



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: August 19, 2009

RE: ATTC Manufacturing, Inc / 123-27492-00023

FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot12/03/07



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Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**ATTC Manufacturing, Inc.
10455 State Road 37
Tell City, Indiana 47586**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-8-11.1, applicable to those conditions.

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

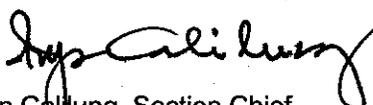
Operation Permit No.: 123-27492-00023	
Issued by:  Iryn Callung, Section Chief Permits Branch Office of Air Quality	Issuance Date: August 19, 2009 Expiration Date: August 19, 2019

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary metal automobile parts manufacturing plant.

Source Address:	10455 State Road 37, Tell City, Indiana 47586
Mailing Address:	10455 State Road 37, Tell City, IN 47586
General Source Phone Number:	812-547-5060
SIC Code:	3714
County Location:	Perry
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) automated painting line, identified as PL1, constructed in 2001 and modified in 2002, with a maximum throughput rate of five hundred fourteen (514) metal parts per hour, using air assisted spray application to apply coatings to metal automobile parts, equipped with dry filters for particulate control, and exhausting through stack S18.
- (b) One (1) automated painting line, identified as PL3, constructed in 2003, with a maximum throughput rate of seventy-two (72) metal parts per hour, using conventional air atomizing spray application to apply coatings to metal automobile parts, equipped with dry filters for particulate control, and exhausting through stack S20.
- (c) Two (2) automated painting lines, identified as PL4 and PL5, constructed in 2005 and 2006, respectively, each having a maximum throughput rate of four hundred eighty (480) metal parts per hour, using conventional air atomizing spray application to apply coatings to metal automobile parts, equipped with dry filters for particulate control, and exhausting through stacks S21 and S22, respectively.
- (d) One (1) automated painting line, identified as PL6, constructed in 2007, with a maximum throughput rate of four hundred eighty (480) metal parts per hour, using conventional air atomizing spray application to apply coatings to metal automobile parts, equipped with dry filters for particulate control, and exhausting through stack S23.
- (e) One (1) automated painting line, identified as PA7, constructed in 2008, with a maximum throughput rate of four hundred eighty (480) metal parts per hour, using conventional air atomizing spray application to apply coatings to metal automobile parts, equipped with dry filters for particulate control, and exhausting through stack S24.

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

This stationary source also includes the following insignificant activities:

- (a) Degreasing operations that do not exceed one hundred forty-five (145) gallons per twelve (12) months, except if subject to 326 IAC 20-6, including the following: [326 IAC 8-3-2, 326 IAC 8-3-5]
 - (1) Two (2) parts washing stations, identified as PW1 and PW2, constructed in 2002, each with a maximum solvent usage of thirty-six and five tenths (36.5) gallons per year, uncontrolled and exhausting inside the building;
- (b) Other emission units, not regulated by a NSPS or NESHAP, with PM₁₀, NO_x, and SO₂ emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs, including the following: [326 IAC 6-3-2]
 - (1) Sixteen (16) metal dry milling lines, identified as DR-1 through DR-5, DR-7, DI-F1 through DI-F8, DI-R1, and DI-R2, constructed in 2001, each with a maximum capacity of 1,300 pounds per hour, controlled by a dust collector and exhausting inside the building;
 - (2) Five (5) metal dry milling lines, identified as DR-0, DR-6, DI-F0, DI-F9, and DI-F10, constructed in 2002, each with a maximum capacity of 1,300 pounds of parts per hour, controlled by a dust collector and exhausting inside the building;
 - (3) Four (4) metal dry milling lines, identified as DI-F11, DI-R4, DI-R5, and DI-R6, to be constructed in 2005, each with a maximum capacity of 1,300 pounds of parts per hour, controlled by a dust collector and exhausting inside the building;
 - (4) Four (4) metal dry milling lines, identified as DI-R7, DI-R8, DI-F11, and DI-F12, to be constructed in 2006, each with a maximum capacity of 1,300 pounds of parts per hour, controlled by a dust collector and exhausting inside the building; and
 - (5) One (1) touch-up spray booth to apply coatings to metal automobile parts, identified as TUPB, constructed in 2002, with a maximum paint usage of less than five (5) gallons per day, uncontrolled and exhausting inside the building.
- (c) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including the following:
 - (1) Three (3) natural gas fired drying ovens, each with a maximum heat input capacity of eight tenths (0.8) MMBtu/hr, uncontrolled and exhausting inside the building;
 - (2) Three (3) natural gas-fired furnaces for building heat, each with a maximum heat input capacity of four tenths (0.4) MMBtu/hr, uncontrolled and exhausting inside the building;

- (3) One (1) natural gas-fired furnace for building heat, with a maximum heat input capacity of twenty-five hundredths (0.25) MMBtu/hr, uncontrolled and exhausting inside the building;
- (4) Two (2) natural gas-fired space heaters, each with a maximum heat input capacity of fifteen hundredths (0.15) MMBtu/hr, uncontrolled and exhausting inside the building;
- (5) One (1) natural gas-fired space heat, with a maximum heat input capacity of two tenths (0.2) MMBtu/hr, uncontrolled and exhausting inside the building; and
- (6) One (1) natural gas-fired space heater, with a maximum heat capacity of two tenths (0.2) MMBtu/hr, uncontrolled and exhausting inside the building;

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

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

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, 123-27492-00023, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

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

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

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

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

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

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

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

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

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

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

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

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

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

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

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

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

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

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Southwest Regional Office phone: (812) 380-2305; fax: (812) 380-2304.

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

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

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

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

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

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

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

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

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

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report. Any emergencies that have been previously reported pursuant to paragraph (b)(5) of this condition and certified by an "authorized individual" need only referenced by the date of the original report.

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

- (a) All terms and conditions of permits established prior to 123-27492-00023 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

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

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

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

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

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

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

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

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

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

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

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

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

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

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

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

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

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

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

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

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

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

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

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

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

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

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

B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

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

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

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

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

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

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

- (3) corrective actions taken.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

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

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

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

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

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

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) automated painting line, identified as PL1, constructed in 2001 and modified in 2002, with a maximum throughput rate of five hundred fourteen (514) metal parts per hour, using air assisted spray application to apply coatings to metal automobile parts, equipped with dry filters for particulate control, and exhausting through stack S18.
- (b) One (1) automated painting line, identified as PL3, constructed in 2003, with a maximum throughput rate of seventy-two (72) metal parts per hour, using conventional air atomizing spray application to apply coatings to metal automobile parts, equipped with dry filters for particulate control, and exhausting through stack S20.
- (c) Two (2) automated painting lines, identified as PL4 and PL5, constructed in 2005 and 2006, respectively, each having a maximum throughput rate of four hundred eighty (480) metal parts per hour, using conventional air atomizing spray application to apply coatings to metal automobile parts, equipped with dry filters for particulate control, and exhausting through stacks S21 and S22, respectively.
- (d) One (1) automated painting line, identified as PL6, constructed in 2007, with a maximum throughput rate of four hundred eighty (480) metal parts per hour, using conventional air atomizing spray application to apply coatings to metal automobile parts, equipped with dry filters for particulate control, and exhausting through stack S23.
- (e) One (1) automated painting line, identified as PA7, constructed in 2008, with a maximum throughput rate of four hundred eighty (480) metal parts per hour, using conventional air atomizing spray application to apply coatings to metal automobile parts, equipped with dry filters for particulate control, and exhausting through stack S24.

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

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

D.1.1 PSD Minor Limits - Particulate Matter (PM) [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 not applicable, the Permittee shall comply with the following:

- (a) The coatings applied by automated painting lines PL1, PL3, PL4, PL5, PL6, and PA7, combined, shall be limited such that total PM emissions shall not exceed forty-six and two tenths (46.2) tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The transfer efficiency at automated painting lines PL1, PL3, PL4, PL5, PL6, and PA7, shall each not be less than thirty percent (30%).
- (c) The control efficiency of the dry filters on automated painting lines PL1, PL3, PL4, PL5, PL6, and PA7 shall each not be less than eighty percent (80%).

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than two hundred fifty (250) tons per twelve (12) consecutive month period and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.2 FESOP Limits - Particulate Matter (PM10/PM2.5) [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4, the following limits shall apply:

- (a) The coatings applied by automated painting lines PL1, PL3, PL4, PL5, PL6, and PA7, combined, shall be limited such that total PM10 emissions shall continue to not exceed forty-six and two tenths (46.2) tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The coatings applied by automated painting lines PL1, PL3, PL4, PL5, PL6, and PA7, combined, shall be limited such that total PM2.5 emissions shall not exceed forty-six and two tenths (46.2) tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) The transfer efficiency at automated painting lines PL1, PL3, PL4, PL5, PL6, and PA7, shall each continue to not be less than thirty percent (30%).
- (d) The control efficiency of the dry filters on automated painting lines PL1, PL3, PL4, PL5, PL6, and PA7 shall each continue to not be less than eighty percent (80%).

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall continue to limit the source-wide total potential to emit of PM10 and PM2.5 to less than one hundred (100) tons per twelve (12) consecutive month period, each, and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.3 FESOP Limits - Volatile Organic Compounds (VOCs) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the following limits shall apply:

- (a) The total VOC input to automated painting lines PL1, PL3, PL4, PL5, PL6, and PA7 and associated clean-up activities, combined, shall continue to not exceed ninety-eight (98.0) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit VOCs from all other emission units at this source, shall continue to limit the source-wide total potential to emit VOCs to less than one hundred (100) tons per twelve (12) consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits) not applicable.

D.1.4 FESOP Limits - Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4] [326 IAC 2-4.1] [326 IAC 20]

Pursuant to 326 IAC 2-8-4, and in order to render the requirements of 326 IAC 2-4.1 and 326 IAC 20 not applicable, the following limits shall apply:

- (a) The input of any single HAP to automated painting lines PL1, PL3, PL4, PL5, PL6, and PA7 and associated clean-up activities shall continue to not exceed nine (9.0) tons per twelve (12) consecutive month period with compliance determined at the end of each month; and
- (b) The input of any combination of HAPs to automated painting lines PL1, PL3, PL4, PL5, PL6, and PA7 and associated clean-up activities, combined, shall continue to not exceed twenty-four (24.0) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit HAPs from all other emission units at this source, shall continue to limit the source-wide total potential to emit of any single HAP to less than ten (10) tons per twelve (12) consecutive month period, and total HAPs to less

than twenty-five (25) tons per twelve (12) consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits), and 326 IAC 2-4.1 and 326 IAC 20 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

D.1.5 Volatile Organic Compound (VOC) Limits [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator for air dried, forced warm air dried or extreme performance coatings.
- (b) Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of automated painting lines PL1, PL3, PL4, PL5, PL6, and PA7 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.1.6 Particulate Limit (PM) [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from automated painting lines PL1, PL3, PL4, PL5, PL6, and PA7 shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.8 Particulate Matter (PM/PM10) Emissions Determination [326 IAC 2-2] [326 IAC 2-8-4]

Compliance with Conditions D.1.1(a), D.1.2(a), and D.1.2(b) shall be determined by calculating the PM/PM10/PM2.5 emissions associated with each coating applied by automated painting lines PL1, PL3, PL4, PL5, PL6, and PA7, combined, using the following equation:

$$PM/PM10/PM2.5 = (\sum CU \times D \times W\%S) \times (1-TE/100) \times (1-CE/100) \times 1/2000$$

Where:

PM/PM10/PM2.5 = The total PM/PM10/PM2.5 emissions (ton/month) for all coatings.

CU = The total coating use (gal coating/month) of each coating.

D = The density (lb coating/gal coating) of each coating.

W%S = The weight percent solids (lb solids/lb coating) of each coating.

TE = The transfer efficiency (%) of the spray applicators. This value shall equal thirty percent (30%) unless an IDEM approved test is conducted, in which case the value shall equal that determined from the most recent IDEM approved test.

CE = The control efficiency (%) of the dry filters. This value shall equal eighty percent (80%) unless an IDEM approved test is conducted, in which case the value shall equal that determined from the most recent IDEM approved test.

The total PM/PM10/PM2.5 emissions (ton/month) from automated painting lines PL1, PL3, PL4, PL5, PL6, and PA7, combined, is equal to the sum of the PM/PM10/PM2.5 emissions associated with each coating applied by those painting lines.

D.1.9 Volatile Organic Compounds and Hazardous Air Pollutant [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC and HAP limitations contained in Conditions D.1.3(a), D.1.4(a), D.1.4(b), and D.1.5(a) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.10 Testing Requirements [326 IAC 2-1.1-11]

- (a) No later than 180 days after issuance of this FESOP Renewal, No. 123-27492-00023, the Permittee shall conduct transfer efficiency testing on one (1) of the automated painting lines subject to Condition D.1.8. The testing shall be done on a painting line that has not been tested in the past ten (10) years. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted using methods approved by the Commissioner and in accordance with 326 IAC 3-6-3 and Section C – Performance Testing.
- (b) No later than 180 days after issuance of this FESOP Renewal, No. 123-27492-00023, the Permittee shall conduct control efficiency testing on the dry filters used by one (1) of the automated painting lines subject to Condition D.1.8. The testing shall be done on filters that have not been tested in the past ten (10) years. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted using methods approved by the Commissioner and in accordance with 326 IAC 3-6-3 and Section C – Performance Testing.

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

D.1.11 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the automated painting lines stacks (S18, S20, S21, S22, S23, and S24) while one or more of the automated painting lines are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.1.12 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1(a), D.1.2(a), and D.1.2(b), the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to

demonstrate compliance with the PM/PM10/PM2.5 emission limits established in Conditions D.1.1(a), D.1.2(a), and D.1.2(b).

- (1) The amount of each coating material used (as applied). Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) The density and weight percent solids of each coating material used (as applied).
 - (3) The transfer efficiency (TE) of the spray guns in automated painting lines PL1, PL3, PL4, PL5, PL6, and PA7.
 - (4) The control efficiency (CE) of the dry filters on automated painting lines PL1, PL3, PL4, PL5, PL6, and PA7.
- (b) To document compliance with Conditions D.1.3(a), D.1.4(a), D.1.4(b), and D.1.5(a), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content and usage limits and the HAP content and usage limits established in Conditions D.1.3(a), D.1.4(a), D.1.4(b), and D.1.5(a).
- (1) The VOC and HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each month.
 - (4) The total VOC and total single and combined HAP usage for each month.
 - (5) The total VOC and total single and combined HAP usage for each compliance period.
- (c) To document compliance with Condition D.1.11, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections. The Permittee shall include in its daily record when an observation and/or inspection is not taken and the reason for the lack of observation and/or inspection (i.e. the process did not operate that day).
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.13 Reporting Requirements

- (a) A quarterly summary of the monthly PM/PM10/PM2.5 emissions from the automated painting lines covered by Conditions D.1.1(a), D.1.2(a), and D.1.2(b) calculated in accordance with Condition D.1.8 shall be submitted to the address listed in Section C – General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) A quarterly summary of the information to document compliance with Conditions D.1.3(a), D.1.4(a), D.1.4(b), and D.1.5(a) shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2

FACILITY CONDITIONS

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

- (a) Degreasing operations that do not exceed one hundred forty-five (145) gallons per twelve (12) months, except if subject to 326 IAC 20-6, including the following: [326 IAC 8-3-2, 326 IAC 8-3-5]
- (1) Two (2) parts washing stations, identified as PW1 and PW2, constructed in 2002, each with a maximum solvent usage of thirty-six and five tenths (36.5) gallons per year, uncontrolled and exhausting inside the building;

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

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

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operation), for cold cleaning operations constructed after January 1, 1980, the Permittee 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; and
- (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.2.2 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 Permittee 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.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities - metal dry milling lines

- (b) Other emission units, not regulated by a NSPS or NESHAP, with PM₁₀, NO_x, and SO₂ emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single Hazardous Air Pollutant (HAP), or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of Hazardous Air Pollutants (HAPs), including the following:
- (1) Sixteen (16) metal dry milling lines, identified as DR-1 through DR-5, DR-7, DI-F1 through DI-F8, DI-R1, and DI-R2, constructed in 2001, each with a maximum capacity of 1,300 pounds per hour, controlled by a dust collector and exhausting inside the building;
 - (2) Five (5) metal dry milling lines, identified as DR-0, DR-6, DI-F0, DI-F9, and DI-F10, constructed in 2002, each with a maximum capacity of 1,300 pounds of parts per hour, controlled by a dust collector and exhausting inside the building;
 - (3) Four (4) metal dry milling lines, identified as DI-F11, DI-R4, DI-R5, and DI-R6, constructed in 2005, each with a maximum capacity of 1,300 pounds of parts per hour, controlled by a dust collector and exhausting inside the building;
 - (4) Four (4) metal dry milling lines, identified as DI-R7, DI-R8, DI-F11, and DI-F12, constructed in 2006, each with a maximum capacity of 1,300 pounds of parts per hour, controlled by a dust collector and exhausting inside the building; and

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

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

D.3.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the twenty-nine (29) existing metal dry milling lines shall each not exceed three and one tenth (3.10) pounds per hour, when operating at a process weight rate of 1,300 pounds per hour.

The pound per hour limitation was calculated with the following equation:

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

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

Where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.3.2 Particulate Control

- (a) In order to comply with Condition D.3.1, the dust collectors for particulate control shall be in operation and control emissions from each of the twenty-nine (29) existing metal dry milling lines at all times that the corresponding metal dry milling lines are in operation.

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

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

Source Name: ATTC Manufacturing, Inc.
Source Address: 10455 State Road 37, Tell City, Indiana 47586
Mailing Address: 10455 State Road 37, Tell City, IN 47586
FESOP Permit No.: 123-27492-00023

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: ATTC Manufacturing, Inc.
Source Address: 10455 State Road 37, Tell City, Indiana 47586
Mailing Address: 10455 State Road 37, Tell City, IN 47586
FESOP Permit No.: 123-27492-00023

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is **not** required for this report.

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

FESOP Quarterly Report

Source Name: ATTC Manufacturing, Inc.
Source Address: 10455 State Road 37, Tell City, Indiana 47586
Mailing Address: 10455 State Road 37, Tell City, Indiana 47586
FESOP Permit No.: 123-27492-00023
Facility: Painting Lines PL1, PL3, PL4, PL5, PL6 and PA7
Parameter: Total PM/PM10/PM2.5 emissions (tons/month)
Limit: Less forty-six and two tenths (46.2) tons per (12) consecutive month period with compliance determined at the end of each month.

PM

PM10

PM2.5

QUARTER: _____ MONTH: _____ YEAR: _____

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: ATTC Manufacturing, Inc.
Source Address: 10455 State Road 37, Tell City, Indiana 47586
Mailing Address: 10455 State Road 37, Tell City, Indiana 47586
FESOP Permit No.: 123-27492-00023
Facility: Painting Lines PL1, PL3, PL4, PL5, PL6 and PA7
Parameter: Total VOC input
Limit: Less than ninety-eight (98.0) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER: _____ MONTH: _____ YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: ATTC Manufacturing, Inc.
Source Address: 10455 State Road 37, Tell City, Indiana 47586
Mailing Address: 10455 State Road 37, Tell City, Indiana 47586
FESOP Permit No.: 123-27492-00023
Facility: Painting Lines PL1, PL3, PL4, PL5, PL6 and PA7
Parameter: Total Single HAP Input
Limit: Less than or equal to nine (9.0) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER: _____ MONTH: _____ YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: ATTC Manufacturing, Inc.
 Source Address: 10455 State Road 37, Tell City, Indiana 47586
 Mailing Address: 10455 State Road 37, Tell City, Indiana 47586
 FESOP Permit No.: 123-27492-00023
 Facility: Painting Lines PL1, PL3, PL4, PL5, PL6 and PA7
 Parameter: Total Combined HAP Input
 Limit: Less than twenty-four (24.0) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER: _____ MONTH: _____ YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

Source Name: ATTC Manufacturing, Inc.
 Source Address: 10455 State Road 37, Tell City, Indiana 47586
 Mailing Address: 10455 State Road 37, Tell City, IN 47586
 FESOP Permit No.: 123-27492-00023

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

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name:	ATTC Manufacturing, Inc.
Source Location:	10455 State Road 37, Tell City, Indiana 47586
County:	Perry
SIC Code:	3714
Permit Renewal No.:	123-27492-00023
Permit Reviewer:	Hannah L. Desrosiers

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from ATTC Manufacturing, Inc. relating to the operation of a stationary metal automobile parts manufacturing plant.

History

On February 16, 2009, ATTC Manufacturing, Inc. submitted an application to the OAQ requesting to renew its operating permit. ATTC Manufacturing, Inc. was issued a FESOP on December 14, 2004.

Permitted Emission Units and Pollution Control Equipment

- (a) One (1) automated painting line, identified as PL1, constructed in 2001 and modified in 2002, with a maximum throughput rate of five hundred fourteen (514) metal parts per hour, using air assisted spray application to apply coatings to metal automobile parts, equipped with dry filters for particulate control, and exhausting through stack S18;
- (b) One (1) automated painting line, identified as PL3, constructed in 2003, with a maximum throughput rate of seventy-two (72) metal parts per hour, using conventional air atomizing spray application to apply coatings to metal automobile parts, equipped with dry filters for particulate control, and exhausting through stack S20;
- (c) Two (2) automated painting lines, identified as PL4 and PL5, constructed in 2005 and 2006, respectively, each having a maximum throughput rate of four hundred eighty (480) metal parts per hour, using conventional air atomizing spray application to apply coatings to metal automobile parts, equipped with dry filters for particulate control, and exhausting through stacks S21 and S22, respectively;
- (d) One (1) automated painting line, identified as PL6, constructed in 2007, with a maximum throughput rate of four hundred eighty (480) metal parts per hour, using conventional air atomizing spray application to apply coatings to metal automobile parts, equipped with dry filters for particulate control, and exhausting through stack S23; and
- (e) One (1) automated painting line, identified as PA7, constructed in 2008, with a maximum throughput rate of four hundred eighty (480) metal parts per hour, using conventional air atomizing spray application to apply coatings to metal automobile parts, equipped with dry filters for particulate control, and exhausting through stack S24.

Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit

There are no unpermitted facilities operating at this existing source during this review process.

Emission Units and Pollution Control Equipment Removed From the Source

No emission units have been removed from this existing source during this review process.

Insignificant Activities

- (a) Degreasing operations that do not exceed one hundred forty-five (145) gallons per twelve (12) months, except if subject to 326 IAC 20-6, including the following:
 - (1) Two (2) parts washing stations, identified as PW1 and PW2, constructed in 2002, each with a maximum solvent usage of thirty-six and five tenths (36.5) gallons per year, uncontrolled and exhausting inside the building.
- (b) Other emission units, not regulated by a NSPS or NESHAP, with PM₁₀, NO_x, and SO₂ emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, VOC emissions less than three (3) pounds per hour or fifteen (15) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine hundredths (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single Hazardous Air Pollutant (HAP), or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of Hazardous Air Pollutants (HAPs), including the following:
 - (1) Sixteen (16) metal dry milling lines, identified as DR-1 through DR-5, DR-7, DI-F1 through DI-F8, DI-R1, and DI-R2, constructed in 2001, each with a maximum capacity of 1,300 pounds per hour, controlled by a dust collector and exhausting inside the building;
 - (2) Five (5) metal dry milling lines, identified as DR-0, DR-6, DI-F0, DI-F9, and DI-F10, constructed in 2002, each with a maximum capacity of 1,300 pounds of parts per hour, controlled by a dust collector and exhausting inside the building;
 - (3) Four (4) metal dry milling lines, identified as DI-F11, DI-R4, DI-R5, and DI-R6, constructed in 2005, each with a maximum capacity of 1,300 pounds of parts per hour, controlled by a dust collector and exhausting inside the building;
 - (4) Four (4) metal dry milling lines, identified as DI-R7, DI-R8, DI-F11, and DI-F12, constructed in 2006, each with a maximum capacity of 1,300 pounds of parts per hour, controlled by a dust collector and exhausting inside the building; and
 - (5) One (1) touch-up spray booth used to apply coatings to metal automobile parts, identified as TUPB, constructed in 2002, with a maximum paint usage of less than five (5) gallons per day, uncontrolled and exhausting inside the building.
- (c) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including the following:
 - (1) Three (3) natural gas fired drying ovens, each with a maximum heat input capacity of eight tenths (0.8) MMBtu/hr, uncontrolled and exhausting inside the building;

- (2) Three (3) natural gas-fired furnaces for building heat, each with a maximum heat input capacity of four tenths (0.4) MMBtu/hr, uncontrolled and exhausting inside the building;
- (3) One (1) natural gas-fired furnace for building heat, with a maximum heat input capacity of twenty-five hundredths (0.25) MMBtu/hr, uncontrolled and exhausting inside the building;
- (4) Two (2) natural gas-fired space heaters, each with a maximum heat input capacity of fifteen hundredths (0.15) MMBtu/hr, uncontrolled and exhausting inside the building;
- (5) One (1) natural gas-fired space heater, with a maximum heat input capacity of two tenths (0.2) MMBtu/hr, uncontrolled and exhausting inside the building; and
- (6) One (1) natural gas-fired space heater, with a maximum heat capacity of two tenths (0.2) MMBtu/hr, uncontrolled and exhausting inside the building;

Existing Approvals

Since the issuance of FESOP No. 123-19672-00023, issued on December 14, 2004, the source has constructed or has been operating under the following approvals as well:

- (a) 1st Administrative Amendment No.: 123-21666-00023, issued August 23, 2005;
- (b) 2nd Administrative Amendment No.: 123-24235-00023, issued on March 29, 2007; and
- (c) 3rd Administrative Amendment No.: 123-25637-00023, issued on January 31, 2008.

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

Enforcement Issues

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

- (1) The source has indicated that the coating used in automated painting line PL3 as been changed to one with a lower VOC content and no HAPs. However, the source has elected to retain their existing VOC and HAPs limits in order to retain maximum operational flexibility.

County Attainment Status

The source is located in Perry County. The following attainment status designations are applicable to Perry County:

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Pollutant	Designation
PM10	Unclassifiable effective November 15, 1990.
PM2.5	Unclassifiable or attainment effective April 5, 2005.
NO ₂	Cannot be classified or better than national standards.
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. ¹
Pb	Not designated.

¹Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.

(a) Ozone Standards

- (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph as attainment for the 8-hour ozone standard.
- (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.
- (4) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Perry County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM2.5

Perry County has been classified as attainment for PM2.5. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 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 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.

(c) Other Criteria Pollutants

Perry 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.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the entire source.

Criteria Pollutants	tons/year
PM	465.28
PM10	465.39
PM2.5	465.35
SO2	0.01
NOx	1.99
VOC	55.71
CO	1.67

HAPs	tons/year
Diethylene Glycol Monobutyl Ether	1.73
n-Hexane	0.04
Other Combustion related HAPs	negl.
Total	1.77

**Appendix A of this TSD reflects the unrestricted, uncontrolled, potential emissions of the entire source.*

- (1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". Additionally, US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.
- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM10 is still equal to or greater than one hundred (100) tons per year. Therefore, the source is still subject to the provisions of 326 IAC 2-7. However, the source has agreed to continue to limit their PM10 emissions to less than Title V levels, consequently, the source will be issued a FESOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM2.5, is equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to limit their PM2.5 emissions to less than Title V levels, consequently, the source will be issued a FESOP Renewal.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are each less than one hundred (100) tons per year.
- (d) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.
- (e) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

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Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)								
	PM	PM10*	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Surface Coating Booths (PL1, PL3-PL6, & PA7)	< 46.2 ⁽¹⁾	< 46.2 ⁽²⁾	< 46.2 ⁽²⁾	0	0	< 98.0 ⁽²⁾	0	< 24.0 ⁽²⁾	< 9.0 ⁽²⁾
Touch-up Paint Booth (TUPB)	2.71	2.71	2.71	0	0	0.16	0	0.14	0.14 (DEGBE)
Washing Stations (PW1 & PW2)	0	0	0	0	0	0.25	0	0	0
Metal Milling Lines (multiple units)	20.32	20.32	20.32	0	0	0	0	0	0
Natural Gas Combustion (multiple units)	0.04	0.15	0.11	0.01	1.99	0.11	1.67	0.04	0.04 (<i>n</i> -Hexane)
Total PTE of Entire Source	69.27	69.38	69.35	0.01	1.99	98.51	1.67	< 25 ⁽²⁾	< 10 ⁽²⁾
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
<p>* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". Additionally, the US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.</p> <p>DEGBE = Diethylene Glycol Monobutyl Ether</p> <p>NA = Non-applicable</p> <p>negl. = negligible</p> <p>⁽¹⁾ Potential to emit after PSD Minor limits to render 326 IAC 2-2 not applicable.</p> <p>⁽²⁾ Potential to emit after FESOP limits, pursuant to 326 IAC 2-8.</p>									

(a) FESOP Status

This existing source is not a Title V major stationary source, because the potential to emit PM10, and PM2.5 from the entire source will be limited to less than the Title V major source threshold levels, and because the potential to emit of all other criteria pollutants from the entire source are less than the Title V major source threshold levels. In addition, this existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this existing source is still an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

- (1) The coatings applied by painting lines PL1, PL3, PL4, PL5, PL6, and PA7, combined, shall be limited such that total PM10 emissions shall continue to not exceed forty-six and two tenths (46.2) tons per twelve (12) consecutive month period with compliance determined at the end of each month (This is an existing limit and being carried over to this renewal);

- (2) The coatings applied by painting lines PL1, PL3, PL4, PL5, PL6, and PA7, combined, shall be limited such that total PM2.5 emissions shall not exceed forty-six and two tenths (46.2) tons per twelve (12) consecutive month period with compliance determined at the end of each month (This is a new limit, see explanation below);
- (3) The transfer efficiency at painting lines PL1, PL3, PL4, PL5, PL6, and PA7, shall each continue to not be less than thirty percent (30%) (This is an existing limit and being carried over to this renewal);
- (4) The control efficiency of the dry filters on painting lines PL1, PL3, PL4, PL5, PL6, and PA7 shall each continue to not be less than eighty percent (80%) (This is an existing limit and being carried over to this renewal).

Note: Although the potential to emit VOC is now less than the Title V major source threshold level of one hundred (100) tons per year and the potential to emit HAPs is now less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs, this source has elected to retain their existing VOC and HAP limits in order to retain maximum operational flexibility, as follows:

- (A) The total VOC input to painting lines PL1, PL3, PL4, PL5, PL6 and PA7 and associated clean-up activities, combined, shall continue to not exceed ninety-eight (98.0) tons per twelve (12) consecutive month period with compliance determined at the end of each month (This is an existing limit and being carried over to this renewal.);
- (B) The input of any single HAP to painting lines PL1, PL3, PL4, PL5, PL6 and PA7 and associated clean-up activities shall continue to not exceed nine (9.0) tons per twelve (12) consecutive month period with compliance determined at the end of each month (This is an existing limit and being carried over to this renewal); and
- (C) The input of any combination of HAPs to painting lines PL1, PL3, PL4, PL5, PL6 and PA7 and associated clean-up activities, combined, shall continue to not exceed twenty-four (24.0) tons per twelve (12) consecutive month period with compliance determined at the end of each month (This is an existing limit and being carried over to this renewal).

Compliance with these limits, combined with the potential to emit PM10, PM2.5, VOC, and HAPs from all other emission units at this source, shall continue to limit the source-wide total potential to emit of PM10, PM2.5, and VOC to less than one hundred (100) tons per twelve (12) consecutive month period, each, any single HAP to less than ten (10) tons per twelve (12) consecutive month period, and total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

Note: The following terms and conditions from previous approvals have been revised in this FESOP Renewal:

- (A) A FESOP limit for PM2.5 has been added to the permit, because on May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, with an effective date for the rule of July 15th, 2008. While Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements, the May 8, 2008 rule revisions require IDEM

to regulate PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.

(b) PSD Minor Source

This existing source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit particulate matter (PM) is limited to less than two hundred fifty (250) tons per year, the potential to emit all other attainment regulated pollutants are less than two hundred fifty (250) tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the source shall comply with the following:

- (1) The coatings applied by painting lines PL1, PL3, PL4, PL5, PL6, and PA7, combined, shall be limited such that total PM emissions shall not exceed forty-six and two tenths (46.2) tons per twelve (12) consecutive month period with compliance determined at the end of each month (This is a new limit, see explanation below);
- (2) The transfer efficiency at painting lines PL1, PL3, PL4, PL5, PL6, and PA7, shall each not be less than thirty percent (30%) (This is a new limit, see explanation below);
- (3) The control efficiency of the dry filters on painting lines PL1, PL3, PL4, PL5, PL6, and PA7 shall each not be less than eighty percent (80%) (This is a new limit, see explanation below).

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than two hundred fifty (250) tons per twelve (12) consecutive month period and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

Note: The following terms and conditions from previous approvals have been revised in this FESOP Renewal:

(A) PSD minor limits

A ton per year limit for particulate matter (PM) has been added to the permit to limit PM to less than 250 tons per year, allowing the source to retain its FESOP status. This limit complements the FESOP PM10/PM2.5 limits and State Rule 326 IAC 6-3 control device requirements, and renders 326 IAC 2-2 PSD not applicable;

Federal Rule Applicability

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM (326 IAC 12), are not included in the permit, since this source is not an automobile assembly plant.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning, 40 CFR 63, Subpart T (326 IAC 20-6), are not included in the permit, since the solvents used in each of the parts washing stations, identified as PW1 and PW2, contain less than 5% by weight of halogenated HAPs, as specified in 40 CFR 63.460.
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Automobile & Light Duty Truck Surface Coating, 40 CFR 63, Subpart IIII (326 IAC 20-85), are not included in this revision, because this source is not a major source of HAP emissions.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart MMMM (326 IAC 20-80), are not included in the permit, since this source is not a major source of HAP emissions.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH (326 IAC 20), are not included in the permit, because although this source uses spray application to coat metal automobile parts, the coatings used do not contain compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX (6X) (326 IAC 20), are not included in the permit, because although this existing source manufactures metal automobile parts, it is not primarily engaged in the operations in one of the nine metal fabrication and finishing source categories, as defined in 40 CFR 63.11514 and 63.11522.
- (f) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability

The following state rules are applicable to the existing source:

- (a) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
PSD applicability is discussed under the PTE of the Entire Source after Issuance of the FESOP section above.
- (b) 326 IAC 2-3 (Emission Offset)
Perry County is classified as attainment or unclassifiable in Indiana for all criteria pollutants. Therefore, the requirements of 326 IAC 2-3 (Emission Offset) still do not apply to this existing source, and the requirements are not included in the permit.

- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
This existing source is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the entire source is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. However, the source has elected to continue to limit the potential to emit of HAPs from the entire source to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs in order to retain maximum operational flexibility. Therefore, the source is not subject to the requirements of 326 IAC 2-4.1. See PTE of the Entire Source After Issuance of the FESOP Section above.
- (d) 326 IAC 2-6 (Emission Reporting)
This source is located in Perry County and the potential to emit of each criteria pollutant is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.
- (e) 326 IAC 2-8-4 (FESOP)
FESOP applicability is discussed under the "PTE of the Entire Source after Issuance of the FESOP" section above.
- (f) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
 - (1) 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.
 - (2) 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.
- (g) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.
- (h) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The unlimited potential VOC emissions from the dry metal milling lines, and natural gas combustion sources are less than twenty-five (25) tons per year, each. Therefore, the requirements of 326 IAC 8-1-6 General Reduction Requirements still do not apply to any of the milling lines or natural gas combustion units, and are not included in the permit.
- (i) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (j) 326 IAC 14 (Emission Standards for Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.
- (k) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Surface Coating

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

- (1) Each of the existing automated painting lines, identified as PL1, PL3, PL4, PL5, PL6, and PA7, continue to use more than five (5) gallons of coating per day; therefore, pursuant to 326 IAC 6-3-2(d) (Particulate emission limitations, work practices, and control technologies), the particulate matter (PM) from each of the automated painting lines, shall continue to be controlled by dry particulate filters, waterwash, or an equivalent control device, and the permittee shall continue to operate each control device in accordance with the manufacturer's specifications.

The automated painting lines PL1, PL3, PL4, PL5, PL6, and PA7, each continue to use dry filters to control particulate overspray; therefore, they are in compliance with 326 IAC 6-3-2.

- (2) The one (1) touch-up spray booth, identified as TUPB, still applies less than five (5) gallons of coatings per day to metal automobile parts. Therefore, pursuant to 326 IAC 6-3-1(b)(15), the requirements of 326 IAC 6-3-2 Particulate Emission Limitations for Manufacturing Processes still do not apply to the touch-up spray booth, and are not included in the permit.

(b) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

The existing automated painting lines PL1, PL3, PL4, PL5, PL6, PA7, and TUPB, are each not subject to this rule because this existing source is already otherwise subject to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations). Therefore, the requirements of 326 IAC 8-1-6 are not included in the permit for any of the automated painting lines or the touch-up spray booth.

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

- (1) The existing automated painting lines, identified as PL1, PL3, PL4, PL5, PL6, and PA7, each constructed after the rule applicability date of July 1, 1991, continue to apply coatings to metal automobile parts, Standard Industrial Classification (SIC) Code major group #37. Additionally, automated painting lines PL3, PL4, PL5, PL6, and PA7, each have potential and actual VOC emissions greater than 15 lbs/day. And although automated painting line PL1 no longer has potential and/or actual VOC emissions greater than 15 lbs/day, pursuant to 326 IAC 8-1-1(a), once a facility becomes subject to an article 8 rule such facility shall remain subject to such rule notwithstanding any subsequent decrease in VOC emissions. Therefore, the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating), continue to apply to each of the automated painting lines, and are included in the permit, as follows:

- (A) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coating(s) delivered to the applicator(s) at each of the automated painting lines PL1, PL3, PL4, PL5, PL6, and PA7, shall continue to not exceed three and five tenths (3.5) pounds of VOCs per gallon of coating less water, for air dried, forced warm air dried at temperatures up to ninety degrees Celsius (90°C) (one hundred ninety-four degrees Fahrenheit (194°F)), or extreme performance coatings (i.e., coatings designed for exposure to temperatures consistently above ninety-five (95) degrees Celsius, detergents, abrasive or scouring agents, solvents, corrosive atmospheres, outdoor weather at all times, or similar environmental conditions).

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

Based on the MSDS submitted by the source and calculations made, each of the automated painting lines can continue to comply with this requirement.

See Appendix A, for the detailed calculations.

- (2) The existing touch-up spray booth, identified as TUPB, although constructed after the rule applicability date of July 1, 1991, and applying coatings to metal automobile parts, Standard Industrial Classification (SIC) Code major group #37, continues to have potential and actual VOC emissions of less than 15 lbs/day. Therefore, the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating) still do not apply to the touch-up spray booth, and are not included in the permit.

- (d) 326 IAC 8-3 (Organic Solvent Degreasing Operations)
Pursuant to 326 IAC 8-3-1 (Organic Solvent Degreasing Operations), the two (2) parts washing stations, identified as PW1 and PW2, are each subject to the requirements of 326 IAC 8-3-2 (Cold Cleaner Operations) and 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control), since each were constructed after the rule applicability date of July 1, 1990, meets the definition of a cold cleaner degreaser under 326 IAC 1-2-18.5, utilizing an organic solvent containing volatile organic compounds (VOCs) (as defined by 326 IAC 1-2-90), and does not have a remote solvent reservoir. Therefore, the following requirements shall apply:
 - (1) 326 IAC 8-3-2 (Cold Cleaner Operation)
Pursuant to 326 IAC 8-3-2, the owner or operator 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 operating 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.

 - (2) 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)
Pursuant to 326 IAC 8-3-5, the owner or operator shall:
 - (A) ensure that the following control equipment requirements are met:
 - (i) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

- (aa) 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));
 - (bb) The solvent is agitated; or
 - (cc) The solvent is heated.
- (ii) 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;
 - (iii) Provide a permanent, conspicuous label which lists the operating requirements outlined in 326 IAC 8-3-5(b);
 - (iv) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (v) 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)):
 - (aa) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater;
 - (bb) A water cover when solvent is used is insoluble in, and heavier than, water;
 - (cc) 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) ensure that the following operating requirements are met:
- (i) Close the cover whenever articles are not being handled in the degreaser;
 - (ii) Drain cleaned articles for at least fifteen (15) seconds or unit dripping ceases;
 - (iii) 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.

- (e) There are no other 326 IAC 8 Rules applicable to automated painting lines PL1, PL3, PL4, PL5, PL6, PA7, and the touch-up spray booth TUPB.

Dry Metal Milling Lines

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The twenty-nine (29) existing dry metal milling lines, identified as DR-1 through DR-5, DR-7, DI-F1 through DI-F8, DI-R1, and DI-R2, constructed in 2001, DR-0, DR-6, DI-F0, DI-F9, and DI-F10, constructed in 2002, , DI-F11, DI-R4, DI-R5, and DI-R6, constructed in 2005, and DI-R7, DI-R8, DI-F11, and DI-F12, constructed in 2006, each controlled by a dust collector and exhausting inside the building, continue to operate at a process weight rate between one hundred (100) pounds per hour and 60,000 pounds per hour. Therefore, pursuant to 326 IAC 6-3-2(e) the allowable rate of emissions shall continue to be calculated by use of the equation:

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

The particulate from the twenty-nine (29) existing metal dry milling lines shall continue to not exceed three and one tenth (3.10) pounds per hour, each, when operating a process weight rate of 1,300 pounds of metal automobile parts per hour.

Based on the calculations in Appendix A, the combined, uncontrolled potential PM emission rate, is:

$$20.3 \text{ ton/yr} \times (2000 \text{ lbs/ton} / 8760 \text{ hrs/yr}) = 4.64 \text{ lbs/hr}$$

Since the unrestricted potential particulate emissions from the twenty-nine (29) metal dry milling lines are four and sixty-four hundredths (4.64) pounds per hour, each, and the maximum the allowable rate of emissions is three and one tenth (3.10) pounds per hour, each, the dust collectors must be in operation at all times when the twenty-nine (29) dry metal milling lines are in operation in order for the facility to comply with this rule.

See Appendix A, for the detailed calculations.

Natural Gas Combustion

- (a) 326 IAC 4-2-2 (Incinerators)
Pursuant to 326 IAC 6-3-1(a), affected facilities include incinerators which emit regulated pollutants located anywhere in the state. The three (3) natural gas-fired drying ovens, four (4) natural gas-fired furnaces, and four (4) natural gas-fired space heaters, each, are not incinerators, as defined by 326 IAC 1-2-34, since they do not burn waste substances. Therefore, 326 IAC 4-2-2 still does not apply to the three (3) natural gas-fired drying ovens, four (4) natural gas-fired furnaces, and four (4) natural gas-fired space heaters, and the requirements are not included in the permit.
- (b) 326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)
The three (3) natural gas-fired drying ovens, four (4) natural gas-fired furnaces, and four (4) natural gas-fired space heaters, each, do not meet the definition of an indirect heating unit, as defined in 236 IAC 1-2-19. Therefore, 326 IAC 6-2 still does not apply to any of the three (3) natural gas-fired drying ovens, four (4) natural gas-fired furnaces, and four (4) natural gas-fired space heaters, and the requirements are not included in the permit.

- (c) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
 Pursuant to 326 IAC 6-3-1(a), activities that do not meet the definition of a "manufacturing process", as defined in 326 IAC 6-3-1.5(2), are exempted from 326 IAC 6-3. The three (3) natural gas-fired drying ovens, four (4) natural gas-fired furnaces, and four (4) natural gas-fired space heaters, each, do not meet the definition of a "manufacturing process", and are therefore exempt from the requirements of 326 IAC 6-3. Consequently, the requirements are not included in the permit.

- (d) 326 IAC 7-1.1 (Sulfur Dioxide Emissions Limitations)
 Pursuant to 326 IAC 7-1.1, this rule applies to all emissions units with a potential to emit twenty-five (25) tons per year or ten (10) pounds per hour of sulfur dioxide. The potential emissions from the three (3) natural gas-fired drying ovens, four (4) natural gas-fired furnaces, and four (4) natural gas-fired space heaters, each, are less than twenty-five (25) tons per year and ten (10) pounds per hour respectively. Therefore, the requirements of 326 IAC 7-1.1-2 still do not apply to the three (3) natural gas-fired drying ovens, four (4) natural gas-fired furnaces, and four (4) natural gas-fired space heaters, and are not included in the permit.

Compliance Determination, Testing, Monitoring, Recordkeeping, and Reporting Requirements

Compliance Determination Requirements

- (a) The automated painting lines PL1, PL3, PL4, PL5, PL6, and PA7, each, have applicable compliance determination conditions as specified below:

Emission Unit/Control	Operating Parameters	Method
Spray coating operations (Booths PB1 through PB4)	PM/PM10/PM2.5	Equation
	VOC and HAP content	Preparing or obtaining the "as supplied" and "as applied" VOC/HAP data sheets Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4 as required by IDEM.

- (1) Calculating the PM/PM10/PM2.5 emissions is required to determine compliance with the provisions of 326 IAC 2-8-4 (FESOP) and to render 326 IAC 2-2 (PSD) not applicable (This is a new requirement for this source);

- (2) Confirmation of the VOC and HAP content of the coatings used in the spray coating operations is still required to determine compliance with the provisions of 326 IAC 2-8-4 (FESOP) (This is an existing requirement for this source and being carried over to this renewal).

Testing requirements

- (a) The automated painting lines PL1, PL3, PL4, PL5, PL6, and PA7, each, have applicable testing conditions, as follows:

Control Device	Parameter	Timeframe for Testing	Frequency of Testing
Dry filters for particulate control	Control Efficiency	180 days after issuance, max.	Every five (5) yrs
	Transfer Efficiency		

- (1) These requirements are necessary to ensure compliance with 326 IAC 2-8-4 (FESOP) and to render 326 IAC 2-2 (PSD) not applicable (This is a new requirement for this source);
- (b) There continue to be no specific testing requirements associated with any of the twenty-nine (29) dry metal milling lines, or eleven (11) natural gas combustion units at this existing source.

Compliance Monitoring Requirements

- (a) The automated painting lines PL1, PL3, PL4, PL5, PL6, and PA7, each, have applicable compliance monitoring conditions as specified below:

Control	Parameter	Frequency	Range	Excursions & Exceedances
Paint booth dry filters	Inspections	Daily	Normal-Abnormal	Response Steps
Paint booth coating emissions and presence of overspray on the rooftops and the nearby ground	Inspections	Weekly and Monthly	Normal-Abnormal	Response Steps

- (1) These monitoring conditions continue to be necessary because the dry filters for the automated painting lines, must operate properly to ensure continued compliance with 326 IAC 6-3-2(d) (Particulate emission limitations, work practices, and control technologies) and 326 IAC 2-8-4 (FESOP), and to render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable (This is an existing requirement for this source and being carried over to this renewal).
- (b) There continue to be no specific compliance monitoring requirements for the twenty-nine (29) dry metal milling lines or eleven (11) natural gas combustion units at this existing source

Recordkeeping and Reporting Requirements

- (a) The Permittee shall maintain records of material usage (as applied), density, and weight percent solids, transfer efficiency and control efficiency in order demonstrate compliance with the PM, PM10 and PM2.5 emission limits established for the automated painting lines (This is a new requirement for this source);
- (b) The Permittee shall submit a quarterly summary of the PM, PM10 and PM2.5 emissions (This is a new requirement for this source);
- (c) The Permittee shall continue to maintain records of material and solvent usage, clean-up solvent usage, and VOC and HAP content, usage and emissions in order demonstrate compliance with the VOC and HAP emission limits established for the automated painting lines (This is an existing requirement for this source and being carried over to this renewal)
- (d) The Permittee shall continue to submit a quarterly summary of the VOC and HAP emissions (This is an existing requirement for this source and being carried over to this renewal); and
- (e) The Permittee shall continue to maintain records of the once per day dry particulate filter inspections, and the once per week and once per month overspray and coating

emissions inspections established for the automated painting lines (This is an existing requirement for this source and being carried over to this renewal).

Conclusion and Recommendation

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 permit renewal was received on February 16, 2009.

The construction and operation of this source shall be subject to the conditions of the attached FESOP Renewal No. 123-27492-00023. The staff recommends to the Commissioner that this FESOP Renewal be approved.

IDEM Contact

Questions regarding this proposed permit can be directed to Hannah Desrosiers at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5374 or toll free at 1-800-451-6027 extension 4-5374.

A copy of the findings is available on the Internet at: www.in.gov/idem/permits/air/pending.html.

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem/permits/guide/.

Appendix A: Emissions Calculations
Entire Source Summary

Company Name: ATTC Manufacturing, Inc.
Address City IN Zip: 10455 State Road 37, Tell City, Indiana 47586
FESOP Renewal No.: 123-27492-00023
Reviewer: Hannah L. Desrosiers
Date Submitted: February 16, 2009

Uncontrolled Potential Emissions (tons/year)							
Category	Pollutant	Surface Coating (PL1, PL3-PL6) (& PA7)	Touch-Up Paint Booth (TUPB)	Washing Stations (PW1 & PW2)	Metal Milling Lines (mult)	Natural Gas Combustion Units (mult)	TOTAL
		Criteria Pollutants	PM	442.21	2.71	0	
	PM10	442.21	2.71	0	20.32	0.15	465.39
	PM2.5	442.21	2.71	0	20.32	0.11	465.35
	SO2	0	0	0	0	0.01	0.01
	NOx	0	0	0	0	1.99	1.99
	VOC	55.19	0.16	0.25	0	0.11	55.71
	CO	0	0	0	0	1.67	1.67
Hazardous Air Pollutants	Benzene	0	0	0	0	4.19E-05	4.19E-05
	Dichlorobenzene	0	0	0	0	2.39E-05	2.39E-05
	Formaldehyde	0	0	0	0	1.49E-03	1.49E-03
	Diethylene Glycol Monobutyl Ether	1.59	0.14	0	0	0	1.73
	Hexane	0	0	0	0	0.036	0.04
	Toluene	0	0	0	0	6.78E-05	6.78E-05
	Cadmium	0	0	0	0	2.19E-05	2.19E-05
	Chromium	0	0	0	0	2.79E-05	2.79E-05
	Lead	0	0	0	0	9.96E-06	9.96E-06
	Manganese	0	0	0	0	7.57E-06	7.57E-06
	Nickel	0	0	0	0	4.19E-05	4.19E-05
	Totals	1.59	0.14	0	0	0.038	1.77
						Worse Case HAP	1.73

Total emissions based on rated capacity at 8,760 hours/year.

Limited/Uncontrolled Potential Emissions (tons/year)							
Category	Pollutant	25637 Surface Coating (PA7)	19672 Touch-Up Paint Booth (TUPB)	19672 Washing Stations (PW1 & PW2)	19672 Metal Milling Lines	19762 Natural Gas Combustion	TOTAL
		Criteria Pollutants	PM ^a	< 46.2	2.71	0	
	PM10 ^b	< 46.2	2.71	0	20.32	0.15	69.38
	PM2.5 ^b	< 46.2	2.71	0	20.32	0.11	69.35
	SO2	0	0	0	0	0.01	0.01
	NOx	0	0	0	0	1.99	1.99
	VOC ^b	< 98.0	0.16	0.25	0	0.11	98.51
	CO	0	0	0	0	1.67	1.67
Hazardous Air Pollutants	Benzene	0	0	0	0	4.19E-05	4.19E-05
	Dichlorobenzene	0	0	0	0	2.39E-05	2.39E-05
	Formaldehyde	0	0	0	0	1.49E-03	1.49E-03
	Diethylene Glycol Monobutyl Ether	< 9.0	0.14	0	0	0	9.14
	Hexane	0	0	0	0	0.036	0.04
	Toluene	0	0	0	0	6.78E-05	6.78E-05
	Cadmium	0	0	0	0	2.19E-05	2.19E-05
	Chromium	0	0	0	0	2.79E-05	2.79E-05
	Lead	0	0	0	0	9.96E-06	9.96E-06
	Manganese	0	0	0	0	7.57E-06	7.57E-06
	Nickel	0	0	0	0	4.19E-05	4.19E-05
	Totals	< 24.0	0.14	0	0	0.038	< 25
						Worse Case HAP	< 10

Total emissions based on rated capacity at 8,760 hours/year.

^a Emissions based on PSD Limits

^b Emissions based on FESOP Limits

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

Company Name: ATTC Manufacturing, Inc.
Address City IN Zip: 10455 State Road 37, Tell City, Indiana 47586
FESOP Renewal No.: 123-27492-00023
Reviewer: Hannah L. Desrosiers
Date Submitted: February 16, 2009

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Maximum Application (gal/unit)	Maximum Throughput (unit/hour)	Maximum Usage (gal/day)	Maximum Usage (lbs/hr)	Pounds VOC per gallon of coating	Pounds VOC per gallon of coating less water	Potential VOC (lbs/hr)	Potential VOC (lbs/day)	Actual VOC ^a (lb/day)	Potential VOC (tons/yr)	Actual VOC ^b (ton/yr)	Potential ^{**} Particulate (PM) (ton/yr)	lb VOC/gal solids	Transfer Efficiency							
Automated Paint Line PL1																											
W44231-Autoprime	11.40	45.02%	43.10%	1.92%	58.97%	38.26%	0.0032	514.0	39.48	18.75	0.22	0.53	0.36	8.64	7.56	1.58	1.32	27.09	0.57	40%							
Automated Paint Line PL3																											
W300	11.16	46.00%	41.80%	4.20%	54.70%	54.00%	0.095	72.0	164.16	76.33	0.47	1.03	3.21	76.95	67.33	14.04	11.77	108.33	0.87	40%							
Automated Paint Line PL4																											
W300	11.16	46.00%	41.80%	4.20%	54.70%	54.00%	0.01	480.0	115.20	53.57	0.47	1.03	2.25	54.00	47.25	9.85	8.26	76.02	0.87	40%							
Automated Paint Line PL5																											
W300	11.16	46.00%	41.80%	4.20%	54.70%	54.00%	0.01	480.0	115.20	53.57	0.47	1.03	2.25	54.00	47.25	9.85	8.26	76.02	0.87	40%							
Automated Paint Line PL6																											
W300	11.16	46.00%	41.80%	4.20%	54.70%	54.00%	0.01	480.0	115.20	53.57	0.47	1.03	2.25	54.00	47.25	9.85	8.26	76.02	0.87	40%							
Automated Paint Line PL7																											
W300	11.16	46.00%	41.80%	4.20%	54.70%	54.00%	0.01	480.0	115.20	53.57	0.47	1.03	2.25	54.00	47.25	9.85	8.26	76.02	0.87	40%							
Touch-Up Paint Booth (TUPB)																											
W44231-Autoprime	11.40	45.02%	43.10%	1.92%	58.97%	38.26%	0.0032	51.4	3.95	1.88	0.22	0.53	0.04	0.86	0.76	0.16	0.13	2.71	0.57	40%							
													State Potential Emissions			Uncontrolled			PM Control Efficiency:			Controlled					
																55.19			46.27			442.21					
																95.0%			55.19			46.27			22.11		

METHODOLOGY

Note: Actual usage based on 7,344 hrs/yr and 21hrs/day.
 Maximum Usage (gal/day) = Maximum Application Rate (gal/unit) * Maximum Throughput (units/hr) * 24 hrs/day
 Maximum Usage (lb/hr) = (Maximum Application Rate (gal/unit) * Maximum Throughput (unit/hour) * Density (lbs/gal))
 Pounds of VOC per Gallon Coating = (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)
 Potential Particulate (tons per year) = Maximum Throughput (units/hour) * Maximum Application (gal/unit) * Maximum Usage (lbs/gal) * (1-Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
 Total = Worst Coating + Sum of all solvents used
^a Actual VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * 21hrs/d
^b Actual VOC tons per year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (7,344 hr/yr) * (1 ton/2000 lb)

**Appendix A: Emission Calculations
Potential HAP Emissions
From the Surface Coating Operations**

Company Name: ATTC Manufacturing, Inc.
Address City IN Zip: 10455 State Road 37, Tell City, Indiana 47586
FESOP Renewal No.: 123-27492-00023
Reviewer: Hannah L. Desrosiers
Date Submitted: February 16, 2009

Unit	Material	Density (lbs/gal)	Maximum Throughput (units/hr)	Maximum Usage (gal/unit)	Weight % Diethylene Glycol Monobutyl Ether	Diethylene Glycol Monobutyl Ether Emissions (tons/yr)
PL1	W44231-Autoprime	11.40	514.0	0.0032	1.76%	1.45
TUPB	W44231-Autoprime	11.40	51.4	0.0032	1.76%	0.14
Total						1.59

METHODOLOGY

PTE of HAP (tons/yr) = Density (lbs/gal) x Max. Throughput (unit/hr) x Max. Usage (gal/unit) x Weight % HAP x 8760 hr/yr x 1 ton/2000 lbs

NOTES

Based on a MSDS submitted by the source, the material currently being used in Automated Paint Lines PL3 - PL6, and PA7 does not contain any HAPs.

**Appendix A: Emission Calculations
VOC and HAP Emissions
From the Two (2) Washing Stations (PW1 and PW2)**

Company Name: ATTC Manufacturing, Inc.
Address City IN Zip: 10455 State Road 37, Tell City, Indiana 47586
FESOP Renewal No.: 123-27492-00023
Reviewer: Hannah L. Desrosiers
Date Submitted: February 16, 2009

Unit ID	Solvent	Density (lb/gal)	Weight % VOC	Maximum Consumption (gal/day)	Potential to Emit VOC (tons/yr)
PW1	Lacquer Thinner 6782	6.9	100.0%	0.10	0.13
PW2	Mineral Spirits	6.8	100.0%	0.10	0.12
Total					0.25

Methodology:

PTE of VOC (tons/yr) = Density (lbs/gal) * Weight % VOC * Maximum Consumption (gal/day) * 365 days/yr * 1 ton/2000 lbs

**Appendix A: Emission Calculations
Particulate Emissions
From Twenty-nine (29) Metal Milling Lines**

Company Name: ATTC Manufacturing, Inc.
Address City IN Zip: 10455 State Road 37, Tell City, Indiana 47586
FESOP Renewal No.: 123-27492-00023
Reviewer: Hannah L. Desrosiers
Date Submitted: February 16, 2009

1. Process Description:

Number of Lines:	29	
Maximum Material Throughput:	1,300	lbs/hr/line
Control Device:	Dust Collectors	
Potential to Emit PM before Control:	0.16	lbs/hr/line (from the TSD for MSOP #123-14584-00023, issued November 6, 2001)
Control Efficiency:	99%	

2. Potential to Emit PM/PM10/PM2.5 before Control:

Annual PM/PM10/PM2.5 emissions = 0.16 lbs/hr/line x 8760 hr/yr x 1/2000 (ton/lb) x 29 lines =

tons/yr
20.3

 lbs/hr 4.64

3. Potential to Emit PM/PM10/PM2.5 after Control:

Annual PM/PM10/PM2.5 emissions = 0.16 lbs/hr/line x 8760 hr/yr x 1/2000 (ton/lb) x 29 lines x (1-99%) =

tons/yr
0.20

 lbs/hr 0.05

Notes

Assume all the PM10 and PM2.5 emissions are equal to PM emissions.

Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". Additionally, US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.

326 IAC 6-3-2(e) Allowable Rate of Emissions

Unit ID	Process Rate (lbs/hr/line)	Process Weight Rate * (tons/hr/line)	Allowable Emissions (lbs/hr/line)
Milling	1,300	0.65	3.07

Methodology

* Process weight; weight rate: Total weight of all materials introduced into any source operation (326 IAC 1-2-59(a)).

Allowable Emissions (lb/hr) = 4.10(Process Weight Rate (lb/hr))^0.67

Allowable Emissions (tons/yr) = (Allowable Emissions (lb/hr)*8760)/2000

**Appendix A: Emission Calculations
Natural Gas Combustion
From Natural Gas Fired Units
(MMBtu/hr < 100) (Insignificant)**

Company Name: ATTC Manufacturing, Inc.
Address City IN Zip: 10455 State Road 37, Tell City, Indiana 47586
FESOP Renewal No.: 123-27492-00023
Reviewer: Hannah L. Desrosiers
Date Submitted: February 16, 2009

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
4.55 (11 Units total)	39.9

	Criteria Pollutant						
Emission Factor in lbs/MMCF	PM*	PM10*	PM2.5*	SO ₂	**NO _x	VOC	CO
Potential to Emit in tons/yr	0.04	0.15	0.11	0.01	1.99	0.11	1.67

	HAPs - Organics				
Emission Factor in lb/MMcf	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Potential Emission in tons/yr	4.185E-05	2.391E-05	1.495E-03	0.036	6.776E-05

	HAPs - Metals				
Emission Factor in lb/MMcf	Lead	Cadmium	Chromium	Manganese	Nickel
Potential Emission in tons/yr	9.965E-06	2.192E-05	2.790E-05	7.573E-06	4.185E-05

Total Haps	0.038	Tons/yr
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*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined. PM2.5 emission factor is condensable PM2.5 only.
 **Emission factors for NO_x: Uncontrolled = 100.
 Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (AP-42 Supplement D 3/98)
 The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Methodology

All emission factors are based on normal firing.
 MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
 Potential to Emit (tons/yr) = Potential Throughput (MMCF/yr) x Emission Factor (lbs/MMCF) x 1 ton/2000 lbs



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

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Josh Wallace
ATTC Manufacturing, Inc.
10455 State Rd 37
Tell City, IN 47586

DATE: August 19, 2009

FROM: Matt Stuckey, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
FESOP - Renewal
123-27492-00023

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
President (ATTC Manufacturing, Inc)
Ray Boyden (Cornerstone Environmental, Health & Safety, Inc)
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 11/30/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Governor

Thomas W. Easterly
Commissioner

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August 19, 2009

TO: Tell City Public Library

From: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: ATTC Manufacturing, Inc
Permit Number: 123-27492-00023

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	MIDENNEY 8/19/2009 ATTC Manufacturing, Inc. 123-27492-00023 (final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Josh Wallace ATTC Manufacturing, Inc. 10455 St Rd 37 Tell City IN 47586 (Source CAATS) via confirmed delivery										
2		President ATTC Manufacturing, Inc. 10455 St Rd 37 Tell City IN 47586 (RO CAATS)										
3		Perry County Health Department Courthouse Annex Cannelton IN 47520-1251 (Health Department)										
4		Mr. Randy Brown Plumbers & Steam Fitters Union, Local 136 2300 St. Joe Industrial Park Dr Evansville IN 47720 (Affected Party)										
5		Mr. Ron Hendrich Schwab Corporation 4630 E St Rd 66 Cannelton IN 47520 (Affected Party)										
6		Tell City - City Council and Mayors Office PO Box 515 Tell City IN 47586 (Local Official)										
7		Perry County Commissioners Court House, 2219 Payne Street Tell City IN 47586 (Local Official)										
8		Tell City Perry County Public Library 2328 Tell Street Tell City IN 47586-1717 (Library)										
9		Mr. Ray Boyden Cornerstone Environmental, Health & Safety, Inc. 880 Lennox Court Zionsville IN 46077 (Consultant)										
10		Mr. John Blair 800 Adams Ave Evansville IN 47713 (Affected Party)										
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