



# 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: October 20, 2009

RE: Total Interior Systems - America, LLC / 051-28157-00045

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 13-15-5-3, 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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## Minor Source Operating Permit Renewal 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 source 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.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: M051-28157-00045	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: October 20, 2009  Expiration Date: October 20, 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 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 South 100 West, Princeton, Indiana 47640
Mailing Address:	1698 South 100 West, Princeton, Indiana 47640
General Source Phone Number:	(812) 491-9100
SIC Code:	3089
County Location:	Gibson (Potoka Township)
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source 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

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

- (a) One (1) spray booth, identified as EU 02, constructed in 2002, using HVLP gun to coat plastic parts, with a maximum capacity of 70 parts per hour, using dry filters for over spray control and exhausting at stacks ID 02.
- (b) One (1) spray booth, identified as EU 03, constructed in 2002, using HVLP gun to coat plastic parts, with a maximum capacity of 70 parts per hour, using dry filters for over spray control and exhausting at stacks ID 03.
- (c) One (1) spray booth, identified as EU 04, constructed in 2002, using HVLP gun to coat plastic parts, with a maximum capacity of 70 parts per hour, using dry filters for over spray control and exhausting at stacks ID 04.
- (d) One (1) spray booth, identified as EU 01, constructed in 2003, using one (1) HVLP gun or aerosol cans to coat plastic parts, 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.
- (e) One (1) spray booth, identified as IA 01, constructed in 2008, using one (1) HVLP gun or aerosol cans to coat plastic parts, 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.
- (f) One (1) spray booth, identified as EU 05, constructed in 2009, using one (1) HVLP gun to coat plastic parts 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.
- (g) One (1) 1,000 kW emergency generator burning No. 2 fuel oil, installed in 2002.
- (h) Thirty-three (33) natural gas fired heaters, identified as RTU 1-21 and UH 1-12, installed in 2009, with a maximum capacity of 6.39 MMBtu per hour.

A.3 Source Definition [326 IAC 1-2-73]

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The parent company consists of two plants:

- (a) Total Interior Systems America LLC, (TISA) is located at 1698 South 100 West, Princeton, IN 47640, Plant ID 051-00045; and
- (b) Toyota Boshoku America (TBA) is located at Southeast of the intersection of CR100W and CR550S (Tulip Tree Drive), Princeton, IN, 47670, Plant ID 051-00050.

IDEM reviewed the relationship between the Toyota Boshoku America Plant (TBA) and Total Interior Systems plant (TISA) and determined in Registration 051-25558-00050 that was issued September 8, 2008, that they do not meet all three parts of the source definition; and, therefore, are permitted as separate sources.

The two (2) plants are located on contiguous or adjacent property and are under the common control of the same entity but they do not belong to the same industrial grouping, therefore, they are not considered as one (1) source. They do not meet all three of the requirements to be considered as one source.

TBA will be supplying its output to TISA for the first two years of operation. Gradually TBA will be supplying less than 50% of its output to TISA and by the fifth year of operation will not be a support facility to TISA. IDEM, OAQ will reexamine the relationship between the sources in the fifth year of TBA's operation or at any later time.

## **SECTION B      GENERAL CONDITIONS**

### **B.1      Definitions [326 IAC 2-1.1-1]**

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

### **B.2      Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]**

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- (a) This permit, M051-28157-00045, 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]**

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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**

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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**

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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**

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

### **B.7      Duty to Provide Information**

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- (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

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- (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 Notification [326 IAC 2-6.1-5(a)(5)]

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- (a) An annual notification shall be submitted by an authorized individual 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) The annual notice shall be submitted in the format attached no later than March 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, IN 46204-2251
- (c) 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.10 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 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.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to M051-28157-00045 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.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]**

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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 one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

**B.13 Permit Renewal [326 IAC 2-6.1-7]**

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- (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 2-6.1-7. Such information shall be included in the application for each emission unit at this source. 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 one hundred twenty (120) days 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 2-6.1 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.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]**

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(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 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 shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

**B.15 Source Modification Requirement**

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

**B.16 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][IC 13-17-3-2][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 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.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]**

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(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 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 notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

**B.18 Annual Fee Payment [326 IAC 2-1.1-7]**

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

**B.19 Credible Evidence [326 IAC 1-1-6]**

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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 2-6.1-5(a)(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 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 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]

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

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- (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. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

### **Testing Requirements [326 IAC 2-6.1-5(a)(2)]**

#### **C.8 Performance Testing [326 IAC 3-6]**

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- (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.9 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 [326 IAC 2-6.1-5(a)(2)]**

### **C.10 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.11 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.12 Instrument Specifications [326 IAC 2-1.1-11]**

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- (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**

### **C.13 Response to Excursions or Exceedances**

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- (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.14 Actions Related to Noncompliance Demonstrated by a Stack Test**

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- (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 2-6.1-5(a)(2)]**

**C.15 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.16 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 within ninety (90) days of permit issuance or ninety (90) days of initial start-up, whichever is later.

C.17 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, 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).
- (d) 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

### Emissions Unit Description:

- (a) One (1) spray booth, identified as EU 02, constructed in 2002, using HVLP gun to coat plastic parts, with a maximum capacity of 70 parts per hour, using dry filters for over spray control and exhausting at stacks ID 02.
- (b) One (1) spray booth, identified as EU 03, constructed in 2002, using HVLP gun to coat plastic parts, with a maximum capacity of 70 parts per hour, using dry filters for over spray control and exhausting at stacks ID 03.
- (c) One (1) spray booth, identified as EU 04, constructed in 2002, using HVLP gun to coat plastic parts, with a maximum capacity of 70 parts per hour, using dry filters for over spray control and exhausting at stacks ID 04.
- (d) One (1) spray booth, identified as EU 01, constructed in 2003 using one (1) HVLP gun or aerosol cans to coat plastic parts, 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.
- (e) One (1) spray booth, identified as IA 01, constructed in 2008, using one (1) HVLP gun or aerosol cans to coat plastic parts, 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.
- (f) One (1) spray booth, identified as EU 05, constructed in 2009, using one (1) HVLP gun to coat plastic parts 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 emissions unit description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

#### 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)]**

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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**

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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**

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- (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.

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

**MINOR SOURCE OPERATING PERMIT (MSOP)  
CERTIFICATION**

Source Name: Total Interior Systems - America, LLC  
Source Address: 1698 South 100 West, Princeton, Indiana 47640  
Mailing Address: 1698 South 100 West, Princeton, Indiana 47640  
MSOP No.: M051-28157-00045

**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**

**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 South 100 West
<b>City:</b>	Princeton, Indiana 47640
<b>Phone #:</b>	(812) 491-9100
<b>MSOP #:</b>	M051-28157-00045

I hereby certify that Total Interior Systems - America, LLC  still in operation.  
 no longer in operation.  
I hereby certify that Total Interior Systems - America, LLC  in compliance with the requirements of MSOP M051-28157-00045.  
 not in compliance with the requirements of MSOP M051-28157-00045.

<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 ?\_\_\_\_, 100 TONS/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 PERMIT 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 Source Operating Permit Renewal**

**Source Background and Description**

<b>Source Name:</b>	<b>Total Interior Systems - America, LLC</b>
<b>Source Location:</b>	<b>1698 South 100 West</b>
<b>County:</b>	<b>Gibson (Patoka Township)</b>
<b>SIC Code:</b>	<b>3089</b>
<b>Permit Renewal No.:</b>	<b>051-28157-00045</b>
<b>Permit Reviewer:</b>	<b>Janet Mobley</b>

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Total Interior Systems - America, LLC relating to the operation of a stationary plastic vehicle door panel manufacturing operation.

**History**

On June 29, 2009, Total Interior Systems - America, LLC submitted an application to the OAQ requesting to renew its operating permit. Total Interior Systems - America, LLC was issued a MSOP on September 24, 2004

**Source Definition**

- (a) Total Interior Systems America LLC, (TISA) is located at 1698 South 100 West, Princeton, IN 47640, Plant ID 051-00045; and
- (b) Toyota Boshoku America (TBA) is located at Southeast of the intersection of CR100W and CR550S (Tulip Tree Drive), Princeton, IN, 47670, Plant ID 051-00050.

IDEM has reviewed the relationship between the Toyota Boshoku America plant (TBA) and the existing Total Interior Systems plant (TISA) in Registration 051-25558- 00050 that was issued September 8, 2008 and made a determination whether they meet the definition of a single source as follows:

The term "source" is defined at 326 IAC 1-2-73. In order for these two plants to be considered one source, they must meet all three of the following:

- (1) the plants must be owned or operated by the same person or by persons under common control;
- (2) the plants must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for the other; and,
- (3) the sources must be located on the same property or on contiguous or adjacent properties.

The two sources will be under common ownership. TBA and TISA have the same parent company. The two plants met the requirements of the first part of the definition of a source.

TBA and TISA do not have the same two digit SIC Code. The two digit SIC Code for TISA is 30 for Major Group 30: Rubber and Miscellaneous Plastics Products. The two digit SIC Code for TBA is 37 for Major Group 37: Transportation Equipment. TBA will be supplying output to TISA. In the first two years of operation, TBA will be running at partial capacity. During that time, all of TBA's output will go to TISA. As TBA ramps up its capacity in the third and fourth years of operation, more of its output will go to other plants. By TBA's fifth year of operation, less than 50% of its output will be going to TISA. TBA will not need any additional air permit approval in order to achieve full production by the fifth year of operation. All of the other plants that will receive output for TBA will share the same parent company as TBA. Since TBA will be a new plant that will be gradually ramping up production and since less than 50% of TBA's full production will be dedicated to TISA, TBA will not be a support facility to TISA. Therefore, the second part of the definition is not met.

TBA will be located on the same property as TISA, so the third part of the definition is met.

TBA and TISA do not meet all three parts of the source definition and therefore will be permitted as separate sources. IDEM, OAQ will reexamine the relationship between the sources if TBA sends 50% or more of its output to TISA in the fifth year of TBA's operation or at any later time.

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

- (a) One (1) spray booth, identified as EU 02, constructed in 2002, using HVLP gun to coat plastic parts, with a maximum capacity of 70 parts per hour, using dry filters for over spray control and exhausting at stacks ID 02.
- (b) One (1) spray booth, identified as EU 03, constructed in 2002, using HVLP gun to coat plastic parts, with a maximum capacity of 70 parts per hour, using dry filters for over spray control and exhausting at stacks ID 03.
- (c) One (1) spray booth, identified as EU 04, constructed in 2002, using HVLP gun to coat plastic parts, with a maximum capacity of 70 parts per hour, using dry filters for over spray control and exhausting at stacks ID 04.
- (d) One (1) spray booth, identified as EU 01, constructed in 2003, using one (1) HVLP gun or aerosol cans to coat plastic parts, 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.
- (e) One (1) spray booth, identified as IA 01, constructed in 2008, using one (1) HVLP gun or aerosol cans to coat plastic parts, 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.
- (f) One (1) spray booth, identified as EU 05, constructed in 2009, using one (1) HVLP gun to coat plastic parts 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.
- (g) One (1) 1,000 kW emergency generator burning No. 2 fuel oil, installed in 2002.
- (h) Thirty-three (33) natural gas fired heaters, identified as RTU 1-21 and UH 1-12, installed in 2009, with a maximum capacity of 6.39 MMBtu per hour.

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

There are no emission units that were constructed and/or is operating without a permit at the time of this review.

## Emission Units and Pollution Control Equipment Removed From the Source

There have not been any emissions units removed from the source.

## Existing Approvals

Since the issuance of the MSOP (051-18702-00045) on September 24, 2004, the source has constructed or has been operating under the following approvals as well:

- (a) First Minor Permit Revision No. (051-20442-00045) issued on January 19, 2005.
- (b) First Notice Only Change No. (051-23675-00045) issued on November 14, 2006.
- (c) Second Notice Only Change No. (051-25109-00045) issued on October 2, 2007.
- (d) Third Notice Only Change No. (051-26898-00045) issued on September 9, 2008; and,
- (e) Second Permit Revision No. (051-27847-00045) issued on June 2, 2009.

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 Issue

There are no enforcement actions pending.

## Emission Calculations

See Appendix A of this document 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.

## County Attainment Status

The source is located in Gibson County (Patoka Township).

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 (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. Gibson County (Patoka Township) 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**  
Gibson County (Patoka Township) 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 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 PM10 emissions as a surrogate for PM2.5 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.
- (d) **Fugitive Emissions**  
The fugitive emission of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.

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**

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants is still less than 100 tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP renewal because VOC PTE is greater than 25 tons per year.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is still less than ten (10) tons per year and/or 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. The source is not subject to the provisions of 326 IAC 2-7.
- (c) 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 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 MSOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (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	1.48	1.48	1.48	0	0	16.85	0	4.27	2.31 <i>n</i> -Hexane
Surface Coating Booths EU 03	1.48	1.48	1.48	0	0	16.85	0	4.27	2.31 <i>n</i> -Hexane
Surface Coating Booths EU 04	1.48	1.48	1.48	0	0	16.85	0	4.27	2.31 <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.
Combustion Units RTU-1-21 and UH-1-12	0.21	0.21	0.21	0.02	2.80	0.15	2.35	0.1	0.05 hexane
<b>Total PTE of Entire Source</b>	<b>6.86</b>	<b>6.86</b>	<b>6.86</b>	<b>1.28</b>	<b>2.92</b>	<b>89.60</b>	<b>2.38</b>	<b>24.34</b>	<b>9.30 Toluene</b>
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
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	NA	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.

\*\* located in Patoka Township which is considered attainment for PM2.5.

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (< 250) tons per year, and it is not one of the twenty-eight (28) listed source categories. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A MSOP renewal will be issued.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination of HAPs is less than twenty-five (25) tons per year.
- (c) **Fugitive Emissions**  
 Since this type of operation is not in one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) are not counted toward determination of PSD and Emission Offset applicability.

## **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 applicable, 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 renewal.

### 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 in this renewal, because although this source is an area source of hazardous air pollutants and performs surface coating operations, the adhesive that the source uses does not contain any of the "target HAPS" (i.e.), 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 in this renewal, 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 in this renewal, 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 in this renewal, 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 new National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

### Compliance Assurance Monitoring (CAM)

- (h) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring (CAM) is not included in this permit. This source is operating as a MSOP. Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring are not applicable to this source.

## **State Rule Applicability - Entire Source**

- (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))  
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.

- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The unlimited potential to emit of HAPs from the 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.
- (d) 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.
- (e) 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.
- (f) 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.
- (g) 326 IAC 8-2 (Surface Coating Emission Limitations)  
The source is not subject to the requirements of 326 IAC 8-2 because the surface coating operations performed at are not of a type regulated by 326 IAC 8-2-2 through 326 IAC 8-2-12.
- (h) There are no other 326 IAC 8 Rules that are applicable to this renewal.
- (i) 326 IAC 12 (New Source Performance Standards)  
See Federal Rule Applicability Section of this TSD.
- (j) 326 IAC 20 (Hazardous Air Pollutants)  
See Federal Rule Applicability Section of this TSD.

### **State Rule Applicability – Individual Facilities**

#### **326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)**

- (a) The potential emissions of VOC from each of the three (3) spray booths (identified as EU 02, 03, and 04) used for coating polypropylene plastic based vehicle door panels, are less than twenty-five (25) tons per year. The three (3) spray booths are considered as three (3) separate lines since the product can go to any of the three (3) booths for coating. Therefore, the requirements of 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) do not apply.
- (b) The potential emissions of VOC from each spray booth (identified as EU01, IA-01 and EU05) are less than twenty-five (25) tons per year. Therefore, 326 IAC 8-1-6 does not apply to these units.

However, any change or modification to the spray booths that would result in a potential to emit of VOC greater than twenty-five (25) tons per year, must require prior approval from IDEM, OAQ

326 IAC 8-2-2 (Automobile & Light Duty Truck Coating Operation)

This source is not subject to the requirements of 326 IAC 8-2-2 ((Automobile & Light Duty Truck Coating Operation) because this source does not operate an automotive and light duty truck assembly plant. It operates a surface coating operation for vehicle door panels.

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

The spray booths are not subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating) because the spray booths coat plastic door panels.

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

Pursuant to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) particulate from the four (4) spray booths shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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:

- (a) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (b) 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.

State Rule Applicability - One (1) 1000 kW Emergency Generator

According to the EPA guidance dated September 6, 1995, an emergency generator means a generator which has the sole function of providing backup power when electric power from the local utility is interrupted, and which in no case shall exceed 500 hours of operation per year. There are no specific state or federal rules applicable to this emission unit.

State Rule Applicability - Natural Gas Fired Heaters

326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)

The natural gas-fired heater units are not subject to 326 IAC 6-2 as they are not sources of indirect heating.

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

Pursuant to 326 IAC 6-3-1(b)(14), the natural gas-fired heaters are each exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight. In addition, they each have a potential particulate emissions less than five hundred fifty one thousandths (0.551) pound per hour.

326 IAC 7-1 (Sulfur dioxide emission limitations: applicability)

The natural gas-fired heaters are each not subject to the requirements of 326 IAC 7-1, because the potential and the actual emissions are less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.

There are no specific state or federal rules applicable to these emission units.

### **Compliance Determination and Monitoring Requirements**

Permits issued under 326 IAC 2-6.1 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-6.1-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no compliance monitoring requirements applicable to this source.

### **Recommendation**

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

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

An application for the purposes of this review was received on June 29, 2009. Additional information was received on August 20, 2009.

### **Conclusion**

The operation of this stationary plastic vehicle door panel manufacturing plant shall be subject to the conditions of the attached MSOP Renewal No. 051-28157-00045.

<b>IDEM Contact</b>
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- (a) Questions regarding this proposed permit can be directed to Janet Mobley 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) 234-5373 or toll free at 1-800-451-6027, extension 4-5373.
- (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: Emission Calculations  
Summary**

**Company Name:** Total Interior Systems - America, LLC  
**Address:** 1698 South 100 West, Princeton, Indiana 47670  
**MSOP Renewal No.:** 051-28157-00045  
**Reviewer:** Janet Mobley

**POTENTIAL TO EMIT IN TONS PER YEAR**

Emission Unit	PM	PM10	PM10	SO <sub>2</sub>	NOx	VOC	CO	Total HAPs	* Single Highest HAP
Surface Coating Booth IA 01	0.08	0.08	0.08	0.00	0.00	2.33	0.00	1.03	.50 Toluene & Xylenes
Surface Coating Booth EU 01	0.73	0.73	0.73	0.00	0.00	21.63	0.00	9.54	4.65 Toluene & Xylenes
Surface Coating Booth EU 02	1.48	1.48	1.48	0.00	0.00	16.85	0.00	4.27	2.31 n-Hexane
Surface Coating Booth EU 03	1.48	1.48	1.48	0.00	0.00	16.85	0.00	4.27	2.31 n-Hexane
Surface Coating Booth EU 04	1.48	1.48	1.48	0.00	0.00	16.85	0.00	4.27	2.31 n-Hexane
Surface Coating Booth EU 05	1.39	1.39	1.39	0.00	0.00	14.94	0.00	0.91	0.91 Methanol
Emergency Generator	0.01	0.01	0.01	1.26	0.12	0.00	0.03	negl.	negl.
Combustion Units RTU-1-21 and UH-1-12	0.21	0.21	0.21	0.02	2.80	0.15	2.35	0.1	0.05 hexane
<b>TOTAL</b>	<b>6.86</b>	<b>6.86</b>	<b>6.86</b>	<b>1.28</b>	<b>2.92</b>	<b>89.60</b>	<b>2.38</b>	<b>24.34</b>	<b>0.00</b>

\* n-Hexane

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

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

**Company Name: Total Interior Systems - America, LLC  
Address: 1698 S 100 W, Princeton, Indiana 47640  
MSOP Renewal No.: 051-28157-00045  
Reviewer: Janet Mobley**

Units	Material	Density (lb/gal)	Weight % Volatiles (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Max. Usage Rate (gal/hour)	Pounds VOC per gallon of coating	PTE VOC (lb/hour)	PTE VOC (lb/day)	PTE VOC (tons/year)	PTE PM/PM10 (ton/year)	* Transfer Efficiency	PTE PM/PM10 (lb/hour)
IAO1	Cosmo Color 34 MZ	8.17	93%	0.0%	93.0%	0.0%	5.0%	0.07	7.60	0.53	13	2.33	0.08	55%	0.02

**Actual VOC Emissions (lbs/day)= 7.4**

\* Material applied by aerosol cans or a spray gun.

NOTE:

On May 8, 2008 U. S. EPA promulgated the new requirements for Prevention Of Significant Deterioration (PSD) for PM 2.5 emissions, and the effective date of these rules was July 15th, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC-2, to include those requirements. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions.

There is no emission factor for PM2.5 in AP42, PM2.5 = PM10

**METHODOLOGY**

Pounds of VOC per gallon coating = Density (lb/gal) \* Weight % Organics

PTE VOC (lb/hour) = Pounds of VOC per Gallon coating (lb/gal) \* Max. Throughput (gal/hour)

PTE VOC (lb/day) = Pounds of VOC per Gallon coating (lb/gal) \* Max. Throughput (gal/hour) \* 24 hour/day

PTE VOC (tons/year) = Pounds of VOC per Gallon coating (lb/gal) \* Max. Throughput (gal/hour) \* 8760 hours/year \* 1 ton/2000 lbs

PTE PM/PM10 (tons/year) = Max. Throughput (gal/hour) \* Density (lb/gal) \* (1- Weight % Volatile) \* (1-Transfer Efficiency) \* 8760 hours/year \* 1 ton/2000 lbs

PTE PM/PM10 (lbs/hour) = Max. Throughput (gal/hour) \* Density (lb/gal) \* (1- Weight % Volatile) \* (1-Transfer Efficiency)

Actual VOC (lbs/day) = VOC PTE (lbs/hour) \* 4200 hours/year \* 1year/300 days of operation

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

**Company Name: Total Interior Systems - America, LLC  
Address: 1698 S 100 W, Princeton, Indiana 47640  
MSOP Renewal No.: 051-28157-00045  
Reviewer: Janet Mobley**

**WEIGHT CONTENT IN PERCENT (%) OF HAPS**

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

**POTENTIAL TO EMIT OF HAPS IN TONS PER YEAR**

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

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

**METHODOLOGY**

Potential To Emit HAPs (tons/year) = Density (lb/gal) \* Max. Usage Rate (gal/hour) \* Weight % HAP \* 8760 hours/year \* 1 ton/2000 lbs  
Material applied by aerosol can or HVLP gun

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

**Company Name: Total Interior Systems - America, LLC  
Address: 1698 South 100 West, Princeton, Indiana 47670  
MSOP Renewal No.: 051-28157-00045  
Reviewer: Janet Mobley**

Units	Material	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Max. Usage Rate (gal/hour)	Pounds VOC per gallon of coating	PTE VOC (lb/hour)	PTE VOC (lb/day)	PTE VOC (tons/year)	PTE PM/PM10 (ton/year)	* Transfer Efficiency	PTE PM/PM10 (lb/hour)
EU01	Cosmo Color 34 MZ	8.17	93%	0.0%	93.0%	0.0%	0.0%	0.65	7.60	4.94	119	21.63	0.73	55%	0.17

**Actual VOC Emissions (lbs/day)= 69.1**

\* Material applied by aerosol cans or a spray gun.

**METHODOLOGY**

Pounds of VOC per gallon coating = Density (lb/gal) \* Weight % Organics

PTE VOC (lb/hour) = Pounds of VOC per Gallon coating (lb/gal) \* Max. Throughput (gal/hour)

PTE VOC (lb/day) = Pounds of VOC per Gallon coating (lb/gal) \* Max.Throughput (gal/hour) \* 24 hour/day

PTE VOC (tons/year) = Pounds of VOC per Gallon coating (lb/gal) \* Max. Throughput (gal/hour) \* 8760 hours/year \* 1 ton/2000 lbs

PTE PM/PM10 (tons/year) = Max. Throughput (gal/hour) \* Density (lb/gal) \* (1- Weight % Volatile) \* (1-Transfer Efficiency) \* 8760 hours/year \* 1ton/2000 lbs

PTE PM/PM10 (lbs/hour) = Max. Throughput (gal/hour) \* Density (lb/gal) \* (1- Weight % Volatile) \* (1-Transfer Efficiency)

Actual VOC (lbs/day) = PTE (lbs/hour) \* 4200 hours/year \* 1year/300 days of operation

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

**Company Name: Total Interior Systems - America, LLC  
Address: 1698 S 100 W, Princeton, Indiana 47640  
MSOP Renewal No.: 051-28157-00045  
Reviewer: Janet Mobley**

**WEIGHT CONTENT IN PERCENT (%) OF HAPS**

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

**POTENTIAL TO EMIT OF HAPS IN TONS PER YEAR**

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

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

**METHODOLOGY**

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

**Appendix A: Emissions Calculations**

**VOC and PM/PM10**

**From Surface Coating Operations**

**Units EU-02, EU-03 & EU04**

**Company Name: Total Interior Systems - America, LLC**

**Address: 1698 South 100 West, Princeton, Indiana 47670**

**MSOP Renewal No.: 051-28157-00045**

**Reviewer: Janet Mobley**

**EU 02**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Penguin Cement	7.2	78.00%	0.0%	78.0%	0.0%	22.00%	0.00876	70.000	5.59	5.59	3.43	82.28	15.02	1.48	25.42	65%
Actosolve	7.3	100.00%	0.0%	100.0%	0.0%	0.00%	0.00081	70.000	7.34	7.34	0.42	10.04	1.83	0.00	0.00	65%
Isopropyl Alcohol	0.0	100.00%	0.0%	100.0%	0.0%	0.00%	0.00033	70.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	65%

**Potential Emissions**

**Add worst case coating to all solvents**

**3.85 92.32 16.85 1.48**

**EU03**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Penguin Cement	7.2	78.00%	0.0%	78.0%	0.0%	22.00%	0.00876	70.000	5.59	5.59	3.43	82.28	15.02	1.48	25.42	65%
Actosolve	7.3	100.00%	0.0%	100.0%	0.0%	0.00%	0.00081	70.000	7.34	7.34	0.42	10.04	1.83	0.00	0.00	65%
Isopropyl Alcohol	0.0	100.00%	0.0%	100.0%	0.0%	0.00%	0.00033	70.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	65%

**Potential Emissions**

**Add worst case coating to all solvents**

**3.85 92.32 16.85 1.48**

**EU04**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Penguin Cement	7.2	78.00%	0.0%	78.0%	0.0%	22.00%	0.00876	70.000	5.59	5.59	3.43	82.28	15.02	1.48	25.42	65%
Actosolve	7.3	100.00%	0.0%	100.0%	0.0%	0.00%	0.00081	70.000	7.34	7.34	0.42	10.04	1.83	0.00	0.00	65%
Isopropyl Alcohol	0.0	100.00%	0.0%	100.0%	0.0%	0.00%	0.00033	70.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	65%

**Potential Emissions**

**Add worst case coating to all solvents**

**3.85 92.32 16.85 1.48**

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

**Appendix A: Emissions Calculations**  
**HAP Emissions**  
**From Surface Coating Operations**  
**Units EU 02, EU 03 and EU 04**  
**Company Name: Total Interior Systems - America, LLC**  
**Address: 1698 South 100 West, Princeton, Indiana 47670**  
**MSOP Renewal No.: 051-28157-00045**  
**Reviewer: Janet Mobley**

**WEIGHT CONTENT IN PERCENT (%) OF HAPS**

Material	Density (lb/gal)	Max. Usage Rate (gal/hour)	Weight % Xylene	Weight % 1-Butanol	Weight % Methyl Alcohol	Weight % Ethylbenzene	Weight % 4-Methyl-2-Pentanone	Weight % Toluene	Weight % n-Hexane	Weight % Cumene	Weight % Isopropyl Alcohol	Weight % 1,2,4 - Trimethyl benzene
Thinner	-	-	2.25%	0.98%	0.11%	3.20%	5.0%	20.0%		1.12%		24%
Lacquer	-	-	17.0%				1.74%	38.7%				
Penguin Cement	Given	Below			3.00%			7.00%	12.0%			
Actosolve	-	-	2.0%							2.0%		40%
Isopropyl Alcohol	-	-									100%	

**POTENTIAL TO EMIT OF HAPS IN TONS PER YEAR**

Material	Density (lb/gal)	Max. Usage Rate (gal/hour)	PTE Xylene	PTE 1-Butanol	PTE Methyl Alcohol	PTE Ethylbenzene	PTE 4-Methyl-2-Pentanone	PTE Toluene	PTE n-Hexane	PTE Cumene	PTE Isopropyl Alcohol	PTE 1,2,4 - Trimethyl benzene
Penguin Cement	7.17	0.61	0.00	0.00	0.58	0.00	0.00	1.35	2.3	0.00	0.00	0.00
Actosolve	7.34	0.057	0.04							0.04	0.00	0.73
Isopropyl Alcohol	7.74	0.023	0.00							0.00	0.78	0.00
<b>TOTAL =</b>			<b>0.04</b>	<b>0.00</b>	<b>0.58</b>	<b>0.00</b>	<b>0.00</b>	<b>1.35</b>	<b>2.31</b>	<b>0.04</b>	<b>0.78</b>	<b>0.73</b>

**HIGHEST SINGLE HAP (n-Hexane) = 2.31**  
**TOTAL HAPs = 4.27**

**METHODOLOGY**

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

**Totals are for one booth**

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

**Company Name: Total Interior Systems - America, LLC**  
**Address City IN Zip: 1698 S 100 W, Princeton, Indiana 47640**  
**MSOP Renewal No.: 051-28157-00045**  
**Reviewer: Janet Mobley**

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
157680 *	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

\*Maximum capacity of EU-04 is 18 plastic parts per hour.

**Appendix A: Emission Calculations  
One (1) Emergency Generator Using Fuel Oil No. 2**

**Company Name: Total Interior Systems - America, LLC  
Address: 1698 South 100 West, Princeton, Indiana 47670  
MSOP Renewal No.: 051-28157-00045  
Reviewer: Janet Mobley**

Heat Input Capacity  
MMBtu/hour

3.41

Potential Throughput  
kgals/year

11.85

S = Weight % Sulfur

1.5

Emission Factor (lb/kgal)	Pollutant				
	PM/PM10*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO
	2.0	213 (142.0 S)	20.0	0.34	5.0
** Potential To Emit (tons/year)	0.012	1.26	0.12	0.002	0.03

Assume all PM emissions are equal to PM10.

\*\* According to EPA's guidance, an emergency generator is a unit operating less than 500 hours per year.

Note: Emission factors are from AP-42, Tables 1.3-1, 1.3-2, and 1.3-3 ( SCC 1-03-005-01/02/03) Supplement E 9/98.  
1 gallon of No. 2 Fuel Oil has a heating value of 144,000 Btu per gallon.

**METHODOLOGY**

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hour) \* 500 hours/year \* 1 kgal/1000 gal \* 1 gal/0.144 MMBtu

Potential To Emit (tons/year) = Potential Throughput (MMCF/year) \* Emission Factor (lb/kgal) \* 1 ton//2000 lbs

See next page for HAPs emissions calculations.

**Appendix A: Emission Calculations**  
**One (1) Emergency Generator Using Fuel Oil No.2**

**Company Name:** Total Interior Systems - America, LLC  
**Address:** 1698 South 100 West, Princeton, Indiana 47670  
**MSOP Renewal No:** 051-28157-00045  
**Reviewer:** Janet Mobley

**HAPs - Metals**

Emission Factor (lb/MMBtu)	Arsenic 4.0E-06	Beryllium 3.0E-06	Cadmium 3.0E-06	Chromium 3.0E-06	Lead 9.0E-06
Potential To Emit (tons/year)	3.41E-06	2.56E-06	2.56E-06	2.56E-06	7.68E-06

**HAPs - Metals (continued)**

Emission Factor (lb/MMBtu)	Mercury 3.0E-06	Mangamese 6.0E-06	Nickel 3.0E-06	Selenium 1.5E-05
Potential To Emit (tons/year)	2.56E-06	5.12E-06	2.56E-06	1.28E-05

No data was available in AP-42 for organic HAPs.

**METHODOLOGY**

Potential To Emit (tons/year) = Heat Input Capacity (MMBtu/hr) \* Emission Factor (lb/MMBtu) \* 500 hours/year \* 1 ton/2000lb

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

**Company Name: Total Interior Systems - America, LLC  
Address City IN Zip: 1698 South 100 West, Princeton, Indiana 47670  
MSOP Renewal No: 051-28157-00045  
Reviewer: Janet Mobley**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

6.39

56.0

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	7.6	7.6	0.6	100	5.5	84
				**see below		
Potential Emission in tons/yr	0.21	0.21	0.02	2.80	0.15	2.35

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

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

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

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See next page for HAPs emissions calculations.

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**HAPs Emissions**

**Company Name: Total Interior Systems - America, LLC**

**Address City IN Zip: 1698 South 100 West, Princeton, Indiana 47670**

**MSOP Renewal No: 051-28157-00045**

**Reviewer: Janet Mobley**

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	5.878E-05	3.359E-05	2.099E-03	5.038E-02	9.516E-05

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.399E-05	3.079E-05	3.918E-05	1.064E-05	5.878E-05

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
**Governor**

*Thomas W. Easterly*  
**Commissioner**

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

**TO:** Pat Summers  
Total Interior Systems - America, LLC  
1698 S CR 100 W  
Princeton, IN 47670

**DATE:** October 20, 2009

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

**SUBJECT:** Final Decision  
MSOP - Renewal  
051-28157-00045

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 Manager)  
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



# 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)

October 20, 2009

TO: Princeton Public Library

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

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

**Applicant Name: Total Interior Systems - America, LLC**  
**Permit Number: 051-28157-00045**

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 10/20/2009 Total Interior Systems America LLC 051-28157-00045 (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>	

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1		Pat Summers Total Interior Systems America LLC 1698 S CR 100 W Princeton IN 47670 (Source CAATS) via confirmed delivery										
2		Ben Saffari Plant Mgr Total Interior Systems America LLC 1698- S CR 100 W 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		Gibson County Commissioners 101 N. Main Street Princeton IN 47670 (Local Official)										
9		Mr. Bil Musgrove PO Box 520 Chandler IN 47610 (Affected Party)										
10		Mr. John Blair 800 Adams Ave Evansville IN 47713 (Affected Party)										
11		Princeton Public Library 124 S. Hart Street Princeton IN 47670 (Library)										
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