⁴⁾	0.00	< 99.59 ⁽¹⁾	0.00	0.00	< 10 ⁽²⁾	< 24.85 ⁽³⁾
Natural Gas Combustion	0.14	0.55	0.04	0.40	6.09	7.25	0.13	0.14
Total Emissions	15.40	15.81	0.04	< 100	6.09	7.25	< 10	< 25

¹ VOC emission limitation in order to comply with 326 IAC 2-8 (FESOP).
² Single worst-case HAP emission limitation in order to comply with 326 IAC 2-8 (FESOP).
³ Combined HAP emission limitations in order to comply with 326 IAC 2-8 (FESOP).
⁴ Controlled emissions assuming PM = PM-10.

County Attainment Status

The source is located in Blackford County.

Pollutant	Status
PM2.5	Attainment
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 redesignating Delaware, Greene, Jackson, Vanderburgh, Vigo and Warrick Counties to attainment for the eight-hour ozone standard, redesignating Lake County to attainment for the sulfur dioxide standard, and revoking the one-hour ozone standard in Indiana.

- (b) Volatile organic compounds (VOC) and nitrogen oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Blackford County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Blackford County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions.
- (d) Blackford County has been classified as attainment or unclassifiable for all other regulated pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Source Status

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

Pollutant	Emissions (tons/yr)
PM	Less than 100
PM-10	Less than 100
SO ₂	Less than 100
VOC	Less than 100
CO	Less than 100
NO _x	Less than 100
Single HAP	Less than 10
Total HAPs	Less than 25

- (a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.

Federal Rule Applicability

- (a) The requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.720, Subpart TTT), Standards of Performance for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines are not included in the permit for one (1) manual spray booth and the seven (7) automated spray booths, because in these booths plastic parts are not processed for use in the manufacture of business machines, as defined in 40 CFR 60.721. The one (1) manual spray booth and the seven (7) automated spray booths are part of a plastic parts painting system to produce painted automobile door handles.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit for this source.

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Plastics Parts Surface Coating 40 CFR Part 63, Subpart PPPP and 326 IAC 20-1-1 are not included in the permit because the source has requested to take self-imposed limits on their HAP emissions to become a minor source of HAPs. Therefore, pursuant to 40 CFR 63.4481(b), this source is not subject to the requirements of this rule because it is a minor source of HAP emissions.
- (d) Since the source has accepted self-imposed limitations to limit emissions below Part 70 major source thresholds, this source is not subject to 40 CFR 64 (CAM) for any emission units at the source.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

In previous Part 70 Operating Permits No.: 009-7508-00018 and No.: 009-17595-00018 the emissions of VOC, PM, and PM-10 were limited to less than 250 tons per year. This source is still not subject to 326 IAC 2-2 (PSD) because emissions of VOCs are limited to less than 100 tons per year in order to comply with 326 IAC 2-8 (FESOP), the controlled emissions of PM-10 are less than 100 tons per year, the controlled emissions of PM are less than 250 tons per year, and emissions of all other attainment regulated pollutants are less than 250 tons per year. This source is also not one of the 28 listed source categories. Therefore, this source is not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)).

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

The operation of this source will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

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 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake or Porter counties, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This source is not subject to the requirements of 326 IAC 8-6-1. Pursuant to 326 IAC 8-6-1, this rule applies to existing sources as of January 1, 1980, located in Lake and Marion Counties, and sources commencing operation after October 7, 1974, and prior to January 1, 1980, located anywhere in the state with potential VOC emissions greater than 100 tons per year, not limited by other rules in Article 8. In order to comply with 326 IAC 2-8 (FESOP), the source will limit emissions of VOC to less than 100 tons per year and this source was constructed in 1993. Therefore, 326 IAC 8-6 does not apply.

326 IAC 2-8 (FESOP)

- (a) The minimum overall control efficiency of the regenerative thermal oxidizer for the seven (7) automated coating booths shall be 80.75% or greater for VOCs.
- (b) The total input of VOCs to the seven (7) automated coating booths and the one (1) manual spray booth, including clean-up solvents, shall be limited to less than 511.32 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Source-wide emissions are limited such that the emissions of VOCs, including emissions from all insignificant activities, are less than one hundred (100) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with the VOC and overall control efficiency limitation shall render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70 Permits) not applicable.

Compliance Demonstration:

$$\begin{aligned} & (1.16 \text{ tons of VOCs per year from the manual booth}) \\ + & (511.32 \text{ tons of total VOCs per year from the automated booths } \times (1 - \text{Control Efficiency})) \\ + & \underline{(0.40 \text{ tons of VOCs per year from natural gas combustion})} \\ = & < 100 \text{ tons of VOCs/year} \end{aligned}$$

- (c) The total input of any single HAP to the seven (7) automated coating booths and the one (1) manual spray booth, including clean-up solvents, shall be limited by Condition D.1.6 (Equation 1) such that HAP emissions from the source are limited to less than ten (10) tons per twelve (12) consecutive month period for any single HAP, with compliance determined at the end of each month.
- (d) The input of total combined HAPs to the seven (7) automated coating booths and the one (1) manual spray booth, including clean-up solvents, shall be limited by Condition D.1.6 (Equation 2) such that the total combined HAP emissions from the source are limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with the HAP limitations and overall control efficiency for the regenerative thermal oxidizer for the seven (7) automated coating booths shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 20 (Hazardous Air Pollutants) not applicable. Compliance with this limit shall also make the source an area source and render 40 CFR Part 63, Subpart PPPP- National Emission Standards for Hazardous Air Pollutants: Surface Coating Plastic Parts and Products not applicable.

Compliance with the single and combined HAP emission limits shall be determined by the following equations:

Equation 1: Single HAP Input Limit

$$D = (E * (1 - C)) + F + G < 10 \text{ tons per year}$$

Where

- D = Single worst case HAP emissions in tons per twelve (12) consecutive month period
- E = Single HAP usage in tons per twelve (12) consecutive month period from the seven (7) automated coating booths
- F = Single HAP usage in tons per twelve (12) consecutive month period from the manual spray booth
- G = Single worst case HAP emissions in tons per twelve (12) consecutive month period from clean-up solvents
- C = Overall control efficiency of the RTO controlling the seven (7) automated coating booths determined in the latest stack test

Equation 2: Total Combined HAP Input Limit

$$J = (K * (1 - C)) + L + M < 24.85 \text{ tons per year}$$

Where

- J = Combined HAP emissions in tons per twelve (12) consecutive month period
- K = Combined HAP usage in tons per twelve (12) consecutive month period from the seven (7) automated coating booths
- L = Combined HAP usage in tons per twelve (12) consecutive month period from manual spray booth
- M = Combined HAP emissions in tons per twelve (12) consecutive month period from clean-up solvents
- C = Overall control efficiency of the RTO controlling the seven (7) automated coating booths determined in the latest stack test

Until the initial stack testing is performed for the regenerative thermal oxidizer for the seven (7) automated coating booths, an overall control efficiency of 80.75% shall be used in Equations (1) and (2). Upon completion of the initial stack test for the regenerative thermal oxidizer for the seven (7) automated coating booths and in accordance with applicable testing requirements.

326 IAC 8-2 (Surface Coating Emission Limitations)

This source is not subject to the requirements of 326 IAC 8-2 because this source is not involved in any of the surface coating operations described in 326 IAC 8-2.

State Rule Applicability – Individual Facilities

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

Pursuant to 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes), the seven (7) automated coating booths and the one (1) manual spray booth shall be controlled by dry particulate filters and/or water washes, at all times that the booths are in operation. The source shall operate the control device in accordance with manufacturer's specifications.

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

Pursuant to 326 IAC 6-2-4(a) (Particulate Matter Emission Limitations for Sources of Indirect Heating), indirect heating units which have 10 MMBtu/hr or less and which began operation after September 21, 1983, shall in no case exceed 0.6 lb/MMBtu heat input.

This limitation is based on the lesser of the following equation or 0.6 lb/MMBtu:

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

where: Pt = maximum allowable particulate matter (PM) emitted per MMBtu heat input
Q = total source maximum indirect heater input = 0.84 MMBtu/hr

$$Pt = 1.09/0.84^{0.26} = 1.14 \text{ lbs PM/MMBtu}$$

Therefore, the PM emissions from the one (1) natural gas fired boiler, rated at 0.84 MMBtu per hour heat input, shall be limited to 0.6 pounds per MMBtu heat input.

326 IAC 8-1-6 (General Volatile Organic Compound Reduction Requirements)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have potential volatile organic compound (VOC) emissions of 25 tons per year or more, and which are not otherwise regulated by another provision of Article 8. VOC emissions from facilities subject to this rule shall be reduced using best available control technologies (BACT). This rule applies to all coating booths at the source, except for the manual booth, which has potential emissions of VOC of less than 25 tons per year, because these facilities were constructed after 1980, have potential emissions of VOC greater than 25 tons per year each, and are not regulated by another Article 8 rule. The VOC content delivered to the applicator of the clear paint coating booth, identified as Clear 1, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply. Pursuant to OP#: T009-7508-00018 and OP#: T009-17595-00018, the source shall comply with the BACT requirements by using the following control technologies for the six (6) coating booths including the one (1) primer spray booth, the two (2) basecoat spray booths, and the three (3) spray booths using the following methods:

- (a) The regenerative thermal oxidizer and the fans moving the exhaust fumes from the surface coating operations shall be in operation at all times that one of the six (6) automated coating booths, the prime bake oven or the final bake oven are operated, and that the water curtain and dry filters that control particulate matter emissions shall be operating and in place at all times that the system is in operation.
- (b) The fans shall operate within an established fan amperage range and the regenerative thermal oxidizer shall operate above a minimum operating temperature, as determined by the most recent test, that is demonstrated to achieve 80.75% overall control efficiency of the volatile organic compounds (VOC) emitted from the parts being coated and baked.
- (c) The regenerative thermal oxidizer and air recirculation system shall continue to be operated after the painting operations cease for at least the minimum period of time, as determined by the most recent test, demonstrated to purge the recirculation air systems residual VOC content through the thermal oxidizer and reduce the VOC concentration in the recirculated air to ambient levels.
- (d) The input of VOC to the plastic parts painting system and the usage of cleanup solvent for the plastic parts painting system shall be limited to 1,164 tons used per twelve (12) consecutive month period. This limitation will prevent the VOC emissions from the plastic parts painting system being greater than 224.4 tons per year. This limitation is based upon the use of a regenerative thermal oxidizer with an overall control efficiency of 80.75%.

Even though the Clear 1 coating booth is not subject to the requirements of 326 IAC 8-1-6, the VOC emissions from the booth will still be controlled by the RTO.

The BACT conditions from the Part 70 Operating Permit No.: 009-7508-00018 and No.: 009-17595-00018 were combined under one condition is this FESOP. The following revision was also made to condition (b). This revision does not change the original meaning or intent of the condition. (Added text is shown in **bold**)

- (b) The fans shall operate within an **established** fan amperage **range** and the regenerative thermal oxidizer shall operate above a minimum operating temperature, as determined by the most recent test, that is demonstrated to achieve 80.75% overall control efficiency of the volatile organic compounds (VOC) emitted from the parts being coated and baked.

Testing Requirements

- (a) The Permittee shall conduct a performance test to verify VOC control efficiency of the regenerative thermal oxidizer, for the seven (7) automated spray booths, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.
- (b) Within 180 days of issuance of the FESOP the Permittee shall conduct a performance test to verify HAP control efficiencies of the regenerative thermal oxidizer, for the seven (7) automated spray booths, utilizing methods as approved by the Commissioner. The test shall be for the HAP used at the source, which has the lowest destruction efficiency as determined by the manufacturer and approved by IDEM. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions 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:

1. The one (1) manual spray booth and the seven (7) automated spray booths have applicable compliance monitoring conditions for the dry filters or water washes as specified below:

- (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 one (1) manual surface coating booth and the seven (7) automated surface coating booths 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.
- (c) Daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the seven (7) automated surface coating booths 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.

These monitoring conditions are necessary because the dry filters and/or water washes for the one (1) manual spray booth and the seven (7) automated spray booths must operate properly to ensure compliance with 326 IAC 2-8 (FESOP), 326 IAC 2-2 (PSD), and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

2. The regenerative thermal oxidizer for the seven (7) automated spray booths has applicable compliance monitoring conditions as specified below:
 - (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as an hourly average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the hourly average temperature of the thermal oxidizer is below 1400°F. An hourly average temperature that is below 1400°F 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.
 - (b) The Permittee shall determine the hourly average temperature from the most recent valid stack test, as approved by IDEM.

- (c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the hourly average temperature of the thermal oxidizer is below the hourly average temperature as observed during the compliant stack test. An hourly average temperature that is below the hourly average temperature as observed during the compliant stack test 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.
- (d) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test, as approved by IDEM.
- (e) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

These monitoring conditions are necessary because the regenerative thermal oxidizer for the seven (7) automated spray booths must operate properly to ensure compliance with 326 IAC 2-8 (FESOP), 326 IAC 2-2 (PSD), and 326 IAC 8-1-6 (BACT).

Conclusion

The operation of this multi-stage coating source that coats automobile door handles/housings shall be subject to the conditions of the FESOP No.: 009-23555-00018.

Appendix A: Emission Calculations

Company Name: Key Plastics L.L.C. - Hartford City Plant
Address City IN Zip: 1615 W. McDonald St, Hartford City, IN 47348
FESOP No.: 009-23555-00018
Pit ID: 009-00018
Reviewer: TW/EVP
Date: Sep-06

Uncontrolled Potential Emissions (tons/year)

Emissions Generating Activity			
Pollutant	Surface Coating Emissions	Natural Gas Combustion	TOTAL
PM	1,249.19	0.14	1,249.33
PM10	1,249.19	0.55	1,249.75
SO2	0.00	0.04	0.04
NOx	0.00	7.25	7.25
VOC	1,719.99	0.40	1,720.39
CO	0.00	6.09	6.09
Total Combined HAPs	315.95	0.14	316.09
Worst case single HAP	130.23	0.13	130.23
	Xylene	Hexane	
Total emissions based on rated capacity at 8,760 hours/year.			

Controlled Potential Emissions (tons/year)

Emissions Generating Activity			
Pollutant	Surface Coating Emissions	Natural Gas Combustion	TOTAL
PM	24.98	0.14	25.12
PM10	24.98	0.55	25.53
SO2	0.00	0.04	0.04
NOx	0.00	7.25	7.25
VOC	<99.59	0.40	<100
CO	0.00	6.09	6.09
Total Combined HAPs	<24.85	0.14	<25
Worst case single HAP	< 10	0.13	<10
	Xylene	Hexane	
Total emissions based on rated capacity at 8,760 hours/year, after control.			

Appendix A: Emissions Calculations
Natural Gas Combustion Only (MM BTU/HR < 100)

Company Name: Key Plastics L.L.C. - Hartford City Plant
Address City IN Zip: 1615 W. McDonald St, Hartford City, IN 47348
FESOP No.: 009-23555-00018
Plt ID: 009-00018
Reviewer: TW/EVP
Date: Sep-06

Heat Input Capacity MMBtu/hr	
0.84	Boiler
3.30	Air Make-up Unit
1.00	Burner
0.60	Dry-off Oven
1.20	Final Bake Oven
5.20	Thermal Oxidizer Burner
0.80	Prime Bake Oven
1.30	Radiant Tube Heaters
0.10	Space Heater
1.00	Stage 2 Burner
0.60	Stage 3 Burner
0.35	Trane HVAC
0.26	Make-up
16.55	Total

Potential Throughput
MMCF/yr

144.978

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.14	0.55	0.04	7.25	0.40	6.09

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCG #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

HAPs Emissions

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	1.52E-04	8.70E-05	5.44E-03	1.30E-01	2.46E-04

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	3.62E-05	7.97E-05	1.01E-04	2.75E-05	1.52E-04

Methodology is the same as previous page.

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
VOC and Particulate
From Surface Coating Operations

Company Name: Key Plastics L.L.C. - Hartford City Plant
Address City IN Zip: 1615 W. McDonald St, Hartford City, IN 47348
FESOP No.: 009-23555-00018
Pit ID: 009-00018
Reviewer: TW/EVP
Date: Sep-06

Material/Facility	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
Primer Booth- Gray Conductive	9.63	49.00%	0.0%	49.0%	0.0%	51.00%	0.002321	10,800.00	4.72	4.72	118.28	2838.79	518.08	323.53	9.25	40%
Primer Booth- White Pearl	12.78	30.40%	0.9%	29.5%	0.0%	68.71%	0.002321	10,800.00	3.77	3.77	94.54	2268.87	414.07	585.96	5.49	40%
Primer Booth- White Basecoat	10.82	27.50%	0.9%	26.6%	0.0%	72.50%	0.002321	10,800.00	2.88	2.88	72.17	1732.14	316.12	516.76	3.97	40%
Base Booth- Gray Conductive	9.63	49.00%	0.0%	49.0%	0.0%	51.00%	0.001010	10,800.00	4.72	4.72	51.47	1235.32	225.45	140.79	9.25	40%
Base Booth- Adhesive Promoter Clear	7.35	89.00%	0.0%	89.0%	0.0%	11.00%	0.001010	10,800.00	6.54	6.54	71.35	1712.51	312.53	23.18	59.47	40%
Base Booth- UniGlos	8.47	56.00%	0.0%	56.0%	0.0%	44.00%	0.001010	10,800.00	4.74	4.74	51.74	1241.73	226.62	106.83	10.78	40%
Base Booth- White Pearl	12.78	30.40%	0.9%	29.5%	0.0%	68.71%	0.001010	10,800.00	3.77	3.77	41.14	987.32	180.19	254.98	5.49	40%
Base Booth- Ebony	8.70	44.40%	0.9%	43.5%	0.0%	55.60%	0.001010	10,800.00	3.79	3.79	41.29	990.98	180.85	138.66	6.81	40%
Base Booth- Dusk Gray	8.82	42.50%	0.9%	41.6%	0.0%	57.50%	0.001010	10,800.00	3.67	3.67	40.03	960.78	175.34	145.38	6.38	40%
Base Booth- Camel	9.26	41.00%	0.9%	40.1%	0.0%	59.00%	0.001010	10,800.00	3.71	3.71	40.51	972.34	177.45	156.62	6.30	40%
Base Booth- Charcoal Black	8.72	45.70%	0.9%	44.8%	0.0%	54.30%	0.001010	10,800.00	3.91	3.91	42.62	1022.93	186.69	135.73	7.20	40%
Base Booth- Gold Slate	8.79	70.00%	0.9%	69.1%	0.0%	30.00%	0.001010	10,800.00	6.07	6.07	66.26	1590.33	290.23	75.59	20.25	40%
Base Booth- Gunmetal Metallic	8.98	54.00%	0.9%	53.1%	0.0%	46.00%	0.001010	10,800.00	4.77	4.77	52.02	1248.56	227.86	118.41	10.37	40%
Base Booth- Green Jewel	8.97	49.00%	0.9%	48.1%	0.0%	51.00%	0.001010	10,800.00	4.32	4.32	47.07	1129.75	206.18	131.14	8.46	40%
Base Booth- White Basecoat	10.82	27.50%	0.9%	26.6%	0.0%	72.50%	0.001010	10,800.00	2.88	2.88	31.41	753.75	137.56	224.87	3.97	40%
Clear Booth- Adhesive Promoter Clear	7.35	89.00%	0.0%	89.0%	0.0%	11.00%	0.000724	10,800.00	6.54	6.54	51.15	1227.58	224.03	16.61	59.47	40%
Clear Booth- UniGlos	8.47	56.00%	0.0%	56.0%	0.0%	44.00%	0.000724	10,800.00	4.74	4.74	37.09	890.11	162.45	76.58	10.78	40%
Clear Booth- Ebony	8.70	44.40%	0.9%	43.5%	0.0%	55.60%	0.000724	10,800.00	3.79	3.79	29.60	710.37	129.64	99.40	6.81	40%
Clear Booth- Dusk Gray	8.82	42.50%	0.9%	41.6%	0.0%	57.50%	0.000724	10,800.00	3.67	3.67	28.70	688.72	125.69	104.21	6.38	40%
Clear Booth-Camel	9.26	41.00%	0.9%	40.1%	0.0%	59.00%	0.000724	10,800.00	3.71	3.71	29.04	697.01	127.20	112.27	6.30	40%
Clear Booth- Charcoal Black	8.72	45.70%	0.9%	44.8%	0.0%	54.30%	0.000724	10,800.00	3.91	3.91	30.55	733.27	133.82	97.30	7.20	40%
Pearl Booth- Gray Conductive	9.63	49.00%	0.0%	49.0%	0.0%	51.00%	0.000724	10,800.00	4.72	4.72	36.90	885.52	161.61	100.92	9.25	40%
Pearl Booth- Adhesive Promoter Clear	7.35	89.00%	0.0%	89.0%	0.0%	11.00%	0.000724	10,800.00	6.54	6.54	51.15	1227.58	224.03	16.61	59.47	40%
Pearl Booth- UniGlos	8.47	56.00%	0.0%	56.0%	0.0%	44.00%	0.000724	10,800.00	4.74	4.74	37.09	890.11	162.45	76.58	10.78	40%
Pearl Booth- White Pearl	12.78	30.40%	0.9%	29.5%	0.0%	68.71%	0.000724	10,800.00	3.77	3.77	29.49	707.74	129.16	182.78	5.49	40%
Pearl Booth- Ebony	8.70	44.40%	0.9%	43.5%	0.0%	55.60%	0.000724	10,800.00	3.79	3.79	29.60	710.37	129.64	99.40	6.81	40%
Pearl Booth- Dusk Gray	8.82	42.50%	0.9%	41.6%	0.0%	57.50%	0.000724	10,800.00	3.67	3.67	28.70	688.72	125.69	104.21	6.38	40%
Pearl Booth- Camel	9.26	41.00%	0.9%	40.1%	0.0%	59.00%	0.000724	10,800.00	3.71	3.71	29.04	697.01	127.20	112.27	6.30	40%
Pearl Booth- Charcoal Black	8.72	45.70%	0.9%	44.8%	0.0%	54.30%	0.000724	10,800.00	3.91	3.91	30.55	733.27	133.82	97.30	7.20	40%
Pearl Booth- Gold Slate	8.79	70.00%	0.9%	69.1%	0.0%	30.00%	0.000724	10,800.00	6.07	6.07	47.50	1140.00	208.05	54.19	20.25	40%
Pearl Booth- Gunmetal Metallic	8.98	54.00%	0.9%	53.1%	0.0%	46.00%	0.000724	10,800.00	4.77	4.77	37.29	895.01	163.34	84.88	10.37	40%
Pearl Booth- Green Jewel	8.97	49.00%	0.9%	48.1%	0.0%	51.00%	0.000724	10,800.00	4.32	4.32	33.74	809.84	147.80	94.00	8.46	40%
Pearl Booth- White Basecoat	10.82	27.50%	0.9%	26.6%	0.0%	72.50%	0.000724	10,800.00	2.88	2.88	22.51	540.31	98.61	161.20	3.97	40%
Purge Solvent	6.86	100.00%	10.0%	90.0%	0.0%	0.00%	0.000740	10,800.00	6.17	6.17	49.34	1184.22	216.12	0.00	0.00	100%
Potential Emissions (tons/yr)											341.28	8190.69	1494.80	1135.98		
Controlled Potential Emissions (tons/yr)													287.75	22.72		

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

NOTES

Controlled potential emissions for VOC calculated using 80.75% control efficiency
Controlled potential emission for particulate calculated using 98% control efficiency
Emissions for the plastic parts washing system were not calculated because it is a hot water based washing system. The system does not utilize any solvents.

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

Company Name: Key Plastics L.L.C. - Hartford City Plant
Address City IN Zip: 1615 W. McDonald St, Hartford City, IN 47348
FESOP No.: 009-23555-00018
Plt ID: 009-00018
Reviewer: TW/EVP
Date: Sep-06

Material/Facility	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Methanol	Weight % Ethyl Benzene	Weight % MIK	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Methanol Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	MIK Emissions (ton/yr)
Primer Booth- Gray Conductive	9.63	0.002321	10,800.00			4.50%			0.00	0.00	10.86	0.00	0.00
Primer Booth- White Pearl	12.78	0.002321	10,800.00	0.32%			0.92%		1.03	0.00	0.00	2.95	0.00
Primer Booth- White Basecoat	10.82	0.002321	10,800.00	4.50%			2.50%		12.21	0.00	0.00	6.78	0.00
Base Booth- Gray Conductive	9.63	0.001010	10,800.00			4.50%			0.00	0.00	4.73	0.00	0.00
Base Booth- Adhesive Promoter Clear	7.35	0.001010	10,800.00	38.00%	44.00%		7.00%		30.47	35.28	0.00	5.61	0.00
Base Booth- UniGlos	8.47	0.001010	10,800.00	10.00%			2.50%		9.24	0.00	0.00	2.31	0.00
Base Booth- White Pearl	12.78	0.001010	10,800.00	0.32%			0.92%		0.45	0.00	0.00	1.28	0.00
Base Booth- Ebony	8.70	0.001010	10,800.00	5.00%			0.80%	6.00%	4.74	0.00	0.00	0.76	5.69
Base Booth- Dusk Gray	8.82	0.001010	10,800.00	6.00%			1.00%	8.00%	5.77	0.00	0.00	0.96	7.70
Base Booth- Camel	9.26	0.001010	10,800.00	6.00%			1.00%	8.00%	6.06	0.00	0.00	1.01	8.08
Base Booth- Charcoal Black	8.72	0.001010	10,800.00	5.00%			1.00%	8.00%	4.76	0.00	0.00	0.95	7.61
Base Booth- Gold Slate	8.79	0.001010	10,800.00	5.00%			2.50%		4.79	0.00	0.00	2.40	0.00
Base Booth- Gunmetal Metallic	8.98	0.001010	10,800.00	2.50%			2.50%		2.45	0.00	0.00	2.45	0.00
Base Booth- Green Jewel	8.97	0.001010	10,800.00	2.50%			2.50%		2.45	0.00	0.00	2.45	0.00
Base Booth- White Basecoat	10.82	0.001010	10,800.00	4.50%			2.50%		5.31	0.00	0.00	2.95	0.00
Adhesive Promoter Clear	7.35	0.000724	10,800.00	38.00%	44.00%		7.00%		21.84	25.29	0.00	4.02	0.00
Clear Booth- UniGlos	8.47	0.000724	10,800.00	10.00%			2.50%		6.62	0.00	0.00	1.66	0.00
Clear Booth- Ebony	8.70	0.000724	10,800.00	5.00%			0.80%	6.00%	3.40	0.00	0.00	0.54	4.08
Clear Booth- Dusk Gray	8.82	0.000724	10,800.00	6.00%			1.00%	8.00%	4.14	0.00	0.00	0.69	5.52
Clear Booth-Camel	9.26	0.000724	10,800.00	6.00%			1.00%	8.00%	4.34	0.00	0.00	0.72	5.79
Clear Booth- Charcoal Black	8.72	0.000724	10,800.00	5.00%			1.00%	8.00%	3.41	0.00	0.00	0.68	5.45
Pearl Booth- Gray Conductive	9.63	0.000724	10,800.00			4.50%			0.00	0.00	3.39	0.00	0.00
Adhesive Promoter Clear	7.35	0.000724	10,800.00	38.00%	44.00%		7.00%		21.84	25.29	0.00	4.02	0.00
Pearl Booth- UniGlos	8.47	0.000724	10,800.00	10.00%			2.50%		6.62	0.00	0.00	1.66	0.00
Pearl Booth- White Pearl	12.78	0.000724	10,800.00	0.32%			0.92%		0.32	0.00	0.00	0.92	0.00
Pearl Booth- Ebony	8.70	0.000724	10,800.00	5.00%			0.80%	6.00%	3.40	0.00	0.00	0.54	4.08
Pearl Booth- Dusk Gray	8.82	0.000724	10,800.00	6.00%			1.00%	8.00%	4.14	0.00	0.00	0.69	5.52
Pearl Booth- Camel	9.26	0.000724	10,800.00	6.00%			1.00%	8.00%	4.34	0.00	0.00	0.72	5.79
Pearl Booth- Charcoal Black	8.72	0.000724	10,800.00	5.00%			1.00%	8.00%	3.41	0.00	0.00	0.68	5.45
Pearl Booth- Gold Slate	8.79	0.000724	10,800.00	5.00%			2.50%		3.44	0.00	0.00	1.72	0.00
Pearl Booth- Gunmetal Metallic	8.98	0.000724	10,800.00	2.50%			2.50%		1.76	0.00	0.00	1.76	0.00
Pearl Booth- Green Jewel	8.97	0.000724	10,800.00	2.50%			2.50%		1.75	0.00	0.00	1.75	0.00
Pearl Booth- White Basecoat	10.82	0.000724	10,800.00	4.50%			2.50%		3.81	0.00	0.00	2.12	0.00
Purge Solvent	6.86	0.000740	10,800.00	40.00%				10.00%	21.93	0.00	0.00	0.00	5.48
Unrestricted Single Worst Case (tons/yr)									108.28	85.85	18.98	20.44	25.15
Controlled Single Worst Case (tons/yr)									20.84	16.53	3.65	3.93	4.84
Unrestricted Combined Total Emission (tons/yr)									258.70				
Controlled Combined Total Emission (tons/yr)									49.80				

METHODOLOGY

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

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

**Company Name: Key Plastics L.L.C. - Hartford City Plant
Address City IN Zip: 1615 W. McDonald St, Hartford City, IN 47348
FESOP No.: 009-23555-00018
Plt ID: 009-00018
Reviewer: TW/EVP
Date: Sep-06**

Material/Facility	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	
Clear Booth- Adhesive Promoter	7.35	89.00%	0.0%	89.0%	0.0%	11.00%	0.000724	10,800.00	6.54	6.54	51.15	1227.58	224.03	16.61	59.47	40%	
Clear Booth- UniGlos	8.47	56.00%	0.0%	56.0%	0.0%	44.00%	0.000724	10,800.00	4.74	4.74	37.09	890.11	162.45	76.58	10.78	40%	
Clear Booth- Ebony	8.70	44.40%	0.9%	43.5%	0.0%	55.60%	0.000724	10,800.00	3.79	3.79	29.60	710.37	129.64	99.40	6.81	40%	
Clear Booth- Dusk Gray	8.82	42.50%	0.9%	41.6%	0.0%	57.50%	0.000724	10,800.00	3.67	3.67	28.70	688.72	125.69	104.21	6.38	40%	
Clear Booth-Camel	9.26	41.00%	0.9%	40.1%	0.0%	59.00%	0.000724	10,800.00	3.71	3.71	29.04	697.01	127.20	112.27	6.30	40%	
Clear Booth- Charcoal Black	8.72	45.70%	0.9%	44.8%	0.0%	54.30%	0.000724	10,800.00	3.91	3.91	30.55	733.27	133.82	97.30	7.20	40%	
Potential Emissions (tons/yr)											51.15	1227.58	224.03	112.27			
Controlled Potential Emissions (tons/yr)														43.13	2.25		

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

NOTES

Controlled Potential Emission for VOC calculated using 80.75% overall control efficiency
Controlled Potential Emission for particulate calculated using 98% control efficiency

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

**Company Name: Key Plastics L.L.C. - Hartford City Plant
Address City IN Zip: 1615 W. McDonald St, Hartford City, IN 47348
FESOP No.: 009-23555-00018
Plt ID: 009-00018
Reviewer: TW/EVP
Date: Sep-06**

Material/Facility	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Methanol	Weight % Ethyl Benzen	Weight % MIK	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Methanol Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	MIK Emissions (ton/yr)
Clear Booth-Adhesive Promoter Clear	7.35	0.000724	10,800.00	38.00%	44.00%		7.00%		21.84	25.29	0.00	4.02	0.00
Clear Booth-UniGlos	8.47	0.000724	10,800.00	10.00%			2.50%		6.62	0.00	0.00	1.66	0.00
Clear Booth-Ebony	8.70	0.000724	10,800.00	5.00%			0.80%	6.00%	3.40	0.00	0.00	0.54	4.08
Clear Booth-Dusk Gray	8.82	0.000724	10,800.00	6.00%			1.00%	8.00%	4.14	0.00	0.00	0.69	5.52
Clear Booth-Camel	9.26	0.000724	10,800.00	6.00%			1.00%	8.00%	4.34	0.00	0.00	0.72	5.79
Clear Booth-Charcoal Black	8.72	0.000724	10,800.00	5.00%			1.00%	8.00%	3.41	0.00	0.00	0.68	5.45
Unrestricted Single Worst Case (tons/yr)									21.84	25.29	0.00	4.02	5.79
Controlled Single Worst Case (tons/yr)									4.20	4.87	0.00	0.77	1.12
Unrestricted Combined Total Emission (tons/yr)									56.94				
Controlled Combined Total Emission (tons/yr)									61.54				

METHODOLOGY

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

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

**Company Name: Key Plastics L.L.C. - Hartford City Plant
Address City IN Zip: 1615 W. McDonald St, Hartford City, IN 47348
FESOP No.: 009-23555-00018
Pit ID: 009-00018
Reviewer: TW/EVP
Date: Sep-06**

Material/Facility	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
Manual Booth- Gray Conductive	9.63	49.00%	0.0%	49.0%	0.0%	51.00%	0.001010	40.00	4.72	4.72	0.19	4.58	0.83	0.52	9.25	40%
Manual Booth- Adhesive Promoter Clear	7.35	89.00%	0.0%	89.0%	0.0%	11.00%	0.001010	40.00	6.54	6.54	0.26	6.34	1.16	0.09	59.47	40%
Manual Booth- UniGlos	8.47	56.00%	0.0%	56.0%	0.0%	44.00%	0.001010	40.00	4.74	4.74	0.19	4.60	0.84	0.40	10.78	40%
Manual Booth- White Pearl	12.78	30.40%	0.9%	29.5%	0.0%	68.71%	0.001010	40.00	3.77	3.77	0.15	3.66	0.67	0.94	5.49	40%
Manual Booth-Ebony	8.70	44.40%	0.9%	43.5%	0.0%	55.60%	0.001010	40.00	3.79	3.79	0.15	3.67	0.67	0.51	6.81	40%
Manual Booth- Dusk Gray	8.82	42.50%	0.9%	41.6%	0.0%	57.50%	0.001010	40.00	3.67	3.67	0.15	3.56	0.65	0.54	6.38	40%
Manual Booth- Camel	9.26	41.00%	0.9%	40.1%	0.0%	59.00%	0.001010	40.00	3.71	3.71	0.15	3.60	0.66	0.58	6.30	40%
Manual Booth- Charcoal Black	8.72	45.70%	0.9%	44.8%	0.0%	54.30%	0.001010	40.00	3.91	3.91	0.16	3.79	0.69	0.50	7.20	40%
Manual Booth- Gold Slate	8.79	70.00%	0.9%	69.1%	0.0%	30.00%	0.001010	40.00	6.07	6.07	0.25	5.89	1.07	0.28	20.25	40%
Manual Booth- Gunmetal Metallic	8.98	54.00%	0.9%	53.1%	0.0%	46.00%	0.001010	40.00	4.77	4.77	0.19	4.62	0.84	0.44	10.37	40%
Manual Booth- Green Jewel	8.97	49.00%	0.9%	48.1%	0.0%	51.00%	0.001010	40.00	4.32	4.32	0.17	4.18	0.76	0.49	8.46	40%
Manual Booth- White Basecoat	10.82	27.50%	0.9%	26.6%	0.0%	72.50%	0.001010	40.00	2.88	2.88	0.12	2.79	0.51	0.83	3.97	40%
Potential Emissions (tons/yr)											0.26	6.34	1.16	0.94		
Controlled Potential Emissions (tons/yr)													1.16	0.02		

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

NOTES

Controlled potential emissions for VOC calculated using 80.75% control efficiency
Controlled potential emission for particulate calculated using 98% control efficiency
Emissions for the plastic parts washing system were not calculated because it is a hot water based washing system. The system does not utilize any solvents.

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

Company Name: Key Plastics L.L.C. - Hartford City Plant
Address City IN Zip: 1615 W. McDonald St, Hartford City, IN 47348
FESOP No.: 009-23555-00018
Plt ID: 009-00018
Reviewer: TW/EVP
Date: Sep-06

Material/Facility	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Methanol	Weight % Ethyl Benzene	Weight % MIK	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Methanol Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	MIK Emissions (ton/yr)
Manual Booth- Gray Conductive	9.63	0.001010	40.00			4.50%			0.00	0.00	0.02	0.00	0.00
Manual Booth- Adhesive Promoter Clear	7.35	0.001010	40.00	38.00%	44.00%		7.00%		0.11	0.13	0.00	0.02	0.00
Manual Booth- UniGlos	8.47	0.001010	40.00	10.00%			2.50%		0.03	0.00	0.00	0.01	0.00
Manual Booth- White Pearl	12.78	0.001010	40.00	0.32%			0.92%		0.00	0.00	0.00	0.00	0.00
Manual Booth-Ebony	8.70	0.001010	40.00	5.00%			0.80%	6.00%	0.02	0.00	0.00	0.00	0.02
Manual Booth- Dusk Gray	8.82	0.001010	40.00	6.00%			1.00%	8.00%	0.02	0.00	0.00	0.00	0.03
Manual Booth- Camel	9.26	0.001010	40.00	6.00%			1.00%	8.00%	0.02	0.00	0.00	0.00	0.03
Manual Booth- Charcoal Black	8.72	0.001010	40.00	5.00%			1.00%	8.00%	0.02	0.00	0.00	0.00	0.03
Manual Booth- Gold Slate	8.79	0.001010	40.00	5.00%			2.50%		0.02	0.00	0.00	0.01	0.00
Manual Booth- Gunmetal Metallic	8.98	0.001010	40.00	2.50%			2.50%		0.01	0.00	0.00	0.01	0.00
Manual Booth- Green Jewel	8.97	0.001010	40.00	2.50%			2.50%		0.01	0.00	0.00	0.01	0.00
Manual Booth- White Basecoat	10.82	0.001010	40.00	4.50%			2.50%		0.02	0.00	0.00	0.01	0.00
Unrestricted Single Worst Case (tons/yr)									0.11	0.13	0.02	0.02	0.03
Controlled Single Worst Case (tons/yr)									0.11	0.13	0.02	0.02	0.03
Unrestricted Combined Total Emission (tons/yr)									0.31				
Controlled Combined Total Emission (tons/yr)									0.31				

METHODOLOGY

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