



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: February 5, 2010

RE: BRC Rubber & Plastics, Inc. / 009-28819-00002

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

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-MOD.dot 12/3/07



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Mr. Thomas Maher
BRC Rubber & Plastics, Inc.
P.O. Box 227
Churubusco, IN 46723

February 5, 2010

Re: 009-28819-00002
First Minor Source Modification to
Part 70 Renewal No.: T009-19529-00002

Dear Mr. Maher:

BRC Rubber & Plastics, Inc. (Montpelier, Indiana) was issued a Part 70 Operating Permit Renewal No. T009-19529-00002 on December 18, 2008 for a stationary miscellaneous automotive rubber parts manufacturing and coating company. IDEM, OAQ has reviewed a modification application, submitted by BRC Rubber & Plastics, Inc. on December 28, 2009, related to the addition and removal of emission units at the source. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

- (1) One (1) paint booth, identified as PB14, equipped with a HVLP spray applicator, approved for construction in 2010, with a maximum capacity of 2000 units per hour, controlled by dry filter CPB14, and exhausting to stack S29.
- (2) Two (2) drying ovens, identified as Ovens 17 and 18, approved for construction in 2010, and exhausting to stack S30.
- (3) One (1) paint booth, identified as PB15, equipped with a HVLP spray applicator, approved for construction in 2010, with a maximum capacity of 1500 units per hour, controlled by dry filter CPB15, and exhausting to stack S31.
- (4) One (1) drying oven, identified as Oven 19, approved for construction in 2010, and exhausting to stack S23.
- (5) SMIX, secondary Banbury mixer [326 IAC 6-3].

The following emission unit is no longer in operation and has been removed from the permit:

- (6) SMIX, secondary, Shaw mixer [326 IAC 6-3].

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
6. Pursuant to 326 IAC 2-7-10.5(i) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

This minor source modification authorizes construction of the new emission units. Operating conditions shall be incorporated into the Part 70 operating permit as a significant permit modification in accordance with 326 IAC 2-7-10.5(i)(2) and 326 IAC 2-7-12. Operation is not approved until the significant permit modification has been issued.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, and ask for Sarah Conner, Ph. D. or extension 4-6555, or dial (317) 234-6555.

Sincerely,



Donald F. Robin, P.E., Section Chief
Permits Branch
Office of Air Quality

Attachments: Updated Permit and Technical Support Document

DFR/SLC

cc: File - Blackford County
U.S. EPA, Region V
Blackford County Health Department
Compliance and Enforcement Branch



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Minor Source Modification to a Part 70 Source OFFICE OF AIR QUALITY

BRC Rubber & Plastics, Inc.
623 West Monroe Street
Montpelier, IN 47359

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions

| | |
|--|------------------------------------|
| Minor Source Modification No.: 009-28819-00002 | |
| Issued by:  Donald F. Robin, P.E., Section Chief Permits Branch Office of Air Quality | Issuance Date: February 5, 2010 |

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary miscellaneous automotive rubber parts manufacturing and coating operation.

| | |
|------------------------------|--|
| Source Address: | 623 West Monroe Street, Montpelier, Indiana 47359 |
| Mailing Address: | 589 U.S. 33 South, P.O. Box 227, Churubusco, Indiana 46723 |
| General Source Phone Number: | 260-693-2171 |
| SIC Code: | 3069 |
| County Location: | Blackford |
| Source Location Status: | Attainment for all criteria pollutants |
| Source Status: | Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories |

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (a) One (1) chain-on-edge coating unit, constructed in 2008, consisting of three (3) coating operations, identified as:
- 1) PB1, with a maximum capacity of 2,000 units per hour and 9.36 lb/hr of primer or 24.6 lb/hr of adhesive, controlled by dry filter CPB1, and exhausting to stack S3;
 - 2) PB2, with a maximum capacity of 2,000 units per hour and 24.6 lb/hr of adhesive, controlled by dry filter CPB2, and exhausting to stack S4;
 - 3) PB3, with a maximum capacity of 2,000 units per hour and 24.6 lb/hr of adhesive, controlled by dry filter CPB3, and exhausting to stack S5; and
 - 4) Four (4) drying ovens with Oven 1 and Oven 4 exhausting to Stack S6, and Oven 2 and Oven 3 exhausting to Stack S7.

Under 40 CFR Part 63, Subpart M, the chain-on-edge unit is considered an affected facility.

- (b) One (1) chain-on-edge coating unit, installed in 1994 and approved for modification in 2009 and 2010, consisting of three (3) coating operations equipped with HVLP spray applicators, identified as:
- (1) PB4, with a maximum capacity of 2000 units per hour, controlled by dry filter CPB4, and exhausting to stack S8.

- (2) PB5, with a maximum capacity of 2000 units per hour, controlled by dry filter CPB5, and exhausting to stack S9.
- (3) PB14, with a maximum capacity of 2000 units per hour, controlled by dry filter CPB14, and exhausting to stack S29.
- (4) Four (4) drying ovens, with Ovens 5 and 6 exhausting to stack S10 and Ovens 17 and 18 exhausting to stack S30.

Under 40 CFR 63, Subpart M MMMM, PB4, PB5 and PB14 are considered affected facilities.

- (c) One (1) paint booth, known as PB6, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CPB6, installed in 1993, exhausting to Stack S19, capacity: 2,000 automotive parts per hour. Under 40 CFR 63, Subpart M MMMM, PB-6 is considered an affected facility.
- (d) One (1) gear line paint unit, reconstructed in 2005, identified as GEAR LINE, consisting of two (2) paint booths, identified as PB7 and PB8, each with a maximum capacity of 850 units per hour each, controlled by dry filters CPB7 and CPB8, exhausting to stack S22 and two (2) drying ovens Oven 13 & Oven 14 exhausting to stack S22. Under 40 CFR Part 63, Subpart M MMMM, GEAR LINE is considered an affected facility.
- (e) Two (2) paint booths (small chain-on-edge), known as PB9 and PB15, each equipped with HVLP spray applicators, each equipped with a dry filter for PM overspray control, known as CPB9 and CPB15, installed in 1993 and 2010 respectively, exhausting to stacks S23 and S31, including a pre-heat oven (Oven 15) and a drying oven (Oven 19) exhausting to stack S23, and a drying oven (Oven 16) with no exhaust, capacity: 1,500 automotive parts per hour.

Under 40 CFR 63, Subpart M MMMM, PB-9 and PB15 are considered affected facilities.

- (f) One (1) hand-spray booth, identified as PB-10, with a maximum coating usage of 3.25 pounds per hour, processing a maximum of 2000 parts per hour, equipped with dry filter identified as CPB10, and exhausting to stack S24. Under 40 CFR 63, Subpart M MMMM, PB-10 is considered an affected facility.
- (g) One (1) paint booth, known as PB11, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CPB11, installed in 1993, exhausting to Stack S25, capacity: 2,000 automotive parts per hour. Under 40 CFR 63, Subpart M MMMM, PB-11 is considered an affected facility.
- (h) One (1) paint booth, known as PB12, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CPB12, installed in 1993, exhausting to Stack S26, capacity: 2,000 automotive parts per hour. Under 40 CFR 63, Subpart M MMMM, PB-12 is considered an affected facility.
- (i) One (1) paint booth, known as PB13, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CPB13, installed in 1993, exhausting to Stack S27, capacity: 2,000 automotive parts per hour. Under 40 CFR 63, Subpart M MMMM, PB-13 is considered an affected facility.
- (j) One (1) roll coater adhesive application system, identified as RC1, with a maximum coating usage of 13.75 pounds per hour, processing a maximum of 6000 parts per hour, exhausting to stack S18. Under 40 CFR 63, Subpart M MMMM, RC1 is considered an affected facility.

- (k) One (1) dip and carousel, known as DIP1, exhausting to Stack S20, and equipped with a drying oven (Oven 11) also exhausting to Stack S20, installed in 1995, capacity: 1,000 automotive parts per hour. Under 40 CFR 63, Subpart M, DIP1 is considered an affected facility.
- (l) One (1) dip coating operation, constructed in 2008, identified as SMDIP, with a maximum capacity of 24,375 units per hour and 2.44 pounds per hour of adhesive, without control or exhaust stack. Under 40 CFR Part 63, Subpart M, SMDIP is considered an affected facility.
- (m) One (1) grit blaster, known as Blaster 1, equipped with a baghouse, known as CB1 installed in 1999, exhausting to Stack S2, capacity: 1,800 pounds of parts per hour and 32.0 pounds of grit per hour.
- (n) One (1) Blaster 2, installed in January 2004, equipped with a self-contained vacuum (CB2), maximum capacity: 2,580 miscellaneous metal, plastic and/or rubber parts and 477.3 pounds per hour.
- (o) One (1) Blaster 3, installed in November 2004, equipped with a self-contained vacuum (CB3), maximum capacity: 100 miscellaneous metal, plastic and/or rubber parts and 350.0 pounds per hour.
- (p) One (1) Blaster 4, equipped with a self-contained vacuum (CB4), maximum capacity: 20 miscellaneous metal, plastic and/or rubber parts and 80 pounds per hour.
- (q) One (1) Blaster 5, with a maximum capacity of 2,345 lb/hr of blast media, controlled by a self-contained vacuum (CB4), without a stack exhaust.
- (r) One (1) natural gas-fired boiler, installed in 2008, identified as BLR4, with a maximum capacity of 14.7 MMBtu/hr, and exhausting to stack S-BLR4. Under 40 CFR 60, Subpart Dc, boiler BLR4 is considered an affected facility.
- (s) One (1) natural gas-fired boiler, installed in 2007, identified as BLR3, with a maximum capacity of 8.5 MMBtu/hr, and exhausting to stack S-BLR3.
- (t) One (1) flammable liquid storage room, known as FSTOR, installed prior to 1980, exhausting to Stack S17, capacity: 3,050 gallons.
- (u) One (1) vapor degreaser, known as VDG1, exhausting to Stack S1, installed in 1997, capacity: 28,000 automotive parts per hour or 2.7 pounds of trichloroethylene per hour.
- (v) One (1) parts washer, identified as PW-1, installed in 2005, capacity: 30 gallons of solvent exhausting to Stack S21.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

Other activities with PM less five (5) pounds per hour or twenty-five (25) pounds per day.

- (a) PMILL, RPRCSS rubber making/primary mill [326 IAC 6-3].
- (b) SMILL, RPRCSS rubber making/secondary mill [326 IAC 6-3].

- (c) RCOAT, rubber coating [326 IAC 6-3].
- (d) PMIX, primary, Banbury mixer [326 IAC 6-3].
- (e) SMIX, secondary Banbury mixer [326 IAC 6-3].
- (f) SBIAS, self-contained sand blaster [326 IAC 6-3].
- (g) CSILOs, three (3) carbon silos [326 IAC 6-3].
- (h) Phosline phosphate line #2 manual, exhausting to Stack S12 [326 IAC 6-3].
- (i) One (1) natural gas fired burn off oven, known as FURN1, consisting of a primary chamber rated at 0.185 million British thermal units per hour and a secondary chamber rated at 0.290 million British thermal units per hour, capacity: 10.0 pounds of waste per hour exhausting to Stack S28 [326 IAC 4-2].
- (j) One (1) phosphate line #1 automatic, installed in January 2003, exhausted through Stack S11, maximum capacity: 1,250 miscellaneous metal, plastic and/or rubber parts per hour [326 IAC 6-3].

Other activities with VOC less three (3) pounds per hour or fifteen (15) pounds per day.

- (k) Four (4) electric ovens, Oven 7, Oven 8 and Oven 9 are heating ovens, and Oven 10 is a drying oven, exhausted through Stacks S13-S16 , respectively, installed in June 2004 and 2005.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

- (a) This permit, T009-19529-00002, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7]

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

B.5 Severability [326 IAC 2-7-5(5)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (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 the "responsible official" 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) A "responsible official" is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

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

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T009-19529-00002 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

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

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

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

- (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 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b),(c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

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 Part 70 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 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 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 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.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

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

B.25 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(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 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.3 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.4 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.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana 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 2-7-6(1)]

C.7 Performance Testing [326 IAC 3-6]

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.8 Compliance Requirements [326 IAC 2-1.1-11]

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

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.9 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

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

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

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

- (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.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (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 the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) Pursuant to 326 IAC 2-6-3(b)(2), the Permittee shall submit by July 1 every three years an emission statement covering the previous three calendar years. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The emission statement 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.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (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 startup, whichever is later.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS: Boilers

Facility Description [326 IAC 2-7-5(15)] Boilers

- (a) One (1) natural gas-fired boiler, constructed in 2008, identified as BLR4, with a maximum capacity of 14.7 MMBtu/hr, and exhausting to stack S-BLR4. Under 40 CFR 60, Subpart Dc, boiler BLR4 is considered an affected facility.
- (b) One (1) natural gas-fired boiler, constructed in 2007, identified as BLR3, with a maximum capacity of 8.5 MMBtu/hr, and exhausting to stack S-BLR3.

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter Limitation (PM) [326 IAC 6-2]

- (a) Pursuant to 326 IAC 6-2-4(a) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1(d)), particulate emissions from the natural gas-fired boiler, BLR3, shall in no case exceed 0.470 pounds of particulate matter per million British thermal units heat input as calculated by the following equation:
- (b) Pursuant to 326 IAC 6-2-4(a) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (d)), particulate emissions from the natural gas-fired boiler, BLR4, shall not exceed 0.480 pounds of particulate matter per million British thermal units heat input as calculated by the following equation:

$$P_t = 1.09 / Q^{0.26}$$

- Where:
- P_t = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.
 - Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

SECTION D.2 FACILITY OPERATION CONDITIONS: Surface Coating

Facility Description [326 IAC 2-7-5(15)]

- (a) One (1) chain-on-edge coating unit, constructed in 2008, consisting of three (3) coating operations, identified as:
- (1) PB1, with a maximum capacity of 2,000 units per hour and 9.36 lb/hr of primer or 24.6 lb/hr of adhesive, controlled by dry filter CPB1, and exhausting to stack S3;
 - (2) PB2, with a maximum capacity of 2,000 units per hour and 24.6 lb/hr of adhesive, controlled by dry filter CPB2, and exhausting to stack S4;
 - (3) PB3, with a maximum capacity of 2,000 units per hour and 24.6 lb/hr of adhesive, controlled by dry filter CPB3, and exhausting to stack S5; and
 - (4) Four (4) drying ovens with Oven 1 and Oven 4 exhausting to Stack S6, and Oven 2 and Oven 3 exhausting to Stack S7.
- Under 40 CFR Part 63, Subpart Mmmm, the chain-on-edge unit is considered an affected facility.
- (b) One (1) chain-on-edge coating unit, installed in 1994 and approved for modification in 2009 and 2010, consisting of three (3) coating operations equipped with HVLP spray applicators, identified as:
- (1) PB4, with a maximum capacity of 2000 units per hour, controlled by dry filter CPB4, and exhausting to stack S8.
 - (2) PB5, with a maximum capacity of 2000 units per hour, controlled by dry filter CPB5, and exhausting to stack S9.
 - (3) PB14, with a maximum capacity of 2000 units per hour, controlled by dry filter CPB14, and exhausting to stack S29.
 - (4) Four (4) drying ovens, with Ovens 5 and 6 exhausting to stack S10 and Ovens 17 and 18 exhausting to stack S30.
- Under 40 CFR 63, Subpart Mmmm, PB4, PB5 and PB14 are considered affected facilities.
- (c) One (1) paint booth, known as PB6, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CPB6, installed in 1993, exhausting to Stack S19, capacity: 2,000 automotive parts per hour. Under 40 CFR 63, Subpart Mmmm, PB-6 is considered an affected facility.
- (d) One (1) gear line paint unit, reconstructed in 2005, identified as GEAR LINE, consisting of two (2) paint booths, identified as PB7 and PB8, each with a maximum capacity of 850 units per hour each, controlled by dry filters CPB7 and CPB8, exhausting to stack S22 and two (2) drying ovens Oven 13 & Oven 14 exhausting to stack S22. Under 40 CFR Part 63, Subpart Mmmm, GEAR LINE is considered an affected facility.

- (e) Two (2) paint booths (small chain-on-edge), known as PB9 and PB15, each equipped with HVLP spray applicators, each equipped with a dry filter for PM overspray control, known as CPB9 and CPB15, installed in 1993 and 2010 respectively, exhausting to stacks S23 and S31, including a pre-heat oven (Oven 15) and a drying oven (Oven 19) exhausting to stack S23, and a drying oven (Oven 16) with no exhaust, capacity: 1,500 automotive parts per hour.
- Under 40 CFR 63, Subpart M, PB-9 and PB15 are considered affected facilities.
- (f) One (1) hand-spray booth, identified as PB-10, with a maximum coating usage of 3.25 pounds per hour, processing a maximum of 2000 parts per hour, equipped with dry filter identified as CPB10, and exhausting to stack S24. Under 40 CFR 63, Subpart M, PB-10 is considered an affected facility.
- (g) One (1) paint booth, known as PB11, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CPB11, installed in 1993, exhausting to Stack S25, capacity: 2,000 automotive parts per hour. Under 40 CFR 63, Subpart M, PB-11 is considered an affected facility.
- (h) One (1) paint booth, known as PB12, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CPB12, installed in 1993, exhausting to Stack S26, capacity: 2,000 automotive parts per hour. Under 40 CFR 63, Subpart M, PB-12 is considered an affected facility.
- (i) One (1) paint booth, known as PB13, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CPB13, installed in 1993, exhausting to Stack S27, capacity: 2,000 automotive parts per hour. Under 40 CFR 63, Subpart M, PB-13 is considered an affected facility.
- (j) One (1) roll coater adhesive application system, identified as RC1, with a maximum coating usage of 13.75 pounds per hour, processing a maximum of 6000 parts per hour, exhausting to stack S18. Under 40 CFR 63, Subpart M, RC1 is considered an affected facility.
- (k) One (1) dip and carousel, known as DIP1, exhausting to Stack S20, and equipped with a drying oven (Oven 11) also exhausting to Stack S20, installed in 1995, capacity: 1,000 automotive parts per hour. Under 40 CFR 63, Subpart M, DIP1 is considered an affected facility.
- (l) One (1) dip coating operation, constructed in 2008, identified as SMDIP, with a maximum capacity of 24,375 units per hour and 2.44 pounds per hour of adhesive, without control or exhaust stack. Under 40 CFR Part 63, Subpart M, SMDIP is considered an affected facility.
- (m) One (1) flammable liquid storage room, known as FSTOR, installed prior to 1980, exhausting to Stack S17, capacity: 3,050 gallons.

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

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

The total VOC usage to emission units PB1 through PB15, RC1, DIP1, SMDIP and FSTOR, shall be limited to less than 232 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period, with compliance determined at the end of

each month. This usage limit coupled with the unlimited potential to emit VOC from all other facilities, including insignificant activities, at this source of 18.0 tons per year shall render the requirements of 326 IAC 2-2 not applicable.

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (a) The VOC usage of GEAR LINE booth PB7 shall be limited to less than twenty-five (25.0) tons of VOC, including adhesives and solvents per twelve (12) consecutive month period, with compliance determined at the end of each month. This usage limit renders 326 IAC 8-1-6 not applicable.
- (b) The VOC usage of the roll coater identified as RC1 shall be limited to less than twenty-five (25) tons of VOC, including adhesives and cleaning solvents, per twelve (12) consecutive month period, with compliance determined at the end of each month. This usage limit renders 326 IAC 8-1-6 not applicable.
- (c) The VOC usage of GEAR LINE booth PB8 shall be limited to less than twenty-five (25.0) tons of VOC, including solvents, per twelve (12) consecutive month period, with compliance determined at the end of each month. This usage limit renders 326 IAC 8-1-6 not applicable.
- (d) The VOC usage of chain-on-edge unit paint booths PB1, PB2 and PB3 shall be limited to less than twenty-five (25.0) tons of VOC each, including solvents, per twelve (12) consecutive month period, with compliance determined at the end of each month. This usage limit renders 326 IAC 8-1-6 not applicable.

D.2.3 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating operations, PB1 through PB15, shall be controlled by the dry particulate filters, and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

D.2.5 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitations contained in Conditions D.2.1 and D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.6 VOC Emissions

Compliance with Conditions D.2.1 and D.2.2 shall be determined within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth stacks S3,4,5,8,9,19,22,23,24,25,26, 27, 29 and 31 while one or more of the paint booths, PB1 through PB15, are in operation. To monitor the performance of the dry filters, weekly observations shall be made of the

overspray from the paint booth stacks S3,4,5,8,9,19,22,23,24,25,26, 27, 29 and 31, while the paint booths they control are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.1 and D.2.2 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and the VOC emission limit established in Conditions D.2.1 and D.2.2.
- (1) The amount and VOC 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) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Conditions D.2.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1 and D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.3 FACILITY OPERATION CONDITIONS: Degreaser

Facility Description [326 IAC 2-7-5(15)]

- (a) One (1) vapor degreaser, known as VDG1, exhausting to Stack S1, installed in 1997, capacity: 28,000 automotive parts per hour or 2.7 pounds of trichloroethylene per hour.

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Open Top Vapor Degreaser Operation [326 IAC 8-3-3]

Pursuant to 326 IAC 8-3-3 (Open Top Vapor Degreasing Operations) for open top vapor degreasing operations constructed after January 1, 1980, the Permittee shall:

- (a) equip the vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;
- (b) keep the cover closed at all times except when processing work loads through the degreaser;
- (c) minimize solvent carryout by:
 - (1) racking parts to allow complete drainage;
 - (2) moving parts in and out of the degreaser at less than 3.3 meters per minute (eleven (11) feet per minute);
 - (3) degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
 - (4) tipping out any pools of solvent on the cleaned parts before removal; and
 - (5) allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry;
- (d) not degrease porous or absorbent materials, such as cloth, leather, wood or rope;
- (e) not occupy more than half of the degreaser's open top area with the workload;
- (f) not load the degreaser such that the vapor level drops more than fifty percent (50%) of the vapor depth when the workload is removed;
- (g) never spray above the vapor level;
- (h) repair solvent leaks immediately, or shut down the degreaser;
- (i) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;

- (j) not use workplace fans near the degreaser opening;
- (k) not allow visually detectable water in the solvent exiting the water separator; and
- (l) provide a permanent, conspicuous label summarizing the operating requirements.

SECTION D.4 FACILITY OPERATION CONDITIONS: Parts Washer

Facility Description [326 IAC 2-7-5(15)] Parts Washer

(n) One (1) parts washer, identified as PW-1, installed in 2005, capacity: 30 gallons of solvent.

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

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

D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

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

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

SECTION D.5 FACILITY OPERATION CONDITIONS: Blasters

Facility Description [326 IAC 2-7-5(15)]

- (a) One (1) grit blaster, known as Blaster 1, equipped with a baghouse, known as CB1 installed in 1999, exhausting to Stack S2, capacity: 1,800 pounds of parts per hour and 32.0 pounds of grit per hour.
- (b) One (1) Blaster 2, installed in January 2004, equipped with a self-contained vacuum (CB2), maximum capacity: 2,580 miscellaneous metal, plastic and/or rubber parts and 477.3 pounds per hour.
- (c) One (1) Blaster 3, installed in November 2004, equipped with a self-contained vacuum (CB3), maximum capacity: 100 miscellaneous metal, plastic and/or rubber parts and 350.0 pounds per hour.
- (d) One (1) Blaster 4, equipped with a self-contained vacuum (CB4), maximum capacity: 20 miscellaneous metal, plastic and/or rubber parts and 80 pounds per hour.
- (e) One (1) Blaster 5, with a maximum capacity of 2,345 lb/hr of blast media, controlled by a self-contained vacuum (CB4), without a stack exhaust.

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the:
 - (1) Blaster 1 facilities shall not exceed 3.82 pounds per hour when operating at a process weight rate of 0.900 tons per hour.
 - (2) Blaster 2 shall not exceed 1.57 pounds per hour when operating at a process weight rate of 0.239 tons per hour.
 - (3) Blaster 3 shall not exceed 1.28 pounds per hour when operating at a process weight rate of 0.175 tons per hour.

The pounds per hour limitations above were calculated with the following equation:

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

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

- (b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable PM emission rate from the Blaster 4 and 5 shall not exceed 0.551 pounds per hour when operating at a process weight rate of less than one hundred (100) pounds per hour, each.

D.5.2 PM and PM₁₀ Limitations [326 IAC 2-2]

The PM and PM₁₀ emission rates for the:

- (a) Blaster 1 facilities shall not exceed 3.82 pounds per hour.
- (b) Blaster 2 shall not exceed 1.57 pounds per hour.
- (c) Blaster 3 shall not exceed 1.28 pounds per hour.
- (d) Blaster 4 shall not exceed 0.551 pounds per hour.
- (e) Blaster 5 shall not exceed 0.551 pound per hour.

Compliance with these PM and PM₁₀ limits renders the requirements of 326 IAC 2-2 not applicable.

D.5.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the blasters.

Compliance Determination Requirements [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

D.5.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee shall perform PM testing of Blaster 1 utilizing Methods 5 or 17 (40 CFR 60, Appendix A) or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the last valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.5.5 Particulate Matter (PM)

- (a) The baghouses for PM control shall be in operation and control emissions from the grit blast facilities at all times that Blaster 1 is in operation.
- (b) The self contained vacuums for PM and PM₁₀ control shall be in operation and control emissions from the Blasters 2-5 at all times that blasters are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.5.6 Visible Emissions Notations [40 CFR 64 (CAM)]

- (a) Daily visible emission notations of the grit blast stack exhaust S2 shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take

response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit. Observation of abnormal emissions that do not violate 326 IAC 6-4 (Fugitive Dust Emissions) or an applicable opacity limit is not a violation from this permit.

D.5.7 Parametric Monitoring [40 CFR 64 (CAM)]

- (a) The Permittee shall record the pressure drop across the baghouses used in conjunction with the grit blaster, at least once per day when Blaster 1 is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (b) If an analog instrument is used for determining the pressure, it shall comply with Section C - Instrument Specifications, of this permit, and shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.5.8 Broken or Failed Bag Detection

- (a) For single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses controlling emissions from a batch process and self-contained vacuums, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.9 Record Keeping Requirements

- (a) To document compliance with Condition D.5.5, the Permittee shall maintain a daily record of visible emission notations of Blaster 1 stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).
- (b) To document compliance with Condition D.5.6(a), the Permittee shall maintain a daily record of the pressure drop across the baghouse controlling Blaster 1. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the process did not operate that day).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.6 FACILITY OPERATION CONDITIONS: Insignificant Activities

Facility Description [326 IAC 2-7-5(15)] Insignificant Activities

Other activities with PM less five (5) pounds per hour or twenty-five (25) pounds per day.

- (a) PMILL, RPRCSS rubber making/primary mill [326 IAC 6-3].
- (b) SMILL, RPRCSS rubber making/secondary mill [326 IAC 6-3].
- (c) RCOAT, rubber coating [326 IAC 6-3].
- (d) PMIX, primary, Banbury mixer [326 IAC 6-3].
- (e) SMIX, secondary Banbury mixer [326 IAC 6-3].
- (f) SBIAST, self-contained sand blaster [326 IAC 6-3].
- (g) CSILOs, three (3) carbon silos [326 IAC 6-3].
- (h) Phosline phosphate line #2 manual, exhausting to Stack S12 [326 IAC 6-3].
- (i) One (1) natural gas fired burn off oven, known as FURN1, consisting of a primary chamber rated at 0.185 million British thermal units per hour and a secondary chamber rated at 0.290 million British thermal units per hour, capacity: 10.0 pounds of waste per hour exhausting to Stack S28 [326 IAC 4-2].
- (j) One (1) phosphate line #1 automatic, installed in January 2003, exhausted through Stack S11, maximum capacity: 1,250 miscellaneous metal, plastic and/or rubber parts per hour [326 IAC 6-3].

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Particulate emission limitations, work practices, and control technologies), the allowable PM emission rate from these facilities shall not exceed allowable PM emission rate based on the following equation:

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

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

D.6.2 Incinerators [326 IAC 4-2]

The one (1) burn off oven, known as FURN1, which emits regulated pollutants shall:

- (a) Consist of primary and secondary chambers or the equivalent.
- (b) Be equipped with a primary burner unless burning only wood products.
- (c) Comply with 326 IAC 5-1 and 326 IAC 2.

- (d) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in Condition D.6.2(g).
- (e) Not emit particulate matter in excess five-tenths (0.5) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators with solid waste capacity less than two hundred (200) pounds per hour.
- (f) If any of the requirements of Conditions D.6.2 (a) through (e) are not met, then the Permittee shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.
- (g) A Permittee developing an operation and maintenance plan pursuant to Condition D.6.2 (d) must comply with the following:
 - (1) The operation and maintenance plan must be designed to meet the particulate matter emission limitation specified in Condition D.6.2(e) and include the following:
 - (A) Procedures for receiving, handling, and charging waste.
 - (B) Procedures for incinerator startup and shutdown.
 - (C) Procedures for responding to a malfunction.
 - (D) Procedures for maintaining proper combustion air supply levels.
 - (E) Procedures for operating the incinerator and associated air pollution control systems.
 - (F) Procedures for handling ash.
 - (G) A list of wastes that can be burned in the incinerator.
 - (2) Each incinerator operator shall review the plan before initial implementation of the operation and maintenance plan and annually thereafter.
 - (3) The operation and maintenance plan must be readily accessible to incinerator operators.
 - (4) The Permittee of the incinerator shall notify the department, in writing, thirty (30) days after the operation and maintenance plan is initially developed pursuant to this section.
- (h) The Permittee of the incinerator must make the manufacturer's specifications or the operation and maintenance plan available to the IDEM, OAQ upon request.

Compliance Determination Requirement [326 IAC 2-1.1-11] [326 IAC 2-7-6(1)]

D.6.3 Afterburner Operation

The afterburner for control shall be in operation at all times when the incineration process is in operation.

SECTION E.1 SOURCE OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (a) One (1) chain-on-edge coating unit, constructed in 2008, consisting of three (3) coating operations, identified as:
- (1) PB1, with a maximum capacity of 2,000 units per hour and 9.36 lb/hr of primer or 24.6 lb/hr of adhesive, controlled by dry filter CPB1, and exhausting to stack S3;
 - (2) PB2, with a maximum capacity of 2,000 units per hour and 24.6 lb/hr of adhesive, controlled by dry filter CPB2, and exhausting to stack S4;
 - (3) PB3, with a maximum capacity of 2,000 units per hour and 24.6 lb/hr of adhesive, controlled by dry filter CPB3, and exhausting to stack S5; and
 - (4) Four (4) drying ovens with Oven 1 and Oven 4 exhausting to Stack S6, and Oven 2 and Oven 3 exhausting to Stack S7.

Under 40 CFR Part 63, Subpart Mmmm, the chain-on-edge unit is considered an affected facility.

- (b) One (1) chain-on-edge coating unit, installed in 1994 and approved for modification in 2009 and 2010, consisting of three (3) coating operations equipped with HVLP spray applicators, identified as:
- (1) PB4, with a maximum capacity of 2000 units per hour, controlled by dry filter CPB4, and exhausting to stack S8.
 - (2) PB5, with a maximum capacity of 2000 units per hour, controlled by dry filter CPB5, and exhausting to stack S9.
 - (3) PB14, with a maximum capacity of 2000 units per hour, controlled by dry filter CPB14, and exhausting to stack S29.
 - (4) Four (4) drying ovens, with Ovens 5 and 6 exhausting to stack S10 and Ovens 17 and 18 exhausting to stack S30.

Under 40 CFR 63, Subpart Mmmm, PB4, PB5 and PB14 are considered affected facilities.

- (c) One (1) paint booth, known as PB6, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CPB6, installed in 1993, exhausting to Stack S19, capacity: 2,000 automotive parts per hour. Under 40 CFR 63, Subpart Mmmm, PB-6 is considered an affected facility.
- (d) One (1) gear line paint unit, reconstructed in 2005, identified as GEAR LINE, consisting of two (2) paint booths, identified as PB7 and PB8, each with a maximum capacity of 850 units per hour each, controlled by dry filters CPB7 and CPB8, exhausting to stack S22 and two (2) drying ovens Oven 13 & Oven 14 exhausting to stack S22. Under 40 CFR Part 63, Subpart Mmmm, GEAR LINE is considered an affected facility.

- (e) Two (2) paint booths (small chain-on-edge), known as PB9 and PB15, each equipped with HVLP spray applicators, each equipped with a dry filter for PM overspray control, known as CPB9 and CPB15, installed in 1993 and 2010 respectively, exhausting to stacks S23 and S31, including a pre-heat oven (Oven 15) and a drying oven (Oven 19) exhausting to stack S23, and a drying oven (Oven 16) with no exhaust, capacity: 1,500 automotive parts per hour.
- Under 40 CFR 63, Subpart M, PB-9 and PB15 are considered affected facilities.
- (f) One (1) hand-spray booth, identified as PB-10, with a maximum coating usage of 3.25 pounds per hour, processing a maximum of 2000 parts per hour, equipped with dry filter identified as CPB10, and exhausting to stack S24. Under 40 CFR 63, Subpart M, PB-10 is considered an affected facility.
- (g) One (1) paint booth, known as PB11, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CPB11, installed in 1993, exhausting to Stack S25, capacity: 2,000 automotive parts per hour. Under 40 CFR 63, Subpart M, PB-11 is considered an affected facility.
- (h) One (1) paint booth, known as PB12, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CPB12, installed in 1993, exhausting to Stack S26, capacity: 2,000 automotive parts per hour. Under 40 CFR 63, Subpart M, PB-12 is considered an affected facility.
- (i) One (1) paint booth, known as PB13, equipped with HVLP spray applicators, equipped with dry filter for PM overspray control, known as CPB13, installed in 1993, exhausting to Stack S27, capacity: 2,000 automotive parts per hour. Under 40 CFR 63, Subpart M, PB-13 is considered an affected facility.
- (j) One (1) roll coater adhesive application system, identified as RC1, with a maximum coating usage of 13.75 pounds per hour, processing a maximum of 6000 parts per hour, exhausting to stack S18. Under 40 CFR 63, Subpart M, RC1 is considered an affected facility.
- (k) One (1) dip and carousel, known as DIP1, exhausting to Stack S20, and equipped with a drying oven (Oven 11) also exhausting to Stack S20, installed in 1995, capacity: 1,000 automotive parts per hour. Under 40 CFR 63, Subpart M, DIP1 is considered an affected facility.
- (l) One (1) dip coating operation, constructed in 2008, identified as SMDIP, with a maximum capacity of 24,375 units per hour and 2.44 pounds per hour of adhesive, without control or exhaust stack. Under 40 CFR Part 63, Subpart M, SMDIP is considered an affected facility.

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

E.1.1 General Provisions Relating to NESHAP Subpart M [326 IAC 20-80-1]
[40 CFR Part 63, Subpart A]

Pursuant to 40 CFR 63.3901, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, as specified in Table 2 of 40 CFR Part 63, Subpart M in accordance with the schedule in 40 CFR 63, Subpart M.

E.1.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart M MMM]

The Permittee who engages in the surface coating of miscellaneous metal parts and products shall comply with the following provisions of 40 CFR Part 63, Subpart M MMM (included as Attachment A of this permit) with a compliance date of January 2, 2007:

- (1) 40 CFR 63.3880
- (2) 40 CFR 63.3881(a)
- (3) 40 CFR 63.3881(a)(1)
- (4) 40 CFR 63.3881(a)(2)
- (5) 40 CFR 63.3881(a)(5)
- (6) 40 CFR 63.3881(b)
- (7) 40 CFR 63.3881(e)(2)
- (8) 40 CFR 63.3882(a)
- (9) 40 CFR 63.3882(b)
- (10) 40 CFR 63.3882(e)
- (11) 40 CFR 63.3883
- (12) 40 CFR 63.3883(b)
- (13) 40 CFR 63.3883(d)
- (14) 40 CFR 63.3890(b)
- (15) 40 CFR 63.3890(b)(1)
- (16) 40 CFR 63.3891
- (17) 40 CFR 63.3891(a)
- (18) 40 CFR 63.3891(b)
- (19) 40 CFR 63.3892(a)
- (20) 40 CFR 63.3893(a)
- (21) 40 CFR 63.3900(a)
- (22) 40 CFR 63.3900(a)(1)
- (23) 40 CFR 63.3900(b)
- (24) 40 CFR 63.3901
- (25) 40 CFR 63.3910(a)
- (26) 40 CFR 63.3910(b)
- (27) 40 CFR 63.3910(c)(1) through (c)(8)
- (28) 40 CFR 63.3920(a)
- (29) 40 CFR 63.3920(a)(1) through (a)(6)
- (30) 40 CFR 63.3930
- (31) 40 CFR 63.3930(a)
- (32) 40 CFR 63.3930(b)
- (33) 40 CFR 63.3930(c)(1) through (c)(3)
- (34) 40 CFR 63.3930(d) through (h)
- (35) 40 CFR 63.3930(j)
- (36) 40 CFR 63.3931
- (37) 40 CFR 63.3940
- (38) 40 CFR 63.3941
- (39) 40 CFR 63.3942
- (40) 40 CFR 63.3950
- (41) 40 CFR 63.3951
- (42) 40 CFR 63.3952
- (43) 40 CFR 63.3980
- (44) 40 CFR 63.3981

SECTION E.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Boilers

- (a) One (1) natural gas-fired boiler, constructed in 2008, identified as BLR4, with a maximum capacity of 14.7 MMBtu/hr, and exhausting to stack S-BLR4. Under 40 CFR 60, Subpart Dc, boiler BLR4 is considered an affected facility.

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

E.2.1 General Provisions Relating to NSPS Dc [326 IAC 12] [40 CFR Part 60, Subpart A]

Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 12.

E.2.2 New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units [326 IAC 12] [40 CFR Part 60, Subpart Dc]

The Permittee who operates a small industrial-commercial-institutional boiler, constructed after June 9, 1989 with a maximum heat input capacity greater than 10 MMBtu/hr but less than 100 MMBtu/hr shall comply with the following provisions of 40 CFR Part 60, Subpart Dc (included as Attachment B of this permit):

- (1) 40 CFR 60.40c(a)
- (2) 40 CFR 60.40c(b)
- (3) 40 CFR 60.40c(c)
- (4) 40 CFR 60.40c(d)
- (5) 40 CFR 60.40c(e)
- (6) 40 CFR 60.40c(f)
- (7) 40 CFR 60.40c(g)
- (8) 40 CFR 60.41c
- (9) 40 CFR 60.48c(a)
- (10) 40 CFR 60.48c(a)
- (11) 40 CFR 60.48c(a)(1)
- (12) 40 CFR 60.48c(a)(2)
- (13) 40 CFR 60.48c(a)(3)
- (14) 40 CFR 60.48c(a)(4)
- (15) 40 CFR 60.48c(f)(4)
- (16) 40 CFR 60.48c(f)(4)(i)
- (17) 40 CFR 60.48c(f)(4)(ii)
- (18) 40 CFR 60.48c(f)(4)(iii)
- (19) 40 CFR 60.48c(g)(1)
- (20) 40 CFR 60.48c(g)(2)
- (21) 40 CFR 60.48c(g)(3)
- (22) 40 CFR 60.48c(i)
- (23) 40 CFR 60.48c(j)

SECTION E.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (a) One (1) vapor degreaser, known as VDG1, exhausting to Stack S14, installed in 1997, capacity: 28,000 automotive parts per hour or 2.7 pounds of trichloroethylene per hour.

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

E.3.1 General Provisions Relating to NESHAP Subpart T [40 CFR Part 63, Subpart A]

Pursuant to 40 CFR 63.460, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, as specified in Appendix B of 40 CFR Part 63, Subpart T in accordance with schedule in 40 CFR 63 Subpart T.

E.3.2 Halogenated Solvent Cleaning NESHAP [40 CFR Part 63, Subpart T]

The Permittee which engages in halogenated solvent cleaning shall comply with the following provisions of 40 CFR Part 63, Subpart T (included as Attachment C of this permit).

- (1) 40 CFR 63.460
- (2) 40 CFR 63.461
- (3) 40 CFR 63.462
- (4) 40 CFR 63.463
- (5) 40 CFR 63.464
- (6) 40 CFR 63.465
- (7) 40 CFR 63.466
- (8) 40 CFR 63.467
- (9) 40 CFR 63.468
- (10) 40 CFR 63.469
- (11) 40 CFR 63.470
- (12) 40 CFR 63.471

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe Street, Montpelier, Indiana 47359
Mailing Address: 589 U.S. 33 South, P.O. Box 227, Churubusco, Indiana 46723
Part 70 Permit No.: T 009-19529-00002

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 North Senate Avenue, MC61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe Street, Montpelier, Indiana 47359
Mailing Address: 589 U.S. 33 South, P.O. Box 227, Churubusco, Indiana 46723
Part 70 Permit No.: T 009-19529-00002

This form consists of 2 pages

Page 1 of 2

This is an emergency as defined in 326 IAC 2-7-1(12)

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

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name: BRC Rubber & Plastics, Inc.
 Source Address: 623 West Monroe Street, Montpelier, Indiana 47359
 Mailing Address: 589 U.S. 33 South, P.O. Box 227, Churubusco, Indiana 46723
 Part 70 Permit No.: T 009-19529-00002
 Facilities: Emission units PB1 through PB15, RC1, DIP1, SMDIP and FSTOR
 Parameter: VOC Usage
 Limit: Less than 232 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

| Month | VOC Usage (tons) | VOC Usage (tons) | VOC Usage (tons) |
|-------|------------------|--------------------|------------------|
| | This Month | Previous 11 Months | 12 Month Total |
| | | | |
| | | | |
| | | | |

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe Street, Montpelier, Indiana 47359
Mailing Address: 589 U.S. 33 South, P.O. Box 227, Churubusco, Indiana 46723
Part 70 Permit No.: T 009-19529-00002
Facility: One (1) GEAR LINE booth, known as PB7
Parameter: VOC Usage
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

| Month | VOC Usage (tons) | VOC Usage (tons) | VOC Usage (tons) |
|-------|------------------|--------------------|------------------|
| | This Month | Previous 11 Months | 12 Month Total |
| | | | |
| | | | |
| | | | |

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe Street, Montpelier, Indiana 47359
Mailing Address: 589 U.S. 33 South, P.O. Box 227, Churubusco, Indiana 46723
Part 70 Permit No.: T 009-19529-00002
Facility: One (1) GEAR LINE booth, known as PB8
Parameter: VOC Usage
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

| Month | VOC Usage (tons) | VOC Usage (tons) | VOC Usage (tons) |
|-------|------------------|--------------------|------------------|
| | This Month | Previous 11 Months | 12 Month Total |
| | | | |
| | | | |
| | | | |

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe Street, Montpelier, Indiana 47359
Mailing Address: 589 U.S. 33 South, P.O. Box 227, Churubusco, Indiana 46723
Part 70 Permit No.: T 009-19529-00002
Facility: Roll Coater RC1
Parameter: VOC Usage
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

| Month | VOC This Month | VOC Previous 11 Months | VOC 12 Month Total |
|-------|------------------|------------------------|--------------------|
| | (tons per month) | (tons per month) | (tons per month) |
| | | | |
| | | | |
| | | | |

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe Street, Montpelier, Indiana 47359
Mailing Address: 589 U.S. 33 South, P.O. Box 227, Churubusco, Indiana 46723
Part 70 Permit No.: T 009-19529-00002
Facility: Chain-on-Edge Unit, known as PB1
Parameter: VOC Usage
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

| Month | VOC This Month | VOC Previous 11 Months | VOC 12 Month Total |
|-------|------------------|------------------------|--------------------|
| | (tons per month) | (tons per month) | (tons per month) |
| | | | |
| | | | |
| | | | |

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe Street, Montpelier, Indiana 47359
Mailing Address: 589 U.S. 33 South, P.O. Box 227, Churubusco, Indiana 46723
Part 70 Permit No.: T 009-19529-00002
Facility: Chain-on-Edge Unit, known as PB2
Parameter: VOC Usage
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

| Month | VOC This Month | VOC Previous 11 Months | VOC 12 Month Total |
|-------|------------------|------------------------|--------------------|
| | (tons per month) | (tons per month) | (tons per month) |
| | | | |
| | | | |
| | | | |

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe Street, Montpelier, Indiana 47359
Mailing Address: 589 U.S. 33 South, P.O. Box 227, Churubusco, Indiana 46723
Part 70 Permit No.: T 009-19529-00002
Facility: Chain-on-Edge Unit, known as PB3
Parameter: VOC Usage
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

| Month | VOC This Month | VOC Previous 11 Months | VOC 12 Month Total |
|-------|------------------|------------------------|--------------------|
| | (tons per month) | (tons per month) | (tons per month) |
| | | | |
| | | | |
| | | | |

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe Street, Montpelier, Indiana 47359
Mailing Address: 589 U.S. 33 South, P.O. Box 227, Churubusco, Indiana 46723
Part 70 Permit No.: T 009-19529-00002

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report

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

**Technical Support Document (TSD) for a Part 70 Minor Source
Modification and Significant Permit Modification**

Source Description and Location

| | |
|--------------------------------------|--|
| Source Name: | BRC Rubber & Plastics, Inc. |
| Source Location: | 623 West Monroe Street, Montpelier, Indiana 47359 |
| County: | Blackford |
| SIC Code: | 3069 |
| Operation Permit No.: | T009-19529-00002 |
| Operation Permit Issuance Date: | December 18, 2008 |
| Minor Source Modification No.: | 009-28819-00002 |
| Significant Permit Modification No.: | 009-28845-00002 |
| Permit Reviewer: | Sarah Conner, Ph. D. |

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. T009-19529-00002 on December 18, 2008. The source has since received Administrative Amendment No. 009-27640-00002, issued on June 24, 2009.

County Attainment Status

The source is located in Blackford County.

| Pollutant | Designation |
|---|---|
| SO ₂ | Better than national standards. |
| CO | Unclassifiable or attainment effective November 15, 1990. |
| O ₃ | Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. ¹ |
| PM ₁₀ | Unclassifiable effective November 15, 1990. |
| NO ₂ | Cannot be classified or better than national standards. |
| Pb | Not designated. |
| ¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM _{2.5} . | |

- (a) Ozone Standards
- (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
 - (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph as attainment for the 8-hour ozone standard.
 - (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.

- (4) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Blackford County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
 Blackford County has been classified as attainment for PM_{2.5}. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions, and the effective date of these rules was July 15, 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 PM_{2.5} emissions until 326 IAC 2-2 is revised.
- (c) **Other Criteria Pollutants**
 Blackford County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) **Fugitive Emissions**
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Source Status

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

| Pollutant | Emissions (tons/yr) |
|------------------|------------------------------------|
| PM | 122.47 |
| PM ₁₀ | 123.05 |
| SO ₂ | 0.06 |
| VOC | greater than 100, less than 250 |
| CO | 8.54 |
| NO _x | 10.16 |
| Single HAPs | greater than 10 |
| Total HAPs | greater than 25 |

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) This existing source is a major source of HAPs, as defined in 40 CFR 63.2, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).
- (c) These emissions are based Title V Operating Permit Renewal No. T009-19529-00002, issued on December 18, 2008, and on the Administrative Amendment No. 009-27640-0002, issued on June 24, 2009.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2007 OAQ emission data.

| Pollutant | Actual Emissions (tons/year) |
|-------------------|------------------------------|
| PM | 2.39 |
| PM ₁₀ | 2.05 |
| PM _{2.5} | 2.08 |
| SO ₂ | 0.01 |
| VOC | 21.41 |
| CO | 0.84 |
| NO _x | 1.00 |
| HAP | No Data Reported |
| Total HAPs | No Data Reported |

Description of the Modification

The Office of Air Quality (OAQ) has reviewed a new source construction application, submitted by BRC Rubber & Plastics, Inc. on December 28, 2009, relating to the construction and operation of new emission units and an insignificant activity and to the removal of an insignificant activity at the source.

The following is a list of the new emission units and pollution control devices:

- (a) One (1) paint booth, identified as PB14, equipped with a HVLP spray applicator, approved for construction in 2010, with a maximum capacity of 2000 units per hour, controlled by dry filter CPB14, and exhausting to stack S29.
- (b) Two (2) drying ovens, identified as Ovens 17 and 18, approved for construction in 2010, and exhausting to stack S30.
- (c) One (1) paint booth, identified as PB15, equipped with a HVLP spray applicator, approved for construction in 2010, with a maximum capacity of 1500 units per hour, controlled by dry filter CPB15, and exhausting to stack S31.
- (d) One (1) drying oven, identified as Oven 19, approved for construction in 2010, and exhausting to stack S23.

The following is a list of the new insignificant activity:

- (e) SMIX, secondary Banbury mixer [326 IAC 6-3].

The following insignificant activity has been removed from the source:

- (f) SMIX, secondary, Shaw mixer [326 IAC 6-3].

Enforcement Issues

There are no pending enforcement actions.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

Permit Level Determination – Part 70

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

| PTE Before Controls of the Modification | |
|--|-----------------------------------|
| Pollutant | Potential To Emit (ton/yr) |
| PM | 2.54 |
| PM ₁₀ | 2.54 |
| PM _{2.5} | 2.54 |
| SO ₂ | 0.00 |
| VOC | 17.35 |
| CO | 0.00 |
| NO _x | 0.00 |

| HAP PTE Before Controls of the Modification | |
|--|-----------------------------------|
| HAPs | Potential To Emit (ton/yr) |
| Xylene | 5.11 |
| TOTAL | 5.11 |

This source modification is subject to 326 IAC 2-7-10.5(d)(3)(B) because the potential to emit Volatile Organic Compounds (VOC) is less than twenty-five (25) tons per year and equal to or greater than ten (10) tons per year and because the potential to emit any single hazardous air pollutant is greater than one (1) ton per year and less than ten (10) tons per year. Additionally, the modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d), because the modification requires significant changes in existing monitoring Part 70 permit terms and conditions and also involves the case-by-case determination of an emission limitation.

Permit Level Determination – PSD

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 minor source modification and significant permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

With the modification, the unrestricted potential to emit VOC is >250 tpy at this source. The source has elected to limit the potential to emit of the source and modification as follows:

The total VOC usage to emission units PB1 through PB15, RC1, DIP1, SMDIP and FSTOR, shall be limited to less than 232 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this emission limit along with the unlimited potential to emit VOC from all other facilities, including insignificant activities, at this source of 18.0 tons per year will limit the source-wide potential to emit VOC to less than 250 tons per year and therefore will render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

Federal Rule Applicability Determination

The following federal rules are applicable to the source due to this modification:

NSPS:

- (a) BRC Rubber & Plastics, Inc. is not subject to the requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60.390, Subpart MM, because the source is not an automobile or light-duty truck assembly plant.
- (b) BRC Rubber & Plastics, Inc. is not subject to the requirements of the New Source Performance Standard for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines, 40 CFR 60.720, Subpart TTT, because the spray booths at the source do not apply prime coats, color coats, texture coats, or touch-up coats. The spray booths at the source apply adhesive.
- (c) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

NESHAP:

- (d) BRC Rubber & Plastics, Inc. is subject to the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63.3881, Subpart M MMM), which is incorporated by reference as 326 IAC 20-80-1. The new units subject to this rule include the following:
 - (1) One (1) paint booth, identified as PB14, equipped with a HVLP spray applicator, approved for construction in 2010, with a maximum capacity of 2000 units per hour, controlled by dry filter CPB14, and exhausting to stack S29.
 - (2) Two (2) drying ovens, identified as Ovens 17 and 18, approved for construction in 2010, and exhausting to stack S30.
 - (3) One (1) paint booth, identified as PB15, equipped with a HVLP spray applicator, approved for construction in 2010, with a maximum capacity of 1500 units per hour, controlled by dry filter CPB15, and exhausting to stack S31.
 - (4) One (1) drying oven, identified as Oven 19, approved for construction in 2010, and exhausting to stack S23.

The source has selected the option of complying without add-on controls. However, the source would like to have the option to use compliant coatings and solvents.

Nonapplicable portions of the NESHAP will not be included in the permit. BRC Rubber &

Plastics, Inc. is subject to the following portions of Subpart MMMM:

- (1) 40 CFR 63.3880
- (2) 40 CFR 63.3881(a)
- (3) 40 CFR 63.3881(a)(1)
- (4) 40 CFR 63.3881(a)(2)
- (5) 40 CFR 63.3881(a)(5)
- (6) 40 CFR 63.3881(b)
- (7) 40 CFR 63.3881(e)(2)
- (8) 40 CFR 63.3882(a)
- (9) 40 CFR 63.3882(b)
- (10) 40 CFR 63.3882(e)
- (11) 40 CFR 63.3883
- (12) 40 CFR 63.3883(b)
- (13) 40 CFR 63.3883(d)
- (14) 40 CFR 63.3890(b)
- (15) 40 CFR 63.3890(b)(1)
- (16) 40 CFR 63.3891
- (17) 40 CFR 63.3891(a)
- (18) 40 CFR 63.3891(b)
- (19) 40 CFR 63.3892(a)
- (20) 40 CFR 63.3893(a)
- (21) 40 CFR 63.3900(a)
- (22) 40 CFR 63.3900(a)(1)
- (23) 40 CFR 63.3900(b)
- (24) 40 CFR 63.3901
- (25) 40 CFR 63.3910(a)
- (26) 40 CFR 63.3910(b)
- (27) 40 CFR 63.3910(c)(1) through (c)(8)
- (28) 40 CFR 63.3920(a)
- (29) 40 CFR 63.3920(a)(1) through (a)(6)
- (30) 40 CFR 63.3930
- (31) 40 CFR 63.3930(a)
- (32) 40 CFR 63.3930(b)
- (33) 40 CFR 63.3930(c)(1) through (c)(3)
- (34) 40 CFR 63.3930(d) through (h)
- (35) 40 CFR 63.3930(j)
- (36) 40 CFR 63.3931
- (37) 40 CFR 63.3940
- (38) 40 CFR 63.3941
- (39) 40 CFR 63.3942
- (40) 40 CFR 63.3950
- (41) 40 CFR 63.3951
- (42) 40 CFR 63.3952
- (43) 40 CFR 63.3980
- (44) 40 CFR 63.3981

The provisions of 40 CFR 63 Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart MMMM.

- (e) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) applicable to this proposed modification.
- (f) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:

- (1) has a potential to emit before controls equal to or greater than the Part 70 major source threshold for the pollutant involved;
- (2) is subject to an emission limitation or standard for that pollutant; and
- (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each new or modified emission unit involved:

| CAM Applicability Analysis | | | | | | | |
|----------------------------|---------------------|------------------------------------|---------------------------|-------------------------|---|----------------------|------------------|
| Emission Unit | Control Device Used | Emission Limitation/Standard (Y/N) | Uncontrolled PTE (ton/yr) | Controlled PTE (ton/yr) | Part 70 Major Source Threshold (ton/yr) | CAM Applicable (Y/N) | Large Unit (Y/N) |
| Paint Booth (PB14)- PM | Dry Filters | Y | 0.42 | 0.04 | 100 | N | N |
| Paint Booth (PB15)- PM | Dry Filters | Y | 2.12 | 0.21 | 100 | N | N |

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the new units as part of this modification.

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| State Rule Applicability Determination |
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The following state rules are applicable to the source due to the modification:

326 IAC 2-2 (Prevention of Significant Deterioration)

This source would be subject to Prevention of Significant Deterioration (PSD); however, they have taken a limit in order to render the requirements of 326 IAC 2-2 not applicable. This limit is discussed under the Permit Level Determination – PSD section.

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

Pursuant to 326 IAC 2-4.1-1(b)(2), the requirements of 326 IAC 2-4.1-1 do not apply to a major source specifically regulated, or exempt from regulation, by a standard issued pursuant to Section 112(d), 112(h), or 112(j) of the CAA.

This source is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63, Subpart M), on and after January 2, 2007. Therefore, the existing source is exempt from the requirements of 326 IAC 2-4.1-1 on and after January 2, 2007.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially. The first report is due no later than July 1, 2005, and subsequent reports are due every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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

Pursuant to 6-3-2 (d), particulate from the two (2) paint booths, identified as PB14 and PB15, shall be controlled by the dry filters and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

326 IAC 8-1-6 (New Facilities: General Reduction Requirements)

The unrestricted potential to emit of VOC from paint booths PB14 and PB15 are each less than twenty-five (25) tons per year. Therefore, paint booths PB14 and PB15 are not subject to the requirements of this rule.

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

The source is not one (1) of the listed source types in 326 IAC 8-2-9(a)(1)-(4). Although, the source coats miscellaneous metal parts, the source is exempt from the requirements of this rule since it's SIC code (3069) is not in the major groups listed pursuant to 326 IAC 8-2-9(a)(5). Therefore, 326 IAC 8-2-9 does not apply to this source.

| |
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| Compliance Determination and Monitoring Requirements |
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Permits issued under 326 IAC 2-7 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 2-7-5. 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.

The Compliance Determination and Monitoring Requirements applicable to paint booths PB14 and PB15 are as follows:

- (1) Compliance with the VOC usage limitations contained in Conditions D.2.1 and D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (2) Compliance with Conditions D.2.1 and D.2.2 shall be determined within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.
- (3) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray booth stacks while one or more of the booths are in operation. The Response to Excursions or Exceedances shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a violation of this permit.

- (4) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Response to Excursions or Exceedances for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Response to Excursions or Exceedances shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a violation of this permit.

These monitoring conditions are necessary because the dry filters and must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-7 (Part 70).

| |
|-------------------------|
| Proposed Changes |
|-------------------------|

The changes listed below have been made to Part 70 Operating Permit No. T009-19529-00002, issued on December 18, 2008. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

1. The source has added emission units to existing operations; therefore, the emission unit descriptions have been updated in Sections A.2, D.2 and E.1 as follows:
 - (a) One (1) chain-on-edge coating unit, constructed in 2008, consisting of three (3) coating operations, identified as:

...
 - (4) Four (4) drying ovens with Oven 1 and Oven 4 exhausting to Stack S6, and Oven 2 and Oven 3 exhausting to Stack S7.
 - ~~(b) Two (2) paint booths PB4 and PB5 known as "large chain on edge", equipped with HVLP spray applicators and equipped with dry filters for PM overspray control, known as CPB4 and CPB5, installed in 1994 and approved in 2009 for modification, exhausting to Stack S8 and S9, capacity: 2,000 automotive parts per hour, including a re-circulating pre-heat oven (Oven 5) with no exhaust and a drying oven (Oven 6) exhausting to Stack S10. Under 40 CFR 63, Subpart M, PB4 and PB5 are considered affected facilities.~~
 - (b) One (1) chain-on-edge coating unit, installed in 1994 and approved for modification in 2009 and 2010, consisting of three (3) coating operations equipped with HVLP spray applicators, identified as:**
 - (1) PB4, with a maximum capacity of 2000 units per hour, controlled by dry filter CPB4, and exhausting to stack S8.**
 - (2) PB5, with a maximum capacity of 2000 units per hour, controlled by dry filter CPB5, and exhausting to stack S9.**
 - (3) PB14, with a maximum capacity of 2000 units per hour, controlled by dry filter CPB14, and exhausting to stack S29.**
 - (4) Four (4) drying ovens, with Ovens 5 and 6 exhausting to stack S10 and Ovens 17 and 18 exhausting to stack S30.**

Under 40 CFR 63, Subpart M, PB4, PB5 and PB14 are considered affected facilities.

...

- (e) ~~One~~**Two (42)** paint booths (small chain-on-edge), known as PB9 **and PB15**, each equipped with HVLP spray applicators, **each** equipped with a dry filter for PM overspray control, known as CPB9 **and CPB15**, **installed in 1993 and 2010 respectively**, including ~~a pre-heat oven (Oven 15)~~ **exhausting to stacks S23 and S31, including a pre-heat oven (Oven 15) and a drying oven (Oven 19) exhausting to stack S23**, and a drying oven (Oven 16) with no exhaust, ~~installed in 1993, exhausting to Stack S23~~, capacity: 1,500 automotive parts per hour.

Under 40 CFR 63, Subpart M, PB-9 **and PB15** ~~are~~ is considered an affected facility.

2. The source has added and removed emission units; therefore, the emission unit descriptions have been revised in Sections A.3 and D.6 as follows:

...

- ~~(e) SMIX, secondary, Shaw mixer [326 IAC 6-3].~~ **(e) SMIX, secondary Banbury mixer [326 IAC 6-3].**

3. The source has added emission units to existing operations; therefore, the applicable requirements for the new emission units have been added in Section D.2. as follows:

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

The total VOC usage to **emission units PB1 through PB15, RC1, DIP1, SMDIP and FSTOR**, ~~all facilities listed in Section D.2~~ shall be limited to less than 232 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period, with compliance determined at the end of each month. This usage limit coupled with the unlimited potential to emit VOC from all other facilities, including insignificant activities, at this source of 18.0 tons per year shall render the requirements of 326 IAC 2-2 not applicable.

...

D.2.3 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating operations, **PB1 through PB15**, ~~PB4 - 6 and PB9 - 13, GEAR LINE unit (PB7 and PB8), and the chain-on-edge coating process (PB1 - 3)~~ shall be controlled by ~~a~~ **the** dry particulate filters, and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan of this permit, is required for ~~surface coating operations, PB4 - 6 and PB9 - 13, GEAR LINE unit (PB7 and PB8), chain-on-edge coating process (PB1 - 3) and RC4~~ **these facilities and any control devices**.

...

D.2.7 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth stacks S3,4,5,8,9,19,22,23,24,25,26, **27, 29** and **2731** while one or more of the paint booths, **PB1 through PB15**, ~~PB4-6 and PB9-13~~, ~~GEAR LINE unit (PB7 and PB8)~~, and the chain-on-edge coating process (~~PB1-3~~) are in operation. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth stacks S3,4,5,8,9,19,22,23,24,25,26, **27, 29** and **2731**, while the paint booths they control are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

4. The provisions of National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart M] which the source shall comply with, has been simplified as follows:

- (1) 40 CFR 63.3880
- ~~(2) 40 CFR 63.3884~~
- ~~(3) 40 CFR 63.3881(a)~~
- ~~(4) 40 CFR 63.3881(a)(1)~~
- ~~(5) 40 CFR 63.3881(a)(2)~~
- ~~(6) 40 CFR 63.3881(a)(5)~~
- ~~(7) 40 CFR 63.3881(b)~~
- (7) 40 CFR 63.3881(e)(2)**
- ~~(8) 40 CFR 63.3882(a)~~
- ~~(9) 40 CFR 63.3882(b)~~
- ~~(10) 40 CFR 63.3882(b)(1)~~
- ~~(11) 40 CFR 63.3882(b)(2)~~
- ~~(12) 40 CFR 63.3882(b)(3)~~
- ~~(13) 40 CFR 63.3882(b)(4)~~
- ~~(14) 40 CFR 63.3882(e)~~
- ~~(15) 40 CFR 63.3883~~
- ~~(16) 40 CFR 63.3883(b)~~
- ~~(17) 40 CFR 63.3883(d)~~
- ~~(18) 40 CFR 63.3890(b)~~
- ~~(19) 40 CFR 63.3890(b)(1)~~
- ~~(20) 40 CFR 63.3891~~
- ~~(21) 40 CFR 63.3891(a)~~
- ~~(22) 40 CFR 63.3891(b)~~
- ~~(23) 40 CFR 63.3892(a)~~
- ~~(24) 40 CFR 63.3893(a)~~
- ~~(25) 40 CFR 63.3900(a)~~
- ~~(26) 40 CFR 63.3900(a)(1)~~
- (23) 40 CFR 63.3900(b)**
- ~~(27) 40 CFR 63.3901~~
- ~~(28) 40 CFR 63.3910(a)~~
- ~~(29) 40 CFR 63.3910(b)~~
- ~~(30) 40 CFR 63.3910(e)~~
- ~~(31) 40 CFR 63.3910(c)(1) though (c)(8)~~
- ~~(32) 40 CFR 63.3910(e)(2)~~
- ~~(33) 40 CFR 63.3910(e)(3)~~
- ~~(34) 40 CFR 63.3910(e)(4)~~
- ~~(35) 40 CFR 63.3910(e)(5)~~
- ~~(36) 40 CFR 63.3910(e)(6)~~
- ~~(37) 40 CFR 63.3910(e)(6)(i)~~
- ~~(38) 40 CFR 63.3910(e)(6)(ii)~~

- ~~(39)~~ 40 CFR 63.3910(e)(7)
- ~~(40)~~ 40 CFR 63.3910(e)(7)(i)
- ~~(41)~~ 40 CFR 63.3910(e)(7)(ii)
- ~~(42)~~ 40 CFR 63.3910(e)(7)(iii)
- ~~(43)~~ 40 CFR 63.3910(e)(7)(iv)
- ~~(44)~~ 40 CFR 63.3910(e)(8)
- ~~(45)~~ 40 CFR 63.3910(e)(8)(i)
- ~~(46)~~ 40 CFR 63.3910(e)(8)(ii)
- ~~(47)~~ 40 CFR 63.3910(e)(8)(iii)
- ~~(48)~~ 40 CFR 63.3910(e)(9)
- ~~(49)~~ 40 CFR 63.3910(e)(9)(i)
- ~~(50)~~ 40 CFR 63.3910(e)(9)(ii)
- ~~(51)~~ 40 CFR 63.3910(e)(9)(iii)
- ~~(52)~~ 40 CFR 63.3910(e)(9)(iv)
- ~~(53)~~ 40 CFR 63.3910(e)(10)
- ~~(54)~~ 40 CFR 63.3910(e)(11)
- ~~(5528)~~ 40 CFR 63.3920(a)
- ~~(5629)~~ 40 CFR 63.3920(a)(1) **through (a)(6)**
- ~~(57)~~ 40 CFR 63.3920(a)(1)(i)
- ~~(58)~~ 40 CFR 63.3920(a)(1)(ii)
- ~~(59)~~ 40 CFR 63.3920(a)(1)(iii)
- ~~(60)~~ 40 CFR 63.3920(a)(1)(iv)
- ~~(61)~~ 40 CFR 63.3920(a)(2)
- ~~(62)~~ 40 CFR 63.3920(a)(3)
- ~~(63)~~ 40 CFR 63.3920(a)(3)(i)
- ~~(64)~~ 40 CFR 63.3920(a)(3)(ii)
- ~~(65)~~ 40 CFR 63.3920(a)(3)(iii)
- ~~(66)~~ 40 CFR 63.3920(a)(3)(iv)
- ~~(67)~~ 40 CFR 63.3920(a)(3)(v)
- ~~(68)~~ 40 CFR 63.3920(a)(3)(vi)
- ~~(69)~~ 40 CFR 63.3920(a)(3)(vii)
- ~~(70)~~ 40 CFR 63.3920(a)(4)
- ~~(71)~~ 40 CFR 63.3920(a)(6)
- ~~(72)~~ 40 CFR 63.3920(a)(6)(i)
- ~~(73)~~ 40 CFR 63.3920(a)(6)(ii)
- ~~(74)~~ 40 CFR 63.3920(a)(6)(iii)
- ~~(7530)~~ 40 CFR 63.3930
- ~~(7631)~~ 40 CFR 63.3930(a)
- ~~(7732)~~ 40 CFR 63.3930(b)
- ~~(78)~~ 40 CFR 63.3930(e)
- ~~(7933)~~ 40 CFR 63.3930(c)(1) **through (c)(3)**
- ~~(80)~~ 40 CFR 63.3930(e)(3)
- ~~(8134)~~ 40 CFR 63.3930(d) **through (h)**
- ~~(81)~~ 40 CFR 63.3930(e)
- ~~(82)~~ 40 CFR 63.3930(f)
- ~~(83)~~ 40 CFR 63.3930(g)
- ~~(84)~~ 40 CFR 63.3930(h)
- ~~(85)~~ 40 CFR 63.3930(h)(1)
- ~~(86)~~ 40 CFR 63.3930(h)(2)
- ~~(87)~~ 40 CFR 63.3930(h)(3)
- ~~(8835)~~ 40 CFR 63.3930(j)
- ~~(8936)~~ 40 CFR 63.3931(a)
- ~~(90)~~ 40 CFR 63.3931(b)
- ~~(91)~~ 40 CFR 63.3931(e)
- ~~(9237)~~ 40 CFR 63.3940
- ~~(9338)~~ 40 CFR 63.3941
- ~~(94)~~ 40 CFR 63.3941(a)
- ~~(95)~~ 40 CFR 63.3941(a)(1)

- ~~(96)~~ 40 CFR 63.3941(a)(1)(i)
- ~~(97)~~ 40 CFR 63.3941(a)(1)(ii)
- ~~(98)~~ 40 CFR 63.3941(a)(2)
- ~~(99)~~ 40 CFR 63.3941(a)(3)
- ~~(100)~~ 40 CFR 63.3941(a)(4)
- ~~(101)~~ 40 CFR 63.3941(a)(5)
- ~~(102)~~ 40 CFR 63.3941(b)
- ~~(103)~~ 40 CFR 63.3941(b)(1)
- ~~(104)~~ 40 CFR 63.3941(b)(2)
- ~~(105)~~ 40 CFR 63.3941(b)(3)
- ~~(106)~~ 40 CFR 63.3941(b)(4)
- ~~(107)~~ 40 CFR 63.3941(c)
- ~~(108)~~ 40 CFR 63.3941(d)
- ~~(109)~~ 40 CFR 63.3941(e)
- ~~(110)~~ **39** 40 CFR 63.3942(a)
- ~~(111)~~ 40 CFR 63.3942(b)
- ~~(112)~~ 40 CFR 63.3942(c)
- ~~(113)~~ 40 CFR 63.3942(d)
- ~~(114)~~ **40** 40 CFR 63.3950
- ~~(115)~~ **41** 40 CFR 63.3951
- ~~(116)~~ 40 CFR 63.3951(a)
- ~~(117)~~ 40 CFR 63.3951(b)
- ~~(118)~~ 40 CFR 63.3951(c)
- ~~(119)~~ 40 CFR 63.3951(d)
- ~~(120)~~ 40 CFR 63.3951(e)
- ~~(121)~~ 40 CFR 63.3951(e)(1)
- ~~(122)~~ 40 CFR 63.3951(e)(2)
- ~~(123)~~ 40 CFR 63.3951(e)(3)
- ~~(124)~~ 40 CFR 63.3951(e)(4)
- ~~(125)~~ 40 CFR 63.3951(e)(4)(i)
- ~~(126)~~ 40 CFR 63.3951(e)(4)(ii)
- ~~(127)~~ 40 CFR 63.3951(e)(4)(iii)
- ~~(128)~~ 40 CFR 63.3951(e)(4)(iv)
- ~~(129)~~ 40 CFR 63.3951(f)
- ~~(130)~~ 40 CFR 63.3951(g)
- ~~(131)~~ 40 CFR 63.3951(h)
- ~~(132)~~ **42** 40 CFR 63.3952(a)
- ~~(133)~~ 40 CFR 63.3952(b)
- ~~(134)~~ 40 CFR 63.3952(c)
- ~~(135)~~ 40 CFR 63.3952(d)
- ~~(136)~~ **43** 40 CFR 63.3980(a)
- ~~(137)~~ 40 CFR 63.3980(b)
- ~~(138)~~ 40 CFR 63.3980(c)
- ~~(139)~~ 40 CFR 63.3980(c)(1)
- ~~(140)~~ 40 CFR 63.3980(c)(2)
- ~~(141)~~ 40 CFR 63.3980(c)(3)
- ~~(142)~~ 40 CFR 63.3980(c)(4)
- ~~(143)~~ **44** 40 CFR 63.3981

5. In order to clarify the provisions of National Emission Standards for Halogenated Solvent Cleaning [40 CFR Part 63, Subpart T], section E.3 has been revised as follows:

- (1) **40 CFR 63.460**
- (2) **40 CFR 63.461**
- (3) **40 CFR 63.462**
- (4) **40 CFR 63.463**
- (5) **40 CFR 63.464**
- (6) **40 CFR 63.465**

- (7) **40 CFR** 63.466
- (8) **40 CFR** 63.467
- (9) **40 CFR** 63.468
- (10) **40 CFR** 63.469
- (11) **40 CFR** 63.470
- (12) **40 CFR** 63.471

6. In order to clarify which emission units are subject to the VOC limit in section D.2, the Part 70 Quarterly Report for all surface coating facilities listed in Section D.2 has been revised as follows:

...

Source Name: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe Street, Montpelier, Indiana 47359
Mailing Address: 589 U.S. 33 South, P.O. Box 227, Churubusco, Indiana 46723
Part 70 Permit No.: T 009-19529-00002
Facilities: ~~All Surface Coating Facilities Listed in Section D.2~~ **Emission units PB1 through PB15, RC1, DIP1, SMDIP and FSTOR**
Parameter: VOC Usage
Limit: Less than 232 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

IDEM, OAQ has decided to make additional revisions to the permit as described below. The permit has been revised as follows with deleted language as ~~strikeouts~~ and new language **bolded**:

7. IDEM, OAQ has revised the Emergency Occurrence Report form; therefore, the Emergency Occurrence Report form has been updated as follows:

PART 70 OPERATING PERMIT
EMERGENCY/~~DEVIATION~~ OCCURRENCE REPORT

Source Name: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe Street, Montpelier, Indiana 47359
Mailing Address: 589 U.S. 33 South, P.O. Box 227, Churubusco, Indiana 46723
Part 70 Permit No.: T 009-19529-00002

This form consists of 2 pages

Page 1 of 2

| |
|---|
| <p>Check either No. 1 or No.2</p> <p><input type="checkbox"/> 1.—This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16 |
| <p><input type="checkbox"/> 2.— This is a deviation, reportable per 326 IAC 2-7-5(3)(C)</p> <ul style="list-style-type: none">• The Permittee must submit notice in writing within ten (10) calendar days |

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

~~Attach a signed certification to complete~~ **A certification is not required for this report.**

8. IDEM, OAQ has revised the Part 70 Quarterly Report forms; therefore, the Part 70 Quarterly Report forms have been updated as follows:

...

Part 70 Quarterly Report

...

- No deviation occurred in this **quarter** ~~month~~.
- Deviation/s occurred in this **quarter** ~~month~~.

...

9. IDEM, OAQ has revised the Quarterly Deviation and Compliance Monitoring Report form; therefore, the Quarterly Deviation and Compliance Monitoring Report form has been updated as follows:

...

QUARTERLY **DEVIATION AND COMPLIANCE** MONITORING REPORT

...

| | | |
|--|-------------------------------|-------------------------------|
| <p>This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the compliance monitoring requirements and, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/ Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p> | | |
| <input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD. | | |
| <input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD | | |
| Compliance Monitoring Requirement (e.g. Permit Condition D.1.5) | Number of Deviations | Date of each Deviation |
| _____ | | |
| _____ | | |
| _____ | | |
| _____ | | |
| _____ | | |
| _____ | | |
| Permit Requirement (specify permit condition #) | | |
| Date of Deviation: | Duration of Deviation: | |

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

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

10. Section B, Condition B.11 – Emergency Provisions has been revised in order to be consistent with the language found in 326 IAC 2-7-16 as follows:

B.11 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

...

~~(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.~~

11. IDEM has decided not to list the submission date of the ERP because the ERP can be updated without permit change; therefore, Section C, Condition C. 12 – Emergency Reduction Plans has been revised as follows:

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee ~~prepared and~~ **shall maintain the most recently** submitted written emergency reduction plans (ERPs) consistent with safe operating procedures ~~in July 21, 2000.~~
12. Blaster 1 has a baghouse while Blasters 2 through 5 have self contained vacuums; therefore, Section D.5.5(b) – Particulate Matter (PM) has been revised as follows:

D.5.5 Particulate Matter (PM)

- (a) The baghouses for PM control shall be in operation and control emissions from the grit blast facilities at all times that Blaster 1 is in operation.
- (b) The self contained vacuums for PM and PM₁₀ control shall be in operation and control emissions from the Blasters ~~4~~ 5 at all times that blasters are in operation.

| |
|--------------------------------------|
| Conclusion and Recommendation |
|--------------------------------------|

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 009-28819-00002 and Part 70 Significant Permit Modification No. 009-28845-00002. The staff recommend to the Commissioner that this Part 70 Minor Source and Part 70 Significant Permit Modification be approved.

**Emission Calculations
PTE Summary**

Company Name: BRC Rubber & Plastics, Inc.
Address City IN Zip: 623 West Monroe Street, Montpelier, Indiana 47359
Minor Source Modification: 009-28819-00002
Significant Permit Modification: 009-28845-00002
Reviewer: Sarah Conner, Ph. D.
Date: 01/11/10

| | Uncontrolled | | | | | | |
|---|---------------|---------------|-------------|--------------|---------------|-------------|------------------|
| | PM | PM10 | SO2 | Nox | VOC | CO | HAP |
| BLR4 | 0.12 | 0.49 | 0.04 | 6.44 | 0.35 | 5.41 | - |
| BLR3 | 0.07 | 0.28 | 0.02 | 3.72 | 0.2 | 3.13 | - |
| PB6, 11, 12, and 13 | 19.76 | 19.76 | - | - | 49.52 | - | 12.68 |
| PB9 | 2.31 | 2.31 | - | - | 11.51 | - | 3.35 |
| PB4 & 5 | 0.84 | 0.84 | - | - | 11.41 | - | 3.23 |
| FSTOR | - | - | - | - | 1.68 | - | 1.68 |
| VDG1 | - | - | - | - | 12 | - | 12 |
| Blaster 1 | 109.81 | 109.81 | - | - | - | - | - |
| DIP1 | - | - | - | - | 11.31 | - | 3.17 |
| RC1 | - | - | - | - | 57.2 | - | 24.1 |
| PB-10 | 8.79 | 8.79 | - | - | 12.38 | - | - |
| Blaster 2 | 214.44 | 214.44 | - | - | - | - | - |
| Blaster 3 | 123.33 | 123.33 | - | - | - | - | - |
| SMDIP | - | - | - | - | 8.45 | - | 9.02 |
| PB1, 2, and 3 | 8.52 | 8.52 | - | - | 301.05 | - | 13.56 |
| Blaster 4 | 41.11 | 41.11 | - | - | - | - | - |
| Blaster 5 | 41.11 | 41.11 | - | - | - | - | - |
| PB7 & 8 | 48.02 | 48.02 | - | - | 220.8 | - | 122.94 |
| Total Uncontrolled Before Modification | 618.23 | 618.81 | 0.06 | 10.16 | 697.86 | 8.54 | >10/25 |
| New PB14 | 0.42 | 0.42 | - | - | 5.70 | - | 1.62 |
| New PB 15 | 2.12 | 2.12 | - | - | 11.65 | - | 3.49 |
| Total Uncontrolled Modification | 2.54 | 2.54 | 0.00 | 0.00 | 17.35 | 0.00 | 5.11 |
| Total Uncontrolled After Modification | 620.77 | 621.35 | 0.06 | 10.16 | 715.21 | 8.54 | >10/25 |

These emissions before modification are based upon Title V Operating Permit Renewal No. T009-19529-00002, issued on December 18, 2008. In addition, the potential to emit VOC from emission units PB4 and PB5 have been revised, these emission units were approved for modification under Administrative Amendment No. 009-27640-0002, issued on June 24, 2009. Calculations for Blaster 4, formerly identified as Ruemblin hand blaster, added under Second Significant Permit Modification No. SPM 009-19963-00002, issued on September 16, 2005, has been added to the summary.

**Emission Calculations
PTE Summary**

Company Name: BRC Rubber & Plastics, Inc.
Address City IN Zip: 623 West Monroe Street, Montpelier, Indiana 47359
Minor Source Modification: 009-28819-00002
Significant Permit Modification: 009-28845-00002
Reviewer: Sarah Conner, Ph. D.
Date: 01/11/10

| | Limited | | | | | | |
|--|---------------|---------------|-------------|--------------|----------------|-------------|------------------|
| | PM | PM10 | SO2 | Nox | VOC | CO | HAPs |
| BLR4 | 0.12 | 0.49 | 0.04 | 6.44 | 0.35 | 5.41 | - |
| BLR3 | 0.07 | 0.28 | 0.02 | 3.72 | 0.2 | 3.13 | - |
| PB6, 11, 12, and 13 | 19.76 | 19.76 | - | - | 49.52 | - | 3.17 |
| PB9 | 2.31 | 2.31 | - | - | 11.51 | - | 3.35 |
| PB4 & 5 | 0.84 | 0.84 | - | - | 11.41 | - | 3.23 |
| FSTOR | - | - | - | - | 1.68 | - | 1.68 |
| VDG1 | - | - | - | - | 12 | - | 12 |
| Blaster 1 | 16.73 | 16.73 | - | - | - | - | - |
| DIP1 | - | - | - | - | 11.31 | - | 3.17 |
| RC1 | - | - | - | - | <25 | - | 9 |
| PB-10 | 8.79 | 8.79 | - | - | 12.38 | - | - |
| Blaster 2 | 6.88 | 6.88 | - | - | - | - | - |
| Blaster 3 | 5.61 | 5.61 | - | - | - | - | - |
| SMDIP | - | - | - | - | 8.45 | - | 9.02 |
| PB1, 2, and 3 | 8.52 | 8.52 | - | - | <25 per | - | 13.56 |
| Blaster 4 | 2.41 | 2.41 | - | - | - | - | - |
| Blaster 5 | 2.41 | 2.41 | - | - | - | - | - |
| PB7 & 8 | 48.02 | 48.02 | - | - | <25 per | - | 122.94 |
| *All Surface Coating Facilities Listed in Section D.2 (emission units PB1 through PB13, RC1, DIP1, SMDIP and FSTOR) of Part 70 Operating Permit Renewal No. T009-19529-00002, issued on December 18, 2008. | - | - | - | - | <232 | - | - |
| Total Limited Before Modification | 122.47 | 123.05 | 0.06 | 10.16 | <250 | 8.54 | >10/25 |
| New PB14 | 0.42 | 0.42 | - | - | 5.70 | - | 1.62 |
| New PB 15 | 2.12 | 2.12 | - | - | 11.65 | - | 3.49 |
| Total Uncontrolled Modification | 2.54 | 2.54 | 0.00 | 0.00 | 17.35 | 0.00 | 5.11 |
| *All Surface Coating Facilities Listed in Section D.2 (emission units PB1 through PB13, RC1, DIP1, SMDIP and FSTOR) of Part 70 Operating Permit Renewal No. T009-19529-00002, issued on December 18, 2008 and new emission units PB14 and PB15. | | | | | <232 | | |
| Total Limited After Modification | 125.01 | 125.59 | 0.06 | 10.16 | <250 | 8.54 | >10/25 |

These emissions before modification are based upon Title V Operating Permit Renewal No. T009-19529-00002, issued on December 18, 2008. In addition, the potential to emit VOC from emission units PB4 and PB5 have been revised, these emission units were approved for modification under Administrative Amendment No. 009-27640-0002, issued on June 24, 2009. Calculations for Blaster 4, formerly identified as Ruemblin hand blaster, added under Second Significant Permit Modification No. SPM 009-19963-00002, issued on September 16, 2005, has been added to the summary.

**Appendix A:
Emissions Calculations After Modification
VOC , HAPs and Particulate**

Surface Coating Operations On Primarily Metal Automotive Parts & Some Nylon and Plastic Parts

Company Name: BRC Rubber & Plastics, Inc.
Address City IN Zip: 623 West Monroe Street, Montpelier, Indiana 47359
Minor Source Modification: 009-28819-00002
Significant Permit Modification: 009-28845-00002
Reviewer: Sarah Conner, Ph. D.
Date: 01/11/10

PB4&5 (Parts may receive a primer in one booth and go through the dryer (CDRY6) and receive a cover coat in the 2nd booth and go through a 2nd dryer (CDRY7)).

| Material All on Metal Substrate Unless Otherwise Indicated | Density (lbs/gal) | Weight % Volatile (H2O & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (units/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 (tons/yr) | lbs VOC/gal solids | Transfer Efficiency |
|--|-------------------|------------------------------------|----------------|-------------------|----------------|---------------------------------|------------------------|----------------------|---|----------------------------------|---------------------------------|--------------------------------|-------------------------------|---------------------------------|--------------------|---------------------|
| PB4&5 Primer | | | | | | | | | | | | | | | | |
| Chemlock 205 for Parts # | | | | | | | | | | | | | | | | |
| 3042010012 | 7.81 | 75.66% | 0.0% | 75.7% | 0.00% | 13.10% | 0.00008 | 1900.000 | 5.91 | 5.91 | 0.90 | 21.56 | 3.93 | 0.38 | 45.11 | 70% |
| 3016540022 | 7.81 | 75.66% | 0.0% | 75.7% | 0.00% | 13.10% | 0.00015 | 1000.000 | 5.91 | 5.91 | 0.89 | 21.27 | 3.88 | 0.37 | 45.11 | 70% |
| 3015250002 | 7.81 | 75.66% | 0.0% | 75.7% | 0.00% | 13.10% | 0.00008 | 2000.000 | 5.91 | 5.91 | 0.89 | 21.27 | 3.88 | 0.37 | 45.11 | 70% |
| 301595012 | 7.81 | 75.66% | 0.0% | 75.7% | 0.00% | 13.10% | 0.00031 | 480.000 | 5.91 | 5.91 | 0.88 | 21.10 | 3.85 | 0.37 | 45.11 | 70% |
| 3015510132 | 7.81 | 75.66% | 0.0% | 75.7% | 0.00% | 13.10% | 0.00050 | 300.000 | 5.91 | 5.91 | 0.89 | 21.27 | 3.88 | 0.37 | 45.11 | 70% |
| 304174001 | 7.81 | 75.66% | 0.0% | 75.7% | 0.00% | 13.10% | 0.00018 | 850.000 | 5.91 | 5.91 | 0.88 | 21.10 | 3.85 | 0.37 | 45.11 | 70% |
| 3013810032 | 7.81 | 75.66% | 0.0% | 75.7% | 0.00% | 13.10% | 0.00031 | 480.000 | 5.91 | 5.91 | 0.88 | 21.10 | 3.85 | 0.37 | 45.11 | 70% |
| Chemlock EP6887-35 for Parts # | | | | | | | | | | | | | | | | |
| 3043760012 | 8.19 | 73.90% | 0.0% | 73.9% | 0.03% | 15.85% | 0.00015 | 1000.000 | 6.05 | 6.05 | 0.91 | 21.78 | 3.97 | 0.42 | 38.17 | 70% |
| 304410001 | 8.19 | 73.90% | 0.0% | 73.9% | 0.03% | 15.85% | 0.00013 | 1200.000 | 6.05 | 6.05 | 0.91 | 21.78 | 3.97 | 0.42 | 38.17 | 70% |
| Chemlock 205 for Parts # | | | | | | | | | | | | | | | | |
| 307408 | 7.81 | 75.66% | 0.0% | 75.7% | 0.00% | 13.10% | 0.00046 | 325.000 | 5.91 | 5.91 | 0.88 | 21.20 | 3.87 | 0.37 | 45.11 | 70% |
| 3072922203 | 7.81 | 75.66% | 0.0% | 75.7% | 0.00% | 13.10% | 0.00018 | 850.000 | 5.91 | 5.91 | 0.88 | 21.10 | 3.85 | 0.37 | 45.11 | 70% |
| 3072922403 | 7.81 | 75.66% | 0.0% | 75.7% | 0.00% | 13.10% | 0.00030 | 500.000 | 5.91 | 5.91 | 0.89 | 21.27 | 3.88 | 0.37 | 45.11 | 70% |

| | | | | | | | | | | | | | | | | |
|--------------------------|--|--|--|--|--|--|---------------|---------------|---------------------|-------------------|-------------|--------------|-------------|-------------|--------------|--|
| Worst Case Primer | | | | | | | | | 6.05 | 6.05 | 0.91 | 21.78 | 3.97 | 0.42 | 45.11 | |
| | | | | | | | VOC PM | 0% 90% | Uncontrolled | Controlled | 0.91 | 21.78 | 3.97 | 0.42 | 0.04 | |

| | | | | | | | | | | | | | | | | |
|---------------------------|------|---------|------|--------|-------|-------|---------|------|------|------|------|------|------|------|-----|-----|
| PB4&5 Solvent | | | | | | | | | | | | | | | | |
| Xylene for Parts # | | | | | | | | | | | | | | | | |
| 3043760012 | 7.24 | 100.00% | 0.0% | 100.0% | 0.00% | 0.00% | 0.00005 | 1000 | 7.24 | 7.24 | 0.36 | 8.69 | 1.59 | 0.00 | n/a | 70% |
| 304410001 | 7.24 | 100.00% | 0.0% | 100.0% | 0.00% | 0.00% | 0.00004 | 1200 | 7.24 | 7.24 | 0.35 | 8.34 | 1.52 | 0.00 | n/a | 70% |

| | | | | | | | | | | | | | | | | |
|--------------------------|--|--|--|--|--|--|------------|-----------|---------------------|-------------|-------------|-------------|-------------|-------------|--|--|
| Worst Case Xylene | | | | | | | | | 7.24 | 7.24 | 0.36 | 8.69 | 1.59 | 0.00 | | |
| | | | | | | | VOC | 0% | Uncontrolled | | 0.36 | 8.69 | 1.59 | | | |

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
HAPS emission rate by weight percentage HAP (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A:
Emissions Calculations After Modification
VOC , HAPs and Particulate
Surface Coating Operations On Primarily Metal Automotive Parts & Some Nylon and Plastic Parts

Company Name: BRC Rubber & Plastics, Inc.
 Address City IN Zip: 623 West Monroe Street, Montpelier, Indiana 47359
 Minor Source Modification: 009-28819-0002
 Significant Permit Modification: 009-28845-0002
 Reviewer: Sarah Conner, Ph. D.
 Date: 01/11/10

| Material All on Metal Substrate Unless Otherwise Indicated | Density (lbs/gal) | Weight % Volatile (H2O & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (units/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 (tons/yr) | lbs VOC/gal solids | Transfer Efficiency |
|--|-------------------|------------------------------------|----------------|-------------------|----------------|---------------------------------|------------------------|----------------------|---|----------------------------------|---------------------------------|--------------------------------|-------------------------------|---------------------------------|--------------------|---------------------|
| PB4&5 Adhesive | | | | | | | | | | | | | | | | |
| Chemlock EP6788-50 for Parts # | | | | | | | | | | | | | | | | |
| 3042010012 | 8.19 | 74.96% | 0.0% | 75.0% | 0.00% | 14.85% | 0.000080 | 1900.000 | 6.14 | 6.14 | 0.93 | 22.40 | 4.09 | 0.41 | 41.34 | 70% |
| 3016540022 | 8.19 | 74.96% | 0.0% | 75.0% | 0.00% | 14.85% | 0.000150 | 1000.000 | 6.14 | 6.14 | 0.92 | 22.10 | 4.03 | 0.40 | 41.34 | 70% |
| Chemlock 220X for Parts # | | | | | | | | | | | | | | | | |
| 301525002 | 8.17 | 75.20% | 0.0% | 75.2% | 0.00% | 14.40% | 0.00008 | 2000.000 | 6.14 | 6.14 | 0.92 | 22.12 | 4.04 | 0.40 | 42.67 | 70% |
| Chemlock 252X for Parts # | | | | | | | | | | | | | | | | |
| 301595012 | 8.04 | 77.03% | 0.0% | 77.0% | 0.00% | 13.10% | 0.00031 | 480.000 | 6.19 | 6.19 | 0.92 | 22.12 | 4.04 | 0.36 | 47.28 | 70% |
| 3015510132 | 8.04 | 77.03% | 0.0% | 77.0% | 0.00% | 13.10% | 0.00050 | 300.000 | 6.19 | 6.19 | 0.93 | 22.30 | 4.07 | 0.36 | 47.28 | 70% |
| Chemlock EP6788-50 for Parts # | | | | | | | | | | | | | | | | |
| 304174001 | 8.19 | 74.96% | 0.0% | 75.0% | 0.00% | 13.10% | 0.00018 | 850.000 | 6.14 | 6.14 | 0.91 | 21.92 | 4.00 | 0.40 | 46.86 | 70% |
| 3013810032 | 8.19 | 74.96% | 0.0% | 75.0% | 0.00% | 13.10% | 0.00031 | 480.000 | 6.14 | 6.14 | 0.91 | 21.92 | 4.00 | 0.40 | 46.86 | 70% |
| Chemlock EP6887-35 for Parts # | | | | | | | | | | | | | | | | |
| 3043760012 | 8.19 | 73.90% | 0.0% | 73.9% | 0.03% | 15.85% | 0.00015 | 1000.000 | 6.05 | 6.05 | 0.91 | 21.78 | 3.97 | 0.42 | 38.17 | 70% |
| 304410001 | 8.19 | 73.90% | 0.0% | 73.9% | 0.03% | 15.85% | 0.00013 | 1200.000 | 6.05 | 6.05 | 0.91 | 21.78 | 3.97 | 0.42 | 38.17 | 70% |
| Chemlock 220X for Parts # | | | | | | | | | | | | | | | | |
| 307408 | 8.17 | 75.20% | 0.0% | 75.2% | 0.00% | 14.40% | 0.00046 | 325.000 | 6.14 | 6.14 | 0.92 | 22.04 | 4.02 | 0.40 | 42.67 | 70% |
| Chemlock 252X for Parts # | | | | | | | | | | | | | | | | |
| 3072922203 | 8.04 | 77.03% | 0.03% | 77.0% | 0.02% | 13.67% | 0.00018 | 850.000 | 6.19 | 6.19 | 0.92 | 22.10 | 4.03 | 0.36 | 45.29 | 70% |
| 3072922403 | 8.04 | 77.03% | 0.03% | 77.0% | 0.02% | 13.67% | 0.00030 | 500.000 | 6.19 | 6.19 | 0.93 | 22.29 | 4.07 | 0.36 | 45.29 | 70% |

| | | | | | | | | | | | | | | | | |
|----------------------------|--|--|--|--|--|--|------------|------------|---------------------|-------------|-------------|--------------|-------------|--------------|--------------|--|
| Worst Case Adhesive | | | | | | | | | 6.19 | 6.19 | 0.93 | 22.40 | 4.09 | 0.42 | 47.28 | |
| | | | | | | | VOC | 0% | Uncontrolled | | | | | | | |
| | | | | | | | PM | 90% | Controlled | | 0.93 | 22.40 | 4.09 | 0.421 | | |
| | | | | | | | | | | | | | | 0.04 | | |

| | | | | | | | | | | | | | | | | |
|---------------------------|------|---------|------|--------|-------|-------|---------|------|------|------|------|------|------|------|-----|-----|
| PB4&5 Solvent | | | | | | | | | | | | | | | | |
| Xylene for Parts # | | | | | | | | | | | | | | | | |
| 3042010012 | 7.24 | 100.00% | 0.0% | 100.0% | 0.00% | 0.00% | 0.00003 | 1900 | 7.24 | 7.24 | 0.34 | 8.25 | 1.51 | 0.00 | n/a | 70% |
| 3016540022 | 7.24 | 100.00% | 0.0% | 100.0% | 0.00% | 0.00% | 0.00005 | 1000 | 7.24 | 7.24 | 0.36 | 8.69 | 1.59 | 0.00 | n/a | 70% |
| 301525002 | 7.24 | 100.00% | 0.0% | 100.0% | 0.00% | 0.00% | 0.00003 | 2000 | 7.24 | 7.24 | 0.36 | 8.69 | 1.59 | 0.00 | n/a | 70% |
| 301595012 | 7.24 | 100.00% | 0.0% | 100.0% | 0.00% | 0.00% | 0.00011 | 480 | 7.24 | 7.24 | 0.36 | 8.76 | 1.60 | 0.00 | na/ | 70% |
| 3015510132 | 7.24 | 100.00% | 0.0% | 100.0% | 0.00% | 0.00% | 0.00017 | 300 | 7.24 | 7.24 | 0.36 | 8.60 | 1.57 | 0.00 | n/a | 70% |
| 304174001 | 7.24 | 100.00% | 0.0% | 100.0% | 0.00% | 0.00% | 0.00006 | 850 | 7.24 | 7.24 | 0.37 | 8.86 | 1.62 | 0.00 | n/a | 70% |
| 3013810032 | 7.24 | 100.00% | 0.0% | 100.0% | 0.00% | 0.00% | 0.00011 | 480 | 7.24 | 7.24 | 0.36 | 8.76 | 1.60 | 0.00 | n/a | 70% |
| 3043760012 | 7.24 | 100.00% | 0.0% | 100.0% | 0.00% | 0.00% | 0.00005 | 1000 | 7.24 | 7.24 | 0.36 | 8.69 | 1.59 | 0.00 | n/a | 70% |
| 304410001 | 7.24 | 100.00% | 0.0% | 100.0% | 0.00% | 0.00% | 0.00004 | 1200 | 7.24 | 7.24 | 0.35 | 8.34 | 1.52 | 0.00 | n/a | 70% |
| 307408 | 7.24 | 100.00% | 0.0% | 100.0% | 0.00% | 0.00% | 0.00016 | 325 | 7.24 | 7.24 | 0.36 | 8.75 | 1.60 | 0.00 | n/a | 70% |
| 3072922203 | 7.24 | 100.00% | 0.0% | 100.0% | 0.00% | 0.00% | 0.00006 | 850 | 7.24 | 7.24 | 0.37 | 8.86 | 1.62 | 0.00 | n/a | 70% |
| 3072922403 | 7.24 | 100.00% | 0.0% | 100.0% | 0.00% | 0.00% | 0.00010 | 500 | 7.24 | 7.24 | 0.36 | 8.69 | 1.59 | 0.00 | n/a | 70% |

| | | | | | | | | | | | | | | | | |
|--------------------------|--|--|--|--|--|--|------------|-----------|---------------------|-------------|-------------|-------------|-------------|--------------|------------|--|
| Worst Case Xylene | | | | | | | | | 7.24 | 7.24 | 0.37 | 8.86 | 1.62 | 0.00 | n/a | |
| | | | | | | | VOC | 0% | Uncontrolled | | | | | | | |
| | | | | | | | | | | | 0.37 | 8.86 | 1.62 | 0.000 | | |

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-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
 HAPS emission rate by weight percentage HAP (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

| Summary | | | | Potential Emissions Uncontrolled (tons/yr) | | | Potential Emissions After Controls (tons/yr) | | | |
|--|------------|-----------|---------------|---|-------------|---------------|---|-------------|---------------|---|
| | VOC | PM | Xylene | VOC | PM | Xylene | VOC | PM | Xylene | |
| PB4&5 (Per Booth) | | | | | | | | | | |
| Primer | 3.97 | 0.42 | 0.00 | 5.56 | 0.42 | 1.59 | 5.56 | 0.04 | 1.59 | Worst case coating usage was first calculated based on actual production data from other existing paint booths. |
| Primer Solvent | 0.00 | 0.00 | 1.59 | | | | | | | The coating usage then recalculated to account for the increase in coating transfer efficiency. In order to be conservative, it was assumed that the gal of material per unit decreased by a factor of 2 do to the increase in transfer efficiency from 20% to 70%. |
| Adhesive | 4.09 | 0.42 | 0.00 | | | | | | | |
| Adhesive Solvent | 0.00 | 0.00 | 1.62 | 5.70 | 0.42 | 1.62 | 5.70 | 0.04 | 1.62 | |
| Worse Case Primer or Adhesive + Solvent per Booth | | | | 5.70 | 0.42 | 1.62 | 5.70 | 0.04 | 1.62 | |
| Total 2 booths | | | | 11.41 | 0.84 | 3.23 | 11.41 | 0.08 | 3.23 | |

**Appendix A:
Emissions Calculations After Modification
VOC , HAPs and Particulate**

Surface Coating Operations On Primarily Metal Automotive Parts & Some Nylon and Plastic Parts

Company Name: BRC Rubber & Plastics, Inc.
Address City IN Zip: 623 West Monroe Street, Montpelier, Indiana 47359
Minor Source Modification: 009-28819-00002
Significant Permit Modification: 009-28845-00002
Reviewer: Sarah Conner, Ph. D.
Date: 01/11/10

PB14

| Material All on Metal Substrate Unless Otherwise Indicated | Density (lbs/gal) | Weight % Volatile (H2O & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (units/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 (tons/yr) | lbs VOC/gal solids | Transfer Efficiency |
|--|-------------------|------------------------------------|----------------|-------------------|----------------|---------------------------------|------------------------|----------------------|---|----------------------------------|---------------------------------|--------------------------------|-------------------------------|---------------------------------|--------------------|---------------------|
| PB14 Primer | | | | | | | | | | | | | | | | |
| Chemlock 205 for Parts # | | | | | | | | | | | | | | | | |
| 3042010012 | 7.81 | 75.66% | 0.0% | 75.7% | 0.00% | 13.10% | 0.00008 | 1900.000 | 5.91 | 5.91 | 0.90 | 21.56 | 3.93 | 0.38 | 45.11 | 70% |
| 3016540022 | 7.81 | 75.66% | 0.0% | 75.7% | 0.00% | 13.10% | 0.00015 | 1000.000 | 5.91 | 5.91 | 0.89 | 21.27 | 3.88 | 0.37 | 45.11 | 70% |
| 3015250002 | 7.81 | 75.66% | 0.0% | 75.7% | 0.00% | 13.10% | 0.00008 | 2000.000 | 5.91 | 5.91 | 0.89 | 21.27 | 3.88 | 0.37 | 45.11 | 70% |
| 301595012 | 7.81 | 75.66% | 0.0% | 75.7% | 0.00% | 13.10% | 0.00031 | 480.000 | 5.91 | 5.91 | 0.88 | 21.10 | 3.85 | 0.37 | 45.11 | 70% |
| 3015510132 | 7.81 | 75.66% | 0.0% | 75.7% | 0.00% | 13.10% | 0.00050 | 300.000 | 5.91 | 5.91 | 0.89 | 21.27 | 3.88 | 0.37 | 45.11 | 70% |
| 304174001 | 7.81 | 75.66% | 0.0% | 75.7% | 0.00% | 13.10% | 0.00018 | 850.000 | 5.91 | 5.91 | 0.88 | 21.10 | 3.85 | 0.37 | 45.11 | 70% |
| 3013810032 | 7.81 | 75.66% | 0.0% | 75.7% | 0.00% | 13.10% | 0.00031 | 480.000 | 5.91 | 5.91 | 0.88 | 21.10 | 3.85 | 0.37 | 45.11 | 70% |
| Chemlock EP6887-35 for Parts # | | | | | | | | | | | | | | | | |
| 3043760012 | 8.19 | 73.90% | 0.0% | 73.9% | 0.03% | 15.85% | 0.00015 | 1000.000 | 6.05 | 6.05 | 0.91 | 21.78 | 3.97 | 0.42 | 38.17 | 70% |
| 304410001 | 8.19 | 73.90% | 0.0% | 73.9% | 0.03% | 15.85% | 0.00013 | 1200.000 | 6.05 | 6.05 | 0.91 | 21.78 | 3.97 | 0.42 | 38.17 | 70% |
| Chemlock 205 for Parts # | | | | | | | | | | | | | | | | |
| 307408 | 7.81 | 75.66% | 0.0% | 75.7% | 0.00% | 13.10% | 0.00046 | 325.000 | 5.91 | 5.91 | 0.88 | 21.20 | 3.87 | 0.37 | 45.11 | 70% |
| 3072922203 | 7.81 | 75.66% | 0.0% | 75.7% | 0.00% | 13.10% | 0.00018 | 850.000 | 5.91 | 5.91 | 0.88 | 21.10 | 3.85 | 0.37 | 45.11 | 70% |
| 3072922403 | 7.81 | 75.66% | 0.0% | 75.7% | 0.00% | 13.10% | 0.00030 | 500.000 | 5.91 | 5.91 | 0.89 | 21.27 | 3.88 | 0.37 | 45.11 | 70% |

| | | | | | | | | | | | | | | | | |
|--------------------------|--|--|--|--|--|--|---------------|------------|---------------------|-------------|--------------|--------------|-------------|-------------|--------------|--|
| Worst Case Primer | | | | | | | | | 6.05 | 6.05 | 0.91 | 21.78 | 3.97 | 0.42 | 45.11 | |
| | | | | | | | VOC PM | 0% | Uncontrolled | 0.91 | 21.78 | 3.97 | 0.42 | 0.04 | | |
| | | | | | | | | 90% | Controlled | | | | | | | |

| PB14 Solvent | | | | | | | | | | | | | | | | |
|---------------------------|------|---------|------|--------|-------|-------|---------|------|------|------|------|------|------|------|-----|-----|
| Xylene for Parts # | | | | | | | | | | | | | | | | |
| 3043760012 | 7.24 | 100.00% | 0.0% | 100.0% | 0.00% | 0.00% | 0.00005 | 1000 | 7.24 | 7.24 | 0.36 | 8.69 | 1.59 | 0.00 | n/a | 70% |
| 304410001 | 7.24 | 100.00% | 0.0% | 100.0% | 0.00% | 0.00% | 0.00004 | 1200 | 7.24 | 7.24 | 0.35 | 8.34 | 1.52 | 0.00 | n/a | 70% |

| | | | | | | | | | | | | | | | | |
|--------------------------|--|--|--|--|--|--|------------|-----------|---------------------|-------------|-------------|-------------|-------------|-------------|--|--|
| Worst Case Xylene | | | | | | | | | 7.24 | 7.24 | 0.36 | 8.69 | 1.59 | 0.00 | | |
| | | | | | | | VOC | 0% | Uncontrolled | 0.36 | 8.69 | 1.59 | 0.00 | | | |

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
HAPS emission rate by weight percentage HAP (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A:
Emissions Calculations After Modification
VOC , HAPs and Particulate
Surface Coating Operations On Primarily Metal Automotive Parts & Some Nylon and Plastic Parts

Company Name: **BRC Rubber & Plastics, Inc.**
 Address City IN Zip: **623 West Monroe Street, Montpelier, Indiana 47359**
 Minor Source Modification: **009-28819-00002**
 Significant Permit Modification: **009-28845-00002**
 Reviewer: **Sarah Conner, Ph. D.**
 Date: **01/11/10**

| Material All on Metal Substrate Unless Otherwise Indicated | Density (lbs/gal) | Weight % Volatile (H2O & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (units/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 (tons/yr) | lbs VOC/gal solids | Transfer Efficiency |
|--|-------------------|------------------------------------|----------------|-------------------|----------------|---------------------------------|------------------------|----------------------|---|----------------------------------|---------------------------------|--------------------------------|-------------------------------|---------------------------------|--------------------|---------------------|
| PB14 Adhesive | | | | | | | | | | | | | | | | |
| Chemlock EP6788-50 for Parts # | | | | | | | | | | | | | | | | |
| 3042010012 | 8.19 | 74.96% | 0.0% | 75.0% | 0.00% | 14.85% | 0.000080 | 1900.000 | 6.14 | 6.14 | 0.93 | 22.40 | 4.09 | 0.41 | 41.34 | 70% |
| 3016540022 | 8.19 | 74.96% | 0.0% | 75.0% | 0.00% | 14.85% | 0.000150 | 1000.000 | 6.14 | 6.14 | 0.92 | 22.10 | 4.03 | 0.40 | 41.34 | 70% |
| Chemlock 220X for Parts # | | | | | | | | | | | | | | | | |
| 301525002 | 8.17 | 75.20% | 0.0% | 75.2% | 0.00% | 14.40% | 0.00008 | 2000.000 | 6.14 | 6.14 | 0.92 | 22.12 | 4.04 | 0.40 | 42.67 | 70% |
| Chemlock 252X for Parts # | | | | | | | | | | | | | | | | |
| 301595012 | 8.04 | 77.03% | 0.0% | 77.0% | 0.00% | 13.10% | 0.00031 | 480.000 | 6.19 | 6.19 | 0.92 | 22.12 | 4.04 | 0.36 | 47.28 | 70% |
| 3015510132 | 8.04 | 77.03% | 0.0% | 77.0% | 0.00% | 13.10% | 0.00050 | 300.000 | 6.19 | 6.19 | 0.93 | 22.30 | 4.07 | 0.36 | 47.28 | 70% |
| Chemlock EP6788-50 for Parts # | | | | | | | | | | | | | | | | |
| 304174001 | 8.19 | 74.96% | 0.0% | 75.0% | 0.00% | 13.10% | 0.00018 | 850.000 | 6.14 | 6.14 | 0.91 | 21.92 | 4.00 | 0.40 | 46.86 | 70% |
| 3013810032 | 8.19 | 74.96% | 0.0% | 75.0% | 0.00% | 13.10% | 0.00031 | 480.000 | 6.14 | 6.14 | 0.91 | 21.92 | 4.00 | 0.40 | 46.86 | 70% |
| Chemlock EP6887-35 for Parts # | | | | | | | | | | | | | | | | |
| 3043760012 | 8.19 | 73.90% | 0.0% | 73.9% | 0.03% | 15.85% | 0.00015 | 1000.000 | 6.05 | 6.05 | 0.91 | 21.78 | 3.97 | 0.42 | 38.17 | 70% |
| 304410001 | 8.19 | 73.90% | 0.0% | 73.9% | 0.03% | 15.85% | 0.00013 | 1200.000 | 6.05 | 6.05 | 0.91 | 21.78 | 3.97 | 0.42 | 38.17 | 70% |
| Chemlock 220X for Parts # | | | | | | | | | | | | | | | | |
| 307408 | 8.17 | 75.20% | 0.0% | 75.2% | 0.00% | 14.40% | 0.00046 | 325.000 | 6.14 | 6.14 | 0.92 | 22.04 | 4.02 | 0.40 | 42.67 | 70% |
| Chemlock 252X for Parts # | | | | | | | | | | | | | | | | |
| 3072922203 | 8.04 | 77.03% | 0.03% | 77.0% | 0.02% | 13.67% | 0.00018 | 850.000 | 6.19 | 6.19 | 0.92 | 22.10 | 4.03 | 0.36 | 45.29 | 70% |
| 3072922403 | 8.04 | 77.03% | 0.03% | 77.0% | 0.02% | 13.67% | 0.00030 | 500.000 | 6.19 | 6.19 | 0.93 | 22.29 | 4.07 | 0.36 | 45.29 | 70% |

| | | | | | | | | | | | | | | | | |
|----------------------------|--|--|--|--|--|--|---------------|---------------|---------------------|-------------------|-------------|--------------|-------------|--------------|--------------|--|
| Worst Case Adhesive | | | | | | | | | 6.19 | 6.19 | 0.93 | 22.40 | 4.09 | 0.42 | 47.28 | |
| | | | | | | | VOC PM | 0% 90% | Uncontrolled | Controlled | 0.93 | 22.40 | 4.09 | 0.421 | 0.04 | |

| | | | | | | | | | | | | | | | | |
|---------------------------|------|---------|------|--------|-------|-------|---------|------|------|------|------|------|------|------|-----|-----|
| PB14 Solvent | | | | | | | | | | | | | | | | |
| Xylene for Parts # | | | | | | | | | | | | | | | | |
| 3042010012 | 7.24 | 100.00% | 0.0% | 100.0% | 0.00% | 0.00% | 0.00003 | 1900 | 7.24 | 7.24 | 0.34 | 8.25 | 1.51 | 0.00 | n/a | 70% |
| 3016540022 | 7.24 | 100.00% | 0.0% | 100.0% | 0.00% | 0.00% | 0.00005 | 1000 | 7.24 | 7.24 | 0.36 | 8.69 | 1.59 | 0.00 | n/a | 70% |
| 301525002 | 7.24 | 100.00% | 0.0% | 100.0% | 0.00% | 0.00% | 0.00003 | 2000 | 7.24 | 7.24 | 0.36 | 8.69 | 1.59 | 0.00 | n/a | 70% |
| 301595012 | 7.24 | 100.00% | 0.0% | 100.0% | 0.00% | 0.00% | 0.00011 | 480 | 7.24 | 7.24 | 0.36 | 8.76 | 1.60 | 0.00 | na/ | 70% |
| 3015510132 | 7.24 | 100.00% | 0.0% | 100.0% | 0.00% | 0.00% | 0.00017 | 300 | 7.24 | 7.24 | 0.36 | 8.60 | 1.57 | 0.00 | n/a | 70% |
| 304174001 | 7.24 | 100.00% | 0.0% | 100.0% | 0.00% | 0.00% | 0.00006 | 850 | 7.24 | 7.24 | 0.37 | 8.86 | 1.62 | 0.00 | n/a | 70% |
| 3013810032 | 7.24 | 100.00% | 0.0% | 100.0% | 0.00% | 0.00% | 0.00011 | 480 | 7.24 | 7.24 | 0.36 | 8.76 | 1.60 | 0.00 | n/a | 70% |
| 3043760012 | 7.24 | 100.00% | 0.0% | 100.0% | 0.00% | 0.00% | 0.00005 | 1000 | 7.24 | 7.24 | 0.36 | 8.69 | 1.59 | 0.00 | n/a | 70% |
| 304410001 | 7.24 | 100.00% | 0.0% | 100.0% | 0.00% | 0.00% | 0.00004 | 1200 | 7.24 | 7.24 | 0.35 | 8.34 | 1.52 | 0.00 | n/a | 70% |
| 307408 | 7.24 | 100.00% | 0.0% | 100.0% | 0.00% | 0.00% | 0.00016 | 325 | 7.24 | 7.24 | 0.36 | 8.75 | 1.60 | 0.00 | n/a | 70% |
| 3072922203 | 7.24 | 100.00% | 0.0% | 100.0% | 0.00% | 0.00% | 0.00006 | 850 | 7.24 | 7.24 | 0.37 | 8.86 | 1.62 | 0.00 | n/a | 70% |
| 3072922403 | 7.24 | 100.00% | 0.0% | 100.0% | 0.00% | 0.00% | 0.00010 | 500 | 7.24 | 7.24 | 0.36 | 8.69 | 1.59 | 0.00 | n/a | 70% |

| | | | | | | | | | | | | | | | | |
|--------------------------|--|--|--|--|--|--|------------|-----------|---------------------|-------------|-------------|-------------|-------------|--------------|------------|--|
| Worst Case Xylene | | | | | | | | | 7.24 | 7.24 | 0.37 | 8.86 | 1.62 | 0.00 | n/a | |
| | | | | | | | VOC | 0% | Uncontrolled | | 0.37 | 8.86 | 1.62 | 0.000 | | |

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 hrs/yr) * (1 ton/2000 lbs)
 Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (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
 HAPS emission rate by weight percentage HAP (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

| Summary | Potential Emissions Uncontrolled (tons/yr) | | | Potential Emissions After Controls (tons/yr) | | | Worst case coating usage was first calculated based on actual production data from other existing paint booths. The coating usage then recalculated to account for the increase in coating transfer efficiency. In order to be conservative, it was assumed that the gal of material per unit decreased by a factor of 2 do to the increase in transfer efficiency from 20% to 70%. |
|--|--|------|--------|--|-------------|-------------|---|
| | VOC | PM | Xylene | VOC | PM | Xylene | |
| PB4&5 (Per Booth) | | | | | | | |
| Primer | 3.97 | 0.42 | 0.00 | 5.56 | 0.42 | 1.59 | |
| Primer Solvent | 0.00 | 0.00 | 1.59 | | | | |
| Adhesive | 4.09 | 0.42 | 0.00 | 5.70 | 0.42 | 1.62 | |
| Adhesive Solvent | 0.00 | 0.00 | 1.62 | | | | |
| Worse Case Primer or Adhesive + Solvent | | | | 5.70 | 0.42 | 1.62 | |

**Appendix A:
Emissions Calculations After Modification
VOC , HAPs and Particulate
Surface Coating Operations On Primarily Metal Automotive Parts & Some Nylon and Plastic Parts**

Company Name: BRC Rubber & Plastics, Inc.
Address City IN Zip: 623 West Monroe Street, Montpelier, Indiana 47359
Minor Source Modification: 009-28819-00002
Significant Permit Modification: 009-28845-00002
Reviewer: Sarah Conner, Ph. D.
Date: 01/11/10

PB14

| Material All on Metal Substrate Unless Otherwise Indicated | Density (lbs/gal) | Weight % Volatile (H2O & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (units/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 (tons/yr) | lbs VOC/gal solids | Transfer Efficiency |
|--|-------------------|------------------------------------|----------------|-------------------|----------------|---------------------------------|------------------------|----------------------|---|----------------------------------|---------------------------------|--------------------------------|-------------------------------|---------------------------------|--------------------|---------------------|
| PB15 Primer | | | | | | | | | | | | | | | | |
| Chemlock 205 for Parts # | | | | | | | | | | | | | | | | |
| 3072922103 | 7.87 | 74.37% | 0.0% | 74.4% | 0.00% | 13.65% | 0.00110 | 264.000 | 5.85 | 5.85 | 1.70 | 40.79 | 7.44 | 2.05 | 42.88 | 20% |
| 3072922303 | 7.87 | 74.37% | 0.0% | 74.4% | 0.00% | 13.65% | 0.00150 | 200.000 | 5.85 | 5.85 | 1.76 | 42.14 | 7.69 | 2.12 | 42.88 | 20% |
| Worst Case Primer | | | | | | | | | 5.85 | 5.85 | 1.76 | 42.14 | 7.69 | 2.12 | 42.88 | |
| | | | | | | | VOC | 0% | Uncontrolled | | 1.76 | 42.14 | 7.69 | 2.12 | | |
| | | | | | | | PM | 90% | Controlled | | | | | 0.21 | | |
| PB15 Solvent | | | | | | | | | | | | | | | | |
| Xylene for Parts # | | | | | | | | | | | | | | | | |
| | 0.00 | 100.00% | 0.0% | 100.0% | 0.00% | 0.00% | 0.00000 | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | n/a | 20% |
| Worst Case Xylene | | | | | | | | | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | | |
| | | | | | | | VOC | 0% | Uncontrolled | | 0.00 | 0.00 | 0.00 | 0.00 | | |

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
HAPS emission rate by weight percentage HAP (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A:
Emissions Calculations After Modification
VOC , HAPs and Particulate
Surface Coating Operations On Primarily Metal Automotive Parts & Some Nylon and Plastic Parts

Company Name: BRC Rubber & Plastics, Inc.
 Address City IN Zip: 623 West Monroe Street, Montpelier, Indiana 47359
 Minor Source Modification: 009-28819-00002
 Significant Permit Modification: 009-28845-00002
 Reviewer: Sarah Conner, Ph. D.
 Date: 01/11/10

| Material All on Metal Substrate Unless Otherwise Indicated | Density (lbs/gal) | Weight % Volatile (H2O & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (units/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 (tons/yr) | lbs VOC/gal solids | Transfer Efficiency | |
|--|-------------------|------------------------------------|----------------|-------------------|----------------|---------------------------------|------------------------|----------------------|---|----------------------------------|---------------------------------|--------------------------------|-------------------------------|---------------------------------|--------------------|---------------------|--|
| PB15 Adhesive | | | | | | | | | | | | | | | | | |
| Chemlock EP6887-35 for Parts # | | | | | | | | | | | | | | | | | |
| 304410002 | 8.19 | 73.90% | 0.0% | 73.9% | 0.03% | 15.85% | 0.00140 | 220.000 | 6.05 | 6.05 | 1.86 | 44.72 | 8.16 | 0.87 | 38.17 | 70% | |
| Chemlock 253X for Parts # | | | | | | | | | | | | | | | | | |
| 3072922103 | 8.27 | 74.38% | 0.03% | 74.4% | 0.02% | 14.23% | 0.00110 | 264.000 | 6.15 | 6.15 | 1.79 | 42.85 | 7.82 | 0.81 | 43.21 | 70% | |
| 3072922303 | 8.27 | 74.38% | 0.03% | 74.4% | 0.02% | 14.23% | 0.00150 | 200.000 | 6.15 | 6.15 | 1.84 | 44.27 | 8.08 | 0.84 | 43.21 | 70% | |
| Worst Case Adhesive | | | | | | | | | 6.15 | 6.15 | 1.86 | 44.72 | 8.16 | 0.87 | 43.21 | | |
| VOC | | | | | | | | | 0% | Uncontrolled | | 1.86 | 44.72 | 8.16 | 0.865 | | |
| PM | | | | | | | | | 90% | Controlled | | | | | 0.09 | | |
| PB14 Solvent | | | | | | | | | | | | | | | | | |
| Xylene for Parts # | | | | | | | | | | | | | | | | | |
| 3042010012 | 7.24 | 100.00% | 0.0% | 100.0% | 0.00% | 0.00% | 0.00050 | 220 | 7.24 | 7.24 | 0.80 | 19.11 | 3.49 | 0.00 | n/a | 70% | |
| 3072922103 | 7.24 | 100.00% | 0.0% | 100.0% | 0.00% | 0.00% | 0.00040 | 264 | 7.24 | 7.24 | 0.76 | 18.35 | 3.35 | 0.00 | n/a | 70% | |
| 3072922303 | 7.24 | 100.00% | 0.0% | 100.0% | 0.00% | 0.00% | 0.00050 | 200 | 7.24 | 7.24 | 0.72 | 17.38 | 3.17 | 0.00 | n/a | 70% | |
| Worst Case Xylene | | | | | | | | | 7.24 | 7.24 | 0.80 | 19.11 | 3.49 | 0.00 | n/a | | |
| VOC | | | | | | | | | 0% | Uncontrolled | | 0.80 | 19.11 | 3.49 | 0.000 | | |

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
 HAPS emission rate by weight percentage HAP (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

| Summary | Potential Emissions Uncontrolled (tons/yr) | | | | | | Potential Emissions After Controls (tons/yr) | | | Worst case coating usage was calculated based on actual production data from other existing paint booths. |
|--|--|------|--------|--------------|-------------|-------------|--|-------------|-------------|---|
| | VOC | PM | Xylene | VOC | PM | Xylene | VOC | PM | Xylene | |
| PB4&5 (Per Booth) | | | | | | | | | | |
| Primer | 7.69 | 2.12 | 0.00 | 7.69 | 2.12 | 0.00 | 7.69 | 0.21 | 0.00 | |
| Primer Solvent | 0.00 | 0.00 | 0.00 | | | | | | | |
| Adhesive | 8.16 | 0.87 | 0.00 | 11.65 | 0.87 | 3.49 | 11.65 | 0.09 | 3.49 | |
| Adhesive Solvent | 0.00 | 0.00 | 3.49 | | | | | | | |
| Worse Case Primer or Adhesive + Solvent | | | | 11.65 | 2.12 | 3.49 | 11.65 | 0.21 | 3.49 | |



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

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

TO: Thomas Maher
BRC Rubber & Plastics, Inc.
589 US 33 S P.O. Box 227
Churusbusco, IN 46723

DATE: February 5, 2010

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

SUBJECT: Final Decision
Minor Source Modification
009-28819-00002

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:
James Konuch - IWM Consulting Group, LLC
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07

Mail Code 61-53

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|----------------------------|---|---|---|--|
| IDEM Staff | GHOTOPP 2/5/2010 BRC Rubber & Plastics, Inc 009-28819-00002 Final | | Type of Mail: CERTIFICATE OF MAILING ONLY | 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 | | |

| Line | Article Number | Name, Address, Street and Post Office Address | Postage | Handing Charges | Act. Value (If Registered) | Insured Value | Due Send if COD | R.R. Fee | S.D. Fee | S.H. Fee | Rest. Del. Fee | Remarks |
|------|----------------|---|---------|-----------------|----------------------------|---------------|-----------------|----------|----------|----------|----------------|---------|
| 1 | | Thomas Maher BRC Rubber & Plastics, Inc 589 US 33 S, PO Box 227 Churubusco IN 46723 (Source CAATS) via confirmed delivery | | | | | | | | | | |
| 2 | | Mr. Charles L. Berger Attorney Berger & Berger, Attorneys at Law 313 Main Street Evansville IN 47700 (Affected Party) | | | | | | | | | | |
| 3 | | Blackford County Commissioners 110 West Washington Street Hartford City IN 47348 (Local Official) | | | | | | | | | | |
| 4 | | Blackford County Health Department 506 E. Van Cleve Street Hartford City IN 47348-1846 (Health Department) | | | | | | | | | | |
| 5 | | Ms. Mary Shipley 10968 E 100 S Marion IN 46953 (Affected Party) | | | | | | | | | | |
| 6 | | Daryl & Lois Hoffman 7750 N. CR 75 E Lizton IN 46149 (Affected Party) | | | | | | | | | | |
| 7 | | Mr. Dan Baugey 1610 W Water Street #D Hartford City IN 47348 (Affected Party) | | | | | | | | | | |
| 8 | | Montpelier City Council and Mayors Office 300 W. Huntington St. Montpelier IN 47359 (Local Official) | | | | | | | | | | |
| 9 | | James Konuch IWM Consulting Group, LLC 3640-C New Vision Dr Fort Wayne IN 46845 (Consultant) | | | | | | | | | | |
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| 8 | | | |