INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: September 9, 2008

RE: Total Interior Systems-America, LLC / 051-26898-00045

FROM: Matthew Stuckey, Branch 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, Suite N 501E, 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.dot12/3/07

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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September 9, 2008

Pat Summers
Total Interior Systems-America, LLC
1698 S 100 W
Princeton, IN 47640

Re: 051-26898-00045
Third Notice-Only Change to
MSOP No. M051-18702-00045

Dear Mr. Summers:

Total Interior Systems-America, LLC was issued a Minor Source Operating Permit (MSOP) on September 24, 2004, for a stationary motor vehicle door panel manufacturing plant, located at 1698 S 100 W Princeton, Indiana 47640. On August 21, 2008, the Office of Air Quality (OAQ) received a letter from Total Interior Systems, requesting that the permit be updated to include the construction and operation of a new touch-up paint booth IA-01, that is of the same type as the other permitted paint booth identified as EU-01 except it is a lower capacity. The new touch-up paint booth would comply with the same applicable requirements and permit terms and conditions as the existing paint booth EU-01, but will not cause the source's potential to emit to be greater than the threshold levels specified in 326 IAC 2-2 or 326 IAC 2-3. Addition of the paint booth IA-01 will increase the potential to emit VOC by 2.33 tons per year and HAPs to 1.03 tons per year, resulting in the source-wide potential to emit VOC of 76.83 tons per year, and HAPS to 24.47 tons per year. The addition of new IA-01 is considered a notice-only change pursuant to 326 IAC 2-6.1-6(d)(13).

Pursuant to the provision of 326 IAC 2-6.1-6, the permit is hereby revised as follows, with deleted language as ~~strikeouts~~ and new language **bolded**:

(1) Gibson County has been classified as nonattainment effective federally April 5, 2005, for the Motgomery Township for PM2.5. This source is located in Patoka Township, therefore this source is attainment for all criteria pollutants. Section A.1 is revised as follows:

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

The Permittee owns and operates a stationary vehicle door panels manufacturing plant.

Source Address:	1698 S 100 W, Princeton, Indiana 47640
Mailing Address:	1698 S 100 W, Princeton, Indiana 47640
General Source Phone:	(812) 491-9100
SIC Code:	3089
County Location:	Gibson **(Patoka Township)**
Source Location Status:	Attainment for all criteria pollutants **except Montgomery Township**
Source Status:	Minor Source Operating Permit Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not in 1 of 28 Source Categories

(2) The facility descriptions in Section A.2(c), and Section D.1(c) have been added, and subsequent facility description has been renumbered accordingly in section D.2. In addition, subsections D.1.1, and D.1.3(a) have been updated as follows:

A.2 Emissions Units and Pollution Control Equipment Summary

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

(a) Three (3) spray booths (identified as EU 02, 03, and 04), using three (3) HVLP guns, each with a maximum throughput rate of 8.64 gallons of glue per hour, using dry filters for over spray control and exhausting at stacks ID 02, 03 and 04. These units were constructed in 2002.

(b) One (1) spray booth (identified as EU 01), using one (1) HVLP gun or aerosol cans, with a maximum throughput rate of 0.65 gallons of coating per hour, using dry filters for over spray control and exhausting at stack ID 01. This unit was constructed in 2003.

(c) One (1) spray booth (identified as IA 01), constructed in 2008, using one (1) HVLP gun or aerosol cans, with a maximum throughput rate of 0.07 gallons of coating per hour, using dry filters for over spray control and exhausting at stack ID IA01.

(~~c~~**d**) One (1) 1,000 kW emergency generator burning No. 2 fuel oil. This unit was installed in 2002.

....

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

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

(a) Three (3) spray booths (identified as EU 02, 03 and 04), using three (3) HVLP guns, each with a maximum throughput rate of 8.64 gallons of glue per hour, using dry filters for over spray control and exhausting at stacks ID 02, 03 and 04. These units were constructed in 2002.

(b) One (1) spray booth (identified as EU 01), using one (1) HVLP gun or aerosol cans, with a maximum throughput rate of 0.65 gallons of coating per hour, using dry filters for over spray control and exhausting at stack ID 01. This unit was constructed in 2003.

(c) One (1) spray booth (identified as IA 01), constructed in 2008, using one (1) HVLP gun or aerosol cans, with a maximum throughput rate of 0.07 gallons of coating per hour, using dry filters for over spray control and exhausting at stack ID IA01.

(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 (VOCs) [326 IAC 8-1-6]

Any change or modification to spray booths **IA01**, EU 01, EU 02, EU 03, and EU04 that would increase the potential to emit of VOC for any individual spray booth to greater than twenty-five (25) tons per year must obtain prior approval from IDEM, OAQ.

D.1.3 Particulate [326 IAC 6-3-2(d)]

(a) Particulate from the ~~four~~ **five** (~~4~~ **5**) spray booths shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

...

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emission Unit Description:

(~~c~~ **d**) One (1) 1,000 kW diesel emergency generator burning No. 2 fuel oil. This unit was installed in 2002.

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

...

All other conditions of the permit shall remain unchanged and in effect. Please find the enclosed copy of the entire revised permit for a vehicle door panels manufacturing plant. 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 Swarna Prabha, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, at (317) 234-5376, or call (800) 451-6027, extension 4-5376.

Sincerely,

Original signed by

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

IC/sp

Attachment: Revised Permit and Emission Calculations

cc: File – Gibson County
Gibson County Health Department
U.S. EPA, Region V
Air Compliance Section Inspector – Derrick Ohning
Southwest Regional Office - David Holder
Permit Tracking
Compliance Data Section
Permits Administrative and Development
Billing, Licensing and Training Section – Dan Stamatkin

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MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR QUALITY

Total Interior Systems – America, LLC
1698 South 100 West
Princeton, Indiana 47640

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 051-18702-00045	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: September 24, 2004 Expiration Date: September 24, 2009

Second Notice-Only Change No. 051-25109-00045, issued on October 2, 2007
First Minor Permit Revision No. 051-20442-00045, issued on September 24, 2007
First Notice-Only Change No. 051-23675-00045, issued on November 14, 2006

Third Notice-Only Change No. 051-26898-00045	Pages Affected: Entire Permit
Issued by/Original Signed By: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: September 9, 2008 Expiration Date: September 24, 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)]

The Permittee owns and operates a stationary vehicle door panels manufacturing plant.

Source Address:	1698 S 100 W, Princeton, Indiana 47640
Mailing Address:	1698 S 100 W, Princeton, Indiana 47640
General Source Phone:	(812) 491-9100
SIC Code:	3089
County Location:	Gibson (Patoka Township)
Source Location Status:	Attainment for all criteria pollutants except Montgomery Township
Source Status:	Minor Source Operating Permit Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not in 1 of 28 Source Categories

A.2 Emissions Units and Pollution Control Equipment Summary

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

(a) Three (3) spray booths (identified as EU 02, 03, and 04), using three (3) HVLP guns, each with a maximum throughput rate of 8.64 gallons of glue per hour, using dry filters for over spray control and exhausting at stacks ID 02, 03 and 04. These units were constructed in 2002.

(b) One (1) spray booth (identified as EU 01), using one (1) HVLP gun or aerosol cans, with a maximum throughput rate of 0.65 gallons of coating per hour, using dry filters for over spray control and exhausting at stack ID 01. This unit was constructed in 2003.

(c) One (1) spray booth (identified as IA 01), constructed in 2008, using one (1) HVLP gun or aerosol cans, with a maximum throughput rate of 0.07 gallons of coating per hour, using dry filters for over spray control and exhausting at stack ID IA01.

(c) One (1) 1,000 kW emergency generator burning No. 2 fuel oil. This unit was installed in 2002.

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 Permit No Defense [IC 13]

This permit to operate 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.

B.2 Definitions

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.3 Effective Date of the Permit [IC13-15-5-3]

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

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

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]

All requirements and conditions of this operating 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)]

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

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

(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]

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)]

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]

(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 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 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR Part 61, Subpart M]

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

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by 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.5 Performance Testing [326 IAC 3-6]

(a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than180 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
MC 61-53 IGCN 1003
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.6 Compliance Requirements [326 IAC 2-1.1-11]

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

Compliance Monitoring Requirements

C.7 Compliance Monitoring [326 IAC 2-1.1-11]

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

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

C.9 Compliance Response Plan - Preparation and Implementation

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

Record Keeping and Reporting Requirements

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

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]

(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]

(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
MC 61-53 IGCN 1003
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 reports 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 EMISSIONS UNIT OPERATION CONDITIONS

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

(a) Three (3) spray booths (identified as EU 02, 03 and 04), using three (3) HVLP guns, each with a maximum throughput rate of 8.64 gallons of glue per hour, using dry filters for over spray control and exhausting at stacks ID 02, 03 and 04. These units were constructed in 2002.

(b) One (1) spray booth (identified as EU 01), using one (1) HVLP gun or aerosol cans, with a maximum throughput rate of 0.65 gallons of coating per hour, using dry filters for over spray control and exhausting at stack ID 01. This unit was constructed in 2003.

(c) One (1) spray booth (identified as IA 01), constructed in 2008, using one (1) HVLP gun or aerosol cans, with a maximum throughput rate of 0.07 gallons of coating per hour, using dry filters for over spray control and exhausting at stack ID IA01.

(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 (VOCs) [326 IAC 8-1-6]

Any change or modification to spray booths IA01, EU 01, EU 02, EU 03, and EU04 that would increase the potential to emit of VOC for any individual spray booth to greater than twenty-five (25) tons per year must obtain prior approval from IDEM, OAQ.

D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1]

(a) Any change or modification which would increase the potential to emit of a single HAP greater than ten (10) tons per year must obtain prior approval from IDEM, OAQ.

(b) Any change or modification which would increase the potential to emit of any combination of HAPs greater than twenty-five (25) tons per year must obtain prior approval from IDEM, OAQ.

D.1.3 Particulate [326 IAC 6-3-2(d)]

(a) Particulate from the five (5) spray booths shall be controlled by a dry particulate filter, 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.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control device.

Compliance Determination Requirements

D.1.5 VOC and HAP Emissions

Compliance with the VOC and HAP content and usage limitations contained in Conditions D.1.1 and D.1.2 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.

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

D.1.6 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and the VOC and HAP emission limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) The total VOC and HAP usage for each month; and

(3) The weight of VOCs and HAPs emitted for each compliance period.

(b) To document compliance with Condition D.1.3(b), the Permittee shall maintain a record of any actions taken if overspray is visibly detected.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emission Unit Description:

(d) One (1) 1,000 kW diesel emergency generator burning No. 2 fuel oil. This unit was installed in 2002.

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

Emission Limitations and Standards

There are no specifically applicable regulations that apply to this emission unit.

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).

Company Name:	Total Interior Systems – America, LLC
Address:	1698 S 100 W
City:	Princeton, Indiana 47640
Phone #:	(812) 491-9100
MSOP #:	051-18702-00045

I hereby certify that Total Interior Systems – America, LLC is
☐ still in operation.
☐ no longer in operation.

I hereby certify that Total Interior Systems – America, LLC is
☐ in compliance with the requirements of MSOP 051-18702-00045
☐ not in compliance with the requirements of MSOP 051-18702-00045

Authorized Individual (typed):
Title:
Signature:
Date:

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.

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967

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.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMI LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY:_____PHONE NO. ( )_____
LOCATION: (CITY AND COUNTY)_____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP:_____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:_____
_____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER:_____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____

_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____
_____
_____

MALFUNCTION REPORTED BY:_____TITLE:_____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____
*SEE PAGE 2

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:

_____

_____

Appendix A: Emission Calculations
Summary

Company Name: **Total Interior Systems - America, LLC**
Address: **1698 S 100 W, Princeton, Indiana 47640**
Notice-Only Change: **051-26898-00045**
Reviewer: **Swarna Prabha**

POTENTIAL TO EMIT IN TONS PER YEAR

Emission Unit	PM	PM10	SO2	NOx	VOC	CO	Total HAPs
***IA01**	**0.08**	**0.08**	**0**	**0**	**2.33**	**0.00**	**1.03**
**EU01	0.73	0.73	0.00	0.00	21.6	0.00	9.54
** EU 02, EU 03, EU 04	7.19	7.19			52.9		13.9
** Generator	0.01	0.01	1.26	0.12	0.00	0.03	0.00
TOTAL	**8.01**	**8.01**	**1.26**	**0.12**	**76.83**	**0.03**	**24.47**

Single highest HAP (EU-01) = **4.65** (Toluene, Xylene)

* New Unit
** Existing Units
Potential to Emit Emissions are based on 8760 Hours per year

Appendix A: Emissions Calculations
VOC and PM/PM10
From Surface Coating Operation IA-01

Company Name: Total Interior Systems - America, LLC
Address: 1698 S 100 W, Princeton, Indiana 47640
Notice-Only Change: 051-26898-00045
Reviewer: Swarna Prabha

Units	Material	Density (lb/gal)	Weight % Volatiles (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Max. Usage Rate (gal/hour)	Pounds VOC per gallon of coating	PTE VOC (lb/hour)	PTE VOC (lb/day)	PTE VOC (tons/year)	PTE PM/PM10 (ton/year)	* Transfer Efficiency	PTE PM/PM10 (lb/hour)
IAO1	Cosmo Color 34 MZ	8.17	93%	0.0%	93.0%	0.0%	5.0%	0.07	7.60	0.53	13	2.3	0.08	55%	0.02

Actual VOC Emissions (lbs/day)= 7.4

* Material applied by aerosol cans or a spray gun.
NOTE:

On May 8, 2008 U. S. EPA promulgated the new requirements for Prevention Of Significant Deterioration (PSD) for PM 2.5 emissions, and the effective date of these rules was July 15th, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC2-2, to include those requirements. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions. There is no emission factor for PM2.5 in AP42, PM2.5 = PM10

METHODOLOGY
Pounds of VOC per gallon coating = Density (lb/gal) * Weight % Organics
PTE VOC (lb/hour) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (gal/hour)
PTE VOC (lb/day) = Pounds of VOC per Gallon coating (lb/gal) * Max.Throughput (gal/hour) * 24 hour/day
PTE VOC (tons/year) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (gal/hour) * 8760 hours/year * 1 ton/2000 lbs
PTE PM/PM10 (tons/year) = Max. Throughput (gal/hour) * Density (lb/gal) * (1- Weight % Volatile) * (1-Transfer Efficiency) * 8760 hours/year * 1ton/2000 lbs
PTE PM/PM10 (lbs/hour) = Max. Throughput (gal/hour) * Density (lb/gal) * (1- Weight % Volatile) * (1-Transfer Efficiency)
Actual VOC (lbs/day) = VOC PTE (lbs/hour) * 4200 hours/year * 1year/300 days of operation

Appendix A: Emissions Calculations
HAP Emissions
From Surface Coating Operation IA-01

Company Name: Total Interior Systems - America, LLC
Address: 1698 S 100 W, Princeton, Indiana 47640
Notice-Only Change: 051-26898-00045
Reviewer: Swarna Prabha

WEIGHT CONTENT IN PERCENT (%) OF HAPS

Material	Density (lb/gal)	Max. Usage Rate (gal/hour)	Weight % Toluene	Weight % Xylene	Weight % MIK
Cosmo Color 34 MZ	8.17	0.07	20.0%	20%	1.00%

POTENTIAL TO EMIT OF HAPS IN TONS PER YEAR

Material	Density (lb/gal)	Max. Usage Rate (gal/hour)	PTE Toluene	PTE Xylene	PTE MIK
Cosmo Color 34 MZ	8.17	0.07	0.50	0.50	0.03
		TOTAL =	**0.50**	**0.50**	**0.03**

HIGHEST SINGLE HAP (IA-01) = 0.50
TOTAL HAPs (IA-01) = 1.03

METHODOLODY
Potential To Emit HAPs (tons/year) = Density (lb/gal) * Max. Usage Rate (gal/hour) * Weight % HAP * 8760 hours/year * 1 ton/2000 lbs

Appendix A: Emissions Calculations
HAP Emissions
From Surface Coating Operation EU-01

Company Name: **Total Interior Systems - America, LLC**
Address: **1698 S 100 W, Princeton, Indiana 47640**
Notice-Only Change: **051-26898-00045**
Reviewer: **Swarna Prabha**

WEIGHT CONTENT IN PERCENT (%) OF HAPS

Material	Density (lb/gal)	Max. Usage Rate (gal/hour)	Weight % Toluene	Weight % Xylene	Weight % MIK
Cosmo Color 34 MZ	8.17	0.65	20.0%	20%	1.00%

POTENTIAL TO EMIT OF HAPS IN TONS PER YEAR

Material	Density (lb/gal)	Max. Usage Rate (gal/hour)	PTE Toluene	PTE Xylene	PTE MIK
Cosmo Color 34 MZ	8.17	0.65	4.65	4.65	0.23
		TOTAL =	4.65	4.65	0.23

HIGHEST SINGLE HAP(EU-01) = 4.65 Xylene, Toluene

METHODOLODY

Potential To Emit HAPs (tons/year) = Density (lb/gal) * Max. Usage Rate (gal/hour) * Weight % HAP * 8760 hours/year * 1 ton/2000 lbs