



# 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](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: June 2, 2009

RE: Total Interior Systems American LLC / 051-27847-00045

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 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 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 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-MOD.dot 12/3/07



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

June 2, 2009

Re: 051-27847-00045  
Second Minor Revision to  
M051-18702-00045

Dear Pat Summers:

Total Interior Systems-America, LLC was issued a Minor Source Operating Permit (MSOP) No. M051-18702-00045, on September 24, 2004, for a stationary plastic vehicle door panel manufacturing plant, located at 1698 S 100 W, Princeton, Indiana 47640. On April 27, 2009, the Office of Air Quality (OAQ) received an application from the source relating to the installation of one (1) new spray booth, to allow for the processing of a new part. The attached Technical Support Document (TSD) provides additional explanation of the changes to the source/permit. Pursuant to the provisions of 326 IAC 2-6.1-6, these changes to the permit are required to be reviewed in accordance with the Minor Permit Revision (MPR) procedures of 326 IAC 2-6.1-6(h). Pursuant to the provisions of 326 IAC 2-6.1-6, a minor permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

The following construction conditions are applicable to the proposed project:

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

Pursuant to 326 IAC 2-6.1-6, this permit shall be revised by incorporating the minor permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Ms. Hannah Desrosiers, of my staff, at 317-234-5374 or 1-800-451-6027, and ask for extension 4-5374.

Sincerely,



Iryn Calilung, Section Chief  
Permits Branch  
Office of Air Quality

Attachments: Technical Support Document and revised permit

IC/hd

cc: File – Gibson County  
Gibson County Health Department  
U.S. EPA, Region V  
Compliance and Enforcement Branch  
Billing, Licensing and Training Section



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## MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

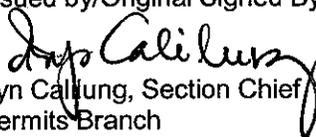
**Total Interior Systems – America, LLC**  
**1698 South 100 West**  
**Princeton, Indiana 47640**

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

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

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

Third Notice-Only Change No. 051-26898-00045, issued on September 9, 2008  
Second Notice-Only Change No. 051-25109-00045, issued on October 2, 2007  
First Minor Permit Revision No. 051-20442-00045, issued on September 24, 2007  
First Notice-Only Change No. 051-23675-00045, issued on November 14, 2006

Second Minor Permit Revision No. 051-27847-00045	Pages Affected: Entire Permit
Issued by/Original Signed By:  Iryn Callung, Section Chief Permits Branch Office of Air Quality	Issuance Date: June 2, 2009 Expiration Date: September 24, 2009

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## SECTION A SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary, plastic vehicle door panel manufacturing plant.

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

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

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

- (a) Three (3) spray booths (identified as EU 02, 03, and 04), using three (3) HVLP guns, each with a maximum throughput rate of 8.64 gallons of glue per hour, using dry filters for over spray control and exhausting at stacks ID 02, 03 and 04. These units were constructed in 2002.
- (b) One (1) spray booth (identified as EU 01), using one (1) HVLP gun or aerosol cans, with a maximum throughput rate of 0.65 gallons of coating per hour, using dry filters for over spray control and exhausting at stack ID 01. This unit was constructed in 2003.
- (c) One (1) spray booth (identified as IA 01), constructed in 2008, using one (1) HVLP gun or aerosol cans, with a maximum throughput rate of 0.07 gallons of coating per hour, using dry filters for over spray control and exhausting at stack ID IA01.
- (d) One (1) spray booth (identified as EU 05), approved for construction in 2009, using one (1) HVLP gun and one electric oven, with a maximum capacity of 18 plastic parts per hour, using dry filters for overspray control and exhausting at stack ID 05.
- (e) One (1) 1,000 kW emergency generator burning No. 2 fuel oil. This unit was installed in 2002.

## SECTION B GENERAL CONDITIONS

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

### B.1 Permit No Defense [IC 13]

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

### B.2 Definitions

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

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

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

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

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

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

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

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All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

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

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

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

- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or

before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

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

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days (this time frame is determined on a case by case basis but no more than ninety (90) days) after issuance of this permit, including the following information on each emissions unit:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMP's shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]**

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- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
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.

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

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

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

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

**B.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]**

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

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

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

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

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

- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

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

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

### C.2 Permit Revocation [326 IAC 2-1.1-9]

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

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

### C.3 Opacity [326 IAC 5-1]

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

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

### C.4 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR Part 61, Subpart M]

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
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 2-7-1(34).

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

## Testing Requirements

### C.5 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

Indiana Department of Environmental Management  
Compliance 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.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ (and local agency) not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, (and local agency), if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.6 Compliance Requirements [326 IAC 2-1.1-11]**

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

### **Compliance Monitoring Requirements**

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

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

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

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

#### **C.9 Compliance Response Plan - Preparation and Implementation**

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- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

## **Record Keeping and Reporting Requirements**

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

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

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

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

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

- (a) Reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) Unless otherwise specified in this permit, any quarterly reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

## SECTION D.1

## EMISSIONS UNIT OPERATION CONDITIONS

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

- (a) Three (3) spray booths (identified as EU 02, 03, and 04), using three (3) HVLP guns, each with a maximum throughput rate of 8.64 gallons of glue per hour, using dry filters for over spray control and exhausting at stacks ID 02, 03 and 04. These units were constructed in 2002.
- (b) One (1) spray booth (identified as EU 01), using one (1) HVLP gun or aerosol cans, with a maximum throughput rate of 0.65 gallons of coating per hour, using dry filters for over spray control and exhausting at stack ID 01. This unit was constructed in 2003.
- (c) One (1) spray booth (identified as IA 01), constructed in 2008, using one (1) HVLP gun or aerosol cans, with a maximum throughput rate of 0.07 gallons of coating per hour, using dry filters for over spray control and exhausting at stack ID IA01.
- (d) One (1) spray booth (identified as EU 05), approved for construction in 2009, using one (1) HVLP gun and one electric oven, with a maximum capacity of 18 plastic parts per hour, using dry filters for overspray control and exhausting at stack ID 05.

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

### Emission Limitations and Standards

#### D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

Any change or modification to spray booths IA01, EU 01, EU 02, EU 03, EU 04, and EU 05 that would increase the potential to emit of VOC for any individual spray booth to greater than twenty-five (25) tons per year must obtain prior approval from IDEM, OAQ.

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

- (a) Any change or modification which would increase the potential to emit of a single HAP greater than ten (10) tons per year must obtain prior approval from IDEM, OAQ.
- (b) Any change or modification which would increase the potential to emit of any combination of HAPs greater than twenty-five (25) tons per year must obtain prior approval from IDEM, OAQ.

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

- (a) Particulate from the six (6) spray booths shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
  - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
  - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

**D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

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

**Compliance Determination Requirements**

**D.1.5 VOC and HAP Emissions**

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

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

**D.1.6 Record Keeping Requirements**

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and the VOC and HAP emission limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) The total VOC and HAP usage for each month; and
  - (3) The weight of VOCs and HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.3(b), the Permittee shall maintain a record of any actions taken if overspray is visibly detected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.2

## EMISSIONS UNIT OPERATION CONDITIONS

### Emission Unit Description:

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

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

### Emission Limitations and Standards

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

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

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

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

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

I hereby certify that Total Interior Systems – America, LLC is

- still in operation.  
 no longer in operation.

I hereby certify that Total Interior Systems – America, LLC is

- in compliance with the requirements of MSOP 051-18702-00045  
 not in compliance with the requirements of MSOP 051-18702-00045

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

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

<b>Noncompliance:</b>

**MALFUNCTION REPORT**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
FAX NUMBER - 317 233-6865**

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

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

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC \_\_\_\_\_ OR, PERMIT CONDITION # \_\_\_\_\_ AND/OR PERM LIMIT OF \_\_\_\_\_

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

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

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

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_        AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_        AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_

INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

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

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

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

**326 IAC 1-2-39 “Malfunction” definition**

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

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

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

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

Technical Support Document (TSD) for a Minor Permit Revision  
to a Minor Source Operating Permit (MSOP)

<b>Source Description and Location</b>
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<b>Source Name:</b>	Total Interior Systems – America, LLC
<b>Source Location:</b>	1698 South 100 West, Princeton, Indiana 47640
<b>County:</b>	Gibson (Patoka Township)
<b>SIC Code:</b>	3089
<b>Operation Permit No.:</b>	M051-18702-00045
<b>Operation Permit Issuance Date:</b>	September 24, 2004
<b>Minor Permit Revision No.:</b>	051-27847-00045
<b>Permit Reviewer:</b>	Hannah L. Desrosiers

On April 27, 2009, the Office of Air Quality (OAQ) received an application from Total Interior Systems – America, LLC related to a modification to an existing stationary plastic vehicle door panel manufacturing plant.

<b>County Attainment Status</b>
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The source is located in Gibson County (Patoka Township). The following attainment status designations are applicable to Gibson County:

Pollutant	Designation
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
PM <sub>2.5</sub>	Basic nonattainment designation effective federally April 5, 2005, for the Montgomery Twp for PM <sub>2.5</sub> . The remainder of Gibson County is unclassifiable or attainment effective April 5, 2005, for PM <sub>2.5</sub> .
SO <sub>2</sub>	Cannot be classified.
NO <sub>2</sub>	Cannot be classified or better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. <sup>1</sup>
Pb	Not designated.
<sup>1</sup> Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	

- (a) **Ozone Standards**  
Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) 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 NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Gibson County (Patoka Township) has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
  
- (b) **PM<sub>2.5</sub>**  
Gibson County (Patoka Township) has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> emissions, and the effective date of these rules was July 15<sup>th</sup>, 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 PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions until 326 IAC 2-2 is revised.

- (c) **Other Criteria Pollutants**  
 Gibson County (Patoka Township) 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**

- (a) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
- (b) 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.

**Status of the Existing Source**

The table below summarizes the potential to emit of the entire source, prior to the proposed revision, after consideration of all enforceable limits established in the effective permits:

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)								
	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Surface Coating Booth IA 01	0.08	0.08	0.08	0	0	2.33	0	1.03	0.50 (Toluene/ Xylene)
Surface Coating Booth EU 01	0.73	0.73	0.73	0	0	21.6	0	9.54	4.65 (Toluene/ Xylene)
Surface Coating Booths EU 02, EU 03 & EU 04	7.19	7.19	7.19	0	0	52.9	0	12.93	6.93 <i>n</i> -Hexane
Emergency Generator	0.01	0.01	0.01	1.26	0.12	0.00	0.03	negl.	negl.
<b>Total PTE of Entire Source</b>	<b>8.01</b>	<b>8.01</b>	<b>8.01</b>	<b>1.26</b>	<b>0.12</b>	<b>76.86</b>	<b>0.03</b>	<b>23.50</b>	<b>9.20 Toluene</b>
Title V Major Source Thresholds	NA	100	NA	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	NA	250	250	250	250	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	100	NA	NA	NA	NA	NA	NA

negl. = negligible

The emissions contained in this table are based upon MSOP Notice Only Change No. 051-26898-00045, issued 09/09/2008.

\* 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.

**Description of Proposed Revision**

The Office of Air Quality (OAQ) has reviewed an application, submitted by Total Interior Systems – America, LLC on April 27, 2009, relating to the installation of one (1) new spray booth, to allow for the processing of a new part.

The following is a list of the new emission unit(s) and pollution control device(s):

- (a) One (1) spray booth (identified as EU 05), using one (1) HVLP gun and one electric oven, with a maximum capacity of 18 plastic parts per hour, using dry filters for overspray control and exhausting at stack ID 05.

Additionally, the source has notified IDEM of their intent to remove two (2) of their existing spray booths, identified as EU 02 and 03, in January of 2010, as follows:

- (b) Two (2) spray booths (identified as EU 02 and 03), using two (2) HVLP guns, each with a maximum throughput rate of 8.64 gallons of glue per hour, using dry filters for over spray control and exhausting at stacks ID 02 and 03. These units were constructed in 2002.

**Note:** No change has been made to the permit regarding the removal of units EU 02 and 03, since the projected removal date is not until January 2010. Therefore, the emissions calculations represent the addition of new unit EU 05, only.

**Enforcement Issues**

There are no pending enforcement actions related to this revision.

**Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

**Note:** No change has been made to the emissions calculations regarding the removal of spray booths EU 02 and 03, since their projected removal date is not until January 2010. Therefore, the emissions calculations represent the addition of new unit EU 05, only.

**Permit Level Determination – MSOP Revision**

The following table is used to determine the appropriate permit level under 326 IAC 2-6.1-6. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	PTE of Proposed Revision (tons/year)								
	PM	PM10*	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
<u>Existing Units</u> Surface Coating Booths EU 01 - EU 04, IA 01, & Emergency Generator	8.01	8.01	8.01	1.26	0.12	76.86	0.03	23.50	9.20 Toluene
<u>New Unit</u> Surface Coating Booth EU 05	1.39	1.39	1.39	0	0	14.94	0	0.91	0.91 Methanol
<b>Total PTE of Proposed Revision</b>	<b>9.40</b>	<b>9.40</b>	<b>9.40</b>	<b>1.26</b>	<b>0.12</b>	<b>91.80</b>	<b>0.03</b>	<b>24.47</b>	<b>9.20 Toluene</b>
negl. = negligible									
* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".									

This MSOP is being revised through a MSOP Minor Permit Revision pursuant to 326 IAC 2-6.1-6(g)(4)(B), because the revision involves the construction of an emission unit with potential to emit (PTE) Volatile Organic Compounds (VOCs) within the ranges specified in 326 IAC 2-6.1-6(g)(4)(B)(iii).

**PTE of the Entire Source After Issuance of the MSOP Revision**

The table below summarizes the potential to emit of the entire source, with updated emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)								
	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Surface Coating Booth IA 01	0.08	0.08	0.08	0	0	2.33	0	1.03	0.50 (Toluene/Xylene)
Surface Coating Booth EU 01	0.73	0.73	0.73	0	0	21.63	0	9.54	4.65 (Toluene/Xylene)
Surface Coating Booths EU 02, EU 03 & EU 04	7.19	7.19	7.19	0	0	52.90	0	12.93	6.93 <i>n</i> -Hexane
<b>Surface Coating Booth EU 05</b>	<b>1.39</b>	<b>1.39</b>	<b>1.39</b>	<b>0</b>	<b>0</b>	<b>14.94</b>	<b>0</b>	<b>0.91</b>	<b>0.91 Methanol</b>
Emergency Generator	0.01	0.01	0.01	1.26	0.12	0.002	0.03	Negl.	Negl.
Total PTE of Entire Source	<b>9.40</b> <del>8.04</del>	<b>9.40</b> <del>8.04</del>	<b>9.40</b> <del>8.04</del>	1.26	0.12	<b>91.80</b> <del>76.83</del>	0.03	<b>24.40</b> <del>23.50</del>	9.20 (Toluene)
Title V Major Source Thresholds	NA	100	-	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	NA	250	250	250	250	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	100	NA	NA	NA	NA	NA	NA
negl. = negligible									
* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".									

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this MSOP permit revision, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. (Note: the table below was generated from the above table, with bold text un-bolded and strikethrough text deleted)

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Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Revision (tons/year)								
	PM	PM10	PM2.5	SO <sub>2</sub>	NOx	VOC	CO	Total HAPs	Worst Single HAP
Surface Coating Booth IA 01	0.08	0.08	0.08	0	0	2.33	0	1.03	0.50 (Toluene/Xylene)
Surface Coating Booth EU 01	0.73	0.73	0.73	0	0	21.63	0	9.54	4.65 (Toluene/Xylene)
Surface Coating Booth EU 02, EU 03 & EU 04	7.19	7.19	7.19	0	0	52.90	0	12.93	6.93 <i>n</i> -Hexane
Surface Coating Booth EU 05	1.39	1.39	1.39	0	0	14.94	0	0.91	0.91 Methanol
Emergency Generator	0.01	0.01	0.01	1.26	0.12	0.002	0.03	Negl.	Negl.
<b>Total PTE of Entire Source</b>	<b>9.40</b>	<b>9.40</b>	<b>9.40</b>	<b>1.26</b>	<b>0.12</b>	<b>91.80</b>	<b>0.03</b>	<b>24.40</b>	<b>9.20 Toluene</b>
Title V Major Source Thresholds	NA	100	NA	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	NA	250	250	250	250	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	100	NA	NA	NA	NA	NA	NA
negl. = negligible									
* 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.									

**MSOP Status**

This revision to an existing Title V minor stationary source will not change the minor status, because the uncontrolled/unlimited potential to emit criteria pollutants from the entire source will still be less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-6.1 (MSOP).

**Federal Rule Applicability Determination**

**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 for this proposed revision, since this source is not an automobile or light duty truck assembly plant, but coats only plastic vehicle door panels.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this proposed revision.

**National Emission Standards for Hazardous Air Pollutants (NESHAP)**

- (c) 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, are not included for this proposed revision, because although this source uses spray application to coat plastic vehicle door panel components, the coatings used do not contain compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Plastic Parts and Products, 40 CFR 63, Subpart PPPP (326 IAC 20-81), are not

included for this proposed revision, since this source is not a major source of hazardous air pollutants (HAPs), as defined in 40 CFR Part 63.2.

- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR 63, Subpart III (326 IAC 20-85), are not included for this proposed revision, since this source is not a major source of hazardous air pollutants (HAPs), as defined in 40 CFR Part 63.2, and is not an automobile or light duty truck assembly plant, but coats only plastic vehicle door panels.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning, 40 CFR 63, Subpart T (63.460 through 63.470), and 326 IAC 20-6, are not included for this proposed revision, since this existing source still does not use degreasing solvents that contain any of the halogenated compounds listed in 40 CFR 63.460(a).
- (g) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed revision.

#### Compliance Assurance Monitoring (CAM)

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

<b>State Rule Applicability Determination</b>
---

The following state rules are applicable to the proposed revision:

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))  
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))  
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than 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. See PTE of the Entire Source After Issuance of the MSOP Revision Section above.
- (c) 326 IAC 2-3 (Emission Offset) and 326 IAC 2-1.1-5 (Nonattainment New Source Review)  
This modification to an existing minor stationary source under 326 IAC 2-1.1-5 (Nonattainment New Source Review) will not change the minor status, because the potential to emit of PM<sub>2.5</sub> from the entire source will continue to be less than 100 tons per year. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do not apply. See PTE of the Entire Source After Issuance of the MSOP Revision Section above.
- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new unit 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.
- (e) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

- (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 proposed revision is not subject to the requirements of 326 IAC 8-1-6, since the unlimited, potential VOC emissions from the surface coating operations performed at booth EU 05 are less than twenty-five (25) tons per year.
- (i) 326 IAC 8-2 (Surface Coating Emission Limitations)  
The proposed revision is not subject to the requirements of 326 IAC 8-2 because the surface coating operations performed at booth EU 05 are not of a type regulated by 326 IAC 8-2-2 through 326 IAC 8-2-12.
- (j) There are no other 326 IAC 8 Rules that are applicable to this revision.
- (k) 326 IAC 12 (New Source Performance Standards)  
See Federal Rule Applicability Section of this TSD.
- (l) 326 IAC 20 (Hazardous Air Pollutants)  
See Federal Rule Applicability Section of this TSD.

#### **Compliance Determination, Monitoring and Testing Requirements**

The existing compliance requirements will not change as a result of this revision. The source shall continue to comply with the applicable requirements and permit conditions as contained in MSOP No: 051-18702-00045, issued on September 24, 2004.

#### **Proposed Changes**

1. The following changes listed below are due to the proposed revision.
  - (a) Section A.1, of the permit, has been revised to clarify the source's operations as plastic, and not metal related.
  - (b) Sections A.2, D.1, D.1.1, and D.1.3, of the permit, have been revised to include the addition of the new surface coating booth EU 05.
  - (c) Permit conditions have been renumbered as needed to accommodate this change.
2. Language deleted from the permit appears as ~~striktthrough~~ text and new language appears as **bold** text, as follows:

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

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

...

A.2 Emissions Units and Pollution Control Equipment Summary

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

...

(d) **One (1) spray booth (identified as EU 05), approved for construction in 2009, using one (1) HVLP gun and one electric oven, with a maximum capacity of 18 plastic parts per hour, using dry filters for overspray control and exhausting at stack ID 05.**

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

...

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

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

...

(d) **One (1) spray booth (identified as EU 05), approved for construction in 2009, using one (1) HVLP gun and one electric oven, with a maximum capacity of 18 plastic parts per hour, using dry filters for overspray control and exhausting at stack ID 05.**

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

Emission Limitations and Standards

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

Any change or modification to spray booths IA01, EU 01, EU 02, EU 03, ~~and EU04~~, **and EU 05** that would increase the potential to emit of VOC for any individual spray booth to greater than twenty-five (25) tons per year must obtain prior approval from IDEM, OAQ.

...

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

(a) Particulate from the ~~six five (6 5)~~ spray booths shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

...

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emission Unit Description:

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

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

...

3. Upon further review, IDEM, OAQ has decided to make the following additional changes to the permit. Deleted language appears as ~~strike through~~ text and new language appears as **bold** text:

(a) Several of IDEM's branches and sections have been renamed. Therefore, IDEM has updated the addresses listed in the permit. References to "Permit Administration and Development Section" and the "Permits Branch" have been changed to "Permit

Administration and Support Section". References to "Asbestos Section", "Compliance Data Section", "Air Compliance Section", and "Compliance Branch" have been changed to "Compliance and Enforcement Branch". The permit has been revised as follows:

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

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 Compliance Data Branch facsimile number has been revised to 317-233-~~5967~~ **6865**.

### 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 review was received on April 27, 2009.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed MSOP Minor Revision No. 051-27847-00045. The staff recommends to the Commissioner that this MSOP Minor Revision be approved.

### IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Ms. 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 45374.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) 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.idem.in.gov](http://www.idem.in.gov)

**Appendix A: Emissions Calculations  
Entire Source Summary after Revision**

**Company Name:** Total Interior Systems - America, LLC  
**Address City IN Zip:** 1698 S 100 W, Princeton, Indiana 47640  
**Permit No.:** 051-18702-00045  
**Permit Revision No.:** 051-27847-00045  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** April 27, 2009

Uncontrolled Potential To Emit of the Entire Source after Issuance of Revision (tons/year)							
Category	Emissions Generating Activity						
	Pollutant	Surface Coating Operations				Generator	TOTAL
		Booth IA 01	Booth EU 01	Booths EU 02, EU 03 & EU 04	Booth EU 05		
Criteria Pollutants	PM	0.08	0.73	7.19	1.39	0.01	9.40
	PM10	0.08	0.73	7.19	1.39	0.01	9.40
	PM2.5	0.08	0.73	7.19	1.39	0.01	9.40
	SO2	0	0	0	0	1.26	1.26
	NOx	0	0	0	0	0.12	0.12
	VOC	2.33	21.63	52.90	14.94	0.002	91.80
	CO	0	0	0	0	0.03	0.03
Hazardous Air Pollutants	Cumene	0	0	0.11	0	0	0.11
	n-Hexane	0	0	6.93	0	0	6.93
	Methanol	0	0	1.73	0.91	0	2.64
	MIK	0.03	0.23	0	0	0	0.26
	Toluene	0.50	4.65	4.04	0	0	9.20
	Xylenes	0.50	4.65	0.11	0	0	5.26
	Arsenic	0	0	0	0	3.41E-06	3.41E-06
	Beryllium	0	0	0	0	2.56E-06	2.56E-06
	Cadmium	0	0	0	0	2.56E-06	2.56E-06
	Chromium	0	0	0	0	2.56E-06	2.56E-06
	Lead	0	0	0	0	7.68E-06	7.68E-06
	Manganese	0	0	0	0	5.12E-06	5.12E-06
	Mercury	0	0	0	0	2.56E-06	2.56E-06
	Nickel	0	0	0	0	2.56E-06	2.56E-06
	Selenium	0	0	0	0	1.28E-05	1.28E-05
<b>Totals</b>	<b>1.03</b>	<b>9.54</b>	<b>12.93</b>	<b>0.91</b>	<b>4.18E-05</b>	<b>24.40</b>	
						<b>Worse Case HAP</b>	<b>9.20</b>

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

## Appendix A: Emissions Calculations Revision Summary

**Company Name:** Total Interior Systems - America, LLC  
**Address City IN Zip:** 1698 S 100 W, Princeton, Indiana 47640  
**Permit No.:** 051-18702-00045  
**Permit Revision No.:** 051-27847-00045  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** April 27, 2009

<b>Uncontrolled Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)</b>					
Category	Pollutant	Emissions Generating Activity			TOTAL
		Existing Units	New Units		
		Coating Booths EU 01 - EU 04, IA 01 & Emergency Generator	Surface Coating Booth EU 05		
Criteria Pollutants	PM	8.01	1.39		9.40
	PM10	8.01	1.39		9.40
	PM2.5	8.01	1.39		9.40
	SO2	1.26	0		1.26
	NOx	0.12	0		0.12
	VOC	76.86	14.94		91.80
	CO	0.03	0		0.03
Hazardous Air Pollutants	Cumene	0.11	0		0.11
	n-Hexane	6.93	0		6.93
	Methanol	1.73	0.91		2.64
	MIK	0.26	0		0.26
	Toluene	9.20	0		9.20
	Xylenes	5.26	0		5.26
	Arsenic	3.41E-06	0		3.41E-06
	Beryllium	2.56E-06	0		2.56E-06
	Cadmium	2.56E-06	0		2.56E-06
	Chromium	2.56E-06	0		2.56E-06
	Lead	7.68E-06	0		7.68E-06
	Manganese	5.12E-06	0		5.12E-06
	Mercury	2.56E-06	0		2.56E-06
	Nickel	2.56E-06	0		2.56E-06
	Selenium	1.28E-05	0		1.28E-05
		<b>Totals</b>	<b>23.50</b>	<b>0.91</b>	
					<b>9.20</b>

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

\*The emissions from the removed units have been subtracted from the total combined emissions to reflect the new operating condition.

**Appendix A: Emissions Calculations**  
**Particulates, Volatile Organic Compounds and Hazardous Air Pollutants**  
**From NEW Surface Coating Operation EU 05**

**Company Name:** Total Interior Systems - America, LLC  
**Address City IN Zip:** 1698 S 100 W, Princeton, Indiana 47640  
**Permit No.:** 051-18702-00045  
**Permit Revision No.:** 051-27847-00045  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** April 27, 2009

Production (parts/yr)	Coat Weight (g/part)	Density (lb/gal)	wt% VOC	wt% solids	wt% Methanol	Transfer Efficiency (%)	Potential Emissions (tons/yr)		
							VOC	HAPs	PM/PM10 & PM2.5
157,680	108.8	6.81	79%	21%	4.8%	65%	14.94	0.91	1.39

**METHODOLOGY**

VOC Emissions (tons/yr) = Production (parts/yr) x Coat Weight (g/part) x lb/453.59 g x wt% VOC x 1 ton/2,000 lbs

HAP Emissions (tons/yr) = Production (parts/yr) x Coat Weight (g/part) x lb/453.59 g x wt% HAPs x 1 ton/2,000 lbs

PM/PM10/PM2.5 Emissions (tons/yr) = Production (parts/yr) x Coat Weight (g/part) x lb/453.59 g x wt% solids x (1 - Transfer Efficiency) x 1 ton/2,000 lbs

**Appendix A: Emissions Calculations  
Existing Emission Unit Summary**

**Company Name:** Total Interior Systems - America, LLC  
**Address City IN Zip:** 1698 S 100 W, Princeton, Indiana 47640  
**Permit No.:** 051-18702-00045  
**Permit Revision No.:** 051-27847-00045  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** April 27, 2009

<b>Uncontrolled Potential Emissions (tons/year)</b>						
Category	Emissions Generating Activity					
	Pollutant	Surface Coating Operations			Generator	TOTAL
		Booth IA 01	Booth EU 01	Booth (EU 02, EU 03) (and EU 04)		
Criteria Pollutants	PM	0.08	0.73	7.19	0.01	8.01
	PM10	0.08	0.73	7.19	0.01	8.01
	PM2.5	0.08	0.73	7.19	0.01	8.01
	SO2	0	0	0	1.26	1.26
	NOx	0	0	0	0.12	0.12
	VOC	2.33	21.63	52.90	0.002	76.86
	CO	0	0	0	0.03	0.03
Hazardous Air Pollutants	Cumene	0	0	0.11	0	0.11
	n-Hexane	0	0	6.93	0	6.93
	Methanol	0	0	1.73	0	1.73
	MIK	0.03	0.23	0	0	0.26
	Toluene	0.50	4.65	4.04	0	9.20
	Xylenes	0.50	4.65	0.11	0	5.26
	Arsenic	0	0	0	3.41E-06	3.41E-06
	Beryllium	0	0	0	2.56E-06	2.56E-06
	Cadmium	0	0	0	2.56E-06	2.56E-06
	Chromium	0	0	0	2.56E-06	2.56E-06
	Lead	0	0	0	7.68E-06	7.68E-06
	Manganese	0	0	0	5.12E-06	5.12E-06
	Mercury	0	0	0	2.56E-06	2.56E-06
	Nickel	0	0	0	2.56E-06	2.56E-06
	Selenium	0	0	0	1.28E-05	1.28E-05
	<b>Totals</b>	<b>1.03</b>	<b>9.54</b>	<b>12.93</b>	<b>2.39E-05</b>	<b>23.50</b>
<b>Worse Case HAP</b>					<b>9.20</b>	

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

The emissions contained in this table are taken from MSOP Notice Only Change No. 051-26898-00045, issued 09/09/2008.



# 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](http://www.idem.IN.gov)

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

**TO:** Pat Summers  
Total Interior Systems American LLC  
RR1 Box 101  
Princeton IN 47670

**DATE:** June 2, 2009

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

**SUBJECT:** Final Decision  
Minor Permit Modification  
051-27847-00045

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:  
Ben Saffari Plant Mgr. Total Interior Systems American LLC  
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](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 11/30/07

# Mail Code 61-53

IDEM Staff	BLOCCHET 6/2/2009 Total Interior Systems America LLC 051-27847-00045 (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:  <b>CERTIFICATE OF MAILING ONLY</b>	

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		Pat Summers Total Interior Systems America LLC RR1 Box 101 Princeton IN 47670 (Source CAATS) <b>Via Confirmed Delivery</b>										
2		Ben Saffari Plant Mgr Total Interior Systems America LLC RR1 Box 101 Princeton IN 47670 (RO CAATS)										
3		Mr. Randy Brown Plumbers & Steam Fitters Union, Local 136 2300 St. Joe Industrial Park Dr Evansville IN 47720 (Affected Party)										
4		Jefferson Co Dept of Planning & EnvironmentalMgt 850 Barret Avenue Louisville KY 40204 (Affected State)										
5		Princeton City Council and Mayors Office 603 South Main Street Princeton IN 47670 (Local Official)										
6		Gibson County Health Department 800 S. Prince St., Courthouse Annex Princeton IN 47670-2664 (Health Department)										
7		Eric Anderson 25 Atlantic Avenue Erlanger KY 41018 (Affected Party)										
8		Mr. Bill Battram 812 North Main Drive Oakland City IN 47660 (Affected Party)										
9		Gibson County Commissioners 101 N. Main Street Princeton IN 47670 (Local Official)										
10		Mr. Bil Musgrove PO Box 520 Chandler IN 47610 (Affected Party)										
11		Mr. John Blair 800 Adams Ave Evansville IN 47713 (Affected Party)										
12												
13												
14												
15												

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