



*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 26, 2007  
RE: Vibration Control Technologies, LLC / 113-23741-00080  
FROM: Nisha Sizemore  
Chief, Permits Branch  
Office of Air Quality

### Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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 from 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-AM.dot 03/23/06



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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

Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

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Indianapolis, Indiana 46204-2251  
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Mr. Steve Sperlazza  
Vibration Control Technologies, LLC  
1496 Gerber Street  
Ligonier, IN 46767

January 26, 2007

Re: 113-23741-00080  
Notice Only Change to  
MSOP 113-16637-00080

Dear Mr. Sperlazza:

Vibration Control Technologies LLC, was issued a Minor Source Operating permit (MSOP) on October 26, 2004 for the production of fabricated metal products. A letter requesting changes to this permit was received on October 6, 2006. Pursuant to the provisions of 326 IAC 2-6.1-6 a Notice Only Change to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the addition of the following:

- (a) One (1) International Line, consisting of:
  - (1) One (1) adhesive roll coater, with a maximum capacity of 75 machined metal parts per hour, and exhausting to general ventilation.
  - (2) One (1) NMP washer, with a maximum capacity of 75 machined metal parts per hour, using 0.04 gallons of non-HAP containing solvent per hour, and exhausting to stack INT01.
  - (3) One (1) rust inhibitor, with a maximum capacity of 75 machined metal parts per hour, exhausting to general ventilation.
- (b) One (1) Chrysler 4.7 L Line, consisting of:
  - (1) One (1) adhesive roll coater, with a maximum capacity of 85 machined metal parts per hour, and exhausting to general ventilation.
  - (2) One (1) NMP washer, with a maximum capacity of 85 machined metal parts per hour, using 0.024 gallons of non-HAP containing solvent per hour, and exhausting to stack CHR01.
  - (3) One (1) rust inhibitor, with a maximum capacity of 85 machined metal parts per hour, exhausting to general ventilation.
  - (4) One (1) paint booth, with a maximum capacity of 85 machined metal parts per hour, using dry filters as particulate matter control, and exhausting to general ventilation.

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions  
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit  
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-6.1-6, this permit shall be revised by incorporating the notice only change into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this revision and the following revised permit to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Linda Quigley, c/o OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204-2251, or at 973-575-2555, extension 3284, or dial 1-800-451-6027, and ask for extension 3-6878.

Sincerely,  
Original signed by

Nisha Sizemore, Chief  
Permits Branch  
Office of Air Quality

Attachments  
LQ/EVP

cc: File – Noble County  
U.S. EPA, Region V  
Noble County Health Department  
Northern Regional Office  
Air Compliance Section Inspector  
Compliance Data Section  
Administrative and Development  
Technical Support and Modeling



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## MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**Vibration Control Technologies, LLC  
1496 Gerber Street  
Ligonier, Indiana 46767**

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

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 MSOP under 326 IAC 2-6.1.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP113-16637-00080	
Original signed by: Paul Dubenetzky, Chief Permits Branch Office of Air Quality	Issuance Date: October 26, 2004  Expiration Date: October 26, 2009
First Minor Permit Revision No.: 113-21996-00080, issued on December 27, 2005 Second Minor Permit Revision No.: 113-22521-00080, issued on March 28, 2006	
Notice Only Change No.: 113-23741-00080	Pages affected: 4, 5, 8, 9, 33, 34
Original signed by:  Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: January 26, 2007  Expiration Date: October 26, 2009

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 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 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

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The Permittee owns and operates automobile parts production plant for machining and surface coating of auto parts.

Authorized Individual: Site Executive Officer  
Source Address: 1496 Gerber Street, Ligonier, IN 46767  
Mailing Address: 1496 Gerber Street, Ligonier, IN 46767  
General Source Phone: (260) 894-7199  
SIC Code: 3499  
County Location: Noble  
Source Location Status: Attainment for all criteria pollutants  
Source Status: Minor Source Operating Permit  
Minor Source, under PSD Rules;  
Minor Source, Section 112 of the Clean Air Act

### A.2 Emissions Units and Pollution Control Equipment Summary

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This stationary source is approved to construct and operate the following emissions units and pollution control devices:

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

- (a) One (1) Ford 6.8 Assembly Cell line, consisting of:
  - (1) One (1) adhesive roll coater, with a maximum capacity of 105 machined metal parts per hour, and exhausting to stack S-9.
  - (2) One (1) NMP washer, with a maximum capacity of 105 machined metal parts per hour, exhausting to general ventilation.
  - (3) One (1) spray booth, identified as P-1, with a maximum capacity of 105 machined metal parts per hour, using dry filters as particulate matter control, and exhausting to stack S-10.
- (b) One (1) Ford 5.4 line, consisting of:
  - (1) One (1) adhesive roll coater, with a maximum capacity of 105 machined metal parts per hour, and exhausting to general ventilation.
  - (2) One (1) NMP washer, with a maximum capacity of 105 machined metal parts per hour, and exhausting to stack S-7.
  - (3) One (1) spray booth, identified as P-2, with a maximum capacity of 105 machined metal parts per hour, using dry filters as control, and exhausting to stack S-8.

- (c) One (1) Honda Civic Assembly line:
  - (1) One (1) spray booth, with a maximum capacity of 100 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-15.
  - (2) One (1) spray booth, with a maximum capacity of 100 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-14.
  - (3) One (1) brush coater or timing mark station, with a maximum capacity of 100 units per hour, and exhausting to the atmosphere.
- (d) One (1) Honda BPX Line #1 Assembly Cell:
  - (1) One (1) spray shadow booth, with a maximum capacity of 92 units per hour, and exhausting to the stack S-17.
  - (2) One (1) spray final booth, with a maximum capacity of 92 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-18.
  - (3) One (1) brush coater or timing mark station, with a maximum capacity of 92 units per hour, and exhausting to the atmosphere.
- (e) One (1) Honda Compact Assembly Cell:
  - (1) One (1) spray shadow booth, with a maximum capacity of 92 units per hour, and exhausting to the stack S-19.
  - (2) One (1) spray final booth, with a maximum capacity of 92 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-20.
  - (3) One (1) brush coater or timing mark station, with a maximum capacity of 92 units per hour, and exhausting to the atmosphere.
- (f) One (1) Ford 2.5 Duratec/DMD line, consisting of:
  - (1) One (1) adhesive roll coater, with a maximum capacity of 85 machined metal parts per hour, and exhausting to general ventilation.
  - (2) One (1) NMP washer, with a maximum capacity of 85 machined metal parts per hour, and exhausting to stack S-2.
  - (3) One (1) dip tank, with a maximum capacity of 85 machined metal parts per hour, using dry filters as particulate matter control, and exhausting to stack S-1.
- (g) One mechanical shot blaster, with a maximum capacity of 80 lb/hr of parts, and exhausting to the atmosphere.
- (h) One (1) Ford 4.0 Redesign Line:
  - (1) One (1) adhesive spray booth, with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-4.
  - (2) One (1) spray booth, with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-6.

- (3) Four (4) rubber molding presses, with a maximum capacity of 81 lb/hr each, exhausting to stack S-5.
- (i) One (1) Ford I4 Assembly line:
  - (1) One (1) spray booth, with a maximum capacity of 105 machined metal parts per hour, and exhausting to the stack S-11.
- (j) Three (3) natural gas-fired heaters, rated at 0.32 million British thermal units (MMBTU) per hour each.
- (k) Two (2) natural gas-fired heaters, rated at 0.2 million British thermal units (MMBTU) per hour each.
- (l) One (1) natural gas-fired heaters, rated at 0.1 million British thermal units (MMBTU) per hour each.
- (m) Four (4) natural gas-fired sealer tank heaters, rated at 0.3 million British thermal units (MMBTU) per hour each.
- (n) Four (4) natural gas-fired wash tank heaters, rated at 0.4 million British thermal units (MMBTU) per hour each.
- (o) One (1) Nissan Assembly Cell:
  - (1) One (1) spray booth, with a maximum capacity of 60 units per hour, and exhausting to the stack S-16.
  - (2) One (1) brush coater or timing mark station, with a maximum capacity of 60 units per hour, and exhausting to the atmosphere.
- (p) One (1) D 35 Assembly Cell line:
  - (1) One (1) spray booth, constructed in 2002, coating metal with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, exhausting to the stack S-12;
  - (2) Four (4) rubber molding presses , with two (2) units constructed in 2002, and the two (2) new units to be constructed in 2006, with a maximum capacity of 58.5 lb/hr each, exhausting to stacks S-13 ,S-21 and S-22;
  - (3) One (1) primer booth, to be constructed in 2006, coating metal with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, exhausting through general ventilation;
  - (4) One (1) adhesive booth, to be constructed in 2006, coating metal with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, exhausting through general ventilation;
  - (5) Two (2) shadow booths, to be constructed in 2006, coating metal with a total maximum capacity of 100 parts/hr, using dry filters as particulate matter control, exhausting through general ventilation; and
  - (6) Two (2) final booths, to be constructed in 2006, coating metal with a total maximum capacity of 100 parts/hr, using dry filters as particulate matter control, exhausting through general ventilation.

- (q) One (1) Ford 3.0 Vulcan Cell:
  - (1) One (1) dip tank, with a maximum capacity of 85 units per hour, and exhausting to stack S-3.
  
- (r) One (1) International Line consisting of:
  - (1) One (1) adhesive roll coater, with a maximum capacity of 75 machined metal parts per hour, and exhausting to general ventilation.
  - (2) One (1) NMP washer, with a maximum capacity of 75 machined metal parts per hour, using 0.04 gallons of non-HAP containing solvent per hour, and exhausting to stack INT01.
  - (3) One (1) Rust Inhibiter Spray Booth, with a maximum capacity of 75 machined metal parts per hour, and exhausting to general ventilation.
  
- (s) One (1) Chrysler 4.7L Line consisting of:
  - (1) One (1) adhesive roll coater, with a maximum capacity of 85 machined metal parts per hour, and exhausting to general ventilation.
  - (2) One (1) NMP washer, with a maximum capacity of 85 machined metal parts per hour, using 0.024 gallons of non-HAP containing solvent per hour, and exhausting to stack CHR01.
  - (3) One (1) Rust Inhibiter Spray Booth, with a maximum capacity of 85 machined metal parts per hour, and exhausting to general ventilation.
  - (4) One (1) paint booth, with a maximum capacity of 85 machined metal parts per hour, using dry filters as particulate matter control, and exhausting to general ventilation.

## **SECTION B GENERAL CONDITIONS**

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

### **B.1 Definitions**

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

### **B.2 Effective Date of the Permit [IC 13-15-5-3]**

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Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

### **B.3 Revocation of Permits [326 IAC 2-1.1-9(5)]**

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Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

### **B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]**

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This permit 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 of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

### **B.5 Modification to Permit [326 IAC 2]**

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Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

### **B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

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- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

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

- (d) The notification 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.

#### B.7 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days (this time frame is determined on a case by case basis but no more than ninety (90) days) after issuance of this permit, including the following information on each emissions unit:
- (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.

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

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

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMP's 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 PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) 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.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (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.

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.

**B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC13-17-3-2][IC 13-30-3-1]**

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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 permitted 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 this title or the conditions of this permit or any operating permit revisions;
- (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 processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (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.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]**

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Pursuant to [326 IAC 2-6.1-6(d)(3)]:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

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

**B.11 Annual Fee Payment [326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
  
- (b) 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.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

**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 Permit Revocation [326 IAC 2-1.1-9]**

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

**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 non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.4 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.5 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 2-7-1(34).

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

- (g) Indiana Accredited Asbestos Inspector  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

## Testing Requirements

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

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- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. 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.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ (and local agency) not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, (and local agency), 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.7 Compliance Requirements [326 IAC 2-1.1-11]

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

## Compliance Monitoring Requirements

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

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

### C.9 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

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

## Record Keeping and Reporting Requirements

### C.10 Malfunctions Report [326 IAC 1-6-2]

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Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

### C.11 General Record Keeping Requirements [326 IAC 2-6.1-5]

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

### C.12 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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- (a) 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

- (b) 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.

- (c) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
  
- (d) 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.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Emissions Unit Description:

One (1) Ford 6.8 line, consisting of:

- (a) One (1) adhesive roll coater, with a maximum capacity of 105 machined metal parts per hour, and exhausting to stack S-9.
- (b) One (1) NMP washer, with a maximum capacity of 105 machined metal parts per hour, exhausting to general ventilation.
- (c) One (1) spray booth, identified as P-1, with a maximum capacity of 105 machined metal parts per hour, using dry filters as particulate matter control, and exhausting to stack S-10.

One (1) Ford 5.4 line, consisting of:

- (d) One (1) adhesive roll coater, with a maximum capacity of 105 machined metal parts per hour, using no control, and exhausting to stack S-12.
- (e) One (1) NMP washer, with a maximum capacity of 105 machined metal parts per hour, using no control, and exhausting to stack S-7.
- (f) One (1) spray booth, identified as P-2, with a maximum capacity of 105 machined metal parts per hour, using dry filters as control, and exhausting to stack S-8.

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

### Emission Limitations and Standards

#### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere VOC in excess of, for air dried or forced warm air dried coatings, three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicators at the Ford 6.8 and 5.4 line spray booths and adhesive roll coaters.

#### D.1.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of P-1 and P-2 during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

#### D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee of NMP washer cold cleaning facilities on the Ford 6.8 and Ford 5.4 Lines shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;

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

#### D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

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- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
  - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.
  - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
  - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent is used is insoluble in, and heavier than, water.

- (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
  - (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

#### D.1.5 Particulate [326 IAC 6-3-2(d)]

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- (a) Particulate from the surface coating manufacturing processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
  - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
  - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

#### D.1.6 Preventive Maintenance Plan [326 IAC 1-6-3]

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

### **Compliance Determination Requirements**

#### D.1.7 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

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Compliance with the VOC content contained in condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) 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.1.8 Particulate Matter (PM)

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In order to comply with condition D.1.5, the dry filters for PM control shall be in operation and control emissions from the spray booths P-1 and P-2 at all times that the spray booths are in operation.

#### D.1.9 Training Requirements

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- (a) In order to comply with condition D.1.5 the Permittee shall implement an operator-training program.
  - (1) All spray booth operators or employees that perform maintenance at the surface coating facilities shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
  - (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.
  - (3) All operators shall be given refresher training annually.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

#### **Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**

##### D.1.10 Record Keeping Requirements

---

- (a) In order to comply with condition D.1.1, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be maintained on a monthly basis and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.1.1.
  - (1) The VOC content of each coating material and solvent used less water; and
  - (2) The coatings and solvents applied during each month, purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the coating or solvent type.
- (b) In order to comply with Condition D.1.9, the Permittee shall maintain a copy of the operator-training program, all training records including the list of trained operators, and the additional measures prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Emissions Unit Description:

One (1) Honda Civic line, consisting of:

- (a) One (1) spray booth, with a maximum capacity of 100 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-15.
- (b) One (1) spray booth, with a maximum capacity of 100 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-14.
- (c) One (1) brush coater or timing mark station, with a maximum capacity of 100 units per hour, and exhausting to the atmosphere.

One (1) Honda BPX Line #1 Assembly Cell:

- (d) One (1) spray shadow booth, with a maximum capacity of 92 units per hour, and exhausting to the stack S-17.
- (e) One (1) spray final booth, with a maximum capacity of 92 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-18.
- (f) One (1) brush coater or timing mark station, with a maximum capacity of 92 units per hour, and exhausting to the atmosphere.

One (1) Honda Compact Assembly Cell:

- (g) One (1) spray shadow booth, with a maximum capacity of 92 units per hour, and exhausting to the stack S-19.
- (h) One (1) spray final booth, with a maximum capacity of 92 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-20.
- (i) One (1) brush coater or timing mark station, with a maximum capacity of 92 units per hour, and exhausting to the atmosphere.

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

### Emission Limitations and Standards

#### D.2.1 Particulate [326 IAC 6-3-2(d)]

- (a) Particulate from the surface coating manufacturing processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
  - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

- (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

#### D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

---

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

### Compliance Determination Requirements

#### D.2.3 Particulate Matter (PM)

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In order to comply with condition D.2.1, the dry filters for PM control shall be in operation and control emissions from the spray booths at all times that the spray booths are in operation.

#### D.2.4 Training Requirements

---

- (a) In order to comply with condition D.2.1 the Permittee shall implement an operator-training program.
  - (1) All spray booth operators or employees that perform maintenance at the surface coating facilities shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
  - (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.
  - (3) All operators shall be given refresher training annually.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

### Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

#### D.2.5 Record Keeping Requirements

---

- (a) In order to comply with Condition D.2.4, the Permittee shall maintain a copy of the operator-training program, all training records including the list of trained operators, and the additional measures prescribed by the Preventive Maintenance Plan.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.3

## FACILITY OPERATION CONDITIONS

### Emissions Unit Description:

One (1) Ford 2.5 Duratec/DMD line, consisting of:

- (a) One (1) adhesive roll coater, with a maximum capacity of 85 machined metal parts per hour, and exhausting to general ventilation.
- (b) One (1) NMP washer, with a maximum capacity of 85 machined metal parts per hour, and exhausting to stack S-2.
- (c) One (1) dip tank, with a maximum capacity of 85 machined metal parts per hour, using dry filters as particulate matter control, and exhausting to stack S-1.

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

### Emission Limitations and Standards

#### D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee of NMP washer cold cleaning facilities on the Ford 2.5 Duratec/DMD line shall:

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

#### D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
  - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
    - (B) The solvent is agitated; or

- (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
  - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
  - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
  - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
  - (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

#### D.3.3 Preventive Maintenance Plan [326 IAC 1-6-3]

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

## SECTION D.4

## FACILITY OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One enclosed mechanical shot blaster, with a maximum capacity of 80 lb/hr of parts, using baghouse as control, and exhausting to the atmosphere.

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

### Emission Limitations and Standards

#### D.4.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2]

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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.

### Compliance Determination Requirement

#### D.4.2 Particulate Control

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In order to comply with D.4.1, the baghouse for particulate control shall be in operation and control emissions from the mechanical shot blasting operation at all times that the machine is in operation.

## SECTION D.5

## FACILITY OPERATION CONDITIONS

### Emissions Unit Description:

One (1) Ford 4.0 Redesign Line consisting of::

- (a) One (1) adhesive spray booth, with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-4.
- (b) One (1) spray booth, with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, and exhausting to the stack S-6.
- (c) Four (4) rubber molding presses, with a maximum capacity of 81 lb/hr each, exhausting to stack S-5.

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

### Emission Limitations and Standards

#### D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere VOC in excess of, for air dried or forced warm air dried coatings, three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicators at the Ford 4.0 Redesign line spray booths.

#### D.5.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of the two (2) spray booths during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

#### D.5.3 Particulate [326 IAC 6-3-2(d)]

- (a) Particulate from the surface coating manufacturing processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
  - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
  - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

**D.5.4 Preventive Maintenance Plan [326 IAC 1-6-3]**

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

**Compliance Determination Requirements**

**D.5.5 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]**

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Compliance with the VOC content contained in condition D.5.1 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.5.6 Particulate Matter (PM)**

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In order to comply with condition D.5.3, the dry filters for PM control shall be in operation and control emissions from the two (2) spray booths at all times that the spray booths are in operation.

**D.5.7 Training Requirements**

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- (a) In order to comply with condition D.5.3 the Permittee shall implement an operator-training program.
- (1) All spray booth operators or employees that perform maintenance at the surface coating facilities shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
  - (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.
  - (3) All operators shall be given refresher training annually.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

**Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**

**D.5.8 Record Keeping Requirements**

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- (a) In order to comply with condition D.5.1, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be maintained on a monthly basis and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.5.1.
- (1) The VOC content of each coating material and solvent used less water; and
  - (2) The coatings and solvents applied during each month, purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the coating or solvent type.

- (b) In order to comply with Condition D.5.7, the Permittee shall maintain a copy of the operator-training program, all training records including the list of trained operators, and the additional measures prescribed by the Preventive Maintenance Plan.
  
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.6 FACILITY OPERATION CONDITIONS

### Emissions Unit Description:

One (1) D 35 Assembly Cell line consisting of:

- (1) One (1) spray booth, constructed in 2002, coating metal with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, exhausting to the stack S-12;
- (2) Four (4) rubber molding presses, with two (2) units constructed in 2002, and the two (2) new units to be constructed in 2006, with a maximum capacity of 58.5 lb/hr each, exhausting to stacks S-13, S-21 and S-22;
- (3) One (1) primer booth, to be constructed in 2006, coating metal with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, exhausting through general ventilation;
- (4) One (1) adhesive booth, to be constructed in 2006, coating metal with a maximum capacity of 225 units per hour, using dry filters as particulate matter control, exhausting through general ventilation;
- (5) Two (2) shadow booths, to be constructed in 2006, coating metal with a total maximum capacity of 100 parts/hr, using dry filters as particulate matter control, exhausting through general ventilation; and
- (6) Two (2) final booths, to be constructed in 2006, coating metal with a total maximum capacity of 100 parts/hr, using dry filters as particulate matter control, exhausting through general ventilation.

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

### Emission Limitations and Standards

#### D.6.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere VOC in excess of, for air dried or forced warm air dried coatings, three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicators at spray booths of the D 35 Assembly Cell line.

#### D.6.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of the one (1) spray booth, one (1) primer booth, one (1) adhesive booth, two (2) shadow booths and (2) two final booths during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

#### D.6.3 Particulate [326 IAC 6-3-2(d)]

- (a) Particulate from the surface coating manufacturing processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

- (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

#### D.6.4 Preventive Maintenance Plan [326 IAC 1-6-3]

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

### **Compliance Determination Requirements**

#### D.6.5 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content contained in Condition D.6.1 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.6.6 Training Requirements

- (a) In order to comply with condition D.6.3 the Permittee shall implement an operator-training program.
  - (1) All spray booth operators or employees that perform maintenance at the surface coating facilities shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
  - (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.
  - (3) All operators shall be given refresher training annually.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

### **Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**

#### D.6.7 Record Keeping Requirements

- (a) In order to comply with condition D.6.1, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be maintained on a monthly basis and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.6.1.

- (1) The VOC content of each coating material and solvent used less water; and
  - (2) The coatings and solvents applied during each month, purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the coating or solvent type.
- (b) In order to comply with Condition D.6.6, the Permittee shall maintain a copy of the operator-training program, all training records including the list of trained operators, and the additional measures prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.7 FACILITY OPERATION CONDITIONS

### Emissions Unit Description:

One (1) International Line consisting of:

- (1) One (1) adhesive roll coater, with a maximum capacity of 75 machined metal parts per hour, and exhausting to general ventilation.
- (2) One (1) NMP washer, with a maximum capacity of 75 machined metal parts per hour, using 0.04 gallons of non-HAP containing solvent per hour, and exhausting to stack INT01.
- (3) One (1) Rust Inhibiter Spray Booth, with a maximum capacity of 75 machined metal parts per hour, and exhausting to general ventilation.

One (1) Chrysler 4.7L Line consisting of:

- (1) One (1) adhesive roll coater, with a maximum capacity of 85 machined metal parts per hour, and exhausting to general ventilation.
- (2) One (1) NMP washer, with a maximum capacity of 85 machined metal parts per hour, using 0.024 gallons of non-HAP containing solvent per hour, and exhausting to stack CHR01.
- (3) One (1) Rust Inhibiter Spray Booth, with a maximum capacity of 85 machined metal parts per hour, and exhausting to general ventilation.
- (4) One (1) paint booth, with a maximum capacity of 85 machined metal parts per hour, using dry filters as particulate matter control, and exhausting to general ventilation.

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

### Emission Limitations and Standards

#### D.7.1 Particulate [326 IAC 6-3-2(d)]

- (a) Particulate from the surface coating manufacturing processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
  - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
  - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

#### D.7.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

### **Compliance Determination Requirements**

#### D.7.3 Training Requirements

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- (a) In order to comply with condition D.7.1 the Permittee shall implement an operator-training program.
  - (1) All spray booth operators or employees that perform maintenance at the surface coating facilities shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
  - (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.
  - (3) All operators shall be given refresher training annually.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

### **Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**

#### D.7.4 Record Keeping Requirements

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- (a) In order to comply with Condition D.7.3, the Permittee shall maintain a copy of the operator-training program, all training records including the list of trained operators, and the additional measures prescribed by the Preventive Maintenance Plan.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

<b>Company Name:</b>	<b>Vibration Control Technologies, LLC (VCT)</b>
<b>Address:</b>	<b>1496 Gerber Street</b>
<b>City:</b>	<b>Ligonier, IN 46767</b>
<b>Phone #:</b>	<b>(260) 894-7199</b>
<b>MSOP #:</b>	<b>113-16637-00080</b>

I hereby certify that VCT is  still in operation.  
 no longer in operation.

I hereby certify that VCT is  in compliance with the requirements of MSOP 113-16637-00080.  
 not in compliance with the requirements of MSOP 113-16637-00080.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

<b>Noncompliance:</b>



**Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.**

**326 IAC 1-6-1 Applicability of rule**

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

**326 IAC 1-2-39 "Malfunction" definition**

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

**\*Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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**Indiana Department of Environmental Management  
Office of Air Quality**

Technical Support Document (TSD) for a Notice Only Change to a  
Minor Source Operating Permit

**Source Background and Description**

<b>Source Name:</b>	<b>Vibration Control Technologies, LLC</b>
<b>Source Location:</b>	<b>1496 Gerber Street</b>
<b>County:</b>	<b>Noble</b>
<b>SIC Code:</b>	<b>3499</b>
<b>Operation Permit No.:</b>	<b>113-16637-00080</b>
<b>Operation Permit Issuance Date:</b>	<b>October 26, 2004</b>
<b>Permit Revision No.:</b>	<b>113-23741-00080</b>
<b>Permit Reviewer:</b>	<b>Linda Quigley</b>

The Office of Air Quality (OAQ) has reviewed an application from Vibration Control Technologies, LLC relating to the construction and operation of two (2) additional coating lines at their automobile parts production plant for machining and surface coating of auto parts.

**Source Definition**

The Source Definition from previous Part 70 Operating Permit T113-7644-00023 concluded the following:

This stationary rubber product manufacturing source consists of two (2) plants:

- (a) Plant 1 is located at 1497 Gerber Street, Ligonier, Indiana 46767; and
- (b) Plant 2 is located at 1496 Gerber Street, Ligonier, Indiana 46767.

The two (2) plants were determined to be located on contiguous properties and owned by one (1) company. Further, while the two plants were determined to have different SIC codes, with Plant 2 producing painted automobile parts made from the rubber components manufactured by Plant 1, Plant 2 was determined to provide a support function to Plant 1. As such, IDEM concluded that the two plants should be considered one (1) source under Part 70 Operating Permit T113-7644-00023.

During this permit application review, the Permittee provided new source definition information. IDEM, OAQ has determined that the two plants are no longer part of the same major source. The term "major source" is defined by rule at 326 IAC 2-7-1(22). In order for these two plants to be considered one major source, they must meet all three of the rule's criteria:

- (1) the plants must be under common ownership or common control;
- (2) the plants must have the same Standard Industrial Classification (SIC) Code or one must serve as a support facility for the other; and,
- (3) the plants must be located on contiguous or adjacent properties.

Vibration Control Technologies, LLC (VCT) purchased Plant #2 from Freudenberg (now Vibracoustic North America or VNA), effective January 1, 2002. VCT is a joint venture between Freudenberg NOK General Partnership (FNGP) and TAG Holdings. VCT is 51% owned by TAG Holdings and 49% is owned by FNGP. VNA is a division of Freudenberg NOK General Partnership (FNGP), and as such is wholly owned by FNGP.

VNA manufactures engine mounts for Ford, bushings for Ford and General Motors, and vibration dampers for Ford and Nissan. These parts are created by molding rubber to chemically treated metal. VNA's Standard Industrial Classification (SIC) Code is 3061 for molded, extruded and lathe cut mechanical rubber goods. VNA sells molded components (rubber/metal), molded rubber TVD rings, unconverted metal components, and preformed rubber to VCT. VNA's sales to VCT are 47% of VNA's total annual sales.

VCT further machines, finishes, and assembles the items from VNA to create torsional vibration dampers (TVDs). VCT sells the TVDs to various automotive manufacturers. VNA's Standard Industrial Classification (SIC) Code is 3714 for motor vehicle parts and accessories. VCT does not sell any product or other material to VNA.

IDEM, OAQ finds that the two plants satisfy the first element of the definition of major source. The two plants are under common control. FNGP has a contractual agreement with TAG Holdings to form the joint venture, VCT. In a joint venture, each venturer commonly participates in the overall management regardless of the percentage of ownership. The common participation in joint ventures is supported by a letter dated November 25, 1997 from Steven C. Riva, Chief, Permitting Section, Air Programs Branch, U.S. EPA, Region 2, to Michael L. Rodburg, Esq., regarding the Dupont Dow Elastomers joint venture. Though IDEM, OAQ is not bound by U.S. EPA guidance, IDEM, OAQ finds the Dupont letter's reasoning persuasive.

However, IDEM, OAQ finds that the two plants do not meet the second element of the definition of major source. The two plants do not have the same two digit SIC code. In order for VNA to be a support facility to VCT, VNA would have to provide at least 50% of its output to VCT. VNA currently provides only 47% of its output to VCT. VNA is not a support facility.

Therefore, these two plants are considered separate sources. This determination is consistent with the Minor Source Operating Permit issued to VCT (MSOP 113-16637-00080) on October 26, 2004. However, should VNA provide 50% or more of its output to VCT at any time in the future, IDEM, OAQ will reexamine this determination. IDEM, OAQ also plans to reexamine this issue whenever VNA or VCT apply for any permit modification or renewal.

### **New Emission Units and Pollution Control Equipment**

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

- (a) One (1) International Line, consisting of:
  - (1) One (1) adhesive roll coater, with a maximum capacity of 75 machined metal parts per hour, and exhausting to general ventilation.
  - (2) One (1) NMP washer, with a maximum capacity of 75 machined metal parts per hour, using 0.04 gallons of non-HAP containing solvent per hour, and exhausting to stack INT01.
  - (3) One (1) rust inhibitor, with a maximum capacity of 75 machined metal parts per hour, exhausting to general ventilation.
- (b) One (1) Chrysler 4.7 L Line, consisting of:
  - (1) One (1) adhesive roll coater, with a maximum capacity of 85 machined metal parts per hour, and exhausting to general ventilation.
  - (2) One (1) NMP washer, with a maximum capacity of 85 machined metal parts per hour, using 0.024 gallons of non-HAP containing solvent per hour, and exhausting to stack CHR01.

- (3) One (1) rust inhibitor, with a maximum capacity of 85 machined metal parts per hour, exhausting to general ventilation.
- (4) One (1) paint booth, with a maximum capacity of 85 machined metal parts per hour, using dry filters as particulate matter control, and exhausting to general ventilation.

### Unpermitted Emission Units and Pollution Control Equipment

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

### Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) MSOP113-16637-00080, issued on October 26, 2004;
- (b) Minor Permit Revision 113-21996-00080, issued on December 27, 2005; and
- (c) Minor Permit Revision 113-22521-00080, issued on March 28, 2006.

All conditions from previous approvals were incorporated into this permit.

### Justification for the Revision

The MSOP is being modified through a Notice Only Change. This revision is being performed pursuant to 326 IAC 2-6.1-6(d)(13) because the potential to emit of all regulated pollutants is less than five (5) tons per year and the new emission units are of the same type already permitted and will comply with the same applicable requirements and permit terms and conditions as existing emission units.

### Enforcement Issue

There are no enforcement actions pending.

### Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
CHR01	Chrysler line	23.00	1.33	3000.00	150.0
INT01	International line	23.00	1.33	3000.00	150.0

### Recommendation

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

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

An application for the purposes of this review was received on October 6, 2006, with additional information received on November 17, 2006, December 8, 2006 and December 15, 2006.

**Emission Calculations**

See Appendix A of this document for detailed emission calculations, two (2) pages.

**Potential to Emit of the Revision Before Controls**

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	3.69
PM-10	3.69
SO <sub>2</sub>	0.00
VOC	4.41
CO	0.00
NO <sub>x</sub>	0.00

HAPs	Potential to Emit (tons/yr)
Diphenylmethane Dilsocyanate	Less than 10
Ethylene Glycol	Less than 10
Total	Less than 25

- (a) The potential to emit of this modification (as defined in 326 IAC 2-6.1-6(d)(10)), of single HAP and combination of HAPs are less than ten (10) tons and twenty-five (25) tons per year, respectively. The potential to emit of PM and PM10 is each less than five (5) tons per year. Therefore, the modification requires a Notice Only Change.
- (b) 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.

**County Attainment Status**

The source is located in Noble County.

Pollutant	Status
PM-10	Attainment
PM-2.5	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	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 emissions and NOx emissions are considered when evaluating the rule applicability relating to ozone. Noble County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (c) Noble County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.
- (d) Nobel County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

### Source Status

Existing Source PSD, Part 70, or 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	23.81
PM-10	23.98
SO <sub>2</sub>	0.02
VOC	30.82
CO	2.58
NO <sub>x</sub>	3.07
Single HAP	4.08
Combination HAPs	7.89

- (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.
- (b) These emissions were based on calculations provided in Minor Permit Revision 113-21996-00080. Minor Permit Revision 113-22521-00080 did not contain any changes to emissions.

**Proposed Revision**

PTE from the proposed revision (based on 8760 hours of operation per year at rated capacity including enforceable emission control and production limit where applicable):

Pollutant	PM (ton/yr)	PM-10 (ton/yr)	SO <sub>2</sub> (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO <sub>x</sub> (ton/yr)
Proposed Revision	3.69	3.69	0.00	4.41	0.00	0.00
Existing Source	23.81	23.98	0.02	30.82	2.58	3.07
Total	27.50	27.67	0.02	35.23	2.58	3.07
PSD Threshold Level	250	250	250	250	250	250

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

**Part 70 Permit Determination**

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit 113-23741-00080, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons per year.

This status is based on all the air approvals issued to the source. This status has been verified by the OAQ inspector assigned to the source.

**Federal Rule Applicability**

- (a) The requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60.310 Subpart EE) are not included in this permit because the provisions of this subpart apply to each metal furniture surface coating operation in which organic coatings are applied and the source does not contain any metal furniture surface coating operation.
- (b) The requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60.450, Subpart SS) are not included in this permit because Standards of Performance for Industrial Surface Coating: Large Appliances apply to each surface coating operation in a large appliance surface coating line and spray booth lines at the source do not fit the definition of large appliance surface coating line.
- (c) The requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60.460, Subpart TT) are not included in this permit since the source does not contain any organic surface coating operation that applies coating to the surface of any continuous metal strip with thickness of 0.15 millimeter (mm) (0.006 in.) or more that is packaged in a roll or coil.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart M MMM are not included in this permit since it is not a major HAP source as defined in 40 CFR 63, subpart A.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart R RRR are not included in this permit since it is not a major HAP source as defined in 40 CFR 63, subpart A.

- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart SSSS are not included in this permit since it is not a major source as defined in 40 CFR 63, subpart A.
- (g) The requirements of the National Emission Standards Hazardous Air Pollutants (NESHAP), Subpart T are not included in this permit because the provisions of this subpart apply to each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane (CAS No. 71-55-6), carbon tetrachloride (CAS No. 56-23-5) or chloroform (CAS No. 67-66-3), or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent and the source does not have any washer/degreaser that uses any solvent mentioned in 40 CFR 63.460 (a).

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

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

The auto parts surface coating operation will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Since the source is not a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.41, 326 IAC 2-4.1 does not apply.

#### 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 5-1 (Visible Emissions 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 8-6-1 (Organic Solvent Emission Limitations)

326 IAC 8-6-1 is not applicable to this source since the source is located in Noble County, and was constructed after January 1, 1980. Moreover, the source-wide VOC emissions are less than one hundred (100) tons per year.

### **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 from the rust inhibitor application and paint booth on the International Line and Chrysler 4.7 L Line, shall be controlled by particulate dry filters, and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

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. The International Line and Chrysler 4.7 L Line each have the potential VOC emissions less than 25 tons per year, therefore 326 IAC 8-1-6 does not apply.

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

Pursuant to 326 IAC 8-2-1(a)(4), the adhesive roll coaters and the rust inhibitor applications on both the International Line and Chrysler 4.7L Line, and the paint booth on the Chrysler 4.7L Line are not subject to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) since each of the lines has the PTE of VOC less than fifteen (15) pounds per day:

326 IAC 8-3-2 (Cold Cleaner Operations)

Pursuant to 326 IAC 8-3-2, the owner or operator of the NMP washers cold cleaning facilities on the International Line and Chrysler 4.7 L Line shall:

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

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

- (a) The requirements of 326 IAC 8-3-5 apply to any new cold cleaner degreaser located in any county in Indiana and not equipped with remote solvent reservoirs. The NMP washers, cold cleaner degreaser facilities on the International Line and Chrysler 4.7 L Line are not equipped with remote solvent reservoirs and therefore the requirements of 326 IAC 8-3-5 shall apply.

Pursuant to 326 IAC 8-3-5(a), the owner or operator of the NMP washers, cold cleaner degreaser facilities on the International Line and Chrysler 4.7 L Line shall:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
  - (A) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38<sup>o</sup>C) (one hundred degrees Fahrenheit (100<sup>o</sup>F));
  - (B) the solvent is agitated; or
  - (C) the solvent is heated.

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

### Proposed Changes

- (1) Section A.2, Emissions Units and Pollution Control Equipment Summary has been revised as follows:

A.2 Emissions Units and Pollution Control Equipment Summary

---

This stationary source is approved to construct and operate the following emissions units and pollution control devices:

.....

**(r) One (1) International Line consisting of:**

- (1) One (1) adhesive roll coater, with a maximum capacity of 75 machined metal parts per hour, and exhausting to general ventilation.**
- (2) One (1) NMP washer, with a maximum capacity of 75 machined metal parts per hour, using 0.04 gallons of non-HAP containing solvent per hour, and exhausting to stack INT01.**
- (3) One (1) Rust Inhibiter Spray Booth, with a maximum capacity of 75 machined metal parts per hour, and exhausting to general ventilation.**

**(s) One (1) Chrysler 4.7L Line consisting of:**

- (1) One (1) adhesive roll coater, with a maximum capacity of 85 machined metal parts per hour, and exhausting to general ventilation.**
- (2) One (1) NMP washer, with a maximum capacity of 85 machined metal parts per hour, using 0.024 gallons of non-HAP containing solvent per hour, and exhausting to stack CHR01.**
- (3) One (1) Rust Inhibiter Spray Booth, with a maximum capacity of 85 machined metal parts per hour, and exhausting to general ventilation.**
- (4) One (1) paint booth, with a maximum capacity of 85 machined metal parts per hour, using dry filters as particulate matter control, and exhausting to general ventilation.**

- (2) Section D.7 has been added to the permit as follows:

#### **SECTION D.7 FACILITY OPERATION CONDITIONS**

**Emissions Unit Description:**

**One (1) International Line consisting of:**

- (1) One (1) adhesive roll coater, with a maximum capacity of 75 machined metal parts per hour, and exhausting to general ventilation.**
- (2) One (1) NMP washer, with a maximum capacity of 75 machined metal parts per hour, using 0.04 gallons of non-HAP containing solvent per hour, and exhausting to stack INT01.**
- (3) One (1) Rust Inhibiter Spray Booth, with a maximum capacity of 75 machined metal parts per hour, and exhausting to general ventilation.**

**One (1) Chrysler 4.7L Line consisting of:**

- (1) One (1) adhesive roll coater, with a maximum capacity of 85 machined metal parts per hour, and exhausting to general ventilation.**
- (2) One (1) NMP washer, with a maximum capacity of 85 machined metal parts per hour, using 0.024 gallons of non-HAP containing solvent per hour, and exhausting to stack CHR01.**
- (3) One (1) Rust Inhibiter Spray Booth, with a maximum capacity of 85 machined metal parts per hour, and exhausting to general ventilation.**
- (4) One (1) paint booth, with a maximum capacity of 85 machined metal parts per hour, using dry filters as particulate matter control, and exhausting to general ventilation.**

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

**Emission Limitations and Standards**

**D.7.1 Particulate [326 IAC 6-3-2(d)]**

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- (a) Particulate from the surface coating manufacturing processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.**
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:**
  - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.**
  - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.**
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.**

**D.7.2 Preventive Maintenance Plan [326 IAC 1-6-3]**

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

**Compliance Determination Requirements**

**D.7.3 Training Requirements**

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- (a) In order to comply with condition D.7.1 the Permittee shall implement an operator-training program.**

- (1) **All spray booth operators or employees that perform maintenance at the surface coating facilities shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.**
  - (2) **Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.**
  - (3) **All operators shall be given refresher training annually.**
- (b) **Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.**

**Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**

**D.7.4 Record Keeping Requirements**

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- (a) **In order to comply with Condition D.7.3, the Permittee shall maintain a copy of the operator-training program, all training records including the list of trained operators, and the additional measures prescribed by the Preventive Maintenance Plan.**
  - (b) **All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**
- (3) Vibration Control Technologies, LLC requested that the "Authorized Individual" listed under Section A.1 be changed from "Plant Manager" to "Site Executive Officer". In addition, "same as above" was removed from Mailing address and the full mailing address was added. The following revisions have been made to Section A.1:

**A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]**

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The Permittee owns and operates automobile parts production plant for machining and surface coating of auto parts.

Authorized Individual: ~~Plant Manager~~ **Site Executive Officer**  
Source Address: 1496 Gerber Street, Ligonier, IN 46767  
Mailing Address: ~~same as above~~ **1496 Gerber Street, Ligonier, IN 46767**  
General Source Phone: (260) 894-7199  
SIC Code: 3499  
County Location: Noble  
Source Location Status: Attainment for all criteria pollutants  
Source Status: Minor Source Operating Permit  
Minor Source, under PSD Rules;  
Minor Source, Section 112 of the Clean Air Act

Upon further review, IDEM, OAQ has decided to make the following changes to the permit:

- (1) The address for IDEM, OAQ has been corrected throughout the MSOP to 100 North Senate Avenue, Indianapolis, Indiana 46204-2251
- (2) The table of contents has been revised accordingly.
- (3) Condition B.1 has been moved to the cover page and revised as follows:

**B.1 — Permit No Defense [IC 13]**

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~~This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.~~

**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 MSOP under 326 IAC 2-6.1.**

**Conclusion**

The operation of this automobile parts production plant for machining and surface coating of auto parts shall be subject to the conditions of Notice Only Change 113-23741-00080.

**Appendix A: Emissions Calculations  
VOC and Particulate**

**Company Name: Vibration Control Technologies, LLC  
Address City IN Zip: 1496 Gerber Street, Ligonier, IN 46767  
Notice Only Change: 113-23741-00080  
Plt ID: 113-00080  
Reviewer: Linda Quigley/EVP  
SIC Code: 3499**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	NMP washer usage (gal/hr)	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
<b>International</b>																	
<i>Adhesive Roll Coater</i>																	
Rubinate M	10.33	0.00%	0.0%	0.0%	0.0%	90.00%		0.00100	75.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
<i>NMP Washer</i>																	
SP-708	8.54	100.00%	0.0%	100.0%	0.0%	0.00%	0.0400			8.54	8.54	0.34	8.20	1.50	0.00	n/a	n/a
<i>Rust Inhibitor</i>																	
Rust Veto 4240	6.56	94.00%	0.0%	94.0%	0.0%	6.00%		0.00030	75.000	6.17	6.17	0.14	3.33	0.61	0.02	n/a	50%
<b>Chrysler 4.7L</b>																	
<i>Adhesive Roll Coater</i>																	
Rubinate M	10.33	0.00%	0.0%	0.0%	0.0%	90.00%		0.00100	85.000	0.00	0.00	0.00	0.00	0.00	0.00	n/a	100%
<i>NMP Washer</i>																	
SP-708	8.54	100.00%	0.0%	100.0%	0.0%	0.00%	0.0240			8.54	8.54	0.20	4.92	0.90	0.00	n/a	n/a
<i>Rust Inhibitor</i>																	
Rust Veto 4240	6.56	94.00%	0.0%	94.0%	0.0%	6.00%		0.00030	85.000	6.17	6.17	0.16	3.77	0.69	0.02	n/a	50%
<i>Paint Booth</i>																	
Kalcor 094-9218FR	10.28	4.70%	0.0%	4.7%	0.0%	53.00%		0.00400	85.000	0.48	0.48	0.16	3.94	0.72	3.65	0.91	75%
<b>1.01</b>													<b>24.16</b>		<b>4.41</b>		<b>3.69</b>

**Controlled Potential Emissions**

Control Efficiency:	Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr	
					VOC
0.00%	80.00%	1.01	24.16	4.41	0.00

<b>Total Controlled Potential Emissions:</b>		
Total Emissions	VOC	PM/PM10
<b>Uncontrolled (tons/yr)</b>	<b>4.41</b>	<b>3.69</b>
<b>Controlled (tons/yr)</b>	<b>4.41</b>	<b>0.00</b>

**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)  
For above calculations, gallon of material used per hour was used for the NMP Washers.

**Appendix A: Emissions Calculations  
HAP**

**Company Name: Vibration Control Technologies, LLC  
Address City IN Zip: 1496 Gerber Street, Ligonier, IN 46767  
Notice Only Change: 113-23741-00080  
Plt ID: 113-00080  
Reviewer: Linda Quigley/EVP  
SIC Code: 3499**

Material	Density	NMP washer usage (gal/hr)	Gallons of Material	Maximum	Weight % Diphenylmethane Dilsocyanate	Weight % Ethylene Glycol	MDI Emissions (ton/yr)	Ethylene Glycol Emissions (ton/yr)
	(Lb/Gal)		(gal/unit)	(unit/hour)				
<i>International</i>								
Rubinate M	10.33		0.00100	75.000	45.00%	0.00%	1.53	0.00
SP708	8.54	0.04		75.000	0.00%	5.00%	0.00	0.00
<i>Chrysler</i>								
Rubinate M	10.33		0.00100	85.000	45.00%	0.00%	1.73	0.00
SP708	8.54	0.02		85.000	0.00%	5.00%	0.00	0.45
<b>Total Potential Emissions</b>							<b>3.26</b>	<b>0.45</b>

**METHODOLOGY**

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