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 8, 2011

RE: Hendrickson Trailer Suspension Systems / 011-29872-00037

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

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot12/03/07

IDEM

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Mr. Frank Hezoucky
Hendrickson Trailer Suspension Systems
2070 Industrial Place SE
Canton, Ohio, 44707

February 8, 2011

Re: 011-29872-00037
First Significant Source Modification to
Part 70 Permit No.: T011-20119-00037

Dear Mr. Hezoucky

Hendrickson Trailer Suspension Systems was issued a Part 70 Operating Permit No. T011-20119-00037 on February 2, 2006 for a stationary metal finishing plant for trailer suspension systems located at 180 Mount Zion Road, Lebanon, Indiana 46052. IDEM, OAQ has reviewed a request for a source modification, submitted by Hendrickson Trailer Suspension Systems on April 21, 2010, relating to the addition of new coating materials to the surface coating operations at its existing stationary metal finishing plant for trailer suspension systems. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for modification at the source:

(a) One (1) paint spray booth for painting metal parts, identified as EP-2, with a maximum production rate of 21.47 trailer parts per hour, using a dry filter as control, constructed in 1995, and modified in 2007, and exhausting at stack S-1.

(b) One (1) paint spray booth for painting metal parts, identified as EP-9, with a maximum production rate of 16.91 trailer parts per hour, using a dry filter as control, constructed in 1997, and modified in 2007, and exhausting at stack S-2.

(c) One (1) touch-up paint booth for painting metal parts, identified as EP-12, with a maximum production rate of 21.47 trailer parts per hour, using a dry filter as control, constructed in 2002, and modified in 2007, and exhausting at stack S-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.

This significant source modification authorizes construction of the modified emission units. Operating conditions shall be incorporated into the Part 70 operating permit second renewal No.: T011-29188-00037.

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: Affected Permit Pages, TSD and TSD Appendix A

DFR/slc

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

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

Hendrickson Trailer Suspension Systems
180 Mount Zion Road
Lebanon, Indiana 46052

(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.

Significant Source Modification No.: 011-29872-00037	Pages Affected: 5, 6, 25 through 29, 32 Pages Added: 5B, 6A, 6B, 25B, 26B, 27B, 27C, 29B, 29C, 29D, 32B
Issued by: Donald F. Robin, P.E., Section Chief Permits Branch Office of Air Quality	Issuance Date: February 8, 2011

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 metal finishing plant for trailer suspension systems.

Responsible Official:	Plant Manager
Source Address:	180 Mount Zion Road, Lebanon, Indiana 46052
Mailing Address:	180 Mount Zion Road, Lebanon, Indiana 46052
General Source Phone Number:	(765) 483-5350
SIC Code:	3714
County Location:	Boone
Source Location Status:	Nonattainment for 8-hour ozone standard Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source under PSD 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) paint spray booth for painting metal parts, identified as EP-2, with a maximum production rate of 21.47 trailer parts per hour, using a dry filter as control, constructed in 1995, and modified in 2007, and exhausting at stack S-1.

(b) One (1) paint spray booth for painting metal parts, identified as EP-9, with a maximum production rate of 16.91 trailer parts per hour, using a dry filter as control, constructed in 1997, and modified in 2007, and exhausting at stack S-2.

(c) One (1) touch-up paint booth for painting metal parts, identified as EP-12, with a maximum production rate of 21.47 trailer parts per hour, using dry filter as control, constructed in 2002, and modified in 2007, and exhausting at stack S-3.

Under the NESHAP for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63, Subpart MMMM) EP-2, EP-9 and EP-12 are considered affected facilities.

A.3 Specifically Regulated 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 which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Welding operations, consisting of:

(1) Two (2) robotic welding stations and one (1) manual station, identified as EP-6A, combined using 34.6 pounds of welding consumables per hour, using RoboVent Smoke Dust Collector, and exhausting to the atmosphere. [326 IAC 6-3-2]

(2) Nine (9) robotic welding stations and two (2) manual stations, identified as EP-6B, combined using 38.9 pounds of welding consumables per hour, using dust collector Torit 002, and exhausting to the atmosphere. [326 IAC 6-3-2]

(3) Eighteen (18) robotic welding stations, identified as EP-7, combined using 58.6 pounds of welding consumables per hour, using dust collector Torit 001, and exhausting to the atmosphere. [326 IAC 6-3-2]

(4) One (1) manual stations, identified as EP-8A, combined using 0.2 pounds of welding consumables per hour, using Airflow Smoke Dust Collector, and exhausting to the atmosphere. [326 IAC 6-3-2]

(5) Four (4) robotic welding stations, two (2) hand weld surelok stations, and four (4) hand weld frame bracket stations, identified as E8-B, combined using 25.4 pounds of welding consumables per hour, using dust collector Torit 003, and exhausting to the atmosphere. [326 IAC 6-3-2]

(b) One (1) Laser Cutting Machine, identified as EP-5, with a maximum capacity of 20 parts per hour, constructed in 2002, and exhausting indoors. [326 IAC 6-3-2]

(c) Degreasing operations, that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6, consisting of one (1) maintenance cleaning station and paint booth parts cleaner, identified as gun cleaning station. [326 IAC 8-3-2] [326 IAC 8-3-5]

(d) Combustion related activities including spaces heaters, process heaters, or boilers using natural gas-fired with heat input equal to or less than ten million (10,000,000) British thermal units per hour; [326 IAC 6-2-4]

(1) Four (4) natural gas-fired air make-up units, with a combined maximum heat input capacity of 2.72 MMBtu/hr and;

(2) One (1) natural gas-fired air make-up unit, with a maximum heat input capacity of 1.50 MMBtu/hr and;

(3) One (1) natural gas-fired air make-up unit, with a maximum heat input capacity of 2.90 MMBtu/hr and;

(4) One (1) natural gas-fired clean/phosphate heater, with a maximum heat input capacity of 1.50 MMBtu/hr and;

(5) One (1) natural gas-fired slider box heater, with a maximum heat input capacity of 1.30 MMBtu/hr and;

(6) One (1) natural gas-fired dry-off oven, with a maximum heat input capacity of 1.60 MMBtu/hr and;

(7) One (1) natural gas-fired bake oven, with a maximum heat input capacity of 2.80 MMBtu/hr.

(e) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

(f) The following VOC and HAP storage containers:

(1) Three (3) closed vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids.

(g) Cleaners and solvents, identified as EP-3, characterized as follows:

(1) having a vapor pressure equal to or less than 2kPa, 15 mm Hg or 0.3 psi measured at 38°C (100°F) or;

(2) having a vapor pressure equal to or less than 0.7 kPa, 5 mm Hg or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(3) One (1) parts washer, identified as maintenance small parts washer, with dimensions are approximately 2’ x 2’ x 2’, constructed in 1995, and exhausting indoors.

(h) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.

(1) One (1) Evaporator, identified as Lake View Evaporator, with a maximum capacity of 0.39 MMBtu/hr, constructed in 2002, and exhausting through Evaporator Stack.

(i) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(1) One (1) Smoke Dust Collector, identified as RoboVent Smoke Dust Collector, with a maximum air throughput of 15,000 cfm, installed in 2005, and exhausting to the atmosphere.

(2) One (1) Dust Collector, identified as Torit 002, with a maximum air throughput of 22,000 cfm, installed in 1998, and exhausting to the atmosphere.

(3) One (1) Dust Collector, identified as Torit 001, with a maximum air throughput of 28,000 cfm, installed in 1995, and exhausting to the atmosphere.

(4) One (1) Smoke Dust Collector, identified as Airflow Smoke Dust Collector, with a maximum air throughput of 1,200 cfm, installed in 2008, and exhausting to the atmosphere.

(5) One (1) Dust Collector, identified as Torit 003, with a maximum air throughput of 24,000 cfm, installed in 2010, and exhausting to the atmosphere.

(j) Sealant operations, consisting of a viscous, semi-solid sealant applied with a high pressure caulking gun and emitting no particulate, emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, emitting less than five (5) pounds per hour or twenty-five (25) pounds per day of VOC.

(1) One (1) Hand Held Dispensing Unit, identified as Axle Sealant Operation, with a maximum capacity of 22 axles per hour, constructed in 1995, and exhausting to the atmosphere.

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 D.1 FACILITY OPERATION CONDITIONS

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

(a) One (1) paint spray booth for painting metal parts, identified as EP-2, with a maximum production rate of 21.47 trailer parts per hour, using a dry filter as control, constructed in 1995, and modified in 2007, and exhausting at stack S-1.

(b) One (1) paint spray booth for painting metal parts, identified as EP-9, with a maximum production rate of 16.91 trailer parts per hour, using a dry filter as control, constructed in 1997, and modified in 2007, and exhausting at stack S-2.

(c) One (1) touch-up paint booth for painting metal parts, identified as EP-12, with a maximum production rate of 21.47 trailer parts per hour, using dry filter as control, constructed in 2002, and modified in 2007, and exhausting at stack S-3.

Under the NESHAP for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63, Subpart MMMM) EP-2, EP-9 and EP-12 are considered affected facilities.

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

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

The total input of VOC, including coatings, dilution solvents, and cleaning solvents, to paint booths EP-2, EP-9, and EP-12 shall be less than 225.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit VOC from other emission units at the source, shall limit the VOC from the entire source to less than 250 tons per twelve (12) consecutive month period and render the requirements of 326 IAC 2-2 not applicable.

D.1.2 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9(c), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts and products may cause, allow, or permit the discharge into the atmosphere of any VOC in excess of the following:

(1) Fifty-two hundredths (0.52) kilogram per liter (four and three-tenths (4.3) pounds per gallon) of coating, excluding water, delivered to a coating applicator that applies clear coatings. A clear coating is a coating that:

(A) lacks color or opacity; and

(B) is transparent and uses the undercoat as a reflectant base or undertone color.

(2) Forty-two hundredths (0.42) kilogram per liter (three and five-tenths (3.5) pounds per gallon) of coating excluding water, delivered to a coating applicator in a coating application system that is air dried or forced warm air dried at temperatures up to ninety (90) degrees Celsius (one hundred ninety-four (194) degrees Fahrenheit).

(3) Forty-two hundredths (0.42) kilogram per liter (three and five-tenths (3.5) pounds per gallon) of coating, excluding water, delivered to a coating applicator that applies extreme performance coatings. Extreme performance coatings are coatings designed for exposure to:

(A) temperatures consistently above ninety-five (95) degrees Celsius;

(B) detergents;

(C) abrasive or scouring agents;

(D) solvents;

(E) corrosive atmospheres;

(F) outdoor weather at all times; or

(G) similar environmental conditions.

(4) Thirty-six hundredths (0.36) kilogram per liter (three (3) pounds per gallon) of coating, excluding water, delivered to a coating applicator for all other coatings and coating application systems.

(b) Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:

(1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.

(2) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.

(3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.

(4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.

(5) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

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

Pursuant to 326 IAC 6-3-2(d), particulate from paint booths EP-2, EP-9, and EP-12 shall be controlled by a dry particulate filter, and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds [326 IAC 8-1-2] [326 IAC 8-1-4] [326 IAC 2-2]

Compliance with the VOC limitation contained in Conditions D.1.1 and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.6 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booths stacks (S-1, S-2, S-3) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps 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 emission, or when evidence of overspray emissions is observed at any stack exhaust, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps 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.1.7 Record Keeping Requirements

(a) To document compliance with Condition D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits and VOC content limits established in Conditions D.1.1 and D.1.2.

(1) The VOC content of each coating material and solvent.

(2) The amount of coating material and solvent less water used on monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvent.

(3) The volume weighted average VOC content of the coatings used for each month

(4) The daily cleanup solvent usage for each month;

(5) The total VOC usage for each month; and

(6) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.1.6, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.

(c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.8 Reporting Requirements

(a) A quarterly summary of the information to document the compliance status with Condition D.1.1 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported.

(b) Section C - General Reporting contains the Permittee’s obligation with regard to the reporting required by this condition. The reports submitted by the Permittee do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(a) Welding operations, consisting of:

(1) Two (2) robotic welding stations and one (1) manual station, identified as EP-6A, combined using 34.6 pounds of welding consumables per hour, using RoboVent Smoke Dust Collector, and exhausting to the atmosphere. [326 IAC 6-3-2]

(2) Nine (9) robotic welding stations and two (2) manual stations, identified as EP-6B, combined using 38.9 pounds of welding consumables per hour, using dust collector Torit 002, and exhausting to the atmosphere. [326 IAC 6-3-2]

(3) Eighteen (18) robotic welding stations, identified as EP-7, combined using 58.6 pounds of welding consumables per hour, using dust collector Torit 001, and exhausting to the atmosphere. [326 IAC 6-3-2]

(4) One (1) manual stations, identified as EP-8A, combined using 0.2 pounds of welding consumables per hour, using Airflow Smoke Dust Collector, and exhausting to the atmosphere. [326 IAC 6-3-2]

(5) Four (4) robotic welding stations, two (2) hand weld surelok stations, and four (4) hand weld frame bracket stations, identified as E8-B, combined using 25.4 pounds of welding consumables per hour, using dust collector Torit 003, and exhausting to the atmosphere. [326 IAC 6-3-2]

(b) One (1) Laser Cutting Machine, identified as EP-5, with a maximum capacity of 20 parts per hour, constructed in 2002, and exhausting indoors. [326 IAC 6-3-2]

(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 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 laser cutting machine (EP-5) shall not exceed 2.2 pounds per hour when operating at a process weight rate of 803.4 pounds per hour.

(b) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the listed emission units shall be limited by the following:

Emission unit	Operation Description	Maximum Process Weight (tons/hour)	326 IAC 6-3 Limit (lbs/hr)	PM/PM10 Emission Factor (lbs PM10/1,000 lbs electrode)	Max PTE Particulate (lb/hour)
EP-6A	Sub-rail: Miller AutoAxcess 450 (x2); Robotic Tandem, L-56, .052" wire.	1.72	5.89	5.20	0.18
	K-brace: Miller XMT 456 (x1); Manual Single, L-59, .045" wire.	1.72	5.89	5.20	0.18
EP-6B	Final #1: Miller AutoAxcess 450 (x2); Robotic Single, L-59, .045" wire.	0.64	3.05	5.20	0.07
	Final #2: Miller AutoAxcess 450 (x4); Robotic Tandem, L-59, .045" wire.	0.64	3.05	5.20	0.07
	Final #3: Miller AutoAxcess 450 (x4); Robotic Tandem, L-59, .045" wire.	0.64	3.05	5.20	0.07
EP-7	Suspension 451: Miller AutoAxcess 450 (x2); Robotic Single, L-59, .045" wire.	1.93	6.36	5.20	0.08
	Suspension 680: Miller AutoAxcess 450 (x4); Robotic Tandem, L-59, .045" wire.	1.93	6.36	5.20	0.08
	Suspension 1286: Cloos 503 (x4), Robotic Tandem, L-59, .045" wire.	1.93	6.36	5.20	0.08
	All Beam robots (x7): Miller AutoAxcess 450; Robotic Single, L-59, .062" wire.	0.28	1.73	5.20	0.06
EP-8B	One Robotic (4026): 4 Miller AutoAxcess, Tandem Torch, L-59, .045" wire.	1.93	6.36	5.20	0.08
	6 Hand weld stations: Miller XMT 456, Manual Single, L-59, .045" wire.	0.15	1.15	5.20	0.01
		0.20	1.41	5.20	0.04

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

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

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

(c) Pursuant to 326 IAC 6-3-2(e)(2), EP-7EP-8 shall not exceed 0.551 lbs/hr based on a process weight rate of less than 100 lbs/hour.

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

(c) Degreasing operations, that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6, consisting of one (1) maintenance cleaning station and paint booth parts cleaner, identified as gun cleaning station. [326 IAC 8-3-2] [326 IAC 8-3-5]

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

D.3.1 Cold Cleaner (Degreaser) Operations [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), 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.3.2 Cold Cleaner (Degreaser) Operations [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), 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^{o}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 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 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.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(d) Combustion related activities including spaces heaters, process heaters, or boilers using natural gas-fired with heat input equal to or less than ten million (10,000,000) British thermal units per hour; [326 IAC 6-2-4]

(1) Four (4) natural gas-fired air make-up units, with a combined maximum heat input capacity of 2.72 MMBtu/hr and;

(2) One (1) natural gas-fired air make-up unit, with a maximum heat input capacity of 1.50 MMBtu/hr and;

(3) One (1) natural gas-fired air make-up unit, with a maximum heat input capacity of 2.90 MMBtu/hr and;

(4) One (1) natural gas-fired clean/phosphate heater, with a maximum heat input capacity of 1.50 MMBtu/hr and;

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

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

D.4.1 Particulate Emissions [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from all of the air make-up units and from the clean/phosphate heater, shall each be limited to 0.52 pound per MMBtu heat input.

SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) paint spray booth for painting metal parts, identified as EP-2, with a maximum production rate of 21.47 trailer parts per hour, using a dry filter as control, constructed in 1995, and modified in 2007, and exhausting at stack S-1.

(b) One (1) paint spray booth for painting metal parts, identified as EP-9, with a maximum production rate of 16.91 trailer parts per hour, using a dry filter as control, constructed in 1997, and modified in 2007, and exhausting at stack S-2.

(c) One (1) touch-up paint booth for painting metal parts, identified as EP-12, with a maximum production rate of 21.47 trailer parts per hour, using a dry filter as control, constructed in 2002, and modified in 2007, and exhausting at stack S-3.

Under the NESHAP for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63, Subpart MMMM) EP-2, EP-9 and EP-12 are considered affected facilities.

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

E.1.1 General Provisions Relating to NESHAP MMMM [326 IAC 20-1] [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 MMMM in accordance with the schedule in 40 CFR 63, Subpart MMMM.

E.1.2 Surface Coating of Miscellaneous Metal Parts and Products NESHAP [40 CFR Part 63, Subpart MMMM]

The Permittee which engages in surface coating of miscellaneous metal parts and products shall comply with the provisions of 40 CFR Part 63, Subpart MMMM, as follows. The full text of Subpart MMMM may be found in Attachment A to this permit.

This source 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(b)
(6) 40 CFR 63.3882(a)
(7) 40 CFR 63.3882(b)
(8) 40 CFR 63.3882(e)
(9) 40 CFR 63.3883
(10) 40 CFR 63.3883(c)(2)
(11) 40 CFR 63.3883(d)
(12) 40 CFR 63.3890(b)
(13) 40 CFR 63.3890(b)(1)
(14) 40 CFR 63.3891
(15) 40 CFR 63.3891(a)
(16) 40 CFR 63.3891(b)
(17) 40 CFR 63.3892(a)
(18) 40 CFR 63.3893(a)
(19) 40 CFR 63.3900(a)
(20) 40 CFR 63.3900(a)(1)

(21) 40 CFR 63.3900(b)
(22) 40 CFR 63.3901
(23) 40 CFR 63.3910(a)
(24) 40 CFR 63.3910(b)
(25) 40 CFR 63.3910(c)(1) through (c)(7), (c)(8)(i) and (c)(8)(ii)
(26) 40 CFR 63.3920(a)
(27) 40 CFR 63.3920(a)(1) through (a)(6)
(28) 40 CFR 63.3930
(29) 40 CFR 63.3930(a)
(30) 40 CFR 63.3930(b)
(31) 40 CFR 63.3930(c)(1) through (c)(3)
(32) 40 CFR 63.3930(d) through (g)
(33) 40 CFR 63.3930(j)
(34) 40 CFR 63.3931
(35) 40 CFR 63.3940
(36) 40 CFR 63.3941
(37) 40 CFR 63.3942
(38) 40 CFR 63.3950
(39) 40 CFR 63.3951
(40) 40 CFR 63.3952
(41) 40 CFR 63.3980
(42) 40 CFR 63.3981
(43) Table 2 to Subpart MMMM
(44) Table 3 to Subpart MMMM
(45) Table 4 to Subpart MMMM

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

Part 70 Quarterly Report

Source Name: Hendrickson Trailer Suspension Systems
Source Address: 180 Mount Zion Road, Lebanon, Indiana 46052
Part 70 Permit No.: T011-29188-00037
Facility: The total input of VOC, including coatings, dilution solvents, and cleaning solvents, to paint booths EP-2, EP-9, and EP-12
Parameter: VOC Usage
Limit: shall be less than 225.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER : YEAR:

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

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

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

Attachment A
to Part 70 Operating Permit Renewal No. T011-20119-00037

Hendrickson Trailer Suspension Systems
180 Mount Zion Road, Lebanon, Indiana 46052

Subpart MMMM—National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products

Source: 69 FR 157, Jan. 2, 2004, unless otherwise noted.

What This Subpart Covers

§ 63.3880 What is the purpose of this subpart?

This subpart establishes national emission standards for hazardous air pollutants (NESHAP) for miscellaneous metal parts and products surface coating facilities. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations.

§ 63.3881 Am I subject to this subpart?

(a) Miscellaneous metal parts and products include, but are not limited to, metal components of the following types of products as well as the products themselves: motor vehicle parts and accessories, bicycles and sporting goods, recreational vehicles, extruded aluminum structural components, railroad cars, heavy duty trucks, medical equipment, lawn and garden equipment, electronic equipment, magnet wire, steel drums, industrial machinery, metal pipes, and numerous other industrial, household, and consumer products. Except as provided in paragraph (c) of this section, the source category to which this subpart applies is the surface coating of any miscellaneous metal parts or products, as described in paragraph (a)(1) of this section, and it includes the subcategories listed in paragraphs (a)(2) through (6) of this section.

(1) Surface coating is the application of coating to a substrate using, for example, spray guns or dip tanks. When application of coating to a substrate occurs, then surface coating also includes associated activities, such as surface preparation, cleaning, mixing, and storage. However, these activities do not comprise surface coating if they are not directly related to the application of the coating. Coating application with handheld, non-refillable aerosol containers, touch-up markers, marking pens, or the application of paper film or plastic film which may be pre-coated with an adhesive by the manufacturer are not coating operations for the purposes of this subpart.

(2) The general use coating subcategory includes all surface coating operations that are not high performance, magnet wire, rubber-to-metal, or extreme performance fluoropolymer coating operations.

(3) The high performance coating subcategory includes surface coating operations that are performed using coatings that meet the definition of high performance architectural coating or high temperature coating in §63.3981.

(4) The magnet wire coating subcategory includes surface coating operations that are performed using coatings that meet the definition of magnet wire coatings in §63.3981.

(5) The rubber-to-metal coatings subcategory includes surface coating operations that are performed using coatings that meet the definition of rubber-to-metal coatings in §63.3981.

(6) The extreme performance fluoropolymer coatings subcategory includes surface coating operations that are performed using coatings that meet the definition of extreme performance fluoropolymer coatings in §63.3981.

(b) You are subject to this subpart if you own or operate a new, reconstructed, or existing affected source, as defined in §63.3882, that uses 946 liters (250 gallons (gal)) per year, or more, of coatings that contain hazardous air pollutants (HAP) in the surface coating of miscellaneous metal parts and products defined in paragraph (a) of this section; and that is a major source, is located at a major source, or is part of a major source of emissions of HAP. A major source of HAP emissions is any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit any single HAP at a rate of 9.07 megagrams (Mg) (10 tons) or more per year or any combination of HAP at a rate of 22.68 Mg (25 tons) or more per year. You do not need to include coatings that meet the definition of non-HAP coating contained in §63.3981 in determining whether you use 946 liters (250 gal) per year, or more, of coatings in the surface coating of miscellaneous metal parts and products.

(c) This subpart does not apply to surface coating or a coating operation that meets any of the criteria of paragraphs (c)(1) through (17) of this section.

(1) A coating operation conducted at a facility where the facility uses only coatings, thinners and other additives, and cleaning materials that contain no organic HAP, as determined according to §63.3941(a).

(2) Surface coating operations that occur at research or laboratory facilities, or is part of janitorial, building, and facility maintenance operations, or that occur at hobby shops that are operated for noncommercial purposes.

(3) Coatings used in volumes of less than 189 liters (50 gal) per year, provided that the total volume of coatings exempt under this paragraph does not exceed 946 liters (250 gal) per year at the facility.

(4) The surface coating of metal parts and products performed on-site at installations owned or operated by the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State) or the National Aeronautics and Space Administration, or the surface coating of military munitions manufactured by or for the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State).

(5) Surface coating where plastic is extruded onto metal wire or cable or metal parts or products to form a coating.

(6) Surface coating of metal components of wood furniture that meet the applicability criteria for wood furniture manufacturing (subpart JJ of this part).

(7) Surface coating of metal components of large appliances that meet the applicability criteria for large appliance surface coating (subpart NNNN of this part).

(8) Surface coating of metal components of metal furniture that meet the applicability criteria for metal furniture surface coating (subpart RRRR of this part).

(9) Surface coating of metal components of wood building products that meet the applicability criteria for wood building products surface coating (subpart QQQQ of this part).

(10) Surface coating of metal components of aerospace vehicles that meet the applicability criteria for aerospace manufacturing and rework (40 CFR part 63, subpart GG).

(11) Surface coating of metal parts intended for use in an aerospace vehicle or component using specialty coatings as defined in appendix A to subpart GG of this part.

(12) Surface coating of metal components of ships that meet the applicability criteria for shipbuilding and ship repair (subpart II of this part).

(13) Surface coating of metal using a web coating process that meets the applicability criteria for paper and other web coating (subpart JJJJ of this part).

(14) Surface coating of metal using a coil coating process that meets the applicability criteria for metal coil coating (subpart SSSS of this part).

(15) Surface coating of boats or metal parts of boats (including, but not limited to, the use of assembly adhesives) where the facility meets the applicability criteria for boat manufacturing facilities (subpart VVVV of this part), except where the surface coating of the boat is a metal coating operation performed on personal watercraft or parts of personal watercraft. This subpart does apply to metal coating operations performed on personal watercraft and parts of personal watercraft.

(16) Surface coating of assembled on-road vehicles that meet the applicability criteria for the assembled on-road vehicle subcategory in plastic parts and products surface coating (40 CFR part 63, subpart PPPP).

(17) Surface coating of metal components of automobiles and light-duty trucks that meets the applicability criteria in §63.3082(b) for the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (40 CFR part 63, subpart IIII) at a facility that meets the applicability criteria in §63.3081(b).

(d) If your facility meets the applicability criteria in §63.3081(b) of the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (40 CFR part 63, subpart IIII), and you perform surface coating of metal parts or products that meets both the applicability criteria in §63.3082(c) and the applicability criteria of the Surface Coating of Miscellaneous Metal Parts and Products (40 CFR part 63, subpart MMMM), then for the surface coating of any or all of your metal parts or products that meets the applicability criteria in §63.3082(c), you may choose to comply with the requirements of subpart IIII of this part in lieu of complying with the Surface Coating of Miscellaneous Metal Parts and Products NESHAP. Surface coating operations on metal parts or products (e.g., parts for motorcycles or lawnmowers) not intended for use in automobiles, light-duty trucks, or other motor vehicles as defined in §63.3176 cannot be made part of your affected source under subpart IIII of this part.

(e) If you own or operate an affected source that meets the applicability criteria of this subpart and at the same facility you also perform surface coating that meets the applicability criteria of any other final surface coating NESHAP in this part you may choose to comply as specified in paragraph (e)(1), (2), or (3) of this section.

(1) You may have each surface coating operation that meets the applicability criteria of a separate NESHAP comply with that NESHAP separately.

(2) You may comply with the emission limitation representing the predominant surface coating activity at your facility, as determined according to paragraphs (e)(2)(i) and (ii) of this section. However, you may not establish high performance, rubber-to-metal, or extreme performance fluoropolymer coating operations as the predominant activity. You must not consider any surface coating activity that is subject to the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (40 CFR part 63, subpart IIII) in determining the predominant surface coating activity at your facility.

(i) If a surface coating operation accounts for 90 percent or more of the surface coating activity at your facility (that is, the predominant activity), then compliance with the emission limitations of the predominant activity for all surface coating operations constitutes compliance with these and other applicable surface coating NESHAP. In determining predominant activity, you must include coating activities that meet the applicability criteria of other surface coating NESHAP and constitute more than 1 percent of total coating activities at your facility. Coating activities that meet the applicability criteria of other surface coating NESHAP but comprise less than 1 percent of coating activities need not be included in the determination of predominant activity but must be included in the compliance calculation.

(ii) You must use liters (gal) of solids used as a measure of relative surface coating activity over a representative period of operation. You may estimate the relative volume of coating solids used from parameters other than coating consumption and volume solids content (*e.g.,* design specifications for the parts or products coated and the number of items produced). The determination of predominant activity must accurately reflect current and projected coating operations and must be verifiable through appropriate documentation. The use of parameters other than coating consumption and volume solids content must be approved by the Administrator. You may use data for any reasonable time period of at least 1 year in determining the relative amount of coating activity, as long as they represent the way the source will continue to operate in the future and are approved by the Administrator. You must determine the predominant activity at your facility and submit the results of that determination with the initial notification required by §63.3910(b). You must also determine predominant activity annually and include the determination in the next semi-annual compliance report required by §63.3920(a).

(3) You may comply with a facility-specific emission limit calculated from the relative amount of coating activity that is subject to each emission limit. If you elect to comply using the facility-specific emission limit alternative, then compliance with the facility-specific emission limit and the emission limitations in this subpart for all surface coating operations constitutes compliance with this and other applicable surface coating NESHAP. The procedures for calculating the facility-specific emission limit are specified in §63.3890. In calculating a facility-specific emission limit, you must include coating activities that meet the applicability criteria of other surface coating NESHAP and constitute more than 1 percent of total coating activities at your facility. You must not consider any surface coating activity that is subject to the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (40 CFR part 63, subpart IIII) in determining a facility-specific emission limit for your facility. Coating activities that meet the applicability criteria of other surface coating NESHAP but comprise less than 1 percent of total coating activities need not be included in the calculation of the facility-specific emission limit but must be included in the compliance calculations.

[69 FR 157, Jan. 2, 2004, as amended at 69 FR 22660, Apr. 26, 2004; 71 FR 76927, Dec. 22, 2006]

§ 63.3882 What parts of my plant does this subpart cover?

(a) This subpart applies to each new, reconstructed, and existing affected source within each of the four subcategories listed in §63.3881(a).

(b) The affected source is the collection of all of the items listed in paragraphs (b)(1) through (4) of this section that are used for surface coating of miscellaneous metal parts and products within each subcategory.

(1) All coating operations as defined in §63.3981;

(2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

(3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and

(4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

(c) An affected source is a new affected source if you commenced its construction after August 13, 2002 and the construction is of a completely new miscellaneous metal parts and products surface coating facility where previously no miscellaneous metal parts and products surface coating facility had existed.

(d) An affected source is reconstructed if it meets the criteria as defined in §63.2.

(e) An affected source is existing if it is not new or reconstructed.

§ 63.3883 When do I have to comply with this subpart?

The date by which you must comply with this subpart is called the compliance date. The compliance date for each type of affected source is specified in paragraphs (a) through (c) of this section. The compliance date begins the initial compliance period during which you conduct the initial compliance demonstration described in §§63.3940, 63.3950, and 63.3960.

(a) For a new or reconstructed affected source, the compliance date is the applicable date in paragraph (a)(1) or (2) of this section:

(1) If the initial startup of your new or reconstructed affected source is before January 2, 2004, the compliance date is January 2, 2004.

(2) If the initial startup of your new or reconstructed affected source occurs after January 2, 2004, the compliance date is the date of initial startup of your affected source.

(b) For an existing affected source, the compliance date is the date 3 years after January 2, 2004.

(c) For an area source that increases its emissions or its potential to emit such that it becomes a major source of HAP emissions, the compliance date is specified in paragraphs (c)(1) and (2) of this section.

(1) For any portion of the source that becomes a new or reconstructed affected source subject to this subpart, the compliance date is the date of initial startup of the affected source or January 2, 2004, whichever is later.

(2) For any portion of the source that becomes an existing affected source subject to this subpart, the compliance date is the date 1 year after the area source becomes a major source or 3 years after January 2, 2004, whichever is later.

(d) You must meet the notification requirements in §63.3910 according to the dates specified in that section and in subpart A of this part. Some of the notifications must be submitted before the compliance dates described in paragraphs (a) through (c) of this section.

Emission Limitations

§ 63.3890 What emission limits must I meet?

(a) For a new or reconstructed affected source, you must limit organic HAP emissions to the atmosphere from the affected source to the applicable limit specified in paragraphs (a)(1) through (5) of this section, except as specified in paragraph (c) of this section, determined according to the requirements in §63.3941, §63.3951, or §63.3961.

(1) For each new general use coating affected source, limit organic HAP emissions to no more than 0.23 kilograms (kg) (1.9 pound (lb)) organic HAP per liter (gal) coating solids used during each 12-month compliance period.

(2) For each new high performance coating affected source, limit organic HAP emissions to no more than 3.3 kg (27.5 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period.

(3) For each new magnet wire coating affected source, limit organic HAP emissions to no more than 0.050 kg (0.44 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period.

(4) For each new rubber-to-metal coating affected source, limit organic HAP emissions to no more than 0.81 kg (6.8 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period.

(5) For each new extreme performance fluoropolymer coating affected source, limit organic HAP emissions to no more than 1.5 kg (12.4 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period.

(b) For an existing affected source, you must limit organic HAP emissions to the atmosphere from the affected source to the applicable limit specified in paragraphs (b)(1) through (5) of this section, except as specified in paragraph (c) of this section, determined according to the requirements in §63.3941, §63.3951, or §63.3961.

(1) For each existing general use coating affected source, limit organic HAP emissions to no more than 0.31 kg (2.6 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period.

(2) For each existing high performance coating affected source, limit organic HAP emissions to no more than 3.3 kg (27.5 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period.

(3) For each existing magnet wire coating affected source, limit organic HAP emissions to no more than 0.12 kg (1.0 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period.

(4) For each existing rubber-to-metal coating affected source, limit organic HAP emissions to no more than 4.5 kg (37.7 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period.

(5) For each existing extreme performance fluoropolymer coating affected source, limit organic HAP emissions to no more than 1.5 kg (12.4 lbs) organic HAP per liter (gal) coating solids used during each 12-month compliance period.

(c) If your facility's surface coating operations meet the applicability criteria of more than one of the subcategory emission limits specified in paragraphs (a) or (b) of this section, you may comply separately with each subcategory emission limit or comply using one of the alternatives in paragraph (c)(1) or (2) of this section.

(1) If the general use or magnet wire surface coating operations subject to only one of the emission limits specified in paragraphs (a)(1), (3), (b)(1), or (3) of this section account for 90 percent or more of the surface coating activity at your facility (*i.e.,* it is the predominant activity at your facility), then compliance with that one emission limitations in this subpart for all surface coating operations constitutes compliance with the other applicable emission limits. You must use liters (gal) of solids used as a measure of relative surface coating activity over a representative period of operation. You may estimate the relative volume of coating solids used from parameters other than coating consumption and volume solids content (*e.g.,*

design specifications for the parts or products coated and the number of items produced). The determination of predominant activity must accurately reflect current and projected coating operations and must be verifiable through appropriate documentation. The use of parameters other than coating consumption and volume solids content must be approved by the Administrator. You may use data for any reasonable time period of at least 1 year in determining the relative amount of coating activity, as long as they represent the way the source will continue to operate in the future and are approved by the Administrator. You must determine the predominant activity at your facility and submit the results of that determination with the initial notification required by §63.3910(b). Additionally, you must determine the facility's predominant activity annually and include the determination in the next semi-annual compliance report required by §63.3920(a).

(2) You may calculate and comply with a facility-specific emission limit as described in paragraphs (c)(2)(i) through (iii) of this section. If you elect to comply using the facility-specific emission limit alternative, then compliance with the facility-specific emission limit and the emission limitations in this subpart for all surface coating operations constitutes compliance with this and other applicable surface coating NESHAP. In calculating a facility-specific emission limit, you must include coating activities that meet the applicability criteria of the other subcategories and constitute more than 1 percent of total coating activities. Coating activities that meet the applicability criteria of other surface coating NESHAP but comprise less than 1 percent of coating activities need not be included in the determination of predominant activity but must be included in the compliance calculation.

(i) You are required to calculate the facility-specific emission limit for your facility when you submit the notification of compliance status required in §63.3910(c), and on a monthly basis afterward using the coating data for the relevant 12-month compliance period.

(ii) Use Equation 1 of this section to calculate the facility-specific emission limit for your surface coating operations for each 12-month compliance period.

$$\textit{Facility-Specific}\ \text{Emission Limit} = \frac{\sum_{i=1}^{n}(\text{Limit}_i)(Solids_i)}{\sum_{i=1}^{n}(Solids_i)} \qquad (Eq.\ 1)$$

Where:

Facility-specific emission limit = Facility-specific emission limit for each 12-month compliance period, kg (lb) organic HAP per kg (lb) coating solids used.

$Limit_i$= The new source or existing source emission limit applicable to coating operation, i, included in the facility-specific emission limit, converted to kg (lb) organic HAP per kg (lb) coating solids used, if the emission limit is not already in those units. All emission limits included in the facility-specific emission limit must be in the same units.

$Solids_i$= The liters (gal) of solids used in coating operation, i, in the 12-month compliance period that is subject to emission limit, i. You may estimate the volume of coating solids used from parameters other than coating consumption and volume solids content (*e.g.,* design specifications for the parts or products coated and the number of items produced). The use of parameters other than coating consumption and volume solids content must be approved by the Administrator.

n = The number of different coating operations included in the facility-specific emission limit.

(iii) If you need to convert an emission limit in another surface coating NESHAP from kg (lb) organic HAP per kg (lb) coating solids used to kg (lb) organic HAP per liter (gal) coating solids used, you must use the default solids density of 1.26 kg solids per liter coating solids (10.5 lb solids per gal solids).

§ 63.3891 What are my options for meeting the emission limits?

You must include all coatings (as defined in §63.3981), thinners and/or other additives, and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in §63.3890. To make this determination, you must use at least one of the three compliance options listed in paragraphs (a) through (c) of this section. You may apply any of the compliance options to an individual coating operation, or to multiple coating operations as a group, or to the entire affected source. You may use different compliance options for different coating operations, or at different times on the same coating operation. You may employ different compliance options when different coatings are applied to the same part, or when the same coating is applied to different parts. However, you may not use different compliance options at the same time on the same coating operation. If you switch between compliance options for any coating operation or group of coating operations, you must document this switch as required by §63.3930(c), and you must report it in the next semiannual compliance report required in §63.3920.

(a) *Compliant material option.* Demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit in §63.3890, and that each thinner and/or other additive, and cleaning material used contains no organic HAP. You must meet all the requirements of §§63.3940, 63.3941, and 63.3942 to demonstrate compliance with the applicable emission limit using this option.

(b) *Emission rate without add-on controls option.* Demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit in §63.3890, calculated as a rolling 12-month emission rate and determined on a monthly basis. You must meet all the requirements of §§63.3950, 63.3951, and 63.3952 to demonstrate compliance with the emission limit using this option.

(c) *Emission rate with add-on controls option.* Demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), and the emissions reductions achieved by emission capture systems and add-on controls, the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit in §63.3890, calculated as a rolling 12-month emission rate and determined on a monthly basis. If you use this compliance option, you must also demonstrate that all emission capture systems and add-on control devices for the coating operation(s) meet the operating limits required in §63.3892, except for solvent recovery systems for which you conduct liquid-liquid material balances according to §63.3961(j), and that you meet the work practice standards required in §63.3893. You must meet all the requirements of §§63.3960 through 63.3968 to demonstrate compliance with the emission limits, operating limits, and work practice standards using this option.

§ 63.3892 What operating limits must I meet?

(a) For any coating operation(s) on which you use the compliant material option or the emission rate without add-on controls option, you are not required to meet any operating limits.

(b) For any controlled coating operation(s) on which you use the emission rate with add-on controls option, except those for which you use a solvent recovery system and conduct a liquid-liquid material balance according to §63.3961(j), you must meet the operating limits specified in Table 1 to this subpart. These operating limits apply to the emission capture and control systems on the coating operation(s) for which you use this option, and you must establish the operating limits during the performance test according to the requirements in §63.3967. You must meet the operating limits at all times after you establish them.

(c) If you use an add-on control device other than those listed in Table 1 to this subpart, or wish to monitor an alternative parameter and comply with a different operating limit, you must apply to the Administrator for approval of alternative monitoring under §63.8(f).

§ 63.3893 What work practice standards must I meet?

(a) For any coating operation(s) on which you use the compliant material option or the emission rate without add-on controls option, you are not required to meet any work practice standards.

(b) If you use the emission rate with add-on controls option, you must develop and implement a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners and/or other additives, and cleaning materials used in, and waste materials generated by the controlled coating operation(s) for which you use this option; or you must meet an alternative standard as provided in paragraph (c) of this section. The plan must specify practices and procedures to ensure that, at a minimum, the elements specified in paragraphs (b)(1) through (5) of this section are implemented.

(1) All organic-HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be stored in closed containers.

(2) Spills of organic-HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be minimized.

(3) Organic-HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be conveyed from one location to another in closed containers or pipes.

(4) Mixing vessels which contain organic-HAP-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents.

(5) Emissions of organic HAP must be minimized during cleaning of storage, mixing, and conveying equipment.

(c) As provided in §63.6(g), we, the U.S. Environmental Protection Agency, may choose to grant you permission to use an alternative to the work practice standards in this section.

General Compliance Requirements

§ 63.3900 What are my general requirements for complying with this subpart?

(a) You must be in compliance with the emission limitations in this subpart as specified in paragraphs (a)(1) and (2) of this section.

(1) Any coating operation(s) for which you use the compliant material option or the emission rate without add-on controls option, as specified in §63.3891(a) and (b), must be in compliance with the applicable emission limit in §63.3890 at all times.

(2) Any coating operation(s) for which you use the emission rate with add-on controls option, as specified in §63.3891(c), must be in compliance with the emission limitations as specified in paragraphs (a)(2)(i) through (iii) of this section.

(i) The coating operation(s) must be in compliance with the applicable emission limit in §63.3890 at all times except during periods of startup, shutdown, and malfunction.

(ii) The coating operation(s) must be in compliance with the operating limits for emission capture systems and add-on control devices required by §63.3892 at all times except during periods of startup, shutdown, and malfunction, and except for solvent recovery systems for which you conduct liquid-liquid material balances according to §63.3961(j).

(iii) The coating operation(s) must be in compliance with the work practice standards in §63.3893 at all times.

(b) You must always operate and maintain your affected source, including all air pollution control and monitoring equipment you use for purposes of complying with this subpart, according to the provisions in §63.6(e)(1)(i).

(c) If your affected source uses an emission capture system and add-on control device, you must develop a written startup, shutdown, and malfunction plan according to the provisions in §63.6(e)(3). The plan must address the startup, shutdown, and corrective actions in the event of a malfunction of the emission capture system or the add-on control device. The plan must also address any coating operation equipment that may cause increased emissions or that would affect capture efficiency if the process equipment malfunctions, such as conveyors that move parts among enclosures.

[69 FR 157, Jan. 2, 2004, as amended at 71 FR 20465, Apr. 20, 2006]

§ 63.3901 What parts of the General Provisions apply to me?

Table 2 to this subpart shows which parts of the General Provisions in §§63.1 through 63.15 apply to you.

Notifications, Reports, and Records

§ 63.3910 What notifications must I submit?

(a) *General.* You must submit the notifications in §§63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to you by the dates specified in those sections, except as provided in paragraphs (b) and (c) of this section.

(b) *Initial Notification.* You must submit the initial notification required by §63.9(b) for a new or reconstructed affected source no later than 120 days after initial startup or 120 days after January 2, 2004, whichever is later. For an existing affected source, you must submit the initial notification no later than 1 year after January 2, 2004. If you are using compliance with the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (subpart IIII of this part) as provided for under §63.3881(d) to constitute compliance with this subpart for any or all of your metal parts coating operations, then you must include a statement to this effect in your initial notification, and no other notifications are required under this subpart in regard to those metal parts coating operations. If you are complying with another NESHAP that constitutes the predominant activity at your facility under §63.3881(e)(2) to constitute compliance with this subpart for your metal parts coating operations, then you must include a statement to this effect in your initial notification, and no other notifications are required under this subpart in regard to those metal parts coating operations.

(c) *Notification of compliance status.* You must submit the notification of compliance status required by §63.9(h) no later than 30 calendar days following the end of the initial compliance period described in §§63.3940, 63.3950, or 63.3960 that applies to your affected source. The notification of compliance status must contain the information specified in paragraphs (c)(1) through (11) of this section and in §63.9(h).

(1) Company name and address.

(2) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

(3) Date of the report and beginning and ending dates of the reporting period. The reporting period is the initial compliance period described in §§63.3940, 63.3950, or 63.3960 that applies to your affected source.

(4) Identification of the compliance option or options specified in §63.3891 that you used on each coating operation in the affected source during the initial compliance period.

(5) Statement of whether or not the affected source achieved the emission limitations for the initial compliance period.

(6) If you had a deviation, include the information in paragraphs (c)(6)(i) and (ii) of this section.

(i) A description and statement of the cause of the deviation.

(ii) If you failed to meet the applicable emission limit in §63.3890, include all the calculations you used to determine the kg (lb) of organic HAP emitted per liter (gal) coating solids used. You do not need to submit information provided by the materials' suppliers or manufacturers, or test reports.

(7) For each of the data items listed in paragraphs (c)(7)(i) through (iv) of this section that is required by the compliance option(s) you used to demonstrate compliance with the emission limit, include an example of how you determined the value, including calculations and supporting data. Supporting data may include a copy of the information provided by the supplier or manufacturer of the example coating or material, or a summary of the results of testing conducted according to §63.3941(a), (b), or (c). You do not need to submit copies of any test reports.

(i) Mass fraction of organic HAP for one coating, for one thinner and/or other additive, and for one cleaning material.

(ii) Volume fraction of coating solids for one coating.

(iii) Density for one coating, one thinner and/or other additive, and one leaning material, except that if you use the compliant material option, only the example coating density is required.

(iv) The amount of waste materials and the mass of organic HAP contained in the waste materials for which you are claiming an allowance in Equation 1 of §63.3951.

(8) The calculation of kg (lb) of organic HAP emitted per liter (gal) coating solids used for the compliance option(s) you used, as specified in paragraphs (c)(8)(i) through (iii) of this section.

(i) For the compliant material option, provide an example calculation of the organic HAP content for one coating, using Equation 2 of §63.3941.

(ii) For the emission rate without add-on controls option, provide the calculation of the total mass of organic HAP emissions for each month; the calculation of the total volume of coating solids used each month; and the calculation of the 12-month organic HAP emission rate using Equations 1 and 1A through 1C, 2, and 3, respectively, of §63.3951.

(iii) For the emission rate with add-on controls option, provide the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month, using Equations 1 and 1A through 1C of §63.3951; the calculation of the total volume of coating solids used each month using Equation 2 of §63.3951; the mass of organic HAP emission reduction each month by emission capture systems and add-on control devices using Equations 1 and 1A through 1D of §63.3961 and Equations 2, 3, and 3A through 3C of §63.3961 as applicable; the calculation of the total mass of organic HAP emissions each month using Equation 4 of §63.3961; and the calculation of the 12-month organic HAP emission rate using Equation 5 of §63.3961.

(9) For the emission rate with add-on controls option, you must include the information specified in paragraphs (c)(9)(i) through (iv) of this section, except that the requirements in paragraphs (c)(9)(i) through (iii) of this section do not apply to solvent recovery systems for which you conduct liquid-liquid material balances according to §63.3961(j).

(i) For each emission capture system, a summary of the data and copies of the calculations supporting the determination that the emission capture system is a permanent total enclosure (PTE) or a measurement of the emission capture system efficiency. Include a description of the protocol followed for measuring capture efficiency, summaries of any capture efficiency tests conducted, and any calculations supporting the capture efficiency determination. If you use the data quality objective (DQO) or lower confidence limit (LCL) approach, you must also include the statistical calculations to show you meet the DQO or LCL criteria in appendix A to subpart KK of this part. You do not need to submit complete test reports.

(ii) A summary of the results of each add-on control device performance test. You do not need to submit complete test reports.

(iii) A list of each emission capture system's and add-on control device's operating limits and a summary of the data used to calculate those limits.

(iv) A statement of whether or not you developed and implemented the work practice plan required by §63.3893.

(10) If you are complying with a single emission limit representing the predominant activity under §63.3890(c)(1), include the calculations and supporting information used to demonstrate that this emission limit represents the predominant activity as specified in §63.3890(c)(1).

(11) If you are complying with a facility-specific emission limit under §63.3890(c)(2), include the calculation of the facility-specific emission limit and any supporting information as specified in §63.3890(c)(2).

[69 FR 157, Jan. 2, 2004, as amended at 69 FR 22660, Apr. 26, 2004]

§ 63.3920 What reports must I submit?

(a) *Semiannual compliance reports.* You must submit semiannual compliance reports for each affected source according to the requirements of paragraphs (a)(1) through (7) of this section. The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in paragraph (a)(2) of this section.

(1) *Dates.* Unless the Administrator has approved or agreed to a different schedule for submission of reports under §63.10(a), you must prepare and submit each semiannual compliance report according to the dates specified in paragraphs (a)(1)(i) through (iv) of this section. Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

(i) The first semiannual compliance report must cover the first semiannual reporting period which begins the day after the end of the initial compliance period described in §63.3940, §63.3950, or §63.3960 that applies to your affected source and ends on June 30 or December 31, whichever date is the first date following the end of the initial compliance period.

(ii) Each subsequent semiannual compliance report must cover the subsequent semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

(iii) Each semiannual compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

(iv) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR part 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the date specified in paragraph (a)(1)(iii) of this section.

(2) *Inclusion with title V report.* Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 40 CFR part 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a semiannual compliance report pursuant to this section along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the semiannual compliance report includes all required information concerning deviations from any emission limitation in this subpart, its submission will be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a semiannual compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.

(3) *General requirements.* The semiannual compliance report must contain the information specified in paragraphs (a)(3)(i) through (vii) of this section, and the information specified in paragraphs (a)(4) through (7) and (c)(1) of this section that is applicable to your affected source.

(i) Company name and address.

(ii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

(iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

(iv) Identification of the compliance option or options specified in §63.3891 that you used on each coating operation during the reporting period. If you switched between compliance options during the reporting period, you must report the beginning and ending dates for each option you used.

(v) If you used the emission rate without add-on controls or the emission rate with add-on controls compliance option (§63.3891(b) or (c)), the calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period.

(vi) If you used the predominant activity alternative (§63.3890(c)(1)), include the annual determination of predominant activity if it was not included in the previous semi-annual compliance report.

(vii) If you used the facility-specific emission limit alternative (§63.3890(c)(2)), include the calculation of the facility-specific emission limit for each 12-month compliance period during the 6-month reporting period.

(4) *No deviations.* If there were no deviations from the emission limitations in §§63.3890, 63.3892, and 63.3893 that apply to you, the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period. If you used the emission rate with add-on controls option and there were no periods during which the continuous parameter monitoring systems (CPMS) were out-of-control as specified in §63.8(c)(7), the semiannual compliance report must include a statement that there were no periods during which the CPMS were out-of-control during the reporting period.

(5) *Deviations: Compliant material option.* If you used the compliant material option and there was a deviation from the applicable organic HAP content requirements in §63.3890, the semiannual compliance report must contain the information in paragraphs (a)(5)(i) through (iv) of this section.

(i) Identification of each coating used that deviated from the applicable emission limit, and each thinner and/or other additive, and cleaning material used that contained organic HAP, and the dates and time periods each was used.

(ii) The calculation of the organic HAP content (using Equation 2 of §63.3941) for each coating identified in paragraph (a)(5)(i) of this section. You do not need to submit background data supporting this calculation (*e.g.,* information provided by coating suppliers or manufacturers, or test reports).

(iii) The determination of mass fraction of organic HAP for each thinner and/or other additive, and cleaning material identified in paragraph (a)(5)(i) of this section. You do not need to submit background data supporting this calculation (*e.g.,* information provided by material suppliers or manufacturers, or test reports).

(iv) A statement of the cause of each deviation.

(6) *Deviations: Emission rate without add-on controls option.* If you used the emission rate without add-on controls option and there was a deviation from the applicable emission limit in §63.3890, the semiannual compliance report must contain the information in paragraphs (a)(6)(i) through (iii) of this section.

(i) The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit in §63.3890.

(ii) The calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred. You must submit the calculations for Equations 1, 1A through 1C, 2, and 3 of §63.3951; and if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.3951(e)(4). You do not need to submit background data supporting these calculations (*e.g.,* information provided by materials suppliers or manufacturers, or test reports).

(iii) A statement of the cause of each deviation.

(7) *Deviations: Emission rate with add-on controls option.* If you used the emission rate with add-on controls option and there was a deviation from an emission limitation (including any periods when emissions bypassed the add-on control device and were diverted to the atmosphere), the semiannual compliance report must contain the information in paragraphs (a)(7)(i) through (xiv) of this section. This includes periods of startup, shutdown, and malfunction during which deviations occurred.

(i) The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit in §63.3890.

(ii) The calculations used to determine the 12-month organic HAP emission rate for each compliance period in which a deviation occurred. You must provide the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 1 and 1A through 1C of §63.3951; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.3951(e)(4); the calculation of the total volume of coating solids used each month using Equation 2 of §63.3951; the calculation of the mass of organic HAP emission reduction each month by emission capture systems and add-on control devices using Equations 1 and 1A through 1D of §63.3961, and Equations 2, 3, and 3A through 3C of §63.3961, as applicable; the calculation of the total mass of organic HAP emissions each month using Equation 4 of §63.3961; and the calculation of the 12-month organic HAP emission rate using Equation 5 of §63.3961. You do not need to submit the background data supporting these calculations (*e.g.,* information provided by materials suppliers or manufacturers, or test reports).

(iii) The date and time that each malfunction started and stopped.

(iv) A brief description of the CPMS.

(v) The date of the latest CPMS certification or audit.

(vi) The date and time that each CPMS was inoperative, except for zero (low-level) and high-level checks.

(vii) The date, time, and duration that each CPMS was out-of-control, including the information in §63.8(c)(8).

(viii) The date and time period of each deviation from an operating limit in Table 1 to this subpart; date and time period of any bypass of the add-on control device; and whether each deviation occurred during a period of startup, shutdown, or malfunction or during another period.

(ix) A summary of the total duration of each deviation from an operating limit in Table 1 to this subpart and each bypass of the add-on control device during the semiannual reporting period, and the total duration as a percent of the total source operating time during that semiannual reporting period.

(x) A breakdown of the total duration of the deviations from the operating limits in Table 1 of this subpart and bypasses of the add-on control device during the semiannual reporting period into those that were due to startup, shutdown, control equipment problems, process problems, other known causes, and other unknown causes.

(xi) A summary of the total duration of CPMS downtime during the semiannual reporting period and the total duration of CPMS downtime as a percent of the total source operating time during that semiannual reporting period.

(xii) A description of any changes in the CPMS, coating operation, emission capture system, or add-on control device since the last semiannual reporting period.

(xiii) For each deviation from the work practice standards, a description of the deviation, the date and time period of the deviation, and the actions you took to correct the deviation.

(xiv) A statement of the cause of each deviation.

(b) *Performance test reports.* If you use the emission rate with add-on controls option, you must submit reports of performance test results for emission capture systems and add-on control devices no later than 60 days after completing the tests as specified in §63.10(d)(2).

(c) *Startup, shutdown, malfunction reports.* If you used the emission rate with add-on controls option and you had a startup, shutdown, or malfunction during the semiannual reporting period, you must submit the reports specified in paragraphs (c)(1) and (2) of this section.

(1) If your actions were consistent with your startup, shutdown, and malfunction plan, you must include the information specified in §63.10(d) in the semiannual compliance report required by paragraph (a) of this section.

(2) If your actions were not consistent with your startup, shutdown, and malfunction plan, you must submit an immediate startup, shutdown, and malfunction report as described in paragraphs (c)(2)(i) and (ii) of this section.

(i) You must describe the actions taken during the event in a report delivered by facsimile, telephone, or other means to the Administrator within 2 working days after starting actions that are inconsistent with the plan.

(ii) You must submit a letter to the Administrator within 7 working days after the end of the event, unless you have made alternative arrangements with the Administrator as specified in §63.10(d)(5)(ii). The letter must contain the information specified in §63.10(d)(5)(ii).

§ 63.3930 What records must I keep?

You must collect and keep records of the data and information specified in this section. Failure to collect and keep these records is a deviation from the applicable standard.

(a) A copy of each notification and report that you submitted to comply with this subpart, and the documentation supporting each notification and report. If you are using the predominant activity alternative under §63.3890(c), you must keep records of the data and calculations used to determine the predominant activity. If you are using the facility-specific emission limit alternative under §63.3890(c), you must keep records of the data used to calculate the facility-specific emission limit for the initial compliance demonstration. You must also keep records of any data used in each annual predominant activity determination and in the calculation of the facility-specific emission limit for each 12-month compliance period included in the semi-annual compliance reports.

(b) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating. If you conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, you must keep a copy of the complete test report. If you use information provided to you by the manufacturer or supplier of the material that was based on testing, you must keep the summary sheet of results provided to you by the manufacturer or supplier. You are not required to obtain the test report or other supporting documentation from the manufacturer or supplier.

(c) For each compliance period, the records specified in paragraphs (c)(1) through (4) of this section.

(1) A record of the coating operations on which you used each compliance option and the time periods (beginning and ending dates and times) for each option you used.

(2) For the compliant material option, a record of the calculation of the organic HAP content for each coating, using Equation 2 of §63.3941.

(3) For the emission rate without add-on controls option, a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 1, 1A through 1C, and 2 of §63.3951; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.3951(e)(4); the calculation of the total volume of coating solids used each month using Equation 2 of §63.3951; and the calculation of each 12-month organic HAP emission rate using Equation 3 of §63.3951.

(4) For the emission rate with add-on controls option, records of the calculations specified in paragraphs (c)(4)(i) through (v) of this section.

(i) The calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 1 and 1A through 1C of §63.3951 and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.3951(e)(4);

(ii) The calculation of the total volume of coating solids used each month using Equation 2 of §63.3951;

(iii) The calculation of the mass of organic HAP emission reduction by emission capture systems and add-on control devices using Equations 1 and 1A through 1D of §63.3961 and Equations 2, 3, and 3A through 3C of §63.3961, as applicable;

(iv) The calculation of each month's organic HAP emission rate using Equation 4 of §63.3961; and

(v) The calculation of each 12-month organic HAP emission rate using Equation 5 of §63.3961.

(d) A record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If you are using the compliant material option for all coatings at the source, you may maintain purchase records for each material used rather than a record of the volume used.

(e) A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period unless the material is tracked by weight.

(f) A record of the volume fraction of coating solids for each coating used during each compliance period.

(g) If you use either the emission rate without add-on controls or the emission rate with add-on controls compliance option, the density for each coating, thinner and/or other additive, and cleaning material used during each compliance period.

(h) If you use an allowance in Equation 1 of §63.3951 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to §63.3951(e)(4), you must keep records of the information specified in paragraphs (h)(1) through (3) of this section.

(1) The name and address of each TSDF to which you sent waste materials for which you use an allowance in Equation 1 of §63.3951; a statement of which subparts under 40 CFR parts 262, 264, 265, and 266 apply to the facility; and the date of each shipment.

(2) Identification of the coating operations producing waste materials included in each shipment and the month or months in which you used the allowance for these materials in Equation 1 of §63.3951.

(3) The methodology used in accordance with §63.3951(e)(4) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each month; and the methodology to determine the mass of organic HAP contained in these waste materials. This must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment.

(i) [Reserved]

(j) You must keep records of the date, time, and duration of each deviation.

(k) If you use the emission rate with add-on controls option, you must keep the records specified in paragraphs (k)(1) through (8) of this section.

(1) For each deviation, a record of whether the deviation occurred during a period of startup, shutdown, or malfunction.

(2) The records in §63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.

(3) The records required to show continuous compliance with each operating limit specified in Table 1 to this subpart that applies to you.

(4) For each capture system that is a PTE, the data and documentation you used to support a determination that the capture system meets the criteria in Method 204 of appendix M to 40 CFR part 51 for a PTE and has a capture efficiency of 100 percent, as specified in §63.3965(a).

(5) For each capture system that is not a PTE, the data and documentation you used to determine capture efficiency according to the requirements specified in §§63.3964 and 63.3965(b) through (e), including the records specified in paragraphs (k)(5)(i) through (iii) of this section that apply to you.

(i) *Records for a liquid-to-uncaptured gas protocol using a temporary total enclosure or building enclosure.* Records of the mass of total volatile hydrocarbon (TVH) as measured by Method 204A or 204F of appendix M to 40 CFR part 51 for each material used in the coating operation, and the total TVH for all materials used during each capture efficiency test run, including a copy of the test report. Records of the mass of TVH emissions not captured by the capture system that exited the temporary total enclosure or building enclosure during each capture efficiency test run, as measured by Method 204D or 204E of appendix M to 40 CFR part 51, including a copy of the test report. Records documenting that the enclosure used for the capture efficiency test met the criteria in Method 204 of appendix M to 40 CFR part 51 for either a temporary total enclosure or a building enclosure.

(ii) *Records for a gas-to-gas protocol using a temporary total enclosure or a building enclosure.* Records of the mass of TVH emissions captured by the emission capture system as measured by Method 204B or 204C of appendix M to 40 CFR part 51 at the inlet to the add-on control device, including a copy of the test report. Records of the mass of TVH emissions not captured by the capture system that exited the temporary total enclosure or building enclosure during each capture efficiency test run as measured by Method 204D or 204E of appendix M to 40 CFR part 51, including a copy of the test report. Records documenting that the enclosure used for the capture efficiency test met the criteria in Method 204 of appendix M to 40 CFR part 51 for either a temporary total enclosure or a building enclosure.

(iii) *Records for an alternative protocol.* Records needed to document a capture efficiency determination using an alternative method or protocol as specified in §63.3965(e), if applicable.

(6) The records specified in paragraphs (k)(6)(i) and (ii) of this section for each add-on control device organic HAP destruction or removal efficiency determination as specified in §63.3966.

(i) Records of each add-on control device performance test conducted according to §§63.3964 and 63.3966.

(ii) Records of the coating operation conditions during the add-on control device performance test showing that the performance test was conducted under representative operating conditions.

(7) Records of the data and calculations you used to establish the emission capture and add-on control device operating limits as specified in §63.3967 and to document compliance with the operating limits as specified in Table 1 to this subpart.

(8) A record of the work practice plan required by §63.3893 and documentation that you are implementing the plan on a continuous basis.

§ 63.3931 In what form and for how long must I keep my records?

(a) Your records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database.

(b) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) You must keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to §63.10(b)(1). You may keep the records off-site for the remaining 3 years.

Compliance Requirements for the Compliant Material Option

§ 63.3940 By what date must I conduct the initial compliance demonstration?

You must complete the initial compliance demonstration for the initial compliance period according to the requirements in §63.3941. The initial compliance period begins on the applicable compliance date specified in §63.3883 and ends on the last day of the 12th month following the compliance date. If the compliance date occurs on any day other than the first day of a month, then the initial compliance period extends through that month plus the next 12 months. The initial compliance demonstration includes the calculations according to §63.3941 and supporting documentation showing that during the initial compliance period, you used no coating with an organic HAP content that exceeded the applicable

emission limit in §63.3890, and that you used no thinners and/or other additives, or cleaning materials that contained organic HAP as determined according to §63.3941(a).

§ 63.3941 How do I demonstrate initial compliance with the emission limitations?

You may use the compliant material option for any individual coating operation, for any group of coating operations in the affected source, or for all the coating operations in the affected source. You must use either the emission rate without add-on controls option or the emission rate with add-on controls option for any coating operation in the affected source for which you do not use this option. To demonstrate initial compliance using the compliant material option, the coating operation or group of coating operations must use no coating with an organic HAP content that exceeds the applicable emission limits in §63.3890 and must use no thinner and/or other additive, or cleaning material that contains organic HAP as determined according to this section. Any coating operation for which you use the compliant material option is not required to meet the operating limits or work practice standards required in §§63.3892 and 63.3893, respectively. You must conduct a separate initial compliance demonstration for each general use, high performance, magnet wire, rubber-to-metal, and extreme performance fluoropolymer coating operation unless you are demonstrating compliance with a predominant activity or facility-specific emission limit as provided in §63.3890(c). If you are demonstrating compliance with a predominant activity or facility-specific emission limit as provided in §63.3890(c), you must demonstrate that all coating operations included in the predominant activity determination or calculation of the facility-specific emission limit comply with that limit. You must meet all the requirements of this section. Use the procedures in this section on each coating, thinner and/or other additive, and cleaning material in the condition it is in when it is received from its manufacturer or supplier and prior to any alteration. You do not need to redetermine the organic HAP content of coatings, thinners and/or other additives, and cleaning materials that are reclaimed on-site (or reclaimed off-site if you have documentation showing that you received back the exact same materials that were sent off-site) and reused in the coating operation for which you use the compliant material option, provided these materials in their condition as received were demonstrated to comply with the compliant material option.

(a) *Determine the mass fraction of organic HAP for each material used.* You must determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during the compliance period by using one of the options in paragraphs (a)(1) through (5) of this section.

(1) *Method 311 (appendix A to 40 CFR part 63).* You may use Method 311 for determining the mass fraction of organic HAP. Use the procedures specified in paragraphs (a)(1)(i) and (ii) of this section when performing a Method 311 test.

(i) Count each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, you do not have to count it. Express the mass fraction of each organic HAP you count as a value truncated to four places after the decimal point (*e.g.,* 0.3791).

(ii) Calculate the total mass fraction of organic HAP in the test material by adding up the individual organic HAP mass fractions and truncating the result to three places after the decimal point (*e.g.,* 0.763).

(2) *Method 24 (appendix A to 40 CFR part 60).* For coatings, you may use Method 24 to determine the mass fraction of nonaqueous volatile matter and use that value as a substitute for mass fraction of organic HAP. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, you may use the alternative method contained in appendix A to subpart PPPP of this part, rather than Method 24. You may use the volatile fraction that is emitted, as measured by the alternative method in appendix A to subpart PPPP of this part, as a substitute for the mass fraction of organic HAP.

(3) *Alternative method.* You may use an alternative test method for determining the mass fraction of organic HAP once the Administrator has approved it. You must follow the procedure in §63.7(f) to submit an alternative test method for approval.

(4) *Information from the supplier or manufacturer of the material.* You may rely on information other than that generated by the test methods specified in paragraphs (a)(1) through (3) of this section, such as manufacturer's formulation data, if it represents each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, you do not have to count it. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, you may rely on manufacturer's data that expressly states the organic HAP or volatile matter mass fraction emitted. If there is a disagreement between such information and results of a test conducted according to paragraphs (a)(1) through (3) of this section, then the test method results will take precedence unless, after consultation, you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

(5) *Solvent blends.* Solvent blends may be listed as single components for some materials in data provided by manufacturers or suppliers. Solvent blends may contain organic HAP which must be counted toward the total organic HAP mass fraction of the materials. When test data and manufacturer's data for solvent blends are not available, you may use the default values for the mass fraction of organic HAP in these solvent blends listed in Table 3 or 4 to this subpart. If you use the tables, you must use the values in Table 3 for all solvent blends that match Table 3 entries according to the instructions for Table 3, and you may use Table 4 only if the solvent blends in the materials you use do not match any of the solvent blends in Table 3 and you know only whether the blend is aliphatic or aromatic. However, if the results of a Method 311 (appendix A to 40 CFR part 63) test indicate higher values than those listed on Table 3 or 4 to this subpart, the Method 311 results will take precedence unless, after consultation, you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

(b) *Determine the volume fraction of coating solids for each coating.* You must determine the volume fraction of coating solids (liters (gal) of coating solids per liter (gal) of coating) for each coating used during the compliance period by a test, by information provided by the supplier or the manufacturer of the material, or by calculation, as specified in paragraphs (b)(1) through (4) of this section. If test results obtained according to paragraph (b)(1) of this section do not agree with the information obtained under paragraph (b)(3) or (4) of this section, the test results will take precedence unless, after consultation, you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

(1) *ASTM Method D2697–86 (Reapproved 1998) or ASTM Method D6093–97 (Reapproved 2003).* You may use ASTM Method D2697–86 (Reapproved 1998), “Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings” (incorporated by reference, see §63.14), or ASTM Method D6093–97 (Reapproved 2003), “Standard Test Method for Percent Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer” (incorporated by reference, see §63.14), to determine the volume fraction of coating solids for each coating. Divide the nonvolatile volume percent obtained with the methods by 100 to calculate volume fraction of coating solids.

(2) *Alternative method.* You may use an alternative test method for determining the solids content of each coating once the Administrator has approved it. You must follow the procedure in §63.7(f) to submit an alternative test method for approval.

(3) *Information from the supplier or manufacturer of the material.* You may obtain the volume fraction of coating solids for each coating from the supplier or manufacturer.

(4) *Calculation of volume fraction of coating solids.* You may determine the volume fraction of coating solids using Equation 1 of this section:

$$V_s = 1 - \frac{m_{volatiles}}{D_{avg}} \qquad (Eq.\ 1)$$

Where:

V_s= Volume fraction of coating solids, liters (gal) coating solids per liter (gal) coating.

$m_{volatiles}$= Total volatile matter content of the coating, including HAP, volatile organic compounds (VOC), water, and exempt compounds, determined according to Method 24 in appendix A of 40 CFR part 60, grams volatile matter per liter coating.

D_{avg}= Average density of volatile matter in the coating, grams volatile matter per liter volatile matter, determined from test results using ASTM Method D1475–98, “Standard Test Method for Density of Liquid Coatings, Inks, and Related Products” (incorporated by reference, see §63.14), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475–98 test results and other information sources, the test results will take precedence unless, after consultation you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

(c) *Determine the density of each coating.* Determine the density of each coating used during the compliance period from test results using ASTM Method D1475–98, “Standard Test Method for Density of Liquid Coatings, Inks, and Related Products” (incorporated by reference, see §63.14), information from the supplier or manufacturer of the material, or specific gravity data for pure chemicals. If there is disagreement between ASTM Method D1475–98 test results and the supplier's or manufacturer's information, the test results will take precedence unless, after consultation you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

(d) *Determine the organic HAP content of each coating.* Calculate the organic HAP content, kg (lb) of organic HAP emitted per liter (gal) coating solids used, of each coating used during the compliance period using Equation 2 of this section:

$$H_c = \frac{(D_c)(W_c)}{V_s} \qquad (Eq.\ 2)$$

Where:

H_c= Organic HAP content of the coating, kg organic HAP emitted per liter (gal) coating solids used.

D_c= Density of coating, kg coating per liter (gal) coating, determined according to paragraph (c) of this section.

W_c= Mass fraction of organic HAP in the coating, kg organic HAP per kg coating, determined according to paragraph (a) of this section.

V_s= Volume fraction of coating solids, liter (gal) coating solids per liter (gal) coating, determined according to paragraph (b) of this section.

(e) *Compliance demonstration.* The calculated organic HAP content for each coating used during the initial compliance period must be less than or equal to the applicable emission limit in §63.3890; and each thinner and/or other additive, and cleaning material used during the initial compliance period must contain

no organic HAP, determined according to paragraph (a) of this section. You must keep all records required by §§63.3930 and 63.3931. As part of the notification of compliance status required in §63.3910, you must identify the coating operation(s) for which you used the compliant material option and submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the initial compliance period because you used no coatings for which the organic HAP content exceeded the applicable emission limit in §63.3890, and you used no thinners and/or other additives, or cleaning materials that contained organic HAP, determined according to the procedures in paragraph (a) of this section.

§ 63.3942 How do I demonstrate continuous compliance with the emission limitations?

(a) For each compliance period to demonstrate continuous compliance, you must use no coating for which the organic HAP content (determined using Equation 2 of §63.3941) exceeds the applicable emission limit in §63.3890, and use no thinner and/or other additive, or cleaning material that contains organic HAP, determined according to §63.3941(a). A compliance period consists of 12 months. Each month, after the end of the initial compliance period described in §63.3940, is the end of a compliance period consisting of that month and the preceding 11 months. If you are complying with a facility-specific emission limit under §63.3890(c), you must also perform the calculation using Equation 1 in §63.3890(c)(2) on a monthly basis using the data from the previous 12 months of operation.

(b) If you choose to comply with the emission limitations by using the compliant material option, the use of any coating, thinner and/or other additive, or cleaning material that does not meet the criteria specified in paragraph (a) of this section is a deviation from the emission limitations that must be reported as specified in §§63.3910(c)(6) and 63.3920(a)(5).

(c) As part of each semiannual compliance report required by §63.3920, you must identify the coating operation(s) for which you used the compliant material option. If there were no deviations from the applicable emission limit in §63.3890, submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because you used no coatings for which the organic HAP content exceeded the applicable emission limit in §63.3890, and you used no thinner and/or other additive, or cleaning material that contained organic HAP, determined according to §63.3941(a).

(d) You must maintain records as specified in §§63.3930 and 63.3931.

Compliance Requirements for the Emission Rate Without Add-On Controls Option

§ 63.3950 By what date must I conduct the initial compliance demonstration?

You must complete the initial compliance demonstration for the initial compliance period according to the requirements of §63.3951. The initial compliance period begins on the applicable compliance date specified in §63.3883 and ends on the last day of the 12th month following the compliance date. If the compliance date occurs on any day other than the first day of a month, then the initial compliance period extends through the end of that month plus the next 12 months. You must determine the mass of organic HAP emissions and volume of coating solids used each month and then calculate an organic HAP emission rate at the end of the initial compliance period. The initial compliance demonstration includes the calculations according to §63.3951 and supporting documentation showing that during the initial compliance period the organic HAP emission rate was equal to or less than the applicable emission limit in §63.3890.

§ 63.3951 How do I demonstrate initial compliance with the emission limitations?

You may use the emission rate without add-on controls option for any individual coating operation, for any group of coating operations in the affected source, or for all the coating operations in the affected source. You must use either the compliant material option or the emission rate with add-on controls option for any coating operation in the affected source for which you do not use this option. To demonstrate initial compliance using the emission rate without add-on controls option, the coating operation or group of coating operations must meet the applicable emission limit in §63.3890, but is not required to meet the operating limits or work practice standards in §§63.3892 and 63.3893, respectively. You must conduct a separate initial compliance demonstration for each general use, magnet wire, rubber-to-metal, and extreme performance fluoropolymer coating operation unless you are demonstrating compliance with a predominant activity or facility-specific emission limit as provided in §63.3890(c). If you are demonstrating compliance with a predominant activity or facility-specific emission limit as provided in §63.3890(c), you must demonstrate that all coating operations included in the predominant activity determination or calculation of the facility-specific emission limit comply with that limit. You must meet all the requirements of this section. When calculating the organic HAP emission rate according to this section, do not include any coatings, thinners and/or other additives, or cleaning materials used on coating operations for which you use the compliant material option or the emission rate with add-on controls option. You do not need to redetermine the mass of organic HAP in coatings, thinners and/or other additives, or cleaning materials that have been reclaimed on-site (or reclaimed off-site if you have documentation showing that you received back the exact same materials that were sent off-site) and reused in the coating operation for which you use the emission rate without add-on controls option. If you use coatings, thinners and/or other additives, or cleaning materials that have been reclaimed on-site, the amount of each used in a month may be reduced by the amount of each that is reclaimed. That is, the amount used may be calculated as the amount consumed to account for materials that are reclaimed.

(a) *Determine the mass fraction of organic HAP for each material.* Determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each month according to the requirements in §63.3941(a).

(b) *Determine the volume fraction of coating solids.* Determine the volume fraction of coating solids (liter (gal) of coating solids per liter (gal) of coating) for each coating used during each month according to the requirements in §63.3941(b).

(c) *Determine the density of each material.* Determine the density of each liquid coating, thinner and/or other additive, and cleaning material used during each month from test results using ASTM Method D1475–98, “Standard Test Method for Density of Liquid Coatings, Inks, and Related Products” (incorporated by reference, see §63.14), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If you are including powder coatings in the compliance determination, determine the density of powder coatings, using ASTM Method D5965–02, “Standard Test Methods for Specific Gravity of Coating Powders” (incorporated by reference, see §63.14), or information from the supplier. If there is disagreement between ASTM Method D1475–98 or ASTM Method D5965–02 test results and other such information sources, the test results will take precedence unless, after consultation you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct. If you purchase materials or monitor consumption by weight instead of volume, you do not need to determine material density. Instead, you may use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, 1C, and 2 of this section.

(d) *Determine the volume of each material used.* Determine the volume (liters) of each coating, thinner and/or other additive, and cleaning material used during each month by measurement or usage records. If you purchase materials or monitor consumption by weight instead of volume, you do not need to determine the volume of each material used. Instead, you may use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, and 1C of this section.

(e) *Calculate the mass of organic HAP emissions.* The mass of organic HAP emissions is the combined mass of organic HAP contained in all coatings, thinners and/or other additives, and cleaning materials used during each month minus the organic HAP in certain waste materials. Calculate the mass of organic HAP emissions using Equation 1 of this section.

$$H_e = A + B + C - R_w \qquad (Eq.\ 1)$$

Where:

H_e= Total mass of organic HAP emissions during the month, kg.

A = Total mass of organic HAP in the coatings used during the month, kg, as calculated in Equation 1A of this section.

B = Total mass of organic HAP in the thinners and/or other additives used during the month, kg, as calculated in Equation 1B of this section.

C = Total mass of organic HAP in the cleaning materials used during the month, kg, as calculated in Equation 1C of this section.

R_w= Total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSDF for treatment or disposal during the month, kg, determined according to paragraph (e)(4) of this section. (You may assign a value of zero to $R_w$if you do not wish to use this allowance.)

(1) Calculate the kg organic HAP in the coatings used during the month using Equation 1A of this section:

$$A = \sum_{i=1}^{m} (Vol_{c,i})(D_{c,i})(W_{c,i}) \qquad (Eq.\ 1A)$$

Where:

A = Total mass of organic HAP in the coatings used during the month, kg.

$Vol_{c,i}$= Total volume of coating, i, used during the month, liters.

$D_{c,i}$= Density of coating, i, kg coating per liter coating.

$W_{c,i}$= Mass fraction of organic HAP in coating, i, kg organic HAP per kg coating. For reactive adhesives as defined in §63.3981, use the mass fraction of organic HAP that is emitted as determined using the method in appendix A to subpart PPPP of this part.

m = Number of different coatings used during the month.

(2) Calculate the kg of organic HAP in the thinners and/or other additives used during the month using Equation 1B of this section:

$$B = \sum_{j=1}^{n} (Vol_{t,j})(D_{t,j})(W_{t,j}) \qquad (Eq.\ 1B)$$

Where:

B = Total mass of organic HAP in the thinners and/or other additives used during the month, kg.

$Vol_{t,j}$= Total volume of thinner and/or other additive, j, used during the month, liters.

$D_{t,j}$= Density of thinner and/or other additive, j, kg per liter.

$W_{t,j}$= Mass fraction of organic HAP in thinner and/or other additive, j, kg organic HAP per kg thinner and/or other additive. For reactive adhesives as defined in §63.3981, use the mass fraction of organic HAP that is emitted as determined using the method in appendix A to subpart PPPP of this part.

n = Number of different thinners and/or other additives used during the month.

(3) Calculate the kg organic HAP in the cleaning materials used during the month using Equation 1C of this section:

$$C = \sum_{k=1}^{p} \left(Vol_{s,k}\right)\left(D_{s,k}\right)\left(W_{s,k}\right) \qquad (Eq.\ 1C)$$

Where:

C = Total mass of organic HAP in the cleaning materials used during the month, kg.

$Vol_{s,k}$= Total volume of cleaning material, k, used during the month, liters.

$D_{s,k}$= Density of cleaning material, k, kg per liter.

$W_{s,k}$= Mass fraction of organic HAP in cleaning material, k, kg organic HAP per kg material.

p = Number of different cleaning materials used during the month.

(4) If you choose to account for the mass of organic HAP contained in waste materials sent or designated for shipment to a hazardous waste TSDF in Equation 1 of this section, then you must determine the mass according to paragraphs (e)(4)(i) through (iv) of this section.

(i) You may only include waste materials in the determination that are generated by coating operations in the affected source for which you use Equation 1 of this section and that will be treated or disposed of by a facility that is regulated as a TSDF under 40 CFR part 262, 264, 265, or 266. The TSDF may be either off-site or on-site. You may not include organic HAP contained in wastewater.

(ii) You must determine either the amount of the waste materials sent to a TSDF during the month or the amount collected and stored during the month and designated for future transport to a TSDF. Do not include in your determination any waste materials sent to a TSDF during a month if you have already included them in the amount collected and stored during that month or a previous month.

(iii) Determine the total mass of organic HAP contained in the waste materials specified in paragraph (e)(4)(ii) of this section.

(iv) You must document the methodology you use to determine the amount of waste materials and the total mass of organic HAP they contain, as required in §63.3930(h). If waste manifests include this information, they may be used as part of the documentation of the amount of waste materials and mass of organic HAP contained in them.

(f) *Calculate the total volume of coating solids used.* Determine the total volume of coating solids used, liters, which is the combined volume of coating solids for all the coatings used during each month, using Equation 2 of this section:

$$V_{st} = \sum_{i=1}^{m} \left(Vol_{c,i}\right)\left(V_{s,i}\right) \qquad (Eq.\ 2)$$

Where:

V_{st}= Total volume of coating solids used during the month, liters.

$Vol_{c,i}$= Total volume of coating, i, used during the month, liters.

$V_{s,i}$= Volume fraction of coating solids for coating, i, liter solids per liter coating, determined according to §63.3941(b).

m = Number of coatings used during the month.

(g) *Calculate the organic HAP emission rate.* Calculate the organic HAP emission rate for the compliance period, kg (lb) organic HAP emitted per liter (gal) coating solids used, using Equation 3 of this section:

$$H_{yr} = \frac{\sum_{y=1}^{n} H_e}{\sum_{y=1}^{n} V_{st}} \qquad (Eq.\ 3)$$

Where:

H_{yr}= Average organic HAP emission rate for the compliance period, kg organic HAP emitted per liter coating solids used.

H_e= Total mass of organic HAP emissions from all materials used during month, y, kg, as calculated by Equation 1 of this section.

V_{st}= Total volume of coating solids used during month, y, liters, as calculated by Equation 2 of this section.

y = Identifier for months.

n = Number of full or partial months in the compliance period (for the initial compliance period, n equals 12 if the compliance date falls on the first day of a month; otherwise n equals 13; for all following compliance periods, n equals 12).

(h) *Compliance demonstration.* The organic HAP emission rate for the initial compliance period calculated using Equation 3 of this section must be less than or equal to the applicable emission limit for each subcategory in §63.3890 or the predominant activity or facility-specific emission limit allowed in §63.3890(c). You must keep all records as required by §§63.3930 and 63.3931. As part of the notification of compliance status required by §63.3910, you must identify the coating operation(s) for which you used the emission rate without add-on controls option and submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the initial compliance period because the organic HAP emission rate was less than or equal to the applicable emission limit in §63.3890, determined according to the procedures in this section.

§ 63.3952 How do I demonstrate continuous compliance with the emission limitations?

(a) To demonstrate continuous compliance, the organic HAP emission rate for each compliance period, determined according to §63.3951(a) through (g), must be less than or equal to the applicable emission limit in §63.3890. A compliance period consists of 12 months. Each month after the end of the initial compliance period described in §63.3950 is the end of a compliance period consisting of that month and the preceding 11 months. You must perform the calculations in §63.3951(a) through (g) on a monthly basis using data from the previous 12 months of operation. If you are complying with a facility-specific emission limit under §63.3890(c), you must also perform the calculation using Equation 1 in §63.3890(c)(2) on a monthly basis using the data from the previous 12 months of operation.

(b) If the organic HAP emission rate for any 12-month compliance period exceeded the applicable emission limit in §63.3890, this is a deviation from the emission limitation for that compliance period and must be reported as specified in §§63.3910(c)(6) and 63.3920(a)(6).

(c) As part of each semiannual compliance report required by §63.3920, you must identify the coating operation(s) for which you used the emission rate without add-on controls option. If there were no deviations from the emission limitations, you must submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the applicable emission limit in §63.3890, determined according to §63.3951(a) through (g).

(d) You must maintain records as specified in §§63.3930 and 63.3931.

Compliance Requirements for the Emission Rate With Add-On Controls Option

§ 63.3960 By what date must I conduct performance tests and other initial compliance demonstrations?

(a) *New and reconstructed affected sources.* For a new or reconstructed affected source, you must meet the requirements of paragraphs (a)(1) through (4) of this section.

(1) All emission capture systems, add-on control devices, and CPMS must be installed and operating no later than the applicable compliance date specified in §63.3883. Except for solvent recovery systems for which you conduct liquid-liquid material balances according to §63.3961(j), you must conduct a performance test of each capture system and add-on control device according to §§63.3964, 63.3965, and 63.3966 and establish the operating limits required by §63.3892 no later than 180 days after the applicable compliance date specified in §63.3883. For a solvent recovery system for which you conduct liquid-liquid material balances according to §63.3961(j), you must initiate the first material balance no later than the applicable compliance date specified in §63.3883. For magnet wire coating operations you may, with approval, conduct a performance test of one representative magnet wire coating machine for each group of identical or very similar magnet wire coating machines.

(2) You must develop and begin implementing the work practice plan required by §63.3893 no later than the compliance date specified in §63.3883.

(3) You must complete the initial compliance demonstration for the initial compliance period according to the requirements of §63.3961. The initial compliance period begins on the applicable compliance date specified in §63.3883 and ends on the last day of the 12th month following the compliance date. If the compliance date occurs on any day other than the first day of a month, then the initial compliance period extends through the end of that month plus the next 12 months. You must determine the mass of organic HAP emissions and volume of coatings solids used each month and then calculate an organic HAP emission rate at the end of the initial compliance period. The initial compliance demonstration includes the results of emission capture system and add-on control device performance tests conducted according to §§63.3964, 63.3965, and 63.3966; results of liquid-liquid material balances conducted according to §63.3961(j); calculations according to §63.3961 and supporting documentation showing that during the initial compliance period the organic HAP emission rate was equal to or less than the applicable emission limit in §63.3890; the operating limits established during the performance tests and the results of the continuous parameter monitoring required by §63.3968; and documentation of whether you developed and implemented the work practice plan required by §63.3893.

(4) You do not need to comply with the operating limits for the emission capture system and add-on control device required by §63.3892 until after you have completed the performance tests specified in paragraph (a)(1) of this section. Instead, you must maintain a log detailing the operation and maintenance of the emission capture system, add-on control device, and continuous parameter monitors during the period between the compliance date and the performance test. You must begin complying with the operating limits for your affected source on the date you complete the performance tests specified in paragraph (a)(1) of this section. For magnet wire coating operations, you must begin complying with the operating limits for all identical or very similar magnet wire coating machines on the date you complete the performance test of a representative magnet wire coating machine. The requirements in this paragraph (a)(4) do not apply to solvent recovery systems for which you conduct liquid-liquid material balances according to the requirements in §63.3961(j).

(b) *Existing affected sources.* For an existing affected source, you must meet the requirements of paragraphs (b)(1) through (3) of this section.

(1) All emission capture systems, add-on control devices, and CPMS must be installed and operating no later than the applicable compliance date specified in §63.3883. Except for magnet wire coating operations and solvent recovery systems for which you conduct liquid-liquid material balances according to §63.3961(j), you must conduct a performance test of each capture system and add-on control device according to the procedures in §§63.3964, 63.3965, and 63.3966 and establish the operating limits required by §63.3892 no later than the compliance date specified in §63.3883. For magnet wire coating operations, you may, with approval, conduct a performance test of a single magnet wire coating machine that represents identical or very similar magnet wire coating machines. For a solvent recovery system for which you conduct liquid-liquid material balances according to §63.3961(j), you must initiate the first material balance no later than the compliance date specified in §63.3883.

(2) You must develop and begin implementing the work practice plan required by §63.3893 no later than the compliance date specified in §63.3883.

(3) You must complete the initial compliance demonstration for the initial compliance period according to the requirements of §63.3961. The initial compliance period begins on the applicable compliance date specified in §63.3883 and ends on the last day of the 12th month following the compliance date. If the compliance date occurs on any day other than the first day of a month, then the initial compliance period extends through the end of that month plus the next 12 months. You must determine the mass of organic HAP emissions and volume of coatings solids used each month and then calculate an organic HAP emission rate at the end of the initial compliance period. The initial compliance demonstration includes

the results of emission capture system and add-on control device performance tests conducted according to §§63.3964, 63.3965, and 63.3966; results of liquid-liquid material balances conducted according to §63.3961(j); calculations according to §63.3961 and supporting documentation showing that during the initial compliance period the organic HAP emission rate was equal to or less than the applicable emission limit in §63.3890; the operating limits established during the performance tests and the results of the continuous parameter monitoring required by §63.3968; and documentation of whether you developed and implemented the work practice plan required by §63.3893.

(c) You are not required to conduct an initial performance test to determine capture efficiency or destruction efficiency of a capture system or control device if you receive approval to use the results of a performance test that has been previously conducted on that capture system or control device. Any such previous tests must meet the conditions described in paragraphs (c)(1) through (3) of this section.

(1) The previous test must have been conducted using the methods and conditions specified in this subpart.

(2) Either no process or equipment changes have been made since the previous test was performed or the owner or operator must be able to demonstrate that the results of the performance test, reliably demonstrate compliance despite process or equipment changes.

(3) Either the required operating parameters were established in the previous test or sufficient data were collected in the previous test to establish the required operating parameters.

§ 63.3961 How do I demonstrate initial compliance?

(a) You may use the emission rate with add-on controls option for any coating operation, for any group of coating operations in the affected source, or for all of the coating operations in the affected source. You may include both controlled and uncontrolled coating operations in a group for which you use this option. You must use either the compliant material option or the emission rate without add-on controls option for any coating operation in the affected source for which you do not use the emission rate with add-on controls option. To demonstrate initial compliance, the coating operation(s) for which you use the emission rate with add-on controls option must meet the applicable emission limitations in §§63.3890, 63.3892, and 63.3893. You must conduct a separate initial compliance demonstration for each general use, magnet wire, rubber-to-metal, and extreme performance fluoropolymer coating operation, unless you are demonstrating compliance with a predominant activity or facility-specific emission limit as provided in §63.3890(c). If you are demonstrating compliance with a predominant activity or facility-specific emission limit as provided in §63.4490(c), you must demonstrate that all coating operations included in the predominant activity determination or calculation of the facility-specific emission limit comply with that limit. You must meet all the requirements of this section. When calculating the organic HAP emission rate according to this section, do not include any coatings, thinners and/or other additives, or cleaning materials used on coating operations for which you use the compliant material option or the emission rate without add-on controls option. You do not need to redetermine the mass of organic HAP in coatings, thinners and/or other additives, or cleaning materials that have been reclaimed onsite (or reclaimed off-site if you have documentation showing that you received back the exact same materials that were sent off-site) and reused in the coatings operation(s) for which you use the emission rate with add-on controls option. If you use coatings, thinners and/or other additives, or cleaning materials that have been reclaimed on-site, the amount of each used in a month may be reduced by the amount of each that is reclaimed. That is, the amount used may be calculated as the amount consumed to account for materials that are reclaimed.

(b) *Compliance with operating limits.* Except as provided in §63.3960(a)(4), and except for solvent recovery systems for which you conduct liquid-liquid material balances according to the requirements of paragraph (j) of this section, you must establish and demonstrate continuous compliance during the initial compliance period with the operating limits required by §63.3892, using the procedures specified in §§63.3967 and 63.3968.

(c) *Compliance with work practice requirements.* You must develop, implement, and document your implementation of the work practice plan required by §63.3893 during the initial compliance period, as specified in §63.3930.

(d) *Compliance with emission limits.* You must follow the procedures in paragraphs (e) through (n) of this section to demonstrate compliance with the applicable emission limit in §63.3890 for each affected source in each subcategory.

(e) *Determine the mass fraction of organic HAP, density, volume used, and volume fraction of coating solids.* Follow the procedures specified in §63.3951(a) through (d) to determine the mass fraction of organic HAP, density, and volume of each coating, thinner and/or other additive, and cleaning material used during each month; and the volume fraction of coating solids for each coating used during each month.

(f) *Calculate the total mass of organic HAP emissions before add-on controls.* Using Equation 1 of §63.3951, calculate the total mass of organic HAP emissions before add-on controls from all coatings, thinners and/or other additives, and cleaning materials used during each month in the coating operation or group of coating operations for which you use the emission rate with add-on controls option.

(g) *Calculate the organic HAP emission reduction for each controlled coating operation.* Determine the mass of organic HAP emissions reduced for each controlled coating operation during each month. The emission reduction determination quantifies the total organic HAP emissions that pass through the emission capture system and are destroyed or removed by the add-on control device. Use the procedures in paragraph (h) of this section to calculate the mass of organic HAP emission reduction for each controlled coating operation using an emission capture system and add-on control device other than a solvent recovery system for which you conduct liquid-liquid material balances. For each controlled coating operation using a solvent recovery system for which you conduct a liquid-liquid material balance, use the procedures in paragraph (j) of this section to calculate the organic HAP emission reduction.

(h) *Calculate the organic HAP emission reduction for each controlled coating operation not using liquid-liquid material balance.* Use Equation 1 of this section to calculate the organic HAP emission reduction for each controlled coating operation using an emission capture system and add-on control device other than a solvent recovery system for which you conduct liquid-liquid material balances. The calculation applies the emission capture system efficiency and add-on control device efficiency to the mass of organic HAP contained in the coatings, thinners and/or other additives, and cleaning materials that are used in the coating operation served by the emission capture system and add-on control device during each month. You must assume zero efficiency for the emission capture system and add-on control device for any period of time a deviation specified in §63.3963(c) or (d) occurs in the controlled coating operation, including a deviation during a period of startup, shutdown, or malfunction, unless you have other data indicating the actual efficiency of the emission capture system and add-on control device and the use of these data is approved by the Administrator. Equation 1 of this section treats the materials used during such a deviation as if they were used on an uncontrolled coating operation for the time period of the deviation.

$$H_C = \left(A_C + B_C + C_C - R_W - H_{UNC}\right)\left(\frac{CE}{100} \times \frac{DRE}{100}\right) \qquad (Eq.\ 1)$$

Where:

H_C= Mass of organic HAP emission reduction for the controlled coating operation during the month, kg.

A_C= Total mass of organic HAP in the coatings used in the controlled coating operation during the month, kg, as calculated in Equation 1A of this section.

B_C= Total mass of organic HAP in the thinners and/or other additives used in the controlled coating operation during the month, kg, as calculated in Equation 1B of this section.

C_C= Total mass of organic HAP in the cleaning materials used in the controlled coating operation during the month, kg, as calculated in Equation 1C of this section.

R_W= Total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSDF for treatment or disposal during the compliance period, kg, determined according to §63.3951(e)(4). (You may assign a value of zero to $R_W$if you do not wish to use this allowance.)

H_{UNC}= Total mass of organic HAP in the coatings, thinners and/or other additives, and cleaning materials used during all deviations specified in §63.3963(c) and (d) that occurred during the month in the controlled coating operation, kg, as calculated in Equation 1D of this section.

CE = Capture efficiency of the emission capture system vented to the add-on control device, percent. Use the test methods and procedures specified in §§63.3964 and 63.3965 to measure and record capture efficiency.

DRE = Organic HAP destruction or removal efficiency of the add-on control device, percent. Use the test methods and procedures in §§63.3964 and 63.3966 to measure and record the organic HAP destruction or removal efficiency.

(1) Calculate the mass of organic HAP in the coatings used in the controlled coating operation, kg (lb), using Equation 1A of this section:

$$A_C = \sum_{i=1}^{m} \left(Vol_{c,i}\right)\left(D_{c,i}\right)\left(W_{c,i}\right) \qquad (Eq.\ 1A)$$

Where:

A_C= Total mass of organic HAP in the coatings used in the controlled coating operation during the month, kg.

$Vol_{c,i}$= Total volume of coating, i, used during the month, liters.

$D_{c,i}$= Density of coating, i, kg per liter.

$W_{c,i}$= Mass fraction of organic HAP in coating, i, kg per kg. For reactive adhesives as defined in §63.3981, use the mass fraction of organic HAP that is emitted as determined using the method in appendix A to subpart PPPP of this part.

m = Number of different coatings used.

(2) Calculate the mass of organic HAP in the thinners and/or other additives used in the controlled coating operation, kg (lb), using Equation 1B of this section:

$$B_C = \sum_{j=1}^{n} (Vol_{t,j})(D_{t,j})(W_{t,j}) \qquad (Eq.\ 1B)$$

Where:

B_C= Total mass of organic HAP in the thinners and/or other additives used in the controlled coating operation during the month, kg.

$Vol_{t,j}$= Total volume of thinner and/or other additive, j, used during the month, liters.

$D_{t,j}$= Density of thinner and/or other additive, j, kg per liter.

$W_{t,j}$= Mass fraction of organic HAP in thinner and/or other additive, j, kg per kg. For reactive adhesives as defined in §63.3981, use the mass fraction of organic HAP that is emitted as determined using the method in appendix A to subpart PPPP of this part.

n = Number of different thinners and/or other additives used.

(3) Calculate the mass of organic HAP in the cleaning materials used in the controlled coating operation during the month, kg (lb), using Equation 1C of this section:

$$C_C = \sum_{k=1}^{p} (Vol_{s,k})(D_{s,k})(W_{s,k}) \qquad (Eq.\ 1C)$$

Where:

C_C= Total mass of organic HAP in the cleaning materials used in the controlled coating operation during the month, kg.

$Vol_{s,k}$= Total volume of cleaning material, k, used during the month, liters.

$D_{s,k}$= Density of cleaning material, k, kg per liter.

$W_{s,k}$= Mass fraction of organic HAP in cleaning material, k, kg per kg.

p = Number of different cleaning materials used.

(4) Calculate the mass of organic HAP in the coatings, thinners and/or other additives, and cleaning materials used in the controlled coating operation during deviations specified in §63.3963(c) and (d), using Equation 1D of this section:

$$H_{UNC} = \sum_{k=1}^{q} (Vol_k)(D_k)(W_k) \qquad (Eq.\ 1D)$$

Where:

H_{UNC}= Total mass of organic HAP in the coatings, thinners and/or other additives, and cleaning materials used during all deviations specified in §63.3963(c) and (d) that occurred during the month in the controlled coating operation, kg.

Vol_h= Total volume of coating, thinner and/or other additive, or cleaning material, h, used in the controlled coating operation during deviations, liters.

D_h= Density of coating, thinner and/or other additives, or cleaning material, h, kg per liter.

W_h= Mass fraction of organic HAP in coating, thinner and/or other additives, or cleaning material, h, kg organic HAP per kg coating. For reactive adhesives as defined in §63.3981, use the mass fraction of organic HAP that is emitted as determined using the method in appendix A to subpart PPPP of this part.

q = Number of different coatings, thinners and/or other additives, and cleaning materials used.

(i) [Reserved]

(j) *Calculate the organic HAP emission reduction for each controlled coating operation using liquid-liquid material balances.* For each controlled coating operation using a solvent recovery system for which you conduct liquid-liquid material balances, calculate the organic HAP emission reduction by applying the volatile organic matter collection and recovery efficiency to the mass of organic HAP contained in the coatings, thinners and/or other additives, and cleaning materials that are used in the coating operation controlled by the solvent recovery system during each month. Perform a liquid-liquid material balance for each month as specified in paragraphs (j)(1) through (6) of this section. Calculate the mass of organic HAP emission reduction by the solvent recovery system as specified in paragraph (j)(7) of this section.

(1) For each solvent recovery system, install, calibrate, maintain, and operate according to the manufacturer's specifications, a device that indicates the cumulative amount of volatile organic matter recovered by the solvent recovery system each month. The device must be initially certified by the manufacturer to be accurate to within ±2.0 percent of the mass of volatile organic matter recovered.

(2) For each solvent recovery system, determine the mass of volatile organic matter recovered for the month, based on measurement with the device required in paragraph (j)(1) of this section.

(3) Determine the mass fraction of volatile organic matter for each coating, thinner and/or other additive, and cleaning material used in the coating operation controlled by the solvent recovery system during the month, kg volatile organic matter per kg coating. You may determine the volatile organic matter mass fraction using Method 24 of 40 CFR part 60, appendix A, or an EPA approved alternative method, or you may use information provided by the manufacturer or supplier of the coating. In the event of any inconsistency between information provided by the manufacturer or supplier and the results of Method 24 of 40 CFR part 60, appendix A, or an approved alternative method, the test method results will take precedence unless, after consultation you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

(4) Determine the density of each coating, thinner and/or other additive, and cleaning material used in the coating operation controlled by the solvent recovery system during the month, kg per liter, according to §63.3951(c).

(5) Measure the volume of each coating, thinner and/or other additive, and cleaning material used in the coating operation controlled by the solvent recovery system during the month, liters.

(6) Each month, calculate the solvent recovery system's volatile organic matter collection and recovery efficiency, using Equation 2 of this section:

$$R_V = 100 \frac{M_{VR}}{\sum_{i=1}^{m} Vol_i D_i WV_{c,i} + \sum_{j=1}^{n} Vol_j D_j WV_{t,j} + \sum_{k=1}^{p} Vol_k D_k WV_{s,k}} \qquad (Eq.\ 2)$$

Where:

R_V= Volatile organic matter collection and recovery efficiency of the solvent recovery system during the month, percent.

M_{VR}= Mass of volatile organic matter recovered by the solvent recovery system during the month, kg.

Vol_i= Volume of coating, i, used in the coating operation controlled by the solvent recovery system during the month, liters.

D_i= Density of coating, i, kg per liter.

$WV_{c,i}$= Mass fraction of volatile organic matter for coating, i, kg volatile organic matter per kg coating. For reactive adhesives as defined in §63.3981, use the mass fraction of organic HAP that is emitted as determined using the method in appendix A to subpart PPPP of this part.

Vol_j= Volume of thinner and/or other additive, j, used in the coating operation controlled by the solvent recovery system during the month, liters.

D_j= Density of thinner and/or other additive, j, kg per liter.

$WV_{t,j}$= Mass fraction of volatile organic matter for thinner and/or other additive, j, kg volatile organic matter per kg thinner and/or other additive. For reactive adhesives as defined in §63.3981, use the mass fraction of organic HAP that is emitted as determined using the method in appendix A to subpart PPPP of this part.

Vol_k= Volume of cleaning material, k, used in the coating operation controlled by the solvent recovery system during the month, liters.

D_k= Density of cleaning material, k, kg per liter.

$WV_{s,k}$= Mass fraction of volatile organic matter for cleaning material, k, kg volatile organic matter per kg cleaning material.

m = Number of different coatings used in the coating operation controlled by the solvent recovery system during the month.

n = Number of different thinners and/or other additives used in the coating operation controlled by the solvent recovery system during the month.

p = Number of different cleaning materials used in the coating operation controlled by the solvent recovery system during the month.

(7) Calculate the mass of organic HAP emission reduction for the coating operation controlled by the solvent recovery system during the month, using Equation 3 of this section and according to paragraphs (j)(7)(i) through (iii) of this section:

$$H_{CSR} = \left(A_{CSR} + B_{CSR} + C_{CSR}\right)\left(\frac{R_V}{100}\right) \qquad (Eq.\ 3)$$

Where:

H_{CSR}= Mass of organic HAP emission reduction for the coating operation controlled by the solvent recovery system using a liquid-liquid material balance during the month, kg.

A_{CSR}= Total mass of organic HAP in the coatings used in the coating operation controlled by the solvent recovery system, kg, calculated using Equation 3A of this section.

B_{CSR}= Total mass of organic HAP in the thinners and/or other additives used in the coating operation controlled by the solvent recovery system, kg, calculated using Equation 3B of this section.

C_{CSR}= Total mass of organic HAP in the cleaning materials used in the coating operation controlled by the solvent recovery system, kg, calculated using Equation 3C of this section.

R_V= Volatile organic matter collection and recovery efficiency of the solvent recovery system, percent, from Equation 2 of this section.

(i) Calculate the mass of organic HAP in the coatings used in the coating operation controlled by the solvent recovery system, kg, using Equation 3A of this section.

$$A_{CSR} = \sum_{i=1}^{m}\left(Vol_{c,i}\right)\left(D_{c,i}\right)\left(W_{c,i}\right) \qquad (Eq.\ 3A)$$

Where:

A_{CSR}= Total mass of organic HAP in the coatings used in the coating operation controlled by the solvent recovery system during the month, kg.

$Vol_{c,i}$= Total volume of coating, i, used during the month in the coating operation controlled by the solvent recovery system, liters.

$D_{c,i}$= Density of coating, i, kg per liter.

$W_{c,i}$= Mass fraction of organic HAP in coating, i, kg organic HAP per kg coating. For reactive adhesives as defined in §63.3981, use the mass fraction of organic HAP that is emitted as determined using the method in appendix A to subpart PPPP of this part.

m = Number of different coatings used.

(ii) Calculate the mass of organic HAP in the thinners and/or other additives used in the coating operation controlled by the solvent recovery system, kg, using Equation 3B of this section:

$$B_{CSR} = \sum_{j=1}^{n} \left(Vol_{t,j}\right)\left(D_{t,j}\right)\left(W_{t,j}\right) \qquad (Eq.\ 3B)$$

Where:

B_{CSR}= Total mass of organic HAP in the thinners and/or other additives used in the coating operation controlled by the solvent recovery system during the month, kg.

$Vol_{t,j}$= Total volume of thinner and/or other additive, j, used during the month in the coating operation controlled by the solvent recovery system, liters.

$D_{t,j}$= Density of thinner and/or other additive, j, kg per liter.

$W_{t,j}$= Mass fraction of organic HAP in thinner and/or other additive, j, kg lb organic HAP per kg thinner and/or other additive. For reactive adhesives as defined in §63.3981, use the mass fraction of organic HAP that is emitted as determined using the method in appendix A to subpart PPPP of this part.

n = Number of different thinners and/or other additives used.

(iii) Calculate the mass of organic HAP in the cleaning materials used in the coating operation controlled by the solvent recovery system during the month, kg, using Equation 3C of this section:

$$C_{CSR} = \sum_{k=1}^{p} \left(Vol_{s,k}\right)\left(D_{s,k}\right)\left(W_{s,k}\right) \qquad (Eq.\ 3C)$$

Where:

C_{CSR}= Total mass of organic HAP in the cleaning materials used in the coating operation controlled by the solvent recovery system during the month, kg.

$Vol_{s,k}$= Total volume of cleaning material, k, used during the month in the coating operation controlled by the solvent recovery system, liters.

$D_{s,k}$= Density of cleaning material, k, kg per liter.

$W_{s,k}$= Mass fraction of organic HAP in cleaning material, k, kg organic HAP per kg cleaning material.

p = Number of different cleaning materials used.

(k) *Calculate the total volume of coating solids used.* Determine the total volume of coating solids used, liters, which is the combined volume of coating solids for all the coatings used during each month in the coating operation or group of coating operations for which you use the emission rate with add-on controls option, using Equation 2 of §63.3951.

(l) *Calculate the mass of organic HAP emissions for each month.* Determine the mass of organic HAP emissions, kg, during each month, using Equation 4 of this section:

$$H_{HAP} = H_e - \sum_{i=1}^{q} \left(H_{c,i}\right) - \sum_{j=1}^{r} \left(H_{CSR,j}\right) \qquad (Eq.\ 4)$$

where:

H_{HAP}= Total mass of organic HAP emissions for the month, kg.

H_e= Total mass of organic HAP emissions before add-on controls from all the coatings, thinners and/or other additives, and cleaning materials used during the month, kg, determined according to paragraph (f) of this section.

$H_{C,i}$= Total mass of organic HAP emission reduction for controlled coating operation, i, not using a liquid-liquid material balance, during the month, kg, from Equation 1 of this section.

$H_{CSR,j}$= Total mass of organic HAP emission reduction for coating operation, j, controlled by a solvent recovery system using a liquid-liquid material balance, during the month, kg, from Equation 3 of this section.

q = Number of controlled coating operations not controlled by a solvent recovery system using a liquid-liquid material balance.

r = Number of coating operations controlled by a solvent recovery system using a liquid-liquid material balance.

(m) *Calculate the organic HAP emission rate for the compliance period.* Determine the organic HAP emission rate for the compliance period, kg (lb) of organic HAP emitted per liter (gal) coating solids used, using Equation 5 of this section:

$$H_{annual} = \frac{\sum_{y=1}^{n} H_{HAP,y}}{\sum_{y=1}^{n} V_{st,y}} \qquad (Eq.\ 5)$$

Where:

H_{annual}= Organic HAP emission rate for the compliance period, kg organic HAP emitted per liter coating solids used.

$H_{HAP,y}$= Organic HAP emissions for month, y, kg, determined according to Equation 4 of this section.

$V_{st,y}$= Total volume of coating solids used during month, y, liters, from Equation 2 of §63.3951.

y = Identifier for months.

n = Number of full or partial months in the compliance period (for the initial compliance period, n equals 12 if the compliance date falls on the first day of a month; otherwise n equals 13; for all following compliance periods, n equals 12).

(n) *Compliance demonstration.* The organic HAP emission rate for the initial compliance period, calculated using Equation 5 of this section, must be less than or equal to the applicable emission limit for each subcategory in §63.3890 or the predominant activity or facility-specific emission limit allowed in §63.3890(c). You must keep all records as required by §§63.3930 and 63.3931. As part of the notification of compliance status required by §63.3910, you must identify the coating operation(s) for which you used

the emission rate with add-on controls option and submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the initial compliance period because the organic HAP emission rate was less than or equal to the applicable emission limit in §63.3890, and you achieved the operating limits required by §63.3892 and the work practice standards required by §63.3893.

§ 63.3962 [Reserved]

§ 63.3963 How do I demonstrate continuous compliance with the emission limitations?

(a) To demonstrate continuous compliance with the applicable emission limit in §63.3890, the organic HAP emission rate for each compliance period, determined according to the procedures in §63.3961, must be equal to or less than the applicable emission limit in §63.3890. A compliance period consists of 12 months. Each month after the end of the initial compliance period described in §63.3960 is the end of a compliance period consisting of that month and the preceding 11 months. You must perform the calculations in §63.3961 on a monthly basis using data from the previous 12 months of operation. If you are complying with a facility-specific emission limit under §63.3890(c), you must also perform the calculation using Equation 1 in §63.3890(c)(2) on a monthly basis using the data from the previous 12 months of operation.

(b) If the organic HAP emission rate for any 12-month compliance period exceeded the applicable emission limit in §63.3890, this is a deviation from the emission limitation for that compliance period that must be reported as specified in §§63.3910(c)(6) and 63.3920(a)(7).

(c) You must demonstrate continuous compliance with each operating limit required by §63.3892 that applies to you, as specified in Table 1 to this subpart, when the coating line is in operation.

(1) If an operating parameter is out of the allowed range specified in Table 1 to this subpart, this is a deviation from the operating limit that must be reported as specified in §§63.3910(c)(6) and 63.3920(a)(7).

(2) If an operating parameter deviates from the operating limit specified in Table 1 to this subpart, then you must assume that the emission capture system and add-on control device were achieving zero efficiency during the time period of the deviation, unless you have other data indicating the actual efficiency of the emission capture system and add-on control device and the use of these data is approved by the Administrator.

(d) You must meet the requirements for bypass lines in §63.3968(b) for controlled coating operations for which you do not conduct liquid-liquid material balances. If any bypass line is opened and emissions are diverted to the atmosphere when the coating operation is running, this is a deviation that must be reported as specified in §§63.3910(c)(6) and 63.3920(a)(7). For the purposes of completing the compliance calculations specified in §§63.3961(h), you must treat the materials used during a deviation on a controlled coating operation as if they were used on an uncontrolled coating operation for the time period of the deviation as indicated in Equation 1 of §63.3961.

(e) You must demonstrate continuous compliance with the work practice standards in §63.3893. If you did not develop a work practice plan, or you did not implement the plan, or you did not keep the records required by §63.3930(k)(8), this is a deviation from the work practice standards that must be reported as specified in §§63.3910(c)(6) and 63.3920(a)(7).

(f) As part of each semiannual compliance report required in §63.3920, you must identify the coating operation(s) for which you used the emission rate with add-on controls option. If there were no deviations from the emission limitations, submit a statement that you were in compliance with the emission

limitations during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the applicable emission limit in §63.3890, and you achieved the operating limits required by §63.3892 and the work practice standards required by §63.3893 during each compliance period.

(g)—(i) [Reserved]

(j) You must maintain records as specified in §§63.3930 and 63.3931.

[69 FR 157, Jan. 2, 2004, as amended at 71 FR 20465, Apr. 20, 2006]

§ 63.3964 What are the general requirements for performance tests?

(a) You must conduct each performance test required by §63.3960 according to the requirements in §63.7(e)(1) and under the conditions in this section, unless you obtain a waiver of the performance test according to the provisions in §63.7(h).

(1) *Representative coating operation operating conditions.* You must conduct the performance test under representative operating conditions for the coating operation. Operations during periods of startup, shutdown, or malfunction and during periods of nonoperation do not constitute representative conditions. You must record the process information that is necessary to document operating conditions during the test and explain why the conditions represent normal operation.

(2) *Representative emission capture system and add-on control device operating conditions.* You must conduct the performance test when the emission capture system and add-on control device are operating at a representative flow rate, and the add-on control device is operating at a representative inlet concentration. You must record information that is necessary to document emission capture system and add-on control device operating conditions during the test and explain why the conditions represent normal operation.

(b) You must conduct each performance test of an emission capture system according to the requirements in §63.3965. You must conduct each performance test of an add-on control device according to the requirements in §63.3966.

§ 63.3965 How do I determine the emission capture system efficiency?

You must use the procedures and test methods in this section to determine capture efficiency as part of the performance test required by §63.3960.

(a) *Assuming 100 percent capture efficiency.* You may assume the capture system efficiency is 100 percent if both of the conditions in paragraphs (a)(1) and (2) of this section are met:

(1) The capture system meets the criteria in Method 204 of appendix M to 40 CFR part 51 for a PTE and directs all the exhaust gases from the enclosure to an add-on control device.

(2) All coatings, thinners and/or other additives, and cleaning materials used in the coating operation are applied within the capture system; coating solvent flash-off, curing, and drying occurs within the capture system; and the removal or evaporation of cleaning materials from the surfaces they are applied to occurs within the capture system. For example, this criterion is not met if parts enter the open shop environment when being moved between a spray booth and a curing oven.

(b) *Measuring capture efficiency.* If the capture system does not meet both of the criteria in paragraphs (a)(1) and (2) of this section, then you must use one of the three protocols described in paragraphs (c), (d), and (e) of this section to measure capture efficiency. The capture efficiency measurements use TVH capture efficiency as a surrogate for organic HAP capture efficiency. For the protocols in paragraphs (c) and (d) of this section, the capture efficiency measurement must consist of three test runs. Each test run must be at least 3 hours duration or the length of a production run, whichever is longer, up to 8 hours. For the purposes of this test, a production run means the time required for a single part to go from the beginning to the end of the production, which includes surface preparation activities and drying and curing time.

(c) *Liquid-to-uncaptured-gas protocol using a temporary total enclosure or building enclosure.* The liquid-to-uncaptured-gas protocol compares the mass of liquid TVH in materials used in the coating operation to the mass of TVH emissions not captured by the emission capture system. Use a temporary total enclosure or a building enclosure and the procedures in paragraphs (c)(1) through (6) of this section to measure emission capture system efficiency using the liquid-to-uncaptured-gas protocol.

(1) Either use a building enclosure or construct an enclosure around the coating operation where coatings, thinners and/or other additives, and cleaning materials are applied, and all areas where emissions from these applied coatings and materials subsequently occur, such as flash-off, curing, and drying areas. The areas of the coating operation where capture devices collect emissions for routing to an add-on control device, such as the entrance and exit areas of an oven or spray booth, must also be inside the enclosure. The enclosure must meet the applicable definition of a temporary total enclosure or building enclosure in Method 204 of appendix M to 40 CFR part 51.

(2) Use Method 204A or 204F of appendix M to 40 CFR part 51 to determine the mass fraction of TVH liquid input from each coating, thinner and/or other additive, and cleaning material used in the coating operation during each capture efficiency test run. To make the determination, substitute TVH for each occurrence of the term VOC in the methods.

(3) Use Equation 1 of this section to calculate the total mass of TVH liquid input from all the coatings, thinners and/or other additives, and cleaning materials used in the coating operation during each capture efficiency test run:

$$TVH_{used} = \sum_{i=1}^{n} (TVH_i)(Vol_i)(D_i) \qquad (Eq.\ 1)$$

Where:

TVH_{used}= Mass of liquid TVH in materials used in the coating operation during the capture efficiency test run, kg.

TVH_i= Mass fraction of TVH in coating, thinner and/or other additive, or cleaning material, i, that is used in the coating operation during the capture efficiency test run, kg TVH per kg material.

Vol_i= Total volume of coating, thinner and/or other additive, or cleaning material, i, used in the coating operation during the capture efficiency test run, liters.

D_i= Density of coating, thinner and/or other additive, or cleaning material, i, kg material per liter material.

n = Number of different coatings, thinners and/or other additives, and cleaning materials used in the coating operation during the capture efficiency test run.

(4) Use Method 204D or 204E of appendix M to 40 CFR part 51 to measure the total mass, kg, of TVH emissions that are not captured by the emission capture system. They are measured as they exit the temporary total enclosure or building enclosure during each capture efficiency test run. To make the measurement, substitute TVH for each occurrence of the term VOC in the methods.

(i) Use Method 204D of appendix M to 40 CFR part 51 if the enclosure is a temporary total enclosure.

(ii) Use Method 204E of appendix M to 40 CFR 51 if the enclosure is a building enclosure. During the capture efficiency measurement, all organic compound emitting operations inside the building enclosure, other than the coating operation for which capture efficiency is being determined, must be shut down, but all fans and blowers must be operating normally.

(5) For each capture efficiency test run, determine the percent capture efficiency of the emission capture system using Equation 2 of this section:

$$CE = \frac{\left(TVH_{used} - TVH_{uncaptured}\right)}{TVH_{used}} \times 100 \qquad \text{(Eq. 2)}$$

Where:

CE = Capture efficiency of the emission capture system vented to the add-on control device, percent.

TVH_{used}= Total mass of TVH liquid input used in the coating operation during the capture efficiency test run, kg.

$TVH_{uncaptured}$= Total mass of TVH that is not captured by the emission capture system and that exits from the temporary total enclosure or building enclosure during the capture efficiency test run, kg.

(6) Determine the capture efficiency of the emission capture system as the average of the capture efficiencies measured in the three test runs.

(d) *Gas-to-gas protocol using a temporary total enclosure or a building enclosure.* The gas-to-gas protocol compares the mass of TVH emissions captured by the emission capture system to the mass of TVH emissions not captured. Use a temporary total enclosure or a building enclosure and the procedures in paragraphs (d)(1) through (5) of this section to measure emission capture system efficiency using the gas-to-gas protocol.

(1) Either use a building enclosure or construct an enclosure around the coating operation where coatings, thinners and/or other additives, and cleaning materials are applied, and all areas where emissions from these applied coatings and materials subsequently occur, such as flash-off, curing, and drying areas. The areas of the coating operation where capture devices collect emissions generated by the coating operation for routing to an add-on control device, such as the entrance and exit areas of an oven or a spray booth, must also be inside the enclosure. The enclosure must meet the applicable definition of a temporary total enclosure or building enclosure in Method 204 of appendix M to 40 CFR part 51.

(2) Use Method 204B or 204C of appendix M to 40 CFR part 51 to measure the total mass, kg, of TVH emissions captured by the emission capture system during each capture efficiency test run as measured at the inlet to the add-on control device. To make the measurement, substitute TVH for each occurrence of the term VOC in the methods.

(i) The sampling points for the Method 204B or 204C measurement must be upstream from the add-on control device and must represent total emissions routed from the capture system and entering the add-on control device.

(ii) If multiple emission streams from the capture system enter the add-on control device without a single common duct, then the emissions entering the add-on control device must be simultaneously measured in each duct and the total emissions entering the add-on control device must be determined.

(3) Use Method 204D or 204E of appendix M to 40 CFR part 51 to measure the total mass, kg, of TVH emissions that are not captured by the emission capture system; they are measured as they exit the temporary total enclosure or building enclosure during each capture efficiency test run. To make the measurement, substitute TVH for each occurrence of the term VOC in the methods.

(i) Use Method 204D of appendix M to 40 CFR part 51 if the enclosure is a temporary total enclosure.

(ii) Use Method 204E of appendix M to 40 CFR part 51 if the enclosure is a building enclosure. During the capture efficiency measurement, all organic compound emitting operations inside the building enclosure, other than the coating operation for which capture efficiency is being determined, must be shut down, but all fans and blowers must be operating normally.

(4) For each capture efficiency test run, determine the percent capture efficiency of the emission capture system using Equation 3 of this section:

$$CE = \frac{TVH_{captured}}{\left(TVH_{captured} + \mathrm{TVH}_{\mathrm{uncaptured}}\right)} \times 100 \qquad \text{(Eq. 3)}$$

Where:

CE = Capture efficiency of the emission capture system vented to the add-on control device, percent.

$TVH_{captured}$= Total mass of TVH captured by the emission capture system as measured at the inlet to the add-on control device during the emission capture efficiency test run, kg.

$TVH_{uncaptured}$= Total mass of TVH that is not captured by the emission capture system and that exits from the temporary total enclosure or building enclosure during the capture efficiency test run, kg.

(5) Determine the capture efficiency of the emission capture system as the average of the capture efficiencies measured in the three test runs.

(e) *Alternative capture efficiency protocol.* As an alternative to the procedures specified in paragraphs (c) and (d) of this section and subject to the approval of the Administrator, you may determine capture efficiency using any other capture efficiency protocol and test methods that satisfy the criteria of either the DQO or LCL approach as described in appendix A to subpart KK of this part.

§ 63.3966 How do I determine the add-on control device emission destruction or removal efficiency?

You must use the procedures and test methods in this section to determine the add-on control device emission destruction or removal efficiency as part of the performance test required by §63.3960. You must conduct three test runs as specified in §63.7(e)(3) and each test run must last at least 1 hour. If the source is a magnet wire coating machine, you may use the procedures in section 3.0 of appendix A to this subpart as an alternative.

(a) For all types of add-on control devices, use the test methods specified in paragraphs (a)(1) through (5) of this section.

(1) Use Method 1 or 1A of appendix A to 40 CFR part 60, as appropriate, to select sampling sites and velocity traverse points.

(2) Use Method 2, 2A, 2C, 2D, 2F, or 2G of appendix A to 40 CFR part 60, as appropriate, to measure gas volumetric flow rate.

(3) Use Method 3, 3A, or 3B of appendix A to 40 CFR part 60, as appropriate, for gas analysis to determine dry molecular weight.

(4) Use Method 4 of appendix A to 40 CFR part 60, to determine stack gas moisture.

(5) Methods for determining gas volumetric flow rate, dry molecular weight, and stack gas moisture must be performed, as applicable, during each test run.

(b) Measure total gaseous organic mass emissions as carbon at the inlet and outlet of the add-on control device simultaneously, using either Method 25 or 25A of appendix A to 40 CFR part 60.

(1) Use Method 25 if the add-on control device is an oxidizer and you expect the total gaseous organic concentration as carbon to be more than 50 parts per million (ppm) at the control device outlet.

(2) Use Method 25A if the add-on control device is an oxidizer and you expect the total gaseous organic concentration as carbon to be 50 ppm or less at the control device outlet.

(3) Use Method 25A if the add-on control device is not an oxidizer.

(c) If two or more add-on control devices are used for the same emission stream, then you must measure emissions at the outlet to the atmosphere of each device. For example, if one add-on control device is a concentrator with an outlet to the atmosphere for the high-volume dilute stream that has been treated by the concentrator, and a second add-on control device is an oxidizer with an outlet to the atmosphere for the low-volume concentrated stream that is treated with the oxidizer, you must measure emissions at the outlet of the oxidizer and the high volume dilute stream outlet of the concentrator.

(d) For each test run, determine the total gaseous organic emissions mass flow rates for the inlet and the outlet of the add-on control device, using Equation 1 of this section. If there is more than one inlet or outlet to the add-on control device, you must calculate the total gaseous organic mass flow rate using Equation 1 of this section for each inlet and each outlet and then total all of the inlet emissions and total all of the outlet emissions:

$$M_f = Q_{sd} C_c (12)\ (0.0416)\ \left(10^{-6}\right) \qquad (Eq.\ 1)$$

Where:

M_f= Total gaseous organic emissions mass flow rate, kg per hour (h).

C_c= Concentration of organic compounds as carbon in the vent gas, as determined by Method 25 or Method 25A, parts per million by volume (ppmv), dry basis.

Q_{sd}= Volumetric flow rate of gases entering or exiting the add-on control device, as determined by Method 2, 2A, 2C, 2D, 2F, or 2G, dry standard cubic meters/hour (dscm/h).

0.0416 = Conversion factor for molar volume, kg-moles per cubic meter (mol/m^3) (@ 293 Kelvin (K) and 760 millimeters of mercury (mmHg).

(e) For each test run, determine the add-on control device organic emissions destruction or removal efficiency, using Equation 2 of this section:

$$DRE = \frac{M_{fi} - M_{fo}}{M_{fi}} \times 100 \qquad \text{(Eq. 2)}$$

Where:

DRE = Organic emissions destruction or removal efficiency of the add-on control device, percent.

M_{fi}= Total gaseous organic emissions mass flow rate at the inlet(s) to the add-on control device, using Equation 1 of this section, kg/h.

M_{fo}= Total gaseous organic emissions mass flow rate at the outlet(s) of the add-on control device, using Equation 1 of this section, kg/h.

(f) Determine the emission destruction or removal efficiency of the add-on control device as the average of the efficiencies determined in the three test runs and calculated in Equation 2 of this section.

§ 63.3967 How do I establish the emission capture system and add-on control device operating limits during the performance test?

During the performance test required by §63.3960 and described in §§63.3964, 63.3965, and 63.3966, you must establish the operating limits required by §63.3892 according to this section, unless you have received approval for alternative monitoring and operating limits under §63.8(f) as specified in §63.3892.

(a) *Thermal oxidizers.* If your add-on control device is a thermal oxidizer, establish the operating limits according to paragraphs (a)(1) and (2) of this section.

(1) During the performance test, you must monitor and record the combustion temperature at least once every 15 minutes during each of the three test runs. You must monitor the temperature in the firebox of the thermal oxidizer or immediately downstream of the firebox before any substantial heat exchange occurs.

(2) Use the data collected during the performance test to calculate and record the average combustion temperature maintained during the performance test. This average combustion temperature is the minimum operating limit for your thermal oxidizer.

(b) *Catalytic oxidizers.* If your add-on control device is a catalytic oxidizer, establish the operating limits according to either paragraphs (b)(1) and (2) or paragraphs (b)(3) and (4) of this section. If the source is a magnet wire coating machine, you may use the procedures in section 3.0 of appendix A to this subpart as an alternative.

(1) During the performance test, you must monitor and record the temperature just before the catalyst bed and the temperature difference across the catalyst bed at least once every 15 minutes during each of the three test runs.

(2) Use the data collected during the performance test to calculate and record the average temperature just before the catalyst bed and the average temperature difference across the catalyst bed maintained during the performance test. These are the minimum operating limits for your catalytic oxidizer.

(3) You must monitor the temperature at the inlet to the catalyst bed and implement a site-specific inspection and maintenance plan for your catalytic oxidizer as specified in paragraph (b)(4) of this section. During the performance test, you must monitor and record the temperature just before the catalyst bed at least once every 15 minutes during each of the three test runs. Use the data collected during the performance test to calculate and record the average temperature just before the catalyst bed during the performance test. This is the minimum operating limit for your catalytic oxidizer.

(4) You must develop and implement an inspection and maintenance plan for your catalytic oxidizer(s) for which you elect to monitor according to paragraph (b)(3) of this section. The plan must address, at a minimum, the elements specified in paragraphs (b)(4)(i) through (iii) of this section.

(i) Annual sampling and analysis of the catalyst activity (*i.e.,* conversion efficiency) following the manufacturer's or catalyst supplier's recommended procedures. If problems are found during the catalyst activity test, you must replace the catalyst bed or take other corrective action consistent with the manufacturer's recommendations.

(ii) Monthly external inspection of the catalytic oxidizer system, including the burner assembly and fuel supply lines for problems and, as necessary, adjust the equipment to assure proper air-to-fuel mixtures.

(iii) Annual internal inspection of the catalyst bed to check for channeling, abrasion, and settling. If problems are found during the annual internal inspection of the catalyst, you must replace the catalyst bed or take other corrective action consistent with the manufacturer's recommendations. If the catalyst bed is replaced and is not of like or better kind and quality as the old catalyst then you must conduct a new performance test to determine destruction efficiency according to §63.3966. If a catalyst bed is replaced and the replacement catalyst is of like or better kind and quality as the old catalyst, then a new performance test to determine destruction efficiency is not required and you may continue to use the previously established operating limits for that catalytic oxidizer.

(c) *Regenerative carbon adsorbers.* If your add-on control device is a regenerative carbon adsorber, establish the operating limits according to paragraphs (c)(1) and (2) of this section.

(1) You must monitor and record the total regeneration desorbing gas (*e.g.,* steam or nitrogen) mass flow for each regeneration cycle, and the carbon bed temperature after each carbon bed regeneration and cooling cycle for the regeneration cycle either immediately preceding or immediately following the performance test.

(2) The operating limits for your regenerative carbon adsorber are the minimum total desorbing gas mass flow recorded during the regeneration cycle and the maximum carbon bed temperature recorded after the cooling cycle.

(d) *Condensers.* If your add-on control device is a condenser, establish the operating limits according to paragraphs (d)(1) and (2) of this section.

(1) During the performance test, you must monitor and record the condenser outlet (product side) gas temperature at least once every 15 minutes during each of the three test runs.

(2) Use the data collected during the performance test to calculate and record the average condenser outlet (product side) gas temperature maintained during the performance test. This average condenser outlet gas temperature is the maximum operating limit for your condenser.

(e) *Concentrators.* If your add-on control device includes a concentrator, you must establish operating limits for the concentrator according to paragraphs (e)(1) through (4) of this section.

(1) During the performance test, you must monitor and record the desorption concentrate stream gas temperature at least once every 15 minutes during each of the three runs of the performance test.

(2) Use the data collected during the performance test to calculate and record the average temperature. This is the minimum operating limit for the desorption concentrate gas stream temperature.

(3) During the performance test, you must monitor and record the pressure drop of the dilute stream across the concentrator at least once every 15 minutes during each of the three runs of the performance test.

(4) Use the data collected during the performance test to calculate and record the average pressure drop. This is the minimum operating limit for the dilute stream across the concentrator.

(f) *Emission capture systems.* For each capture device that is not part of a PTE that meets the criteria of §63.3965(a), establish an operating limit for either the gas volumetric flow rate or duct static pressure, as specified in paragraphs (f)(1) and (2) of this section. The operating limit for a PTE is specified in Table 1 to this subpart. If the source is a magnet wire coating machine, you may use the procedures in section 2.0 of appendix A to this subpart as an alternative.

(1) During the capture efficiency determination required by §63.3960 and described in §§63.3964 and 63.3965, you must monitor and record either the gas volumetric flow rate or the duct static pressure for each separate capture device in your emission capture system at least once every 15 minutes during each of the three test runs at a point in the duct between the capture device and the add-on control device inlet.

(2) Calculate and record the average gas volumetric flow rate or duct static pressure for the three test runs for each capture device. This average gas volumetric flow rate or duct static pressure is the minimum operating limit for that specific capture device.

§ 63.3968 What are the requirements for continuous parameter monitoring system installation, operation, and maintenance?

(a) *General.* You must install, operate, and maintain each CPMS specified in paragraphs (c), (e), (f), and (g) of this section according to paragraphs (a)(1) through (6) of this section. You must install, operate, and maintain each CPMS specified in paragraphs (b) and (d) of this section according to paragraphs (a)(3) through (5) of this section.

(1) The CPMS must complete a minimum of one cycle of operation for each successive 15-minute period. You must have a minimum of four equally spaced successive cycles of CPMS operation in 1 hour.

(2) You must determine the average of all recorded readings for each successive 3-hour period of the emission capture system and add-on control device operation.

(3) You must record the results of each inspection, calibration, and validation check of the CPMS.

(4) You must maintain the CPMS at all times and have available necessary parts for routine repairs of the monitoring equipment.

(5) You must operate the CPMS and collect emission capture system and add-on control device parameter data at all times that a controlled coating operation is operating, except during monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, if applicable, calibration checks and required zero and span adjustments).

(6) You must not use emission capture system or add-on control device parameter data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities when calculating data averages. You must use all the data collected during all other periods in calculating the data averages for determining compliance with the emission capture system and add-on control device operating limits.

(7) A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the CPMS to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. Any period for which the monitoring system is out-of-control and data are not available for required calculations is a deviation from the monitoring requirements.

(b) *Capture system bypass line.* You must meet the requirements of paragraphs (b)(1) and (2) of this section for each emission capture system that contains bypass lines that could divert emissions away from the add-on control device to the atmosphere.

(1) You must monitor or secure the valve or closure mechanism controlling the bypass line in a nondiverting position in such a way that the valve or closure mechanism cannot be opened without creating a record that the valve was opened. The method used to monitor or secure the valve or closure mechanism must meet one of the requirements specified in paragraphs (b)(1)(i) through (v) of this section.

(i) *Flow control position indicator.* Install, calibrate, maintain, and operate according to the manufacturer's specifications a flow control position indicator that takes a reading at least once every 15 minutes and provides a record indicating whether the emissions are directed to the add-on control device or diverted from the add-on control device. The time of occurrence and flow control position must be recorded, as well as every time the flow direction is changed. The flow control position indicator must be installed at the entrance to any bypass line that could divert the emissions away from the add-on control device to the atmosphere.

(ii) *Car-seal or lock-and-key valve closures.* Secure any bypass line valve in the closed position with a car-seal or a lock-and-key type configuration. You must visually inspect the seal or closure mechanism at least once every month to ensure that the valve is maintained in the closed position, and the emissions are not diverted away from the add-on control device to the atmosphere.

(iii) *Valve closure monitoring.* Ensure that any bypass line valve is in the closed (nondiverting) position through monitoring of valve position at least once every 15 minutes. You must inspect the monitoring system at least once every month to verify that the monitor will indicate valve position.

(iv) *Automatic shutdown system.* Use an automatic shutdown system in which the coating operation is stopped when flow is diverted by the bypass line away from the add-on control device to the atmosphere when the coating operation is running. You must inspect the automatic shutdown system at least once every month to verify that it will detect diversions of flow and shut down the coating operation.

(v) *Flow direction indicator.* Install, calibrate, maintain, and operate according to the manufacturer's specifications a flow direction indicator that takes a reading at least once every 15 minutes and provides a record indicating whether the emissions are directed to the add-on control device or diverted from the add-on control device. Each time the flow direction changes, the next reading of the time of occurrence and flow direction must be recorded. The flow direction indicator must be installed in each bypass line or air makeup supply line that could divert the emissions away from the add-on control device to the atmosphere.

(2) If any bypass line is opened, you must include a description of why the bypass line was opened and the length of time it remained open in the semiannual compliance reports required in §63.3920.

(c) *Thermal oxidizers and catalytic oxidizers.* If you are using a thermal oxidizer or catalytic oxidizer as an add-on control device (including those used with concentrators or with carbon adsorbers to treat desorbed concentrate streams), you must comply with the requirements in paragraphs (c)(1) through (3) of this section:

(1) For a thermal oxidizer, install a gas temperature monitor in the firebox of the thermal oxidizer or in the duct immediately downstream of the firebox before any substantial heat exchange occurs.

(2) For a catalytic oxidizer, install gas temperature monitors upstream and/or downstream of the catalyst bed as required in §63.3967(b).

(3) For all thermal oxidizers and catalytic oxidizers, you must meet the requirements in paragraphs (a) and (c)(3)(i) through (v) of this section for each gas temperature monitoring device.

(i) Locate the temperature sensor in a position that provides a representative temperature.

(ii) Use a temperature sensor with a measurement sensitivity of 5 degrees Fahrenheit or 1.0 percent of the temperature value, whichever is larger.

(iii) Before using the sensor for the first time or when relocating or replacing the sensor, perform a validation check by comparing the sensor output to a calibrated temperature measurement device or by comparing the sensor output to a simulated temperature.

(iv) Conduct an accuracy audit every quarter and after every deviation. Accuracy audit methods include comparisons of sensor output to redundant temperature sensors, to calibrated temperature measurement devices, or to temperature simulation devices.

(v) Conduct a visual inspection of each sensor every quarter if redundant temperature sensors are not used.

(d) *Regenerative carbon adsorbers.* If you are using a regenerative carbon adsorber as an add-on control device, you must monitor the total regeneration desorbing gas (*e.g.,* steam or nitrogen) mass flow for each regeneration cycle, the carbon bed temperature after each regeneration and cooling cycle, and comply with paragraphs (a)(3) through (5) and (d)(1) through (3) of this section.

(1) The regeneration desorbing gas mass flow monitor must be an integrating device having a measurement sensitivity of plus or minus 10 percent capable of recording the total regeneration desorbing gas mass flow for each regeneration cycle.

(2) The carbon bed temperature monitor must be capable of recording the temperature within 15 minutes of completing any carbon bed cooling cycle.

(3) For all regenerative carbon adsorbers, you must meet the requirements in paragraphs (c)(3)(i) through (v) of this section for each temperature monitoring device.

(e) *Condensers.* If you are using a condenser, you must monitor the condenser outlet (product side) gas temperature and comply with paragraphs (a) and (e)(1) and (2) of this section.

(1) The temperature monitor must provide a gas temperature record at least once every 15 minutes.

(2) For all condensers, you must meet the requirements in paragraphs (c)(3)(i) through (v) of this section for each temperature monitoring device.

(f) *Concentrators.* If you are using a concentrator, such as a zeolite wheel or rotary carbon bed concentrator, you must comply with the requirements in paragraphs (f)(1) and (2) of this section.

(1) You must install a temperature monitor in the desorption gas stream. The temperature monitor must meet the requirements in paragraphs (a) and (c)(3) of this section.

(2) You must install a device to monitor pressure drop across the zeolite wheel or rotary carbon bed. The pressure monitoring device must meet the requirements in paragraphs (a) and (g)(2) of this section.

(g) *Emission capture systems.* The capture system monitoring system must comply with the applicable requirements in paragraphs (g)(1) and (2) of this section. If the source is a magnet wire coating machine, you may use the procedures in section 2.0 of appendix A to this subpart as an alternative.

(1) For each flow measurement device, you must meet the requirements in paragraphs (a) and (g)(1)(i) through (vii) of this section.

(i) Locate a flow sensor in a position that provides a representative flow measurement in the duct from each capture device in the emission capture system to the add-on control device.

(ii) Use a flow sensor with an accuracy of at least 10 percent of the flow.

(iii) Perform an initial sensor calibration in accordance with the manufacturer's requirements.

(iv) Perform a validation check before initial use or upon relocation or replacement of a sensor. Validation checks include comparison of sensor values with electronic signal simulations or via relative accuracy testing.

(v) Conduct an accuracy audit every quarter and after every deviation. Accuracy audit methods include comparisons of sensor values with electronic signal simulations or via relative accuracy testing.

(vi) Perform leak checks monthly.

(vii) Perform visual inspections of the sensor system quarterly if there is no redundant sensor.

(2) For each pressure drop measurement device, you must comply with the requirements in paragraphs (a) and (g)(2)(i) through (vii) of this section.

(i) Locate the pressure sensor(s) in or as close to a position that provides a representative measurement of the pressure drop across each opening you are monitoring.

(ii) Use a pressure sensor with an accuracy of at least 0.5 inches of water column or 5 percent of the measured value, whichever is larger.

(iii) Perform an initial calibration of the sensor according to the manufacturer's requirements.

(iv) Conduct a validation check before initial operation or upon relocation or replacement of a sensor. Validation checks include comparison of sensor values to calibrated pressure measurement devices or to pressure simulation using calibrated pressure sources.

(v) Conduct accuracy audits every quarter and after every deviation. Accuracy audits include comparison of sensor values to calibrated pressure measurement devices or to pressure simulation using calibrated pressure sources.

(vi) Perform monthly leak checks on pressure connections. A pressure of at least 1.0 inches of water column to the connection must yield a stable sensor result for at least 15 seconds.

(vii) Perform a visual inspection of the sensor at least monthly if there is no redundant sensor.

Other Requirements and Information

§ 63.3980 Who implements and enforces this subpart?

(a) This subpart can be implemented and enforced by us, the U.S. Environmental Protection Agency (EPA), or a delegated authority such as your State, local, or tribal agency. If the Administrator has delegated authority to your State, local, or tribal agency, then that agency (as well as the EPA) has the authority to implement and enforce this subpart. You should contact your EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to your State, local, or tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or tribal agency under subpart E of this part, the authorities contained in paragraph (c) of this section are retained by the Administrator and are not transferred to the State, local, or tribal agency.

(c) The authorities that will not be delegated to State, local, or tribal agencies are listed in paragraphs (c)(1) through (4) of this section:

(1) Approval of alternatives to the requirements in §63.3881 through 3883 and §63.3890 through 3893.

(2) Approval of major alternatives to test methods under §63.7(e)(2)(ii) and (f) and as defined in §63.90.

(3) Approval of major alternatives to monitoring under §63.8(f) and as defined in §63.90.

(4) Approval of major alternatives to recordkeeping and reporting under §63.10(f) and as defined in §63.90.

§ 63.3981 What definitions apply to this subpart?

Terms used in this subpart are defined in the CAA, in 40 CFR 63.2, and in this section as follows:

Additive means a material that is added to a coating after purchase from a supplier (*e.g.,* catalysts, activators, accelerators).

Add-on control means an air pollution control device, such as a thermal oxidizer or carbon adsorber, that reduces pollution in an air stream by destruction or removal before discharge to the atmosphere.

Adhesive, adhesive coating means any chemical substance that is applied for the purpose of bonding two surfaces together. Products used on humans and animals, adhesive tape, contact paper, or any other product with an adhesive incorporated onto or in an inert substrate shall not be considered adhesives under this subpart.

Assembled on-road vehicle coating means any coating operation in which coating is applied to the surface of some component or surface of a fully assembled motor vehicle or trailer intended for on-road use including, but not limited to, components or surfaces on automobiles and light-duty trucks that have been repaired after a collision or otherwise repainted, fleet delivery trucks, and motor homes and other recreational vehicles (including camping trailers and fifth wheels). Assembled on-road vehicle coating includes the concurrent coating of parts of the assembled on-road vehicle that are painted off-vehicle to protect systems, equipment, or to allow full coverage. Assembled on-road vehicle coating does not include surface coating operations that meet the applicability criteria of the automobiles and light-duty trucks NESHAP. Assembled on-road vehicle coating also does not include the use of adhesives, sealants, and caulks used in assembling on-road vehicles.

Capture device means a hood, enclosure, room, floor sweep, or other means of containing or collecting emissions and directing those emissions into an add-on air pollution control device.

Capture efficiency or capture system efficiency means the portion (expressed as a percentage) of the pollutants from an emission source that is delivered to an add-on control device.

Capture system means one or more capture devices intended to collect emissions generated by a coating operation in the use of coatings or cleaning materials, both at the point of application and at subsequent points where emissions from the coatings and cleaning materials occur, such as flashoff, drying, or curing. As used in this subpart, multiple capture devices that collect emissions generated by a coating operation are considered a single capture system.

Cleaning material means a solvent used to remove contaminants and other materials, such as dirt, grease, oil, and dried or wet coating (*e.g.,* depainting or paint stripping), from a substrate before or after coating application or from equipment associated with a coating operation, such as spray booths, spray guns, racks, tanks, and hangers. Thus, it includes any cleaning material used on substrates or equipment or both.

Coating means a material applied to a substrate for decorative, protective, or functional purposes. Such materials include, but are not limited to, paints, sealants, liquid plastic coatings, caulks, inks, adhesives, and maskants. Decorative, protective, or functional materials that consist only of protective oils for metal, acids, bases, or any combination of these substances, or paper film or plastic film which may be pre-coated with an adhesive by the film manufacturer, are not considered coatings for the purposes of this subpart. A liquid plastic coating means a coating made from fine particle-size polyvinyl chloride (PVC) in solution (also referred to as a plastisol).

Coating operation means equipment used to apply cleaning materials to a substrate to prepare it for coating application (surface preparation) or to remove dried coating; to apply coating to a substrate (coating application) and to dry or cure the coating after application; or to clean coating operation equipment (equipment cleaning). A single coating operation may include any combination of these types of equipment, but always includes at least the point at which a given quantity of coating or cleaning material is applied to a given part and all subsequent points in the affected source where organic HAP are emitted from the specific quantity of coating or cleaning material on the specific part. There may be multiple coating operations in an affected source. Coating application with handheld, non-refillable aerosol containers, touch-up markers, or marking pens is not a coating operation for the purposes of this subpart.

Coatings solids means the nonvolatile portion of the coating that makes up the dry film.

Continuous parameter monitoring system (CPMS) means the total equipment that may be required to meet the data acquisition and availability requirements of this subpart, used to sample, condition (if applicable), analyze, and provide a record of coating operation, or capture system, or add-on control device parameters.

Controlled coating operation means a coating operation from which some or all of the organic HAP emissions are routed through an emission capture system and add-on control device.

Deviation means any instance in which an affected source subject to this subpart, or an owner or operator of such a source:

(1) Fails to meet any requirement or obligation established by this subpart including but not limited to, any emission limit or operating limit or work practice standard;

(2) Fails to meet any term or condition that is adopted to implement an applicable requirement in this subpart and that is included in the operating permit for any affected source required to obtain such a permit; or

(3) Fails to meet any emission limit, or operating limit, or work practice standard in this subpart during startup, shutdown, or malfunction, regardless of whether or not such failure is permitted by this subpart.

Emission limitation means the aggregate of all requirements associated with a compliance option including emission limit, operating limit, work practice standard, etc.

Enclosure means a structure that surrounds a source of emissions and captures and directs the emissions to an add-on control device.

Exempt compound means a specific compound that is not considered a VOC due to negligible photochemical reactivity. The exempt compounds are listed in 40 CFR 51.100(s).

Extreme performance fluoropolymer coating means coatings that are formulated systems based on fluoropolymer resins which often contain bonding matrix polymers dissolved in non-aqueous solvents as well as other ingredients. Extreme performance fluoropolymer coatings are typically used when one or more critical performance criteria are required including, but not limited to a nonstick low-energy surface, dry film lubrication, high resistance to chemical attack, extremely wide operating temperature, high electrical insulating properties, or that the surface comply with government (*e.g.,* USDA, FDA) or third party specifications for health, safety, reliability, or performance. Once applied to a substrate, extreme performance fluoropolymer coatings undergo a curing process that typically requires high temperatures, a chemical reaction, or other specialized technology.

Facility maintenance means the routine repair or renovation (including the surface coating) of the tools, equipment, machinery, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity.

General use coating means any material that meets the definition of coating but does not meet the definition of high performance coating, rubber-to-metal coating, magnet wire coating, or extreme performance fluoropolymer coating as defined in this section.

High performance architectural coating means any coating applied to architectural subsections which is required to meet the specifications of Architectural Aluminum Manufacturer's Association's publication number AAMA 605.2–2000.

High performance coating means any coating that meets the definition of high performance architectural coating or high temperature coating in this section.

High temperature coating means any coating applied to a substrate which during normal use must withstand temperatures of at least 538 degrees Celsius (1000 degrees Fahrenheit).

Hobby shop means any surface coating operation, located at an affected source, that is used exclusively for personal, noncommercial purposes by the affected source's employees or assigned personnel.

Magnet wire coatings, commonly referred to as magnet wire enamels, are applied to a continuous strand of wire which will be used to make turns (windings) in electrical devices such as coils, transformers, or motors. Magnet wire coatings provide high dielectric strength and turn-to-turn conductor insulation. This allows the turns of an electrical device to be placed in close proximity to one another which leads to increased coil effectiveness and electrical efficiency.

Magnet wire coating machine means equipment which applies and cures magnet wire coatings.

Manufacturer's formulation data means data on a material (such as a coating) that are supplied by the material manufacturer based on knowledge of the ingredients used to manufacture that material, rather than based on testing of the material with the test methods specified in §63.3941. Manufacturer's formulation data may include, but are not limited to, information on density, organic HAP content, volatile organic matter content, and coating solids content.

Mass fraction of organic HAP means the ratio of the mass of organic HAP to the mass of a material in which it is contained, expressed as kg of organic HAP per kg of material.

Month means a calendar month or a pre-specified period of 28 days to 35 days to allow for flexibility in recordkeeping when data are based on a business accounting period.

Non-HAP coating means, for the purposes of this subpart, a coating that contains no more than 0.1 percent by mass of any individual organic HAP that is an OSHA-defined carcinogen as specified in 29 CFR 1910.1200(d)(4) and no more than 1.0 percent by mass for any other individual HAP.

Organic HAP content means the mass of organic HAP emitted per volume of coating solids used for a coating calculated using Equation 2 of §63.3941. The organic HAP content is determined for the coating in the condition it is in when received from its manufacturer or supplier and does not account for any alteration after receipt. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, organic HAP content is the mass of organic HAP that is emitted, rather than the organic HAP content of the coating as it is received.

Permanent total enclosure (PTE) means a permanently installed enclosure that meets the criteria of Method 204 of appendix M, 40 CFR part 51, for a PTE and that directs all the exhaust gases from the enclosure to an add-on control device.

Personal watercraft means a vessel (boat) which uses an inboard motor powering a water jet pump as its primary source of motive power and which is designed to be operated by a person or persons sitting, standing, or kneeling on the vessel, rather than in the conventional manner of sitting or standing inside the vessel.

Protective oil means an organic material that is applied to metal for the purpose of providing lubrication or protection from corrosion without forming a solid film. This definition of protective oil includes, but is not limited to, lubricating oils, evaporative oils (including those that evaporate completely), and extrusion oils. Protective oils used on miscellaneous metal parts and products include magnet wire lubricants and soft temporary protective coatings that are removed prior to installation or further assembly of a part or component.

Reactive adhesive means adhesive systems composed, in part, of volatile monomers that react during the adhesive curing reaction, and, as a result, do not evolve from the film during use. These volatile components instead become integral parts of the adhesive through chemical reaction. At least 70 percent of the liquid components of the system, excluding water, react during the process.

Research or laboratory facility means a facility whose primary purpose is for research and development of new processes and products, that is conducted under the close supervision of technically trained personnel, and is not engaged in the manufacture of final or intermediate products for commercial purposes, except in a *de minimis* manner.

Responsible official means responsible official as defined in 40 CFR 70.2.

Rubber-to-metal coatings are coatings that contain heat-activated polymer systems in either solvent or water that, when applied to metal substrates, dry to a non-tacky surface and react chemically with the rubber and metal during a vulcanization process.

Startup, initial means the first time equipment is brought online in a facility.

Surface preparation means use of a cleaning material on a portion of or all of a substrate. This includes use of a cleaning material to remove dried coating, which is sometimes called depainting.

Temporary total enclosure means an enclosure constructed for the purpose of measuring the capture efficiency of pollutants emitted from a given source as defined in Method 204 of appendix M, 40 CFR part 51.

Thinner means an organic solvent that is added to a coating after the coating is received from the supplier.

Total volatile hydrocarbon (TVH) means the total amount of nonaqueous volatile organic matter determined according to Methods 204 and 204A through 204F of appendix M to 40 CFR part 51 and substituting the term TVH each place in the methods where the term VOC is used. The TVH includes both VOC and non-VOC.

Uncontrolled coating operation means a coating operation from which none of the organic HAP emissions are routed through an emission capture system and add-on control device.

Volatile organic compound (VOC) means any compound defined as VOC in 40 CFR 51.100(s).

Volume fraction of coating solids means the ratio of the volume of coating solids (also known as the volume of nonvolatiles) to the volume of a coating in which it is contained; liters (gal) of coating solids per liter (gal) of coating.

Wastewater means water that is generated in a coating operation and is collected, stored, or treated prior to being discarded or discharged.

Table 1 to Subpart MMMM of Part 63—Operating Limits if Using the Emission Rate With Add-On Controls Option

If you are required to comply with operating limits by §63.3892(c), you must comply with the applicable operating limits in the following table:

For the following device . . .	You must meet the following operating limit . . .	And you must demonstrate continuous compliance with the operating limit by . . .
1. Thermal oxidizer	a. The average combustion temperature in any 3-hour period must not fall below the combustion temperature limit established according to §63.3967(a)	i. Collecting the combustion temperature data according to §63.3968(c); ii. Reducing the data to 3-hour block averages; and iii. Maintaining the 3-hour average combustion temperature at or above the temperature limit.
2. Catalytic oxidizer	a. The average temperature measured just before the catalyst bed in any 3-hour period must not fall below the limit established according to §63.3967(b) (for magnet wire coating machines, temperature can be monitored before or after the catalyst bed); and either	i. Collecting the temperature data according to §63.3968(c); ii. Reducing the data to 3-hour block averages; and iii. Maintaining the 3-hour average temperature before (or for magnet wire coating machines after) the catalyst bed at or above the temperature limit.
	b. Ensure that the average temperature difference across the catalyst bed in any 3-hour period does not fall below the temperature difference limit established according to §63.3967(b) (2); or	i. Collecting the temperature data according to §63.3968(c); ii. Reducing the data to 3-hour block averages; and iii. Maintaining the 3-hour average temperature difference at or above the temperature difference limit.
	c. Develop and implement an inspection and maintenance plan according to §63.3967(b)(4) or for magnet wire coating machines according to section 3.0 of appendix A to this subpart	i. Maintaining and up-to-date inspection and maintenance plan, records of annual catalyst activity checks, records of monthly inspections of the oxidizer system, and records of the annual internal inspections of the catalyst bed. If a problem is discovered during a monthly or annual inspection required by §63.3967(b)(4) or for magnet wire coating machines by section 3.0 of appendix A to this subpart, you must take corrective action as soon as practicable consistent with the manufacturer's recommendations.

For the following device . . .	You must meet the following operating limit . . .	And you must demonstrate continuous compliance with the operating limit by . . .
3. Regenerative carbon adsorber	a. The total regeneration desorbing gas (*e.g.,* steam or nitrogen) mass flow for each carbon bed regeneration cycle must not fall below the total regeneration desorbing gas mass flow limit established according to §63.3967(c); and	i. Measuring the total regeneration desorbing gas (*e.g.,* steam or nitrogen) mass flow for each regeneration cycle according to §63.3968(d); and ii. Maintaining the total regeneration desorbing gas mass flow at or above the mass flow limit.
	b. The temperature of the carbon bed, after completing each regeneration and any cooling cycle, must not exceed the carbon bed temperature limit established according to §63.3967(c)	i. Measuring the temperature of the carbon bed after completing each regeneration and any cooling cycle according to §63.3968(d); and ii. Operating the carbon beds such that each carbon bed is not returned to service until completing each regeneration and any cooling cycle until the recorded temperature of the carbon bed is at or below the temperature limit.
4. Condenser	a. The average condenser outlet (product side) gas temperature in any 3-hour period must not exceed the temperature limit established according to §63.3967(d)	i. Collecting the condenser outlet (product side) gas temperature according to §63.3968(e); ii. Reducing the data to 3-hour block averages; and iii. Maintaining the 3-hour average gas temperature at the outlet at or below the temperature limit.
5. Concentrators, including zeolite wheels and rotary carbon adsorbers	a. The average gas temperature of the desorption concentrate stream in any 3-hour period must not fall below the limit established according to §63.3967(e); and	i. Collecting the temperature data according to 63.3968(f); ii. Reducing the data to 3-hour block averages; and iii. Maintaining the 3-hour average temperature at or above the temperature limit.
	b. The average pressure drop of the dilute stream across the concentrator in any 3-hour period must not fall below the limit established according to §63.3967(e)	i. Collecting the pressure drop data according to 63.3968(f); ii. Reducing the pressure drop data to 3-hour block averages; and iii. Maintaining the 3-hour average pressure drop at or above the pressure drop limit.
6. Emission capture system that is a PTE according to §63.3965(a)	a. The direction of the air flow at all times must be into the enclosure; and either	i. Collecting the direction of air flow, and either the facial velocity of air through all natural draft openings according to §63.3968(b)(1) or the pressure drop across the enclosure according to §63.3968(g)(2); and ii. Maintaining the facial velocity of air flow through all natural draft openings or the pressure drop at or above the facial velocity limit or pressure drop limit, and maintaining the direction of air flow into the enclosure at all times.

For the following device . . .	You must meet the following operating limit . . .	And you must demonstrate continuous compliance with the operating limit by . . .
	b. The average facial velocity of air through all natural draft openings in the enclosure must be at least 200 feet per minutes; or	i. See items 6.a.i and 6.a.ii.
	c. The pressure drop across the enclosure must be at least 0.007 inch H_2O, as established in Method 204 of appendix M to 40 CFR part 51	i. See items 6.a.i and 6.a.ii.
7. Emission capture system that is not a PTE according to §63.3965(a)	a. The average gas volumetric flow rate or duct static pressure in each duct between a capture device and add-on control device inlet in any 3-hour period must not fall below the average volumetric flow rate or duct static pressure limit established for that capture device according to §63.3967(f)	i. Collecting the gas volumetric flow rate or duct static pressure for each capture device according to §63.3968(g); ii. Reducing the data to 3-hour block averages; and iii. Maintaining the 3-hour average gas volumetric flow rate or duct static pressure for each capture device at or above the gas volumetric flow rate or duct static pressure limited.

Table 2 to Subpart MMMM of Part 63—Applicability of General Provisions to Subpart MMMM of Part 63

You must comply with the applicable General Provisions requirements according to the following table:

Citation	Subject	Applicable to subpart MMMM	Explanation
§63.1(a)(1)–(14)	General Applicability	Yes	
§63.1(b)(1)–(3)	Initial Applicability Determination	Yes	Applicability to subpart MMMM is also specified in §63.3881.
§63.1(c)(1)	Applicability After Standard Established	Yes	
§63.1(c)(2)–(3)	Applicability of Permit Program for Area Sources	No	Area sources are not subject to subpart MMMM.
§63.1(c)(4)–(5)	Extensions and Notifications	Yes	
§63.1(e)	Applicability of Permit Program Before Relevant Standard is Set	Yes	
§63.2	Definitions	Yes	Additional definitions are specified in §63.3981.
§63.1(a)–(c)	Units and Abbreviations	Yes	

Citation	Subject	Applicable to subpart MMMM	Explanation
§63.4(a)(1)–(5)	Prohibited Activities	Yes	
§63.4(b)–(c)	Circumvention/Severability	Yes	
§63.5(a)	Construction/Reconstruction	Yes	
§63.5(b)(1)–(6)	Requirements for Existing Newly Constructed, and Reconstructed Sources	Yes	
§63.5(d)	Application for Approval of Construction/Reconstruction	Yes	
§63.5(e)	Approval of Construction/Reconstruction	Yes	
§63.5(f)	Approval of Construction/Reconstruction Based on Prior State Review	Yes	
§63.6(a)	Compliance With Standards and Maintenance Requirements—Applicability	Yes	
§63.6(b)(1)–(7)	Compliance Dates for New and Reconstructed Sources	Yes	Section 63.3883 specifies the compliance dates.
§63.6(c)(1)–(5)	Compliance Dates for Existing Sources	Yes	Section 63.3883 specifies the compliance dates.
§63.6(e)(1)–(2)	Operation and Maintenance	Yes	
§63.6(e)(3)	Startup, Shutdown, and Malfunction Plan	Yes	Only sources using an add-on control device to comply with the standard must complete startup, shutdown, and malfunction plans.
§63.6(f)(1)	Compliance Except During Startup, Shutdown, and Malfunction	Yes	Applies only to sources using an add-on control device to comply with the standard.
§63.6(f)(2)–(3)	Methods for Determining Compliance.	Yes	
§63.6(g)(1)–(3)	Use of an Alternative Standard	Yes	
§63.6(h)	Compliance With Opacity/Visible Emission Standards	No	Subpart MMMM does not establish opacity standards and does not require continuous opacity monitoring systems (COMS).

Citation	Subject	Applicable to subpart MMMM	Explanation
§63.6(i)(1)–(16)	Extension of Compliance	Yes	
§63.6(j)	Presidential Compliance Exemption	Yes	
§63.7(a)(1)	Performance Test Requirements—Applicability	Yes	Applies to all affected sources. Additional requirements for performance testing are specified in §§63.3964, 63.3965, and 63.3966.
§63.7(a)(2)	Performance Test Requirements—Dates	Yes	Applies only to performance tests for capture system and control device efficiency at sources using these to comply with the standard. Section 63.3960 specifies the schedule for performance test requirements that are earlier than those specified in §63.7(a)(2).
§63.7(a)(3)	Performance Tests Required By the Administrator	Yes	
§63.7(b)–(e)	Performance Test Requirements—Notification, Quality Assurance, Facilities Necessary for Safe Testing, Conditions During Test	Yes	Applies only to performance tests for capture system and add-on control device efficiency at sources using these to comply with the standard.
§63.7(f)	Performance Test Requirements—Use of Alternative Test Method	Yes	Applies to all test methods except those used to determine capture system efficiency.
§63.7(g)–(h)	Performance Test Requirements—Data Analysis, Recordkeeping, Reporting, Waiver of Test	Yes	Applies only to performance tests for capture system and add-on control device efficiency at sources using these to comply with the standard.
§63.8(a)(1)–(3)	Monitoring Requirements—Applicability	Yes	Applies only to monitoring of capture system and add-on control device efficiency at sources using these to comply with the standard. Additional requirements for monitoring are specified in §63.3968.
§63.8(a)(4)	Additional Monitoring Requirements	No	Subpart MMMM does not have monitoring requirements for flares.
§63.8(b)	Conduct of Monitoring	Yes	

Citation	Subject	Applicable to subpart MMMM	Explanation
§63.8(c)(1)–(3)	Continuous Monitoring Systems (CMS) Operation and Maintenance	Yes	Applies only to monitoring of capture system and add-on control device efficiency at sources using these to comply with the standard. Additional requirements for CMS operations and maintenance are specified in §63.3968.
§63.8(c)(4)	CMS	No	§63.3968 specifies the requirements for the operation of CMS for capture systems and add-on control devices at sources using these to comply.
§63.8(c)(5)	COMS	No	Subpart MMMM does not have opacity or visible emission standards.
§63.8(c)(6)	CMS Requirements	No	Section 63.3968 specifies the requirements for monitoring systems for capture systems and add-on control devices at sources using these to comply.
§63.8(c)(7)	CMS Out-of-Control Periods	Yes	
§63.8(c)(8)	CMS Out-of-Control Periods and Reporting	No	§63.3920 requires reporting of CMS out-of-control periods.
§63.8(d)–(e)	Quality Control Program and CMS Performance Evaluation	No	Subpart MMMM does not require the use of continuous emissions monitoring systems.
§63.8(f)(1)–(5)	Use of an Alternative Monitoring Method	Yes	
§63.8(f)(6)	Alternative to Relative Accuracy Test	No	Subpart MMMM does not require the use of continuous emissions monitoring systems.
§63.8(g)(1)–(5)	Data Reduction	No	Sections 63.3967 and 63.3968 specify monitoring data reduction.
§63.9(a)–(d)	Notification Requirements	Yes	
§63.9(e)	Notification of Performance Test	Yes	Applies only to capture system and add-on control device performance tests at sources using these to comply with the standard.
§63.9(f)	Notification of Visible Emissions/Opacity Test	No	Subpart MMMM does not have opacity or visible emissions standards.
§63.9(g)(1)–(3)	Additional Notifications When Using CMS	No	Subpart MMMM does not require the use of continuous emissions monitoring systems.

Citation	Subject	Applicable to subpart MMMM	Explanation
§63.9(h)	Notification of Compliance Status	Yes	Section 63.3910 specifies the dates for submitting the notification of compliance status.
§63.9(i)	Adjustment of Submittal Deadlines	Yes	
§63.9(j)	Change in Previous Information	Yes	
§63.10(a)	Recordkeeping/Reporting—Applicability and General Information	Yes	
§63.10(b)(1)	General Recordkeeping Requirements	Yes	Additional requirements are specified in §§63.3930 and 63.3931.
§63.10(b)(2)(i)–(v)	Recordkeeping Relevant to Startup, Shutdown, and Malfunction Periods and CMS	Yes	Requirements for startup, shutdown, and malfunction records only apply to add-on control devices used to comply with the standard.
§63.10(b)(2)(vi)–(xi)		Yes	
§63.10(b)(2)(xii)	Records	Yes	
§63.10(b)(2)(xiii)		No	Subpart MMMM does not require the use of continuous emissions monitoring systems.
§63.10(b)(2)(xiv)		Yes	
§63.10(b)(3)	Recordkeeping Requirements for Applicability Determinations	Yes	
§63.10(c)(1)–(6)	Additional Recordkeeping Requirements for Sources with CMS	Yes	
§63.10(c)(7)–(8)		No	The same records are required in §63.3920(a)(7).
§63.10(c)(9)–(15)		Yes	
§63.10(d)(1)	General Reporting Requirements	Yes	Additional requirements are specified in §63.3920.
§63.10(d)(2)	Report of Performance Test Results	Yes	Additional requirements are specified in §63.3920(b).
§63.10(d)(3)	Reporting Opacity or Visible Emissions Observations	No	Subpart MMMM does not require opacity or visible emissions observations.

Citation	Subject	Applicable to subpart MMMM	Explanation
§63.10(d)(4)	Progress Reports for Sources With Compliance Extensions	Yes	
§63.10(d)(5)	Startup, Shutdown, and Malfunction Reports	Yes	Applies only to add-on control devices at sources using these to comply with the standard.
§63.10(e) (1)–(2)	Additional CMS Reports	No	Subpart MMMM does not require the use of continuous emissions monitoring systems.
§63.10(e) (3)	Excess Emissions/CMS Performance Reports	No	Section 63.3920 (b) specifies the contents of periodic compliance reports.
§63.10(e) (4)	COMS Data Reports	No	Subpart MMMMM does not specify requirements for opacity or COMS.
§63.10(f)	Recordkeeping/Reporting Waiver	Yes	
§63.11	Control Device Requirements/Flares	No	Subpart MMMM does not specify use of flares for compliance.
§63.12	State Authority and Delegations	Yes	
§63.13	Addresses	Yes	
§63.14	Incorporation by Reference	Yes	
§63.15	Availability of Information/Confidentiality	Yes	

Table 3 to Subpart MMMM of Part 63—Default Organic HAP Mass Fraction for Solvents and Solvent Blends

You may use the mass fraction values in the following table for solvent blends for which you do not have test data or manufacturer's formulation data and which match either the solvent blend name or the chemical abstract series (CAS) number. If a solvent blend matches both the name and CAS number for an entry, that entry's organic HAP mass fraction must be used for that solvent blend. Otherwise, use the organic HAP mass fraction for the entry matching either the solvent blend name or CAS number, or use the organic HAP mass fraction from table 4 to this subpart if neither the name or CAS number match.

Solvent/solvent blend	CAS. No.	Average organic HAP mass fraction	Typical organic HAP, percent by mass
1. Toluene	108–88–3	1.0	Toluene.
2. Xylene(s)	1330–20–7	1.0	Xylenes, ethylbenzene.
3. Hexane	110–54–3	0.5	n-hexane.
4. n-Hexane	110–54–3	1.0	n-hexane.

Solvent/solvent blend	CAS. No.	Average organic HAP mass fraction	Typical organic HAP, percent by mass
5. Ethylbenzene	100–41–4	1.0	Ethylbenzene.
6. Aliphatic 140		0	None.
7. Aromatic 100		0.02	1% xylene, 1% cumene.
8. Aromatic 150		0.09	Naphthalene.
9. Aromatic naphtha	64742–95–6	0.02	1% xylene, 1% cumene.
10. Aromatic solvent	64742–94–5	0.1	Naphthalene.
11. Exempt mineral spirits	8032–32–4	0	None.
12. Ligroines (VM & P)	8032–32–4	0	None.
13. Lactol spirits	64742–89–6	0.15	Toluene.
14. Low aromatic white spirit	64742–82–1	0	None.
15. Mineral spirits	64742–88–7	0.01	Xylenes.
16. Hydrotreated naphtha	64742–48–9	0	None.
17. Hydrotreated light distillate	64742–47–8	0.001	Toluene.
18. Stoddard solvent	8052–41–3	0.01	Xylenes.
19. Super high-flash naphtha	64742–95–6	0.05	Xylenes.
20. Varsol®solvent	8052–49–3	0.01	0.5% xylenes, 0.5% ethylbenzene.
21. VM & P naphtha	64742–89–8	0.06	3% toluene, 3% xylene.
22. Petroleum distillate mixture	68477–31–6	0.08	4% naphthalene, 4% biphenyl.

Table 4 to Subpart MMMM of Part 63—Default Organic HAP Mass Fraction for Petroleum Solvent Groups[a]

You may use the mass fraction values in the following table for solvent blends for which you do not have test data or manufacturer's formulation data.

Solvent type	Average organic HAP mass fraction	Typical organic HAP, percent by mass
Aliphatic[b]	0.03	1% Xylene, 1% Toluene, and 1% Ethylbenzene.
Aromatic[c]	0.06	4% Xylene, 1% Toluene, and 1% Ethylbenzene.

[a]Use this table only if the solvent blend does not match any of the solvent blends in Table 3 to this subpart by either solvent blend name or CAS number and you only know whether the blend is aliphatic or aromatic.

[b]Mineral Spirits 135, Mineral Spirits 150 EC, Naphtha, Mixed Hydrocarbon, Aliphatic Hydrocarbon, Aliphatic Naphtha, Naphthol Spirits, Petroleum Spirits, Petroleum Oil, Petroleum Naphtha, Solvent Naphtha, Solvent Blend.

[c]Medium-flash Naphtha, High-flash Naphtha, Aromatic Naphtha, Light Aromatic Naphtha, Light Aromatic Hydrocarbons, Aromatic Hydrocarbons, Light Aromatic Solvent.

Appendix A to Subpart MMMM of Part 63—Alternative Capture Efficiency and Destruction Efficiency Measurement and Monitoring Procedures for Magnet Wire Coating Operations

1.0 Introduction.

1.1 These alternative procedures for capture efficiency and destruction efficiency measurement and monitoring are intended principally for newer magnet wire coating machines where the control device is internal and integral to the oven so that it is difficult or infeasible to make gas measurements at the inlet to the control device.

1.2 In newer gas fired magnet wire ovens with thermal control (no catalyst), the burner tube serves as the control device (thermal oxidizer) for the process. The combustion of solvents in the burner tube is the principal source of heat for the oven.

1.3 In newer magnet wire ovens with a catalyst there is either a burner tube (gas fired ovens) or a tube filled with electric heating elements (electric heated oven) before the catalyst. A large portion of the solvent is often oxidized before reaching the catalyst. The combustion of solvents in the tube and across the catalyst is the principal source of heat for the oven. The internal catalyst in these ovens cannot be accessed without disassembly of the oven. This disassembly includes removal of the oven insulation. Oven reassembly often requires the installation of new oven insulation.

1.4 Some older magnet wire ovens have external afterburners. A significant portion of the solvent is oxidized within these ovens as well.

1.5 The alternative procedure for destruction efficiency determines the organic carbon content of the volatiles entering the control device based on the quantity of coating used, the carbon content of the volatile portion of the coating and the efficiency of the capture system. The organic carbon content of the control device outlet (oven exhaust for ovens without an external afterburner) is determined using Method 25 or 25A.

1.6 When it is difficult or infeasible to make gas measurements at the inlet to the control device, measuring capture efficiency with a gas-to-gas protocol (see §63.3965(d)) which relies on direct measurement of the captured gas stream will also be difficult or infeasible. In these situations, capture efficiency measurement is more appropriately done with a procedure which does not rely on direct measurement of the captured gas stream.

1.7 Magnet wire ovens are relatively small compared to many other coating ovens. The exhaust rate from an oven is low and varies as the coating use rate and solvent loading rate change from job to job. The air balance in magnet wire ovens is critical to product quality. Magnet wire ovens must be operated under negative pressure to avoid smoke and odor in the workplace, and the exhaust rate must be sufficient to prevent over heating within the oven.

1.8 The liquid and gas measurements needed to determine capture efficiency and control device efficiency using these alternative procedures may be made simultaneously.

1.9 Magnet wire facilities may have many (*e.g.,* 20 to 70 or more) individual coating lines each with its own capture and control system. With approval, representative capture efficiency and control device efficiency testing of one magnet wire coating machine out of a group of identical or very similar magnet wire coating machines may be performed rather than testing every individual magnet wire coating machine. The operating parameters must be established for each tested magnet wire coating machine during each capture efficiency test and each control device efficiency test. The operating parameters established for each tested magnet wire coating machine also serve as the operating parameters for untested or very similar magnet wire coating machines represented by a tested magnet wire coating machine.

2.0 Capture Efficiency.

2.1 If the capture system is a permanent total enclosure as described in §63.3965(a), then its capture efficiency may be assumed to be 100 percent.

2.2 If the capture system is not a permanent total enclosure, then capture efficiency must be determined using the liquid-to-uncaptured-gas protocol using a temporary total enclosure or building enclosure in §63.3965(c), or an alternative capture efficiency protocol (see §63.3965(e)) which does not rely on direct measurement of the captured gas stream.

2.3 As an alternative to establishing and monitoring the capture efficiency operating parameters in §63.3967(f), the monitoring described in either section 2.4 or 2.5, and the monitoring described in sections 2.6 and 2.7 may be used for magnet wire coating machines.

2.4 Each magnet wire oven must be equipped with an interlock mechanism which will stop or prohibit the application of coating either when any exhaust fan for that oven is not operating or when the oven experiences an over limit temperature condition.

2.5 Each magnet wire oven must be equipped with an alarm which will be activated either when any oven exhaust fan is not operating or when the oven experiences an over limit temperature condition.

2.6 If the interlock in 2.4 or the alarm in 2.5 is monitoring for over limit temperature conditions, then the temperature(s) that will trigger the interlock or the alarm must be included in the start-up, shutdown and malfunction plan and the interlock or alarm must be set to be activated when the oven reaches that temperature.

2.7 Once every 6 months, each magnet wire oven must be checked using a smoke stick or equivalent approach to confirm that the oven is operating at negative pressure compared to the surrounding atmosphere.

3.0 Control Device Efficiency.

3.1 Determine the weight fraction carbon content of the volatile portion of each coating, thinner, additive, or cleaning material used during each test run using either the procedure in section 3.2 or 3.3.

3.2 Following the procedures in Method 204F, distill a sample of each coating, thinner, additive, or cleaning material used during each test run to separate the volatile portion. Determine the weight fraction carbon content of each distillate using ASTM Method D5291–02, “Standard Test Methods for Instrumental Determination of Carbon, Hydrogen, and Nitrogen in Petroleum Products and Lubricants” (incorporated by reference, see §63.14).

3.3 Analyze each coating, thinner, additive or cleaning material used during each test run using Method 311. For each volatile compound detected in the gas chromatographic analysis of each coating, thinner, additive, or cleaning material calculate the weight fraction of that whole compound in the coating, thinner, additive, or cleaning material. For each volatile compound detected in the gas chromatographic analysis of each coating, thinner, additive, or cleaning material calculate the weight fraction of the carbon in that compound in the coating, thinner, additive, or cleaning material. Calculate the weight fraction carbon content of each coating, thinner, additive, or cleaning material as the ratio of the sum of the carbon weight fractions divided by the sum of the whole compound weight fractions.

3.4 Determine the mass fraction of total volatile hydrocarbon (TVH_i) in each coating, thinner, additive, or cleaning material, i, used during each test run using Method 24. The mass fraction of total volatile hydrocarbon equals the weight fraction volatile matter ($W_v$in Method 24) minus the weight fraction water ($W_w$in Method 24), if any, present in the coating. The ASTM Method D6053–00, “Standard Test Method for Determination of Volatile Organic Compound (VOC) Content of Electrical Insulating Varnishes” (incorporated by reference, see §63.14), may be used as an alternative to Method 24 for magnet wire enamels. The specimen size for testing magnet wire enamels with ASTM Method D6053–00 must be 2.0 ±0.1 grams.

3.5 Determine the volume (VOL_i) or mass ($MASS_i$) of each coating, thinner, additive, or cleaning material, i, used during each test run.

3.6 Calculate the total volatile hydrocarbon input ($TVHC_{inlet}$) to the control device during each test run, as carbon, using Equation 1:

$$TVHC_{inlet} = \sum_{i=1}^{n} (TVH_i \times VOL_i \times D_i \times CD_i) \qquad (Eq.\ 1)$$

where:

TVH_i= Mass fraction of TVH in coating, thinner, additive, or cleaning material, i, used in the coating operation during the test run.

VOL_i= Volume of coating, thinner, additive, or cleaning material, i, used in the coating operation during the test run, liters.

D_i= Density of coating, thinner, additive, or cleaning material, i, used in the coating operation during the test run, kg per liter.

CD_i= Weight fraction carbon content of the distillate from coating, thinner, additive, or cleaning material, i, used in the coating operation during the test run, percent.

n = Number of coating, thinner, additive, and cleaning materials used in the coating operation during the test run.

3.7 If the mass, $MASS_i$, of each coating, solvent, additive, or cleaning material, i, used during the test run is measured directly then $MASS_i$can be substituted for $VOL_i \times D_i$in Equation 1 in section 3.6.

3.8 Determine the TVHC output ($TVHC_{outlet}$) from the control device, as carbon, during each test run using the methods in §63.3966(a) and the procedure for determining M_{fo}in §63.3966(d). $TVHC_{outlet}$equals M_{fo}times the length of the test run in hours.

3.9 Determine the control device efficiency (DRE) for each test run using Equation 2:

$$DRE = \frac{(TVHC_{inlet} - TVHC_{outlet})}{TVHC_{inlet}} \times 100 \qquad \text{(Eq. 2)}$$

3.10 The efficiency of the control device is the average of the three individual test run values determined in section 3.9.

3.11 As an alternative to establishing and monitoring the destruction efficiency operating parameters for catalytic oxidizers in §63.3967(b), the monitoring described in sections 3.12 and 3.13 may be used for magnet wire coating machines equipped with catalytic oxidizers.

3.12 During the performance test, you must monitor and record the temperature either just before or just after the catalyst bed at least once every 15 minutes during each of the three test runs. Use the data collected during the performance test to calculate and record the average temperature either just before or just after the catalyst bed during the performance test. This is the minimum operating limit for your catalytic oxidizer and for the catalytic oxidizers in identical or very similar magnet wire coating machines represented by the tested magnet wire coating machine.

3.13 You must develop and implement an inspection and maintenance plan for your catalytic oxidizer(s). The plan must address, at a minimum, the elements specified in sections 3.14 and 3.15, and the elements specified in either (a) section 3.16 or (b) sections 3.17 and 3.18.

3.14 You must conduct a monthly external inspection of each catalytic oxidizer system, including the burner assembly and fuel supply lines for problems and, as necessary, adjust the equipment to assure proper air-to-fuel mixtures.

3.15 You must conduct an annual internal inspection of each accessible catalyst bed to check for channeling, abrasion, and settling. If problems are found, you must replace the catalyst bed or take corrective action consistent with the manufacturer's recommendations. This provision does not apply to internal catalysts which cannot be accessed without disassembling the magnet wire oven.

3.16 You must take a sample of each catalyst bed and perform an analysis of the catalyst activity (*i.e.,* conversion efficiency) following the manufacturer's or catalyst supplier's recommended procedures. This sampling and analysis must be done within the time period shown in Table 1 below of the most recent of the last catalyst activity test or the last catalyst replacement. For example, if the warranty for the catalyst is 3 years and the catalyst was more recently replaced then the sampling and analysis must be done within the earlier of 26,280 operating hours or 5 calendar years of the last catalyst replacement. If the warranty for the catalyst is 3 years and the catalyst was more recently tested then the sampling and analysis must be done within the earlier of 13,140 operating hours or 3 calendar years of the last catalyst activity test. If problems are found during the catalyst activity test, you must replace the catalyst bed or take corrective action consistent with the manufacturer's recommendations.

Table 1—Catalyst Monitoring Requirements

If the catalyst was last (more recently) replaced and the warranty period is . . .	Then the time between catalyst replacement and the next catalyst activity test cannot exceed the earlier of . . .	And the catalyst was more recently tested, then the time between catalyst activity tests cannot exceed the earlier of . . .
1 year	8,760 operating hours or 5 calendar years	8,760 operating hours or 3 calendar years.
2 years	15,520 operating hours or 5 calendar years	8,760 operating hours or 3 calendar years.
3 years	26,280 operating hours or 5 calendar years	13,100 operating hours or 3 calendar years.
4 years	35,040 operating hours or 5 calendar years	17,520 operating hours or 3 calendar years.
5 or more years	43,800 operating hours or 5 calendar years	21,900 operating hours or 3 calendar years.

3.17 During the performance test, you must determine the average concentration of organic compounds as carbon in the magnet wire oven exhaust stack gases ($C_c$in Equation 1 in §63.3966(d)) and the destruction efficiency of the catalytic oxidizer, and calculate the operating limit for oven exhaust stack gas concentration as follows. You must identify the highest organic HAP content coating used on this magnet wire coating machine or any identical or very similar magnet wire coating machines to which the same destruction efficiency test results will be applied. Calculate the percent emission reduction necessary to meet the magnet wire coating emission limit when using this coating. Calculate the average concentration of organic compounds as carbon in the magnet wire oven exhaust stack gases that would be equivalent to exactly meeting the magnet wire coating emissions limit when using the highest organic HAP content coating. The maximum operating limit for oven exhaust stack gas concentration equals 90 percent of this calculated concentration.

3.18 For each magnet wire coating machine equipped with a catalytic oxidizer you must perform an annual 10 minute test of the oven exhaust stack gases using EPA Method 25A. This test must be performed under steady state operating conditions similar to those at which the last destruction efficiency test for equipment of that type (either the specific magnet wire coating machine or an identical or very similar magnet wire coating machine) was conducted. If the average exhaust stack gas concentration during the annual test of a magnet wire coating machine equipped with a catalytic oxidizer is greater than the operating limit established in section 3.17 then that is a deviation from the operating limit for that catalytic oxidizer. If problems are found during the annual 10-minute test of the oven exhaust stack gases, you must replace the catalyst bed or take other corrective action consistent with the manufacturer's recommendations.

3.19 If a catalyst bed is replaced and the replacement catalyst is not of like or better kind and quality as the old catalyst, then you must conduct a new performance test to determine destruction efficiency according to §63.3966 and establish new operating limits for that catalytic oxidizer unless destruction efficiency test results and operating limits for an identical or very similar unit (including consideration of the replacement catalyst) are available and approved for use for the catalytic oxidizer with the replacement catalyst.

3.20 If a catalyst bed is replaced and the replacement catalyst is of like or better kind and quality as the old catalyst, then a new performance test to determine destruction efficiency is not required and you may continue to use the previously established operating limits for that catalytic oxidizer.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Significant Source Modification and Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	Hendrickson Trailer Suspension Systems
Source Location:	180 Mount Zion Road, Lebanon, Indiana 46052
County:	Boone
SIC Code:	3714
Significant Source Modification No.:	011-29872-00037
Permit Renewal No.:	T011-29188-00037
Permit Reviewer:	Sarah Conner, Ph. D.

The Office of Air Quality (OAQ) has reviewed the operating permit renewal with source modification application from Hendrickson Trailer Suspension Systems relating to the operation of a stationary metal finishing plant for trailer suspension systems. On April 21, 2010, Hendrickson Trailer Suspension Systems submitted an application to the OAQ relating to the renewal of its operating permit and to the addition of new coating materials to the surface coating operations at its existing stationary metal finishing plant for trailer suspension systems. Hendrickson Trailer Suspension Systems was issued its first Part 70 Operating Permit Renewal No. T011-20119-00037 on February 2, 2006. This source is an ESP source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

(a) One (1) paint spray booth for painting metal parts, identified as EP-2, with a maximum production rate of 21.47 trailer parts per hour, using a dry filter as control, constructed in 1995, and exhausting at stack S-1.

(b) One (1) paint spray booth for painting metal parts, identified as EP-9, with a maximum production rate of 16.91 trailer parts per hour, using a dry filter as control, constructed in 1997, and exhausting at stack S-2.

(c) One (1) touch-up paint booth for painting metal parts, identified as EP-12, with a maximum production rate of 21.47 trailer parts per hour, using a dry filter as control, constructed in 2002, and exhausting at stack S-3.

Under the NESHAP for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63, Subpart MMMM) EP-2, EP-9 and EP-12 are considered affected facilities.

Insignificant Activities

The source also consists of the following insignificant activities:

(a) Welding operations, consisting of:

(1) Two (2) robotic welding stations and one (1) manual station, identified as EP-6A, combined using 34.6 pounds of welding consumables per hour, using RoboVent Smoke Dust Collector, and exhausting to the atmosphere. [326 IAC 6-3-2]

(2) Nine (9) robotic welding stations and two (2) manual stations, identified as EP-6B, combined using 38.9 pounds of welding consumables per hour, using dust collector Torit 002, and exhausting to the atmosphere. [326 IAC 6-3-2]

(3) Eighteen (18) robotic welding stations, identified as EP-7, combined using 58.6 pounds of welding consumables per hour, using dust collector Torit 001, and exhausting to the atmosphere. [326 IAC 6-3-2]

(4) One (1) manual stations, identified as EP-8A, combined using 0.2 pounds of welding consumables per hour, using Airflow Smoke Dust Collector, and exhausting to the atmosphere. [326 IAC 6-3-2]

(5) Four (4) robotic welding stations, two (2) hand weld surelok stations, and four (4) hand weld frame bracket stations, identified as E8-B, combined using 25.4 pounds of welding consumables per hour, using dust collector Torit 003, and exhausting to the atmosphere. [326 IAC 6-3-2]

(b) One (1) Laser Cutting Machine, identified as EP-5, with a maximum capacity of 20 parts per hour, constructed in 2002, and exhausting indoors. [326 IAC 6-3-2]

(c) Degreasing operations, that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6, consisting of one (1) maintenance cleaning station and paint booth parts cleaner, identified as gun cleaning station. [326 IAC 8-3-2] [326 IAC 8-3-5]

(d) Combustion related activities including spaces heaters, process heaters, or boilers using natural gas-fired with heat input equal to or less than ten million (10,000,000) British thermal units per hour;

(1) Four (4) natural gas-fired air make-up units, each with a maximum heat input capacity of 2.72 MMBtu/hr and;

(2) One (1) natural gas-fired air make-up unit, with a maximum heat input capacity of 1.50 MMBtu/hr and;

(3) One (1) natural gas-fired air make-up unit, with a maximum heat input capacity of 2.90 MMBtu/hr and;

(4) One (1) natural gas-fired clean/phosphate heater, with a maximum heat input capacity of 1.50 MMBtu/hr and;

(5) One (1) natural gas-fired slider box heater, with a maximum heat input capacity of 1.30 MMBtu/hr and;

(6) One (1) natural gas-fired dry-off oven, with a maximum heat input capacity of 1.60 MMBtu/hr and;

(7) One (1) natural gas-fired bake oven, with a maximum heat input capacity of 2.80 MMBtu/hr.

(e) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

(f) The following VOC and HAP storage containers:

(1) Three (3) closed vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids.

(g) Cleaners and solvents, identified as EP-3, characterized as follows:

(1) having a vapor pressure equal to or less than 2kPa, 15 mm Hg or 0.3 psi measured at 38°C (100°F) or;

(2) having a vapor pressure equal to or less than 0.7 kPa, 5 mm Hg or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(3) One (1) parts washer, identified as maintenance small parts washer, with dimensions are approximately 2' x 2' x 2', constructed in 1995, and exhausting indoors.

(h) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.

(1) One (1) Evaporator, identified as Lake View Evaporator, with a maximum capacity of 0.39 MMBtu/hr, constructed in 2002, and exhausting through Evaporator Stack.

(i) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(1) One (1) Smoke Dust Collector, identified as RoboVent Smoke Dust Collector, with a maximum air throughput of 15,000 cfm, installed in 2005, and exhausting to the atmosphere.

(2) One (1) Dust Collector, identified as Torit 002, with a maximum air throughput of 22,000 cfm, installed in 1998, and exhausting to the atmosphere.

(3) One (1) Dust Collector, identified as Torit 001, with a maximum air throughput of 28,000 cfm, installed in 1995, and exhausting to the atmosphere.

(4) One (1) Smoke Dust Collector, identified as Airflow Smoke Dust Collector, with a maximum air throughput of 1,200 cfm, installed in 2008, and exhausting to the atmosphere.

(5) One (1) Dust Collector, identified as Torit 003, with a maximum air throughput of 24,000 cfm, installed in 2010, and exhausting to the atmosphere.

(j) Sealant operations, consisting of a viscous, semi-solid sealant applied with a high pressure caulking gun and emitting no particulate, emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, emitting less than five (5) pounds per hour or twenty-five (25) pounds per day of VOC.

(1) One (1) Hand Held Dispensing Unit, identified as Axle Sealant Operation, with a maximum capacity of 22 axles per hour, constructed in 1995, and exhausting to the atmosphere.

Existing Approvals

There have been no other approvals to this source since the issuance of the Part 70 Operating Permit Renewal No. T011-20119-00037 on February 2, 2006. The source submitted an application for a Part 70 Operating Permit Second Renewal on April 21, 2010.

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

County Attainment Status

The source is located in Boone County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Attainment effective October 19, 2007, 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 PM2.5.	

(a) Ozone Standards
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. Boone 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) $PM_{2.5}$
Boone 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. These rules became effective on 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 PM_{10} emissions as a surrogate for $PM_{2.5}$ emissions until 326 IAC 2-2 is revised.

(c) Other Criteria Pollutants
Boone County has been classified as attainment or unclassifiable in Indiana for all other regulated pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

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** (ton/yr)
PM	219.05
PM_{10}	219.61
$PM_{2.5}$	219.61
SO_2	0.06
VOC	281.46
CO	8.25
NO_X	9.82

HAPs	**tons/year**
Xylene	2.69
Toluene	2.69
Methyl Isobutyl Ketone	2.15
Hexane	1.25
Formaldehyde	0.007
Manganese	2.56
Total HAPs	11.34

(a) On February 2, 2006, the source was issued permit No. T011-20119-00037. At the time the permit was issued, the source was an existing major stationary source, under PSD (326 IAC 2-2), because VOC, a regulated pollutant, had potential emissions greater than 250 tons per year or more, and the source was not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).

(b) On February 2, 2006, the source was issued first renewal permit No. T011-20119-00037.

At the time the permit was issued, the source was an existing major stationary source, under Emission Offset (326 IAC 2-3), because pollutant VOC, a nonattainment regulated pollutant, had potential emissions greater than 100 tons per year or more.

Boone County became attainment effective October 19, 2007 for the 8-hour ozone standard. Therefore, after October 19, 2007, the source was no longer subject to the regulations of 326 IAC 2-3 (Emission Offset).

(c) On February 2, 2006, the source was issued first renewal permit No. T011-20119-00037. At the time the permit was issued, the source was not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions were less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source was an area source under Section 112 of the Clean Air Act (CAA).

(d) These emissions are based upon the Technical Support Document, Appendix A calculations for Part 70 permit T011-20119-00037, issued on February 2, 2006.

(e) The source changed its method of operation in August 2007, when it replaced Black A.D. Enamel by Valspar Black, and again, in June 2008, when it added Valspar Gray to the surface coating operations. The source has requested to keep Black A.D. Enamel in the

calculations for the renewal in case it switches back to that coating in the future. Prior to August 2007, the source should have come in for permitting pursuant to 326 IAC 2-7-10.5(f)(4)(D) because the increase in PTE from VOC was greater than twenty-five (25) tons per year. See Enforcement Issue section of this technical support document for additional details. In 2007, the source could have requested minor VOC limits for the project to limit the emissions from Valspar Black to less than 40 tons per year in order to render the requirements of 326 IAC 2-3 (Emission Offset) and 326 IAC 2-2 (PSD) not applicable. The source provided actual emissions from the surface coating operations for all of the coatings. In 2007, the source emitted 50.85 tons of VOC, which is well below Emission Offset (326 IAC 2-3) and PSD (326 IAC 2-2) major source thresholds. In addition, the actual emissions from Valspar Black were 8.7 tons of VOC, which was well below the significant level for Emission Offset (326 IAC 2-3) and PSD (326 IAC 2-2). The actual VOC emissions at the source have remained well below Emission Offset (326 IAC 2-3) and PSD (326 IAC 2-2) major source thresholds through 2010. See Appendix A to this technical support document for actual emissions from surface coating. Therefore, the source has not violated the requirements of Emission Offset (326 IAC 2-3) or PSD (326 IAC 2-2) and can now take minor limits for this modification in renewal No. T011-29188-00037.

(f) Upon issuance of the permit renewal No. T011-29188-00037, this existing source will not be a major stationary source, under PSD (326 IAC 2-2), because the source is taking limits such that no regulated pollutant will be emitted at a rate of 250 tons per year or more, and this source is not in one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).

(g) In both August 2007 and June 2008, the source should have applied for permitting pursuant to 326 IAC 2-7-10.5(f)(6), 326 IAC 20-80-1, and CFR 40 Part 63 (Subpart MMMM) because the addition of Valspar Black and Valspar Gray both increased the potential to emit of a single hazardous air pollutant (HAP) to greater than ten (10) tons per year and of any combination of hazardous air pollutants (HAPs) to greater than twenty-five (25) tons per year. Although the actual HAP emissions have not exceeded ten (10) tons per year of a single hazardous air pollutant (HAP) or twenty-five (25) tons per year of any combination of hazardous air pollutants (HAPs), the source failed to receive the proper permitting approvals before becoming subject to NESHAP Subpart MMM; therefore, the source became a major source of HAPs, as defined in 40 CFR 63.2, when it began using Valspar Black and Valspar Grey.

(h) 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).

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed an application for an operating permit renewal with source modification, submitted by Hendrickson Trailer Suspension Systems on April 21, 2010, relating to the renewal of its operating permit and the addition of new coating materials to the surface coating operations at its existing stationary metal finishing plant for trailer suspension systems. The following is a list of the modified emission units:

(a) One (1) paint spray booth for painting metal parts, identified as EP-2, with a maximum production rate of 21.47 trailer parts per hour, using a dry filter as control, constructed in 1995, and modified in 2007, and exhausting at stack S-1.

(b) One (1) paint spray booth for painting metal parts, identified as EP-9, with a maximum production rate of 16.91 trailer parts per hour, using a dry filter as control, constructed in 1997, and modified in 2007, and exhausting at stack S-2.

(c) One (1) touch-up paint booth for painting metal parts, identified as EP-12, with a maximum production rate of 21.47 trailer parts per hour, using a dry filter as control, constructed in 2002, and modified in 2007, and exhausting at stack S-3.

Enforcement Issue

(a) IDEM is aware that there is a pending enforcement action because the source changed its method of operation, as defined in 326 IAC 326 2-2-1(ee), when it added new coatings to the surface coating operations in August 2007 and in June 2008 prior to receipt of the proper permit. The addition of Valspar Black in August 2007 as a coating increased the PTE of VOC to greater than twenty-five (25) tons per year. The source should have applied prior to August 2007 to request a Significant Source Modification pursuant to 326 IAC 2-7-10.5(g)(1). Therefore, in August 2007, the source violated 326 IAC 2-7-10.5(f)(4)(D) because the increase in PTE of VOC was greater than twenty-five (25) tons per year. The addition of Valspar Black in August 2007 increased the potential to emit of a single hazardous air pollutant to greater than ten (10) tons per year and of any combination of hazardous air pollutants to greater than twenty-five (25) tons per year. The addition of Valspar Gray in June, 2008 also increased the potential to emit of a single hazardous air pollutant to greater than ten (10) tons per year and of any combination of hazardous air pollutants to greater than twenty-five (25) tons per year. Therefore, the source violated 326 IAC 2-7-10.5(f)(6), 326 IAC 20-80-1, and CFR 40 Part 63 (Subpart MMMM) in August 2007 and in June 2008 because the addition of Valspar Black and Valspar Gray both increased the potential to emit of a single hazardous air pollutant to greater than ten (10) tons per year and of any combination of hazardous air pollutants to greater than twenty-five (25) tons per year.

(b) IDEM is reviewing this matter and will take appropriate action. This proposed source modification and renewal permit are intended to satisfy the requirements of the construction and operating permit rules.

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.

Appendix A of this TSD reflects the unrestricted potential emissions of the modification and reflects the actual emissions from the modification.

PTE Change of the Modified Process			
Pollutant	**PTE Before Modification** (ton/yr)	**PTE After Modification** (ton/yr)	**Increase from Modification** (ton/yr)
PM	219.05	222.31	3.26
PM_{10}	219.61	222.87	3.26
SO_2	0.06	0.06	0.00
VOC	281.46	424.20	142.74
CO	8.25	8.25	0.00
NO_X	9.82	9.82	0.00
Single HAP	2.69	47.71	45.02
Combined HAPs	11.34	110.99	99.65

This source modification is subject to 326 IAC 2-7-10.5(f)(4)(D) and 2-7-10.5(f)(6) because the source modification increased the potential to emit VOC greater than or equal to twenty-five (25) tons per year, and increased the potential to emit greater than or equal to ten (10) tons per year of a single HAP as defined under Section 112(b) of the CAA or twenty-five (25) tons per year of any combination of HAPs. The modification could 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. Part 70 Operating Permit No. T011-20119-00037 expires on February 2, 2011 and the source submitted a renewal application on April 21, 2010; therefore, IDEM will incorporate the changes into the renewal.

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 source modification and permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	**Potential to Emit** (ton/yr)							
	PM	PM10*	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Paint Spray Booth #1 (EP-2)	43.97	43.97	0.0	0.0	<225.0	0.0	22.24	10.12 (Pseudo Cumene)
Paint Spray Booth #2 (EP-9)	152.79	152.79					83.24	35.94 (Xylene)
Touch-up Paint Booth (EP-12)	8.79	8.79					4.45	2.02 (Pseudo Cumene)
Welding Stations (EP-6 and EP-7)	13.58	13.58	0.0	0.0	0.0	0.0	0.83	0.83 (Manganese)
Indirect Heating Units	0.14	0.55	0.04	7.21	0.40	6.05	0.14	0.13 (Hexane)
Direct Heating Units	0.05	0.19	0.01	2.45	0.13	2.06	0.05	0.04 (Hexane)
Degreasing Operations (gun cleaning station)	0.00	0.00	0.00	0.00	0.06	0.00	0.00	0.00
Laser Cutter	2.99	2.99	0.00	0.00	0.00	0.00	0.04	0.04 (Manganese)
Evaporator	0.003	0.013	0.001	0.167	0.009	0.141	0.003	0.003 (Hexane)
Total PTE of Entire Source	**222.31**	**222.31**	**0.06**	**9.82**	**<225.60**	**8.25**	**109.78**	**48.38 (Pseudo Cumene)**
Title V Major Source Thresholds	NA	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	NA	NA

negl. = negligible
*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

Since the unrestricted potential to emit VOC of this source is greater than 250 tons per year, this source has elected to limit the potential to emit of this as follows:

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

(a) The total VOC input to paint booths EP-2, EP-9, EP-12 shall be less than 225.0 tons, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with the above limits, combined with the potential to emit VOC from other emission units at the source, shall limit the VOC emissions from the entire source to less than 250 tons per twelve (12) consecutive month period and therefore will render the requirements of 326 IAC 2-2 not applicable

Unrestricted Potential Emissions

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

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	222.31
PM_{10}	222.87
$PM_{2.5}$	222.87
SO_2	0.06
VOC	424.20
CO	8.25
NO_x	9.82
CO_2e	11,856.50

HAPs	tons/year
Xylene	47.71
Toluene	2.69
Methyl Isobutyl Ketone	2.15
Ethyl Benzene	9.01
Hexane	1.25
Formaldehyde	0.01
Pseudo Cumene	47.31
Manganese	0.87
All other single HAPs	negligible
Total	**110.99**

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM, PM_{10}, $PM_{2.5}$ and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit Renewal.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, because the source met the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:

(1) has a potential to emit before controls equal to or greater than the 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 table below is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each existing emission unit and specified pollutant subject to CAM:

Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
EP-2 - $PM/PM_{10}/PM_{2.5}$	dry filter	Y	43.97	8.79	100	N	N
EP-9 - $PM/PM_{10}/PM_{2.5}$	dry filter	Y	152.79	30.56	100	Y	N
EP-12 - $PM/PM_{10}/PM_{2.5}$	dry filter	Y	8.79	1.76	100	N	N

CAM was evaluated only for the units that use a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to EP-9 for pollutants PM, PM_{10} and $PM_{2.5}$ upon issuance of the Part 70 Renewal. A CAM plan will be incorporated into this Part 70 permit renewal.

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to EP-2 and EP-12 for pollutants PM, PM_{10}, $PM_{2.5}$ upon issuance of the Part 70 Renewal because the uncontrolled PM, PM_{10}, $PM_{2.5}$ emissions are each less than 100 tons per year.

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to EP-2, EP-9 and EP-12 for pollutants VOC, single HAPs and total combined HAPs upon issuance of the Part 70 Renewal because EP-2, EP-9 and EP-12 do not use a control device for pollutants VOC, single HAPs and total combined HAPs.

NSPS:

(b) The requirments of the NSPS for Automobile and Light Duty Truck Surface Coating Operations (40 CFR 60, Subpart MM) are not applicable to the source, as it is not an automotive or light-duty truck assembly plant. Therefore, these requirements are not included in the permit.

(c) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

NESHAP:

(d) The requirements of the National Emission Standards for Halogenated Solvent Cleaning (40 CFR 63, Subpart T) are not applicable to the degreasing operations at this source because the cold solvent cleaning machine does not use a solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, chloroform or any combination of these halogenated HAP solvents in a total concentration greater than five percent (5%) by weight as a cleaning or drying agent.

(e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Surface Coating of Automobiles and Light-Duty Trucks (40 CFR 63, Subpart IIII) are not applicable to the source because it does not applies topcoat to new automobile or new light-duty truck bodies or body parts for new automobiles or new light-duty trucks. Therefore, these requirements are not included in the permit.

(f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, Subpart HHHHHH are not included in the permit for Hendrickson Trailer Suspension Systems. This source is a major source of hazardous air pollutants.

The following federal rule is applicable to the source due to this modification and renewal:

(g) The two (2) paint spray booths, identified as EP-2 and EP-9, and the one (1) touch-up paint booth, identified as EP-12 are all subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63.3880), Subpart MMMM, which is incorporated by reference as 326 IAC 20-80 because they operate at an existing affected source, as defined in 40 CFR 63.3882, that uses 946 liters (250 gallons (gal)) per year, or more, of coatings that contain hazardous air pollutants (HAP) in the surface coating of miscellaneous metal parts and products and are located at a major source of HAPs.

The two (2) paint spray booths, identified as EP-2 and EP-9, and the one (1) touch-up paint booth, identified as EP-12, are subject to the following portions of Subpart MMMM. The entire rule is included as Attachment A of the permit.

(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(b)
(6) 40 CFR 63.3882(a)
(7) 40 CFR 63.3882(b)
(8) 40 CFR 63.3882(e)
(9) 40 CFR 63.3883
(10) 40 CFR 63.3883(c)(2)
(11) 40 CFR 63.3883(d)
(12) 40 CFR 63.3890(b)
(13) 40 CFR 63.3890(b)(1)
(14) 40 CFR 63.3891
(15) 40 CFR 63.3891(a)
(16) 40 CFR 63.3891(b)
(17) 40 CFR 63.3892(a)
(18) 40 CFR 63.3893(a)
(19) 40 CFR 63.3900(a)
(20) 40 CFR 63.3900(a)(1)
(21) 40 CFR 63.3900(b)

(22) 40 CFR 63.3901
(23) 40 CFR 63.3910(a)
(24) 40 CFR 63.3910(b)
(25) 40 CFR 63.3910(c)(1) through (c)(7), (c)(8)(i) and (c)(8)(ii)
(26) 40 CFR 63.3920(a)
(27) 40 CFR 63.3920(a)(1) through (a)(6)
(28) 40 CFR 63.3930
(29) 40 CFR 63.3930(a)
(30) 40 CFR 63.3930(b)
(31) 40 CFR 63.3930(c)(1) through (c)(3)
(32) 40 CFR 63.3930(d) through (g)
(33) 40 CFR 63.3930(j)
(34) 40 CFR 63.3931
(35) 40 CFR 63.3940
(36) 40 CFR 63.3941
(37) 40 CFR 63.3942
(38) 40 CFR 63.3950
(39) 40 CFR 63.3951
(40) 40 CFR 63.3952
(41) 40 CFR 63.3980
(42) 40 CFR 63.3981
(43) Table 2 to Subpart MMMM
(44) Table 3 to Subpart MMMM
(45) Table 4 to Subpart MMMM

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.

(h) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this source modification or renewal.

State Rule Applicability – Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)
The source is subject to 326 IAC 1-6-3. The source submitted a Preventive Maintenance Plan (PMP) on February 23, 2000.

326 IAC 1-5-2 (Emergency Reduction Plans)
The source is subject to 326 IAC 1-5-2. The source submitted a Emergency Reduction Plan on March 4, 1999.

326 IAC 2-6 (Emission Reporting)
This source, not located in Lake, Porter, or LaPorte County, is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7 (Part 70). The potential to emit of VOC and PM10 is less than 250 tons per year; and the potential to emit of CO, NOx, and SO2 is less than 2,500 tons per year. Therefore, pursuant to 326 IAC 2-6-3(a)(2), triennial reporting is required. An emission statement shall be submitted in accordance with the compliance schedule in 326 IAC 2-6-3 by July 1, 2011 and every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)
This source is subject to the opacity limitations specified in 326 IAC 5-1-2(1) .

326 IAC 6.5 PM Limitations Except Lake County
This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

326 IAC 6.8 PM Limitations for Lake County
This source is not subject to 326 IAC 6.8 because it is not located in Lake County.

State Rule Applicability – Individual Facilities

State Rule Applicability – Paint Booths EP-2, EP-9 and EP-12

326 IAC 2-2 (Prevention of Significant Deterioration)
This existing stationary source is not major for PSD because the emissions of each regulated pollutant are less than two hundred fifty (<250) tons per year or are limited to less than two hundred fifty (<250) tons per year, and it is not in one of the twenty-eight (28) listed source categories.

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

(a) The total VOC input to paint booths EP-2, EP-9, EP-12 shall be less than 225.0 tons, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit VOC from other emission units at the source, shall limit the VOC emissions from the entire source to less than 250 tons per twelve (12) consecutive month period and therefore will render the requirements of 326 IAC 2-2 not applicable.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
(a) The operation of paint booth EP-2 will emit greater than ten (10) tons per year for a single HAP; however, pursuant to 326 IAC 2-4.1-1(b)(2), because this unit is specifically regulated by NESHAP 40 CFR 63, Subpart MMMM, which was issued pursuant to Section 112(d) of the CAA, this unit is exempt from the requirements of 326 IAC 2-4.1.

(b) The operation of paint booth EP-9 will emit 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; however, pursuant to 326 IAC 2-4.1-1(b)(2), because this unit is specifically regulated by NESHAP 40 CFR 63, Subpart MMMM, which was issued pursuant to Section 112(d) of the CAA, this unit is exempt from the requirements of 326 IAC 2-4.1.

(c) The operation of paint booth EP-12 will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(d), particulate from paint booths EP-2, EP-9, EP-12 shall be controlled by a dry particulate filter, and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

326 IAC 8-2 (Surface Coating Emission Limitations)
Paint booths EP-2, EP-9, and EP-12 are subject to 326 IAC 8-2-1(a)(4) because they were constructed after July 1, 1990, are of the types described in sections 2 through 12 of this rule and they have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls.

Paint booths EP-2, EP-9, and EP-12 are subject to 326 IAC 8-2-9 (Miscellaneous metal and plastic coating operations).

(a) Pursuant to 326 IAC 8-2-9(c), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts and products may cause, allow, or permit the discharge into the atmosphere of any VOC in excess of the following:

(1) Fifty-two hundredths (0.52) kilogram per liter (four and three-tenths (4.3) pounds per gallon) of coating, excluding water, delivered to a coating applicator that applies clear coatings. A clear coating is a coating that:

(A) lacks color or opacity; and

(B) is transparent and uses the undercoat as a reflectant base or undertone color.

(2) Forty-two hundredths (0.42) kilogram per liter (three and five-tenths (3.5) pounds per gallon) of coating excluding water, delivered to a coating applicator in a coating application system that is air dried or forced warm air dried at temperatures up to ninety (90) degrees Celsius (one hundred ninety-four (194) degrees Fahrenheit).

(3) Forty-two hundredths (0.42) kilogram per liter (three and five-tenths (3.5) pounds per gallon) of coating, excluding water, delivered to a coating applicator that applies extreme performance coatings. Extreme performance coatings are coatings designed for exposure to:

(A) temperatures consistently above ninety-five (95) degrees Celsius;

(B) detergents;

(C) abrasive or scouring agents;

(D) solvents;

(E) corrosive atmospheres;

(F) outdoor weather at all times; or

(G) similar environmental conditions.

(4) Thirty-six hundredths (0.36) kilogram per liter (three (3) pounds per gallon) of coating, excluding water, delivered to a coating applicator for all other coatings and coating application systems.

Based on the MSDS submitted by the source and calculations made, the spray booth can comply with this requirement.

(b) Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:

(1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.

(2) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.

(3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.

(4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.

(5) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

State Rule Applicability – Laser Cutting Machine (EP-5), Robotic Welding Stations (EP-6) and Manual Welding Stations (EP-7)

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

(a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the laser cutting machine (EP-5) shall not exceed 2.2 pounds per hour when operating at a process weight rate of 803.4 pounds per hour.

(b) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the listed emission units shall be limited by the following:

Emission unit	Operation Description	Maximum Process Weight (tons/hour)	326 IAC 6-3 Limit (lbs/hr)	PM/PM10 Emission Factor (lbs PM10/1,000 lbs electrode)	Max PTE Particulate (lb/hour)
EP-6A	Sub-rail: Miller AutoAxcess 450 (x2); Robotic Tandem, L-56, .052” wire.	1.72	5.89	5.20	0.18
	K-brace: Miller XMT 456 (x1); Manual Single, L-59, .045” wire.	1.72	5.89	5.20	0.18
EP-6B	Final #1: Miller AutoAxcess 450 (x2); Robotic Single, L-59, .045” wire.	0.64	3.05	5.20	0.07
	Final #2: Miller AutoAxcess 450 (x4); Robotic Tandem, L-59, .045” wire.	0.64	3.05	5.20	0.07
	Final #3: Miller AutoAxcess 450 (x4); Robotic Tandem, L-59, .045” wire.	0.64	3.05	5.20	0.07
EP-7	Suspension 451: Miller AutoAxcess 450 (x2); Robotic Single, L-59, .045” wire.	1.93	6.36	5.20	0.08

Emission unit	Operation Description	Maximum Process Weight (tons/hour)	326 IAC 6-3 Limit (lbs/hr)	PM/PM10 Emission Factor (lbs PM10/1,000 lbs electrode)	Max PTE Particulate (lb/hour)
	Suspension 680: Miller AutoAxcess 450 (x4); Robotic Tandem, L-59, .045" wire.	1.93	6.36	5.20	0.08
	Suspension 1286: Cloos 503 (x4), Robotic Tandem, L-59, .045" wire.	1.93	6.36	5.20	0.08
	All Beam robots (x7): Miller AutoAxcess 450; Robotic Single, L-59, .062" wire.	0.28	1.73	5.20	0.06
EP-8B	One Robotic (4026): 4 Miller AutoAxcess, Tandem Torch, L-59, .045" wire.	1.93	6.36	5.20	0.08
	6 Hand weld stations: Miller XMT 456, Manual Single, L-59, .045" wire.	0.15	1.15	5.20	0.01
		0.20	1.41	5.20	0.04

The above pounds per hour limitations 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:

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

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

(c) Pursuant to 326 IAC 6-3-2(e)(2), EP-8A shall not exceed five hundred fifty-one thousandths (0.551) pound per hour based on a process weight rate of less than 100 lbs/hour.

All of the welding stations at the source are able to comply with the limits established in 326 IAC 6-3-2 without the use of controls.

State Rule Applicability – Degreasing Operations

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

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(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.

326 IAC 8-3-5 (Cold cleaner degreaser operation and control)

(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 of 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.

State Rule Applicability – Combustion related activities

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), indirect heating units constructed after September 21, 1983 shall be limited using the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where: Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units 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.

For the air make-up units and clean/phosphate heater (all installed in the 1990s)

Q= 16.78 = (2.72*4) + 1.5 + 2.9 + 1.5

For the air make-up units and clean/phosphate heater

$Pt = 1.09/(16.78)^{0.26}$ = 0.52 lbs PM/MMBtu heat input

The potential to emit of PM from each air make up unit, with a maximum heat input capacity of 2.72 MMBtu/hr, is 0.0226 tons per year.

For each (1) air make up unit, with a maximum heat input capacity of 2.72 MMBtu/hr

0.0226 tons/yr × (2000 lbs/ton / 8760 hrs/yr) = 0.0052 lbs/hr
(0.0052 lbs/hr / 2.72 MMBtu/hr) = 0.0019 lbs PM per MMBtu

The potential to emit of PM from one (1) air make up unit and from the clean/phosphate heater, each with a maximum heat input capacity of 1.5 MMBtu/hr, is 0.0125 tons per year.

For one (1) air make up unit and for the clean/phosphate heater, each with a maximum heat input capacity of 1.5 MMBtu/hr

0.0125 tons/yr × (2000 lbs/ton / 8760 hrs/yr) = 0.00285 lbs/hr
(0.00285 lbs/hr / 1.5 MMBtu/hr) = 0.0019 lbs PM per MMBtu

The potential to emit of PM from the one (1) air make up unit, with a maximum heat input capacity of 2.9 MMBtu/hr, is 0.0241 tons per year.

For the one (1) air make up unit, with a maximum heat input capacity of 2.9 MMBtu/hr

0.0241 tons/yr × (2000 lbs/ton / 8760 hrs/yr) = 0.0055 lbs/hr
(0.0055 lbs/hr / 2.9 MMBtu/hr) = 0.0019 lbs PM per MMBtu

Therefore, all of the air make-up units and clean/phosphate heater (all installed in the 1990s), will be able to comply with this rule.

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

(a) The natural gas-fired direct heating units, including the slider box heater, dry-off oven and bake oven, each have potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour. In addition, pursuant to 326 IAC 1-2-59(a), liquid and gaseous fuels and combustion air will not be considered as part of the process weight. Therefore, pursuant to 326 IAC 6-3-1(b)(14), the natural gas-fired direct heating facilities at the source are exempt from this rule.

(a) The air make-up units and clean/phosphate heater (all installed in the 1990s), are each exempt from the requirements of 326 IAC 6-3 since they are sources of indirect heating.

Compliance Determination and Monitoring Requirements

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 this source are as follows:

1. Volatile Organic Compounds (VOC)
Compliance with the VOC limitation contained in Conditions D.1.1 and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

These monitoring conditions are necessary because the VOC usage and content must be verified in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable and to ensure compliance with 326 IAC 8-2-9 (Miscellaneous metal and plastic coating operations).

2. 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 surface coating booths stacks (S-1, S-2, S-3) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps 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. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

These monitoring conditions are necessary because the dry filter must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes). In addition, these conditions will ensure compliance with 40 CFR 64, Compliance Assurance Monitoring (CAM).

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T011-20119-00037. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

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 metal finishing plant for trailer suspension systems.

Responsible Official:	Plant Manager
Source Address:	180 Mount Zion Road, Lebanon, Indiana 46052
Mailing Address:	180 Mount Zion Road, Lebanon, Indiana 46052
General Source Phone Number:	(765) 483-5350
SIC Code:	3714
County Location:	Boone
Source Location Status:	Nonattainment for 8-hour ozone standard Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program ~~Major Source, under Emission Offset~~

~~Major~~ **Minor** Source~~,~~ under PSD
~~Minor~~ **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) paint spray booth for painting metal parts, identified as EP-2, ~~constructed in 1995,~~ with a maximum production rate of 21.47 trailer parts per hour, ~~and~~ using a dry filter as control, **constructed in 1995, and modified in 2007, and** exhausting at stack S-1.

(b) One (1) paint spray booth for painting metal parts, identified as EP-9, ~~constructed in 1997,~~ with a maximum production rate of 16.91 trailer parts per hour, ~~and~~ using a dry filter as control, **constructed in 1997, and modified in 2007, and** exhausting at stack S-2.

(c) One (1) touch-up paint booth for painting metal parts, identified as EP-12, ~~constructed in 2002,~~ with a maximum production rate of 21.47 trailer parts per hour, ~~and~~ using dry filter as control, **constructed in 2002, and modified in 2007, and** exhausting at stack S-3.

Under the NESHAP for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63, Subpart MMMM) EP-2, EP-9 and EP-12 are considered affected facilities.

A.3 Specifically Regulated 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 which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Welding operations, consisting of:

~~(1) Eighty-eight (88) robotic welding stations, identified as EP-6, using 20 pounds of welding consumables per hour per welder.~~

~~(2) Five (5) manual welding stations, identified as EP-7, using 10 pounds of welding consumables per hour per welder.~~

~~Particulate emissions from twenty-seven (27) robotic welders and five (5) manual welders are controlled by three (3) dust collectors using cartridge filter systems. One filter system exhausts inside the building, and two filter systems exhaust either through two (2) stacks (S-6a, S-6b) or inside the building, depending upon seasonal heating requirements. [326 IAC 6-3-2]~~

(1) Two (2) robotic welding stations and one (1) manual station, identified as EP-6A, combined using 34.6 pounds of welding consumables per hour, using RoboVent Smoke Dust Collector, and exhausting to the atmosphere. [326 IAC 6-3-2]

(2) Nine (9) robotic welding stations and two (2) manual stations, identified as EP-6B, combined using 38.9 pounds of welding consumables per hour, using dust collector Torit 002, and exhausting to the atmosphere. [326 IAC 6-3-2]

(3) Eighteen (18) robotic welding stations, identified as EP-7, combined using 58.6 pounds of welding consumables per hour, using dust collector Torit 001, and exhausting to the atmosphere. [326 IAC 6-3-2]

(4) One (1) manual stations, identified as EP-8A, combined using 0.2 pounds of welding consumables per hour, using Airflow Smoke Dust Collector, and exhausting to the atmosphere. [326 IAC 6-3-2]

(5) Four (4) robotic welding stations, two (2) hand weld surelok stations, and four (4) hand weld frame bracket stations, identified as E8-B, combined using 25.4 pounds of welding consumables per hour, using dust collector Torit 003, and exhausting to the atmosphere. [326 IAC 6-3-2]

(b) One (1) Laser Cutting Machine, identified as EP-5, with a maximum capacity of 20 parts per hour, constructed in 2002, and exhausting indoors. [326 IAC 6-3-2]

~~(b) The following equipment related to manufacturing activities not resulting in the emission of HAPS; brazing equipment, cutting torches, soldering equipment and welding equipment, consisting of one (1) Laser Cutting Machine, identified as EP-5, with particulate controlled by a dust filter system, and exhausting inside the building. [326 IAC 6-3-2]~~

(c) Degreasing operations, that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6, consisting of one (1) maintenance cleaning station and paint booth parts cleaner, identified as ~~EP-12~~ **gun cleaning station**. [326 IAC 8-3-2] [326 IAC 8-3-5]

(d) Combustion related activities including spaces heaters, process heaters, or boilers using natural gas-fired with heat input equal to or less than ten million (10,000,000) British thermal units per hour; [326 IAC 6-2-4]

(1) Four (4) natural gas-fired air make-up units, with a combined maximum heat input capacity of 2.72 MMBtu/hr and;

(2) One (1) natural gas-fired air make-up unit, with a maximum heat input capacity of 1.50 MMBtu/hr and;

(3) One (1) natural gas-fired air make-up unit, with a maximum heat input capacity of 2.90 MMBtu/hr and;

(4) One (1) natural gas-fired clean/phosphate heater, with a maximum heat input capacity of 1.50 MMBtu/hr and;

(5) One (1) natural gas-fired slider box heater, with a maximum heat input capacity of 1.30 MMBtu/hr and;

(6) One (1) natural gas-fired dry-off oven, with a maximum heat input capacity of 1.60 MMBtu/hr and;

(7) One (1) natural gas-fired bake oven, with a maximum heat input capacity of 2.80 MMBtu/hr.

(~~d~~**e**) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

(f) The following VOC and HAP storage containers:

(1) Three (3) closed vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids.

(g) Cleaners and solvents, identified as EP-3, characterized as follows:

(1) having a vapor pressure equal to or less than 2kPa, 15 mm Hg or 0.3 psi measured at 38°C (100°F) or;

(2) having a vapor pressure equal to or less than 0.7 kPa, 5 mm Hg or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(3) One (1) parts washer, identified as maintenance small parts washer, with dimensions are approximately 2' x 2' x 2', constructed in 1995, and exhausting indoors.

(h) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.

(1) One (1) Evaporator, identified as Lake View Evaporator, with a maximum capacity of 0.39 MMBtu/hr, constructed in 2002, and exhausting through Evaporator Stack.

(i) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(1) One (1) Smoke Dust Collector, identified as RoboVent Smoke Dust Collector, with a maximum air throughput of 15,000 cfm, installed in 2005, and exhausting to the atmosphere.

(2) One (1) Dust Collector, identified as Torit 002, with a maximum air throughput of 22,000 cfm, installed in 1998, and exhausting to the atmosphere.

(3) One (1) Dust Collector, identified as Torit 001, with a maximum air throughput of 28,000 cfm, installed in 1995, and exhausting to the atmosphere.

(4) One (1) Smoke Dust Collector, identified as Airflow Smoke Dust Collector, with a maximum air throughput of 1,200 cfm, installed in 2008, and exhausting to the atmosphere.

(5) One (1) Dust Collector, identified as Torit 003, with a maximum air throughput of 24,000 cfm, installed in 2010, and exhausting to the atmosphere.

(j) Sealant operations, consisting of a viscous, semi-solid sealant applied with a high pressure caulking gun and emitting no particulate, emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, emitting less than five (5) pounds per hour or twenty-five (25) pounds per day of VOC.

(1) One (1) Hand Held Dispensing Unit, identified as Axle Sealant Operation, with a maximum capacity of 22 axles per hour, constructed in 1995, and exhausting to the atmosphere.

…

SECTION D.1 FACILITY OPERATION CONDITIONS

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

(a) One (1) paint spray booth for painting metal parts, identified as EP-2, ~~constructed in 1995,~~ with a maximum production rate of 21.47 trailer parts per hour, ~~and~~ using a dry filter as control, **constructed in 1995, and modified in 2007, and** exhausting at stack S-1.

(b) One (1) paint spray booth for painting metal parts, identified as EP-9, ~~constructed in 1997,~~ with a maximum production rate of 16.91 trailer parts per hour, ~~and~~ using a dry filter as control, **constructed in 1997, and modified in 2007, and** exhausting at stack S-2.

(c) One (1) touch-up paint booth for painting metal parts, identified as EP-12, ~~constructed in 2002,~~ with a maximum production rate of 21.47 trailer parts per hour, ~~and~~ using dry filter as control, **constructed in 2002, and modified in 2007, and** exhausting at stack S-3.

Under the NESHAP for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63, Subpart MMMM) EP-2, EP-9 and EP-12 are considered affected facilities.

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

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

The total input of VOC, including coatings, dilution solvents, and cleaning solvents, to paint booths EP-2, EP-9, and EP-12 shall be less than 225.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit VOC from other emission units at the source, shall limit the VOC from the entire source to less than 250 tons per twelve (12) consecutive month period and render the requirements of 326 IAC 2-2 not applicable.

D.1.~~1~~**2** Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]~~[326 IAC 2-4.1]~~

~~(a) Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.~~

~~(b) Pursuant to T011-11925-00037, issued on October 2, 2000, the spray booth EP-9 shall satisfy the requirements of 326 IAC 2-4.1 by complying with the requirements of 326 IAC 8-2-9.~~

(a) Pursuant to 326 IAC 8-2-9(c), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts and products may cause, allow, or permit the discharge into the atmosphere of any VOC in excess of the following:

(1) Fifty-two hundredths (0.52) kilogram per liter (four and three-tenths (4.3) pounds per gallon) of coating, excluding water, delivered to a coating applicator that applies clear coatings. A clear coating is a coating that:

(A) lacks color or opacity; and

(B) is transparent and uses the undercoat as a reflectant base or undertone color.

(2) Forty-two hundredths (0.42) kilogram per liter (three and five-tenths (3.5) pounds per gallon) of coating excluding water, delivered to a coating applicator in a coating application system that is air dried or forced warm air dried at temperatures up to ninety (90) degrees Celsius (one hundred ninety-four (194) degrees Fahrenheit).

(3) Forty-two hundredths (0.42) kilogram per liter (three and five-tenths (3.5) pounds per gallon) of coating, excluding water, delivered to a coating applicator that applies extreme performance coatings. Extreme performance coatings are coatings designed for exposure to:

(A) temperatures consistently above ninety-five (95) degrees Celsius;

(B) detergents;

(C) abrasive or scouring agents;

(D) solvents;

(E) corrosive atmospheres;

(F) outdoor weather at all times; or

(G) similar environmental conditions.

(4) Thirty-six hundredths (0.36) kilogram per liter (three (3) pounds per gallon) of coating, excluding water, delivered to a coating applicator for all other coatings and coating application systems.

(b) Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:

(1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.

(2) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.

(3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.

(4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.

(5) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

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

Pursuant to 326 IAC 6-3-2(d), particulate from paint booths EP-2, EP-9, and EP-12 shall be controlled by a dry particulate filter, and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds [326 IAC 8-1-2] [326 IAC 8-1-4] [326 IAC 2-2]

Compliance with the VOC limitation contained in Conditions D.1.1 and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

~~D.1.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]~~

~~Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of the surface coating booths (EP-2, EP-9 and EP-12) during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.~~

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

~~Pursuant to CP 011-4304-00037, issued on May 11, 1995, CP 011-8677-00037, issued on November 13, 1997, MSM 011-15223-00037, issued on January 31, 2002 and 326 IAC 6-3-2(d), particulate from the surface coating operations shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer’s specifications.~~

~~D.1.4 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 their control devices.~~

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

D.1.~~5~~**6** Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booths stacks (S-1, S-2, S-3) while one or more of the booths 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.~~ **Section C - Response to Excursions or Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition.** 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 emission, or when evidence of overspray emissions is observed at any stack exhaust, the Permittee shall take reasonable response steps**.** ~~in accordance with Section C - Response to Excursions or Exceedances.~~ **Section C -**

Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. 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.1.~~6~~**7** Record Keeping Requirements

(a) To document compliance with Condition D.1.1 **and D.1.2**, the Permittee shall maintain records in accordance with (1) through (~~5~~**6**) below. Records maintained for (1) through (~~5~~**6**) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit**s** ~~established in Condition D.1.1.~~ **and VOC content limits established in Conditions D.1.1 and D.1.2.**

(1) The VOC content of each coating material and solvent ~~used less water~~.

(2) The amount of coating material and solvent ~~used on daily basis.~~ **less water used on monthly basis.**

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvent.

(3) The volume weighted average VOC content of the coatings used for each **month** ~~day~~;

(4) The daily cleanup solvent usage **for each month**; ~~and~~

(5) The total VOC usage for each ~~day.~~ **month; and**

(6) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.1.~~5~~**6**, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.

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

(c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.8 Reporting Requirements

(a) A quarterly summary of the information to document the compliance status with Condition D.1.1 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported.

(b) Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The reports submitted by the Permittee do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

…

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(a) Welding operations, consisting of:

~~(1) Eighty-eight (88) robotic welding stations, identified as EP-6, using 20 pounds of welding consumables per hour per welder.~~

~~(2) Five (5) manual welding stations, identified as EP-7, using 10 pounds of welding consumables per hour per welder.~~

~~Particulate emissions from twenty-seven (27) robotic welders and five (5) manual welders are controlled by three (3) dust collectors using cartridge filter systems. One filter system exhausts inside the building, and two filter systems exhaust either through two (2) stacks (S-6a, S-6b) or inside the building, depending upon seasonal heating requirements. [326 IAC 6-3-2]~~

~~(b) The following equipment related to manufacturing activities not resulting in the emission of HAPS; brazing equipment, cutting torches, soldering equipment and welding equipment, consisting of one (1) Laser Cutting Machine, identified as EP-5, with particulate controlled by a dust filter system, and exhausting inside the building. [326 IAC 6-3-2]~~

(1) Two (2) robotic welding stations and one (1) manual station, identified as EP-6A, combined using 34.6 pounds of welding consumables per hour, using RoboVent Smoke Dust Collector, and exhausting to the atmosphere. [326 IAC 6-3-2]

(2) Nine (9) robotic welding stations and two (2) manual stations, identified as EP-6B, combined using 38.9 pounds of welding consumables per hour, using dust collector Torit 002, and exhausting to the atmosphere. [326 IAC 6-3-2]

(3) Eighteen (18) robotic welding stations, identified as EP-7, combined using 58.6 pounds of welding consumables per hour, using dust collector Torit 001, and exhausting to the atmosphere. [326 IAC 6-3-2]

(4) One (1) manual stations, identified as EP-8A, combined using 0.2 pounds of welding consumables per hour, using Airflow Smoke Dust Collector, and exhausting to the atmosphere. [326 IAC 6-3-2]

(5) Four (4) robotic welding stations, two (2) hand weld surelok stations, and four (4) hand weld frame bracket stations, identified as E8-B, combined using 25.4 pounds of welding consumables per hour, using dust collector Torit 003, and exhausting to the atmosphere. [326 IAC 6-3-2]

(b) One (1) Laser Cutting Machine, identified as EP-5, with a maximum capacity of 20 parts per hour, constructed in 2002, and exhausting indoors. [326 IAC 6-3-2]

(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 Particulate [326 IAC 6-3-2]

~~(a) Pursuant to 326 IAC 6-3-2, the particulate emissions from the robotic welding, manual welding and the laser cutting machine shall be limited by the following:~~

~~(1) The robotic welding, identified as EP-6, shall be limited to 3.76 lbs/hr based on a process weight rate of 1,760 lbs/hour.~~

~~(2) The plasma arc cutting, identified as EP-5, shall be limited to 1.62 lb/hr of PM/PM10 based on a process weight rate of 500 lbs/hour.~~

~~The pounds per hour limitation was calculated with the following equation:~~

(a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the laser cutting machine (EP-5) shall not exceed 2.2 pounds per hour when operating at a process weight rate of 803.4 pounds per hour.

(b) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the listed emission units shall be limited by the following:

Emission unit	Operation Description	Maximum Process Weight (tons/hour)	326 IAC 6-3 Limit (lbs/hr)	PM/PM10 Emission Factor (lbs PM10/1,000 lbs electrode)	Max PTE Particulate (lb/hour)
EP-6A	Sub-rail: Miller AutoAxcess 450 (x2); Robotic Tandem, L-56, .052" wire.	1.72	5.89	5.20	0.18
	K-brace: Miller XMT 456 (x1); Manual Single, L-59, .045" wire.	1.72	5.89	5.20	0.18
EP-6B	Final #1: Miller AutoAxcess 450 (x2); Robotic Single, L-59, .045" wire.	0.64	3.05	5.20	0.07
	Final #2: Miller AutoAxcess 450 (x4); Robotic Tandem, L-59, .045" wire.	0.64	3.05	5.20	0.07
	Final #3: Miller AutoAxcess 450 (x4); Robotic Tandem, L-59, .045" wire.	0.64	3.05	5.20	0.07
EP-7	Suspension 451: Miller AutoAxcess 450 (x2); Robotic Single, L-59, .045" wire.	1.93	6.36	5.20	0.08
	Suspension 680: Miller AutoAxcess 450 (x4); Robotic Tandem, L-59, .045" wire.	1.93	6.36	5.20	0.08

Emission unit	Operation Description	Maximum Process Weight (tons/hour)	326 IAC 6-3 Limit (lbs/hr)	PM/PM10 Emission Factor (lbs PM10/1,000 lbs electrode)	Max PTE Particulate (lb/hour)
	Suspension 1286: Cloos 503 (x4), Robotic Tandem, L-59, .045" wire.	**1.93**	**6.36**	**5.20**	**0.08**
	All Beam robots (x7): Miller AutoAxcess 450; Robotic Single, L-59, .062" wire.	**0.28**	**1.73**	**5.20**	**0.06**
EP-8B	**One Robotic (4026): 4 Miller AutoAxcess, Tandem Torch, L-59, .045" wire.**	**1.93**	**6.36**	**5.20**	**0.08**
	6 Hand weld stations: Miller XMT 456, Manual Single, L-59, .045" wire.	**0.15**	**1.15**	**5.20**	**0.01**
		0.20	**1.41**	**5.20**	**0.04**

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

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

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

(~~b~~**c**) Pursuant to 326 IAC 6-3-2(e)(2), ~~the manual welding, identified as EP-7~~**EP-8**~~,~~ shall **not exceed** ~~be limited to~~ 0.551 lbs/hr based on a process weight rate of less than 100 lbs/hour.

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

~~Compliance Determination Requirements~~

~~D.2.2 Particulate Control~~

~~Pursuant to CP-011-8677-00037, issued on November 13, 1997 and 326 IAC 6-3-2, and in order to comply with condition D.2.1, the dust collectors for particulate control shall be in operation and control emissions from the robotic welding, manual welding and laser cutting facilities at all times these facilities are in operation.~~

...

SECTION D.3 FACILITY OPERATION CONDITIONS

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

(c) Degreasing operations, that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6, consisting of one (1) maintenance cleaning station and paint booth parts cleaner, identified as ~~EP-12~~ **gun cleaning station**. [326 IAC 8-3-2] [326 IAC 8-3-5]

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

...

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(d) Combustion related activities including spaces heaters, process heaters, or boilers using natural gas-fired with heat input equal to or less than ten million (10,000,000) British thermal units per hour; [326 IAC 6-2-4]

(1) Four (4) natural gas-fired air make-up units, with a combined maximum heat input capacity of 2.72 MMBtu/hr and;

(2) One (1) natural gas-fired air make-up unit, with a maximum heat input capacity of 1.50 MMBtu/hr and;

(3) One (1) natural gas-fired air make-up unit, with a maximum heat input capacity of 2.90 MMBtu/hr and;

(4) One (1) natural gas-fired clean/phosphate heater, with a maximum heat input capacity of 1.50 MMBtu/hr and;

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

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

D.4.1 Particulate Emissions [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from all of the air make-up units and from the clean/phosphate heater, shall each be limited to 0.52 pound per MMBtu heat input.

…

SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) paint spray booth for painting metal parts, identified as EP-2, with a maximum production rate of 21.47 trailer parts per hour, using a dry filter as control, constructed in 1995, and modified in 2007, and exhausting at stack S-1.

(b) One (1) paint spray booth for painting metal parts, identified as EP-9, with a maximum production rate of 16.91 trailer parts per hour, using a dry filter as control, constructed in 1997, and modified in 2007, and exhausting at stack S-2.

(c) One (1) touch-up paint booth for painting metal parts, identified as EP-12, with a maximum production rate of 21.47 trailer parts per hour, using a dry filter as control, constructed in 2002, and modified in 2007, and exhausting at stack S-3.

Under the NESHAP for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63, Subpart MMMM) EP-2, EP-9 and EP-12 are considered affected facilities.

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

E.1.1 General Provisions Relating to NESHAP MMMM [326 IAC 20-1] [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 MMMM in accordance with the schedule in 40 CFR 63, Subpart MMMM.

E.1.2 Surface Coating of Miscellaneous Metal Parts and Products NESHAP [40 CFR Part 63, Subpart MMMM]

The Permittee which engages in surface coating of miscellaneous metal parts and products shall comply with the provisions of 40 CFR Part 63, Subpart MMMM, as follows. The full text of Subpart MMMM may be found in Attachment A to this permit.

This source 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(b)
(6) 40 CFR 63.3882(a)
(7) 40 CFR 63.3882(b)
(8) 40 CFR 63.3882(e)
(9) 40 CFR 63.3883
(10) 40 CFR 63.3883(c)(2)
(11) 40 CFR 63.3883(d)
(12) 40 CFR 63.3890(b)
(13) 40 CFR 63.3890(b)(1)
(14) 40 CFR 63.3891
(15) 40 CFR 63.3891(a)
(16) 40 CFR 63.3891(b)
(17) 40 CFR 63.3892(a)
(18) 40 CFR 63.3893(a)

(19) 40 CFR 63.3900(a)
(20) 40 CFR 63.3900(a)(1)
(21) 40 CFR 63.3900(b)
(22) 40 CFR 63.3901
(23) 40 CFR 63.3910(a)
(24) 40 CFR 63.3910(b)
(25) 40 CFR 63.3910(c)(1) through (c)(7), (c)(8)(i) and (c)(8)(ii)
(26) 40 CFR 63.3920(a)
(27) 40 CFR 63.3920(a)(1) through (a)(6)
(28) 40 CFR 63.3930
(29) 40 CFR 63.3930(a)
(30) 40 CFR 63.3930(b)
(31) 40 CFR 63.3930(c)(1) through (c)(3)
(32) 40 CFR 63.3930(d) through (g)
(33) 40 CFR 63.3930(j)
(34) 40 CFR 63.3931
(35) 40 CFR 63.3940
(36) 40 CFR 63.3941
(37) 40 CFR 63.3942
(38) 40 CFR 63.3950
(39) 40 CFR 63.3951
(40) 40 CFR 63.3952
(41) 40 CFR 63.3980
(42) 40 CFR 63.3981
(43) Table 2 to Subpart MMMM
(44) Table 3 to Subpart MMMM
(45) Table 4 to Subpart MMMM

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

Part 70 Quarterly Report

Source Name: **Hendrickson Trailer Suspension Systems**
Source Address: **180 Mount Zion Road, Lebanon, Indiana 46052**
Part 70 Permit No.: **T011-29188-00037**
Facility: **The total input of VOC, including coatings, dilution solvents, and cleaning solvents, to paint booths EP-2, EP-9, and EP-12**
Parameter: **VOC Usage**
Limit: **shall be less than 225.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.**

QUARTER : **YEAR:**

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

☐ **No deviation occurred in this quarter.**

☐ **Deviation/s occurred in this quarter.**
Deviation has been reported on:

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

…

The full text of 40 CFR 63.4480, Subpart MMMM, NESHAP for Surface Coating of Miscellaneous Metal Parts and Products may be found in Attachment A to this permit.

Recommendation

The staff recommends to the Commissioner that this Part 70 Significant Source Modification and Part 70 Operating Permit Renewal be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on April 21, 2010. Additional information was received on May 3, 2010, May 25, 2010, October 6, 2010, October 8, 2010, October 15, 2010, October 18, 2010, October 20, 2010, October 27, 2010 and November 2, 2010.

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 011-29872-00037 and Part 70 Operating Permit Renewal No. T011-29188-00037.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Sarah Conner, Ph. D. at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) (234-6555) or toll free at 1-800-451-6027 extension (4-6555).

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

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

Appendix A: Emission Calculations
PTE Summary

Company Name: Hendrickson Trailer Suspension Systems
Address City IN Zip: 180 Mount Zion Road, Lebanon, Indiana 46052
Significant Source Modification: 011-29872-00037
Renewal Permit Number: T011-29188-00037
Reviewer: Sarah Conner, Ph. D.
Date: 10/20/2010

[1,2]Uncontrolled PTE (tons/year) from T011-20119-00037, issued on February 2, 2006							
Emission Unit	PM	PM10	SO_2	NO_X	VOC	CO	Total HAPs
[1,2]Surface Coating (EP-2, EP-9 and EP-12)	174.65	174.65	-	-	280.85	-	8.60
[1]Welding Stations (EP-6 and EP-7)	41.22	41.22	-	-	-	-	2.52
[1]Natural Gas Units	0.75	0.75	0.06	9.85	0.54	8.27	0.01
TOTAL	216.63	216.63	0.06	9.85	281.39	8.27	11.13

[1]Uncontrolled PTE (tons/year) to compare to for the Significant Source Modificatior									
Emission Unit	PM	PM10	PM2.5	SO_2	NO_X	VOC	CO	Total HAPs	Single HAP
Surface Coating (EP-2, EP-9 and EP-12)	174.65	174.65	174.65	-	-	280.85	-	8.60	2.69 (Xylene) and 2.69 (Toluene)
Welding Stations (EP-6 and EP-7)	41.22	41.22	41.22	-	-	-	-	2.52	2.52 (Manganese)
[3]Natural Gas Units	0.18	0.73	0.73	0.06	9.65	0.53	8.11	0.18	0.174 (Hexane)
[4]Degreasing Operations (gun cleaning station)	-	-	-	-	-	0.06	-	-	-
[4]Laser Cutter	2.99	2.99	2.99	-	-	-	-	0.04	0.04 (Manganese)
[4]Evaporator	0.003	0.013	0.013	0.001	0.17	0.01	0.14	0.003	0.003 (Hexane)
TOTAL	219.05	219.61	219.61	0.06	9.82	281.46	8.25	11.34	2.69 (Xylene) and 2.69 (Toluene)

Notes:

Note1: Emissions are taken from T011-20119-00037, issued on February 2, 2006.

Note 2: The source added the SoftCoat SG-500B (black) and SoftCoat SG-500G (gray) coatings to the surface coating operations in August 2002, but emissions from these coatings were not included in the PTE calculations for first renewal T011-20199-00037, issued on February 2, 2006. Therefore, because SoftCoat SG-500B (black) and SoftCoat SG-500G (gray) were never included in surface coating PTE calculations for this source, the surface coating PTE calculations from the first renewal T011-20199-00037 will be used as the baseline to compare against for the significant source modification.

Note 3: Emissions from natural gas-fired units have been updated to current methodology and emission factors in AP 42, Chapter 1.4,. The corrected natural gas emissions will be used as the baseline to compare against for the significant source modification since the difference in PTE is negligible.

Note 4: Emissions from the degreasing operations, the laser cutter and the evaporator were not included in the PTE for permit T011-20119-00037, issued on February 2, 2006. However, these units have the potential to emit all regulated pollutants at exempt levels as specified in 326 IAC 2-1.1-3(e). Therefore, these emissions will be used as the baseline to compare against for the significant source modification.

Appendix A: Emission Calculations
PTE Summary

Company Name: Hendrickson Trailer Suspension Systems
Address City IN Zip: 180 Mount Zion Road, Lebanon, Indiana 46052
Significant Source Modification: 011-29872-00037
Renewal Permit Number: T011-29188-00037
Reviewer: Sarah Conner, Ph. D.
Date: 10/20/2010

	[1]Uncontrolled PTE (tons/year) after June 2008								
Emission Unit	PM	PM10	PM2.5	SO_2	NO_X	VOC	CO	Total HAPs	Single HAP
Spray Booth #1 (EP-2)	43.97	43.97	43.97	-	-	89.05	-	22.24	10.12 (Pseudo Cumene)
Spray Booth #2 (EP-9)	152.79	152.79	152.79	-	-	317.03	-	83.24	35.94 (Xylene)
Touch-up Booth (EP-12)	8.79	8.79	8.79	-	-	17.51	-	4.45	2.02 (Pseudo Cumene)
Welding Stations (EP-6 and EP-7)	13.58	13.58	13.58	-	-	-	-	0.83	0.83 (Manganese)
Natural Gas Units	0.18	0.73	0.73	0.06	9.65	0.53	8.11	0.18	0.174 (Hexane)
Degreasing Operations (gun cleaning station)	-	-	-	-	-	0.06	-	-	-
Laser Cutter	2.99	2.99	2.99	-	-	-	-	0.04	0.04 (Manganese)
Evaporator	0.003	0.013	0.013	0.001	0.167	0.009	0.141	0.003	0.003 (Hexane)
[1]Uncontrolled PTE (tons/year) after June 2008	**222.31**	**222.87**	**222.87**	**0.06**	**9.82**	**424.20**	**8.25**	**110.99**	47.71 (Xylene) 47.31 (Pseudo Cumene)
[2]Uncontrolled PTE (tons/year) prior to August 2007	219.05	219.61	219.61	0.06	9.82	281.46	8.25	11.34	2.69 (Xylene) and 2.69 (Toluene)
Change in PTE due to modification	**3.26**	**3.26**	**3.26**	**0.00**	**0.00**	**142.74**	**0.00**	**99.65**	**> 10 for single HAP Xylene**

Notes:

Note 1: New materials (SoftCoat SG-500B (black) and SG-500G (gray)) were added to the surface coating operations in August 2002, but emissions from these coatings were not included in the PTE calculations for first renewal T011-20199-00037, issued on February 2, 2006. In addition, Black A.D. Enamel was replaced by Valspar Black in August 2007. The source has requested to keep Black A.D. Enamel in the calculations in case they switch back to it in the future. The source added Valspar Gray in June 2008. Therefore, the PTE from surface coating after June 2008 includes emissions from SoftCoat SG-500B (black), SG-500G (gray), Valspar Black, and Valspar Gray.

Note 2: See previous page for details regarding the table "Uncontrolled PTE (tons/year) to compare against for enforcement calculations and referal".

Appendix A: Emissions Calculations
Summary

Company Name: **Hendrickson Trailer Suspension Systems**
Address City IN Zip: **180 Mount Zion Road, Lebanon, Indiana 46052**
Significant Source Modification: **011-29872-00037**
Renewal Permit Number: **T011-29188-00037**
Reviewer: **Sarah Conner, Ph. D.**
Date: **10/20/2010**

	Uncontrolled PTE (tons/year)								
Emission Unit	PM	PM10	PM2.5	SO_2	NO_X	VOC	CO	Total HAPs	Single HAP
Paint Spray Booth #1 (EP-2)	43.97	43.97	43.97	-	-	89.05	-	22.24	10.12 (Pseudo Cumene)
Paint Spray Booth #2 (EP-9)	152.79	152.79	152.79	-	-	317.03	-	83.24	35.94 (Xylene)
Touch-up Paint Booth (EP-12)	8.79	8.79	8.79	-	-	17.51	-	4.45	2.02 (Pseudo Cumene)
Welding Stations (EP-6A, EP-6B, EP-7, EP-8A,and EP-8B)	13.58	13.58	13.58	-	-	-	-	0.83	0.83 (Manganese)
Indirect Heating Units	0.14	0.55	0.55	0.04	7.21	0.40	6.05	0.14	0.13 (Hexane)
Direct Heating Units	0.05	0.19	0.19	0.01	2.45	0.13	2.06	0.05	0.04 (Hexane)
Degreasing Operations (gun cleaning station)	-	-	-	-	-	0.06	-	-	-
Laser Cutter	2.99	2.99	2.99	-	-	-	-	0.04	0.04 (Manganese)
Evaporator	0.003	0.013	0.013	0.001	0.167	0.009	0.141	0.003	0.003 (Hexane)
TOTAL	**222.31**	**222.87**	**222.87**	**0.06**	**9.82**	**424.20**	**8.25**	**110.99**	**48.38 (Pseudo Cumene)**

	Limited PTE (tons/year)								
Emission Unit	PM	PM10	PM2.5	SO_2	NO_X	VOC	CO	Total HAPs	Single HAP
Paint Spray Booth #1 (EP-2)	43.97	43.97	43.97	-	-	<225.0	-	22.24	10.12 (Pseudo Cumene)
Paint Spray Booth #2 (EP-9)	152.79	152.79	152.79	-	-		-	83.24	35.94 (Xylene)
Touch-up Paint Booth (EP-12)	8.79	8.79	8.79	-	-		-	4.45	2.02 (Pseudo Cumene)
Welding Stations (EP-6A, EP-6B, EP-7, EP-8A,and EP-8B)	13.58	13.58	13.58	-	-	-	-	0.83	0.83 (Manganese)
Indirect Heating Units	0.14	0.55	0.55	0.04	7.21	0.40	6.05	0.14	0.13 (Hexane)
Direct Heating Units	0.05	0.19	0.19	0.01	2.45	0.13	2.06	0.05	0.04 (Hexane)
Degreasing Operations (gun cleaning station)	-	-	-	-	-	0.06	-	-	-
Laser Cutter	2.99	2.99	2.99	-	-	-	-	0.04	0.04 (Manganese)
Evaporator	0.003	0.013	0.013	0.001	0.167	0.009	0.141	0.003	0.003 (Hexane)
TOTAL	**222.31**	**222.87**	**222.87**	**0.06**	**9.82**	**<225.60**	**8.25**	**110.99**	**48.38 (Pseudo Cumene)**

Appendix A: Emission Calculations
VOC and Particulate Emissions from Surface Coating Operations before August 2007

Company Name: Hendrickson Trailer Suspension Systems
Address City IN Zip: 180 Mount Zion Road, Lebanon, Indiana 46052
Significant Source Modification: 011-29872-00037
Renewal Permit Number: T011-29188-00037
Reviewer: Sarah Conner, Ph. D.
Date: 10/20/2010

Process ID	****Material	Density (lb/gal)	Weight % Volatile (H_20 & Organics)	Weight % Water (Non-volatile)	Weight % Organics	Weight % Solids	Max. Usage (gal/unit)	Maximum Throughput (unit/hour)	Pounds VOC per Gallon of Coating	PTE of VOC (ton/yr)	Transfer Efficiency	PTE of PM/PM10/PM2.5 Uncontrolled (ton/yr)	***Control Efficiency	PTE of PM/PM10/PM2.5 Controlled (ton/yr)
Spray Booth #1 (EP-2)	*Black A.D. Enamel	11.3	30.9%	0.00%	30.9%	69.1%	0.17	21.5	3.49	55.8	70%	37.4	80%	7.47
	**Sealant	9.90	9.0%	0.00%	9.0%	91.0%	0.018	21.5	0.89	1.51	100%	0.00	80%	0.00
	*Lacquer Thinner 105	7.20	100%	0.00%	100%	0.00%	0.0018	21.5	7.20	1.22	70%	0.00	80%	0.00
										58.52		**37.36**		**7.47**
Spray Booth #2 (EP-9)	*Black A.D. Enamel	11.3	30.9%	0.00%	30.9%	69.1%	0.75	16.9	3.49	193.87	70%	129.82	80%	25.96
	*Lacquer Thinner 105	7.20	100%	0.00%	100%	0.00%	0.032	16.9	7.20	17.1	70%	0.00	80%	0.00
										210.93		**129.82**		**25.96**
Touch-up Booth (EP-12)	*Black A.D. Enamel	11.3	30.9%	0.00%	30.9%	69.1%	0.034	21.5	3.49	11.2	70%	7.47	80%	1.49
	*Lacquer Thinner 105	7.20	100%	0.00%	100%	0.00%	0.00036	21.5	7.20	0.24	70%	0.00	80%	0.00
										11.40		**7.47**		**1.49**
									Total	**280.85**		**174.65**		**34.93**

Notes:

*Black A.D. Enamel and Lacquer Thinner 105 were calculated in the previous renewal permit No. T011-20119-00037, issued on February 2, 2006. The source confirmed that these have not changed.

**Sealant is applied with caulking gun and transfer efficiency is 100 %.

***Particulate emissions from the spray booths are controlled with dry filters.

****The source added the SoftCoat SG-500B (black) and SoftCoat SG-500G (gray) coatings to the surface coating operations in August 2002, but emissions from these coatings were not included in the PTE calculations for first renewal T011-20199-00037, issued on February 2, 2006. Therefore, because SoftCoat SG-500B (black) and SoftCoat SG-500G (gray) were never included in surface coating PTE calculations for this source, the surface coating PTE calculations from the first renewal T011-20199-00037 will be used as the baseline to compare against for the significant source modification.

METHODOLOGY

Lbs VOC per gallon of coating (lbs/gal) = Density (lb/gal) x Weight % Organics

PTE VOC (tons/yr) = Density (lb/gal) x Weight % Organics x Max. Usage (gal/unit) x Max. Throughput (units/hr) x 8760 (hr/yr) x 1 ton/2000 lbs

PTE PM/PM10/PM2.5 Uncontrolled (tons/yr) = Density (lb/gal) x Weight % Solids x Max. Usage (gal/unit) x Max. Throughput (units/hr) x (1- Transfer Efficiency %) x 8760 hr/yr x 1 ton/2000 lbs

PTE PM/PM10/PM2.5 Controlled (tons/yr) = Density (lb/gal) x Weight % Solids x Max. Usage (gal/unit) x Max. Throughput (units/hr) x (1- Transfer Efficiency %) x (1-Control Efficiency %) x 8760 hr/yr x 1 ton/2000 lbs

Appendix A: Emission Calculations
VOC and Particulate Emissions from Surface Coating Operations after June 2008

Company Name: Hendrickson Trailer Suspension Systems
Address City IN Zip: 180 Mount Zion Road, Lebanon, Indiana 46052
Significant Source Modification: 011-29872-00037
Renewal Permit Number: T011-29188-00037
Reviewer: Sarah Conner, Ph. D.
Date: 10/20/2010

Process ID	****Material	Density (lb/gal)	Weight % Volatile (H_20 & Organics)	Weight % Water (Non-volatile)	Weight % Organics	Weight % Solids	Max. Usage (gal/unit)	Maximum Throughput (unit/hour)	Pounds VOC per Gallon of Coating	PTE of VOC (ton/yr)	Transfer Efficiency	PTE of PM/PM10/PM2.5 Uncontrolled (ton/yr)	***Control Efficiency	PTE of PM/PM10/PM2.5 Controlled (ton/yr)
Spray Booth #1 (EP-2)	Valspar Black Primer 130	12.7	27.6%	0.00%	27.6%	72.4%	0.17	21.5	3.49	55.8	70%	44.0	80%	8.79
	Valspar Gray Primer 120	12.1	32.4%	5.80%	26.6%	73.4%	0.17	21.5	3.21	51.2	70%	42.4	80%	8.48
	*Black A.D. Enamel	11.3	30.9%	0.00%	30.9%	69.1%	0.17	21.5	3.49	55.8	70%	37.4	80%	7.47
	SoftCoat SG-500B (black) and SG-500G (gray)	6.0	100.0%	55.00%	45.0%	65.0%	0.34	21.5	2.70	86.3	70%	37.4	80%	7.48
	**Sealant	9.90	9.0%	0.00%	9.0%	91.0%	0.018	21.5	0.89	1.51	100%	0.00	80%	0.00
	*Lacquer Thinner 105	7.20	100%	0.00%	100%	0.00%	0.0018	21.5	7.20	1.22	70%	0.00	80%	0.00
										89.05		**43.97**		**8.79**
Spray Booth #2 (EP-9)	Valspar Black Primer 130	12.7	27.6%	0.00%	27.6%	72.4%	0.75	16.9	3.49	193.96	70%	152.79	80%	30.56
	Valspar Gray Primer 120	12.1	32.4%	5.80%	26.6%	73.4%	0.75	16.9	3.21	178.05	70%	147.40	80%	29.48
	*Black A.D. Enamel	11.3	30.9%	0.00%	30.9%	69.1%	0.75	16.9	3.49	193.87	70%	129.82	80%	25.96
	SoftCoat SG-500B (black) and SG-500G (gray)	6.0	100.0%	55.00%	45.0%	65.0%	1.50	16.9	2.70	299.97	70%	129.99	80%	26.00
	*Lacquer Thinner 105	7.20	100%	0.00%	100%	0.00%	0.032	16.9	7.20	17.1	70%	0.00	80%	0.00
										317.03		**152.79**		**30.56**
Touch-up Booth (EP-12)	Valspar Black Primer 130	12.7	27.6%	0.00%	27.6%	72.4%	0.034	21.5	3.49	11.2	70%	8.79	80%	1.76
	Valspar Gray Primer 120	12.1	32.4%	5.80%	26.6%	73.4%	0.034	21.5	3.21	10.2	70%	8.48	80%	1.70
	*Black A.D. Enamel	11.3	30.9%	0.00%	30.9%	69.1%	0.034	21.5	3.49	11.2	70%	7.47	80%	1.49
	SoftCoat SG-500B (black) and SG-500G (gray)	6.0	100.0%	55.00%	45.0%	65.0%	0.068	21.5	2.70	17.3	70%	7.48	80%	1.50
	*Lacquer Thinner 105	7.20	100%	0.00%	100%	0.00%	0.00036	21.5	7.20	0.24	70%	0.00	80%	0.00
										17.51		**8.79**		**1.76**
									Total	**423.59**		**205.55**		**41.11**

Notes:

*Black A.D. Enamel and Lacquer Thinner 105 were calculated in the previous renewal permit No. T011-20119-00037, issued on February 2, 2006. The source confirmed that these have not changed.

**Sealant is applied with caulking gun and transfer efficiency is 100 %.
***Particulate emissions from the spray booths are controlled with dry filters.

****New materials (SoftCoat SG-500B (black) and SG-500G (gray)) were added to the surface coating operations in August 2002, but emissions from these coatings were not included in the PTE calculations for first renewal T011-20199-00037, issued on February 2, 2006. In addition, Black A.D. Enamel was replaced by Valspar Black in August 2007. The source has requested to keep Black A.D. Enamel in the calculations in case they switch back to it in the future. The source added Valspar Gray in June 2008. Therefore, the PTE from surface coating after June 2008 includes emissions from SoftCoat SG-500B (black), SG-500G (gray), Valspar Black, and Valspar Gray. Valspar Black Primer 130, Valspar Grey Primer 120, Black A.D. Enamel and Softcoat Black SG-500B are all "single coatings". The source does not put on Valspar primer, then coat it with softcoat. It's either one or the other, not both on the product. Different coating types are separated in the table.

METHODOLOGY
Lbs VOC per gallon of coating (lbs/gal) = Density (lb/gal) x Weight % Organics
PTE VOC (tons/yr) = Density (lb/gal) x Weight % Organics x Max. Usage (gal/unit) x Max. Throughput (units/hr) x 8760 (hr/yr) x 1 ton/2000 lbs

PTE PM/PM10/PM2.5 Uncontrolled (tons/yr) = Density (lb/gal) x Weight % Solids x Max. Usage (gal/unit) x Max. Throughput (units/hr) x (1- Transfer Efficiency %) x 8760 hr/yr x 1 ton/2000 lbs

PTE PM/PM10/PM2.5 Controlled (tons/yr) = Density (lb/gal) x Weight % Solids x Max. Usage (gal/unit) x Max. Throughput (units/hr) x (1- Transfer Efficiency %) x (1-Control Efficiency %) x 8760 hr/yr x 1 ton/2000 lbs

Appendix A: Emission Calculations
HAP Emissions from Surface Coating Operations before August 2007

Company Name: Hendrickson Trailer Suspension Systems
Address City IN Zip: 180 Mount Zion Road, Lebanon, Indiana 46052
Significant Source Modification: 011-29872-00037
Renewal Permit Number: T011-29188-00037
Reviewer: Sarah Conner, Ph. D.
Date: 10/20/2010

Process ID	**Material	Density (lb/gal)	Max. Usage (gal/unit)	Maximum Throughput (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Methyl Isobutyl Ketone	Weight % Ethyl Benzene	Weight % Hexane	Weight % Pseudo Cumene
Spray Booth #1 (EP-2)	*Lacquer Thinner 105	7.20	0.0018	21.47	14.5%	14.5%	11.6%	0.0%	5.80%	0.00%
Spray Booth #2 (EP-9)	*Lacquer Thinner 105	7.20	0.032	16.91	14.5%	14.5%	11.6%	0.0%	5.80%	0.00%
Touch-up Booth (EP-12)	*Lacquer Thinner 105	7.20	0.00036	21.47	14.5%	14.5%	11.6%	0.0%	5.80%	0.00%

Process ID	**Material	Density (lb/gal)	Max. Usage (gal/unit)	Maximum Throughput (unit/hour)	PTE of Xylene (tons/yr)	PTE of Toluene (tons/yr)	PTE of Methyl Isobutyl Ketone (tons/yr)	PTE of Ethyl benzene (tons/yr)	PTE of Hexane (tons/yr)	PTE of Pseudo Cumene (tons/yr)	Total Combined HAPs
Spray Booth #1 (EP-2)	*Lacquer Thinner 105	use above			0.18	0.18	0.14	0.00	0.07	0.00	0.57
					0.18	**0.18**	**0.14**	**0.00**	**0.07**	**0.00**	**0.57**
Spray Booth #2 (EP-9)	*Lacquer Thinner 105	use above			2.47	2.47	1.98	0.00	0.99	0.00	7.92
					2.47	**2.47**	**1.98**	**0.00**	**0.99**	**0.00**	**7.92**
Touch-up Booth (EP-12)	*Lacquer Thinner 105	use above			0.04	0.04	0.03	0.00	0.01	0.00	0.11
					0.035	**0.035**	**0.028**	**0.000**	**0.014**	**0.000**	**0.113**
				Total Single Worst HAP from source	**2.686**	**2.686**	**2.149**	**0.000**	**1.075**	**0.000**	
				Total Combined HAPs from source	**8.597**						

SoftCoat SG-500B (black) and SG-500G (gray) do not contain any HAPs.
The Black A.D. Enamel 5-0444 contains no HAPs.

*Lacquer Thinner 105 HAPs were calculated in the previous renewal permit No. T011-20119-00037, issued on February 2, 2006. The source confirmed that this has not changed.

**New material SoftCoat SG-500B (black) and SoftCoat SG-500G (gray) were added to the surface coating operations in August 2002, but emissions from these coatings were not included in the PTE calculations for first renewal T011-20199-00037, issued on February 2, 2006. Therefore, for the enforcement calculations and referral, the PTE from the first renewal T011-20199-00037 will be used as the baseline.

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

Appendix A: Emission Calculations
HAP Emissions from Surface Coating Operations after June 2008

Company Name: Hendrickson Trailer Suspension Systems
Address City IN Zip: 180 Mount Zion Road, Lebanon, Indiana 46052
Significant Source Modification: 011-29872-00037
Renewal Permit Number: T011-29188-00037
Reviewer: Sarah Conner, Ph. D.
Date: 10/20/2010

Process ID	**Material	Density (lb/gal)	Max. Usage (gal/unit)	Maximum Throughput (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Methyl Isobutyl Ketone	Weight % Ethyl Benzene	Weight % Hexane	Weight % Pseudo Cumene
Spray Booth #1 (EP-2)	Valspar Black Primer 130	12.66	0.17	21.47	0.0%	0.0%	0.0%	0.0%	0.00%	5.00%
Spray Booth #1 (EP-2)	Valspar Gray Primer 120	12.05	0.17	21.47	5.0%	0.0%	0.0%	1.0%	0.00%	5.00%
Spray Booth #1 (EP-2)	*Lacquer Thinner 105	7.20	0.0018	21.47	14.5%	14.5%	11.6%	0.0%	5.80%	0.00%
Spray Booth #2 (EP-9)	Valspar Black Primer 130	12.66	0.75	16.91	0.0%	0.0%	0.0%	0.0%	0.00%	5.00%
Spray Booth #2 (EP-9)	Valspar Gray Primer 120	12.05	0.75	16.91	5.0%	0.0%	0.0%	1.0%	0.00%	5.00%
Spray Booth #2 (EP-9)	*Lacquer Thinner 105	7.20	0.032	16.91	14.5%	14.5%	11.6%	0.0%	5.80%	0.00%
Touch-up Booth (EP-12)	Valspar Black Primer 130	12.66	0.034	21.47	0.0%	0.0%	0.0%	0.0%	0.00%	5.00%
Touch-up Booth (EP-12)	Valspar Gray Primer 120	12.05	0.034	21.47	5.0%	0.0%	0.0%	1.0%	0.00%	5.00%
Touch-up Booth (EP-12)	*Lacquer Thinner 105	7.20	0.00036	21.47	14.5%	14.5%	11.6%	0.0%	5.80%	0.00%

Process ID	**Material	Density (lb/gal)	Max. Usage (gal/unit)	Maximum Throughput (unit/hour)	PTE of Xylene (tons/yr)	PTE of Toluene (tons/yr)	PTE of Methyl Isobutyl Ketone (tons/yr)	PTE of Ethyl benzene (tons/yr)	PTE of Hexane (tons/yr)	PTE of Pseudo Cumene (tons/yr)	Total Combined HAPs
Spray Booth #1 (EP-2)	Valspar Black Primer 130				0.00	0.00	0.00	0.00	0.00	10.12	10.12
Spray Booth #1 (EP-2)	Valspar Gray Primer 120		use above		9.63	0.00	0.00	1.93	0.00	9.63	21.19
Spray Booth #1 (EP-2)	*Lacquer Thinner 105				0.18	0.18	0.14	0.00	0.07	0.00	0.57
					9.81	**0.18**	**0.14**	**1.93**	**0.07**	**10.12**	**22.24**
Spray Booth #2 (EP-9)	Valspar Black Primer 130				0.00	0.00	0.00	0.00	0.00	35.16	35.16
Spray Booth #2 (EP-9)	Valspar Gray Primer 120		use above		33.47	0.00	0.00	6.69	0.00	33.47	73.63
Spray Booth #2 (EP-9)	*Lacquer Thinner 105				2.47	2.47	1.98	0.00	0.99	0.00	7.92
					35.94	**2.47**	**1.98**	**6.69**	**0.99**	**35.16**	**83.24**
Touch-up Booth (EP-12)	Valspar Black Primer 130				0.00	0.00	0.00	0.00	0.00	2.02	2.02
Touch-up Booth (EP-12)	Valspar Gray Primer 120		use above		1.93	0.00	0.00	0.39	0.00	1.93	4.24
Touch-up Booth (EP-12)	*Lacquer Thinner 105				0.04	0.04	0.03	0.00	0.01	0.00	0.11
					1.96	**0.04**	**0.03**	**0.39**	**0.01**	**2.02**	**4.45**
			Total Single Worst HAP from source		**47.71**	**2.69**	**2.15**	**9.01**	**1.07**	**47.31**	
			Total Combined HAPs from source		**109.93**						

SoftCoat SG-500B (black) and SG-500G (gray) do not contain any HAPs.
The Black A.D. Enamel 5-0444 contains no HAPs.

*Lacquer Thinner 105 HAPs were calculated in the previous renewal permit No. T011-20119-00037, issued on February 2, 2006. The source confirmed that this has not changed.

**New materials SoftCoat SG-500B (black) and SoftCoat SG-500G (gray) were added to the surface coating operations in August 2002, but emissions from these coatings were not included in the PTE calculations for first renewal T011-20199-00037, issued on February 2, 2006. Therefore, for the enforcement calculations and referral, the PTE from the first renewal T011-20199-00037 will be used as the baseline. In addition, Black A.D. Enamel was replaced by Valspar Black in August 2007. The source added Valspar Grey in June 2008. The source has requested to keep Black A.D. Enamel in the calculations in case they switch back to it in the future. Therefore, the PTE from surface coating after June 2008 includes emissions from SoftCoat SG-500B (black) and SoftCoat SG-500G (gray), Valspar Black and Valspar Gray.

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

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Indirect Heating Units

Company Name: **Hendrickson Trailer Suspension Systems**
Address City IN Zip: **180 Mount Zion Road, Lebanon, Indiana 46052**
Significant Source Modification: **011-29872-00037**
Renewal Permit Number: **T011-29188-00037**
Reviewer: **Sarah Conner, Ph. D.**
Date: **10/20/2010**

# of Emission Units	Emission Unit Description	Total Heat Input Capacity (MMBtu/hr)
4	Air Make-up Units	10.88
1	Air Make-up Unit	1.50
1	Air Make-up Unit	2.90
1	Clean/phosphate Heater	1.50

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
16.78	144.1

for all indirect heating units

	Pollutant						
	PM*	PM10*	PM2.5	SO_2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.137	0.548	0.548	0.043	7.206	0.396	6.053

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,020,000 Cubic Feet of Gas
NOx and CO Emission Factors are from AP 42, Chapter 1.4, Table 1.4-1
PM, SO_2, CO_2, N_2O and Methane Emission Factors are from AP 42, Chapter 1.4, Table 1.4-2
Global Warming Potentials are from 40 CFR Part 98, Subpart A, Table A-1
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
CO_2e emissions (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton x Global warming potential
See next page for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
HAPs Emissions
Indirect Heating Units

Company Name: **Hendrickson Trailer Suspension Systems**
Address City IN Zip: **180 Mount Zion Road, Lebanon, Indiana 46052**
Significant Source Modification: **011-29872-00037**
Renewal Permit Number: **T011-29188-00037**
Reviewer: **Sarah Conner, Ph. D.**
Date: **10/20/2010**

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.51E-04	8.65E-05	0.0054	0.1297	2.45E-04

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	Total
Potential Emission in tons/yr	3.60E-05	7.93E-05	1.01E-04	2.74E-05	1.51E-04	0.136

Methodology is the same as previous page.
Organic HAPs Emission Factors are from AP 42, Chapter 1.4, Table 1.4-3
Metal HAPs Emission Factors are from AP 42, Chapter 1.4, Table 1.4-4
The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4, Tables 1.4-3 and 1.4-4

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Direct Heating Units

Company Name: **Hendrickson Trailer Suspension Systems**
Address City IN Zip: **180 Mount Zion Road, Lebanon, Indiana 46052**
Significant Source Modification: **011-29872-00037**
Renewal Permit Number: **T011-29188-00037**
Reviewer: **Sarah Conner, Ph. D.**
Date: **10/20/2010**

# of Emission Units	Emission Unit Description	Total Heat Input Capacity (MMBtu/hr)
1	Slider Box Heater	1.30
1	Dry-off Oven	1.60
1	Bake Oven	2.80

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
5.70	49.0

for all direct heating units

	Pollutant						
	PM*	PM10*	PM2.5	SO_2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.047	0.186	0.186	0.015	2.448	0.135	2.056

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,020,000 Cubic Feet of Gas
NOx and CO Emission Factors are from AP 42, Chapter 1.4, Table 1.4-1
PM, SO_2, CO_2, N_2O and Methane Emission Factors are from AP 42, Chapter 1.4, Table 1.4-2
Global Warming Potentials are from 40 CFR Part 98, Subpart A, Table A-1
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
CO_2e emissions (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton x Global warming potential
See next page for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
HAPs Emissions
Direct Heating Units

Company Name: **Hendrickson Trailer Suspension Systems**
Address City IN Zip: **180 Mount Zion Road, Lebanon, Indiana 46052**
Significant Source Modification: **011-29872-00037**
Renewal Permit Number: **T011-29188-00037**
Reviewer: **Sarah Conner, Ph. D.**
Date: **10/20/2010**

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	5.14E-05	2.94E-05	0.0018	0.0441	8.32E-05

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	Total
Potential Emission in tons/yr	1.22E-05	2.69E-05	3.43E-05	9.30E-06	5.14E-05	0.046

Methodology is the same as previous page.
Organic HAPs Emission Factors are from AP 42, Chapter 1.4, Table 1.4-3
Metal HAPs Emission Factors are from AP 42, Chapter 1.4, Table 1.4-4
The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4, Tables 1.4-3 and 1.4-4

Appendix A: Emissions Calculations
Degreasing from the Gun Cleaning Station

Company Name: **Hendrickson Trailer Suspension Systems**
Address City IN Zip: **180 Mount Zion Road, Lebanon, Indiana 46052**
Significant Source Modification: **011-29872-00037**
Renewal Permit Number: **T011-29188-00037**
Reviewer: **Sarah Conner, Ph. D.**
Date: **10/20/2010**

Material	Maximum Usage (gallons/year)	Density (lbs/gal)	*Weight % VOC	VOC Emissions (tons/yr)
MeanGreen (6386)	145.00	8.70	10%	**0.06**

*Source provided the MSDS sheet for MeanGreen (6386). The only VOC listed on the MSDS sheet was 2-butoxyethanol with a weight percent ranging from 5 to 10%.

METHODOLOGY

VOC emission rate (tons/yr) = Material Usage (gal/year) * Density (lbs/gal) * 1 ton/2000 lbs * Weight % VOC

Appendix A: Emissions Calculations
LASER Cutter (EP-5) - Regulated Pollutants
Hendrickson Trailer Suspension Systems

Company Name: **Hendrickson Trailer Suspension Systems**
Address City IN Zip: **180 Mount Zion Road, Lebanon, Indiana 46052**
Significant Source Modification: **011-29872-00037**
Renewal Permit Number: **T011-29188-00037**
Reviewer: **Sarah Conner, Ph. D.**
Date: **10/20/2010**

POLLUTANTS - PM/PM_{10} and HAP's

Average Part Cut Duration	0.05	Hours/Part
Average Part Cut Duration	3	Minutes/Part
	8760	Hours Available in year
Number of Parts Potential/Yr	175,200	number of parts
(a) Maximum Potential Inches of Cut/Year	12,805,105	Inches/Year (machine capability)
(b) Maximum Potential Inches of Cut Per Steel Plate	4,000	Inches of Cut/Plate (Part Nest Capability)
(c) Kerf Width of Cut	0.01	Inches
(d) Average Steel Thickness	0.22	Inches
(e) Density of Steel	0.283	Lbs/In^3
(f) Maximum Amount of Steel Removed/Plate (b x c x d x e)	2.49	Lbs/Plate
(g) Amount of Steel Vaporized	25%	
(h) Maximum Amount of Steel Sheets Cut (a / b)	3,201	Number of Sheets Cut/Year
Volume of Steel Removed/Year ((h x f)) - (h x f x g)	5,979	Lbs
HAP Content		
Manganese	1.28%	By Weight

Equipment Efficiency (a)

Equipment	**Type**	**Efficiency**
Down Draft	Capture (CaE)	99%
Filter	PM Control (CoE)	99%

Calculation of Emission Rates

Pollutant	Maximum Potential Emission Rates tons/year	
	Controlled (tpy)	Uncontrolled (tpy)
PM/PM10/PM2.5	0.03	2.99
Manganese	0.0003827	0.04

Methodology

Parts/Year = 1 Part/0.05 Hours * 8760 Hours/Year

Inches/Year (machine capability) = Parts/Year * 73.0885 Inches/Part

Volume of Steel Removed/Year = ((Max amount of Steel Sheets Cut x Max amount of Steal Removed/Plate)) - (Max amount of Steel Sheets Cut x Max amount of Steal Removed/Plate x amount of Steel Vaporized)

Controlled PM/PM_{10} emission (tons/yr) = Volume of Steel Removed/Year x (1-Control Efficiency) / 2000 lbs/ton

Uncontrolled PM/PM_{10} emission (tons/yr) = Volume of Steel Removed/Year / 2000 lbs/ton

Uncontrolled Manganese emission (tons/yr) = Uncontrolled PM/PM_{10} x % by Weight Manganese

Controlled Manganese emission (tons/yr) = Controlled PM/PM_{10} x % by Weight Manganese

For 326 IAC 6-3-2 the Process Weight Rate is based on the part nesting of a maximum size and the maximum time it takes to cut the parts out of the sheet. The steel that the parts are nested on has a dimension of 144" x 41.75" x .25" and based on time studies, it takes 31.74 minutes to process this sheet of steel. The steel weights 425 lbs. Therefore in 1 hour, the source has the potential to cut 803.4 lbs of steel, which is equivalent to 0.4 tons of steel per hour.

Emissions Units	Maximum (lbs/hr) for each unit of that type	Maximum Process Weight (tons/hour)	326 IAC 6-3 Limit (lbs/hr)	Max PTE Particulate (lb/hour)
One (1) Laser Cutting Machine (EP-5)	803.40	0.402	2.225	0.683

(a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the laser cutting machine (EP-5) shall not exceed 2.2 pounds per hour when operating at a process weight rate of 803.4 pounds per hour.

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

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

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

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

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
from Lake-View Evaporator

Company Name: **Hendrickson Trailer Suspension Systems**
Address City IN Zip: **180 Mount Zion Road, Lebanon, Indiana 46052**
Significant Source Modification: **011-29872-00037**
Renewal Permit Number: **T011-29188-00037**
Reviewer: **Sarah Conner, Ph. D.**
Date: **10/20/2010**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
0.39	3.3

For emission unit Lake View Evaporator

	Pollutant						
	PM*	PM10*	PM2.5	SO_2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.003	0.013	0.013	0.001	0.167	0.009	0.141

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,020,000 Cubic Feet of Gas
NOx and CO Emission Factors are from AP 42, Chapter 1.4, Table 1.4-1
PM, SO_2, CO_2, N_2O and Methane Emission Factors are from AP 42, Chapter 1.4, Table 1.4-2
Global Warming Potentials are from 40 CFR Part 98, Subpart A, Table A-1
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
CO_2e emissions (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton x Global warming potential
See next page for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
HAPs Emissions
from Lake-View Evaporator

Company Name: **Hendrickson Trailer Suspension Systems**
Address City IN Zip: **180 Mount Zion Road, Lebanon, Indiana 46052**
Significant Source Modification: **011-29872-00037**
Renewal Permit Number: **T011-29188-00037**
Reviewer: **Sarah Conner, Ph. D.**
Date: **10/20/2010**

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	3.52E-06	2.01E-06	0.0001	0.003	5.69E-06

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	Total
Potential Emission in tons/yr	8.37E-07	1.84E-06	2.34E-06	6.36E-07	3.52E-06	0.003

Methodology is the same as previous page.
Organic HAPs Emission Factors are from AP 42, Chapter 1.4, Table 1.4-3
Metal HAPs Emission Factors are from AP 42, Chapter 1.4, Table 1.4-4
The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4, Tables 1.4-3 and 1.4-4

Appendix A: Emission Calculations
Particulate and HAP Emissions from Welding Operations

Company Name: **Hendrickson Trailer Suspension Systems**
Address City IN Zip: **180 Mount Zion Road, Lebanon, Indiana 46052**
Significant Source Modification: **011-29872-00037**
Renewal Permit Number: **T011-29188-00037**
Reviewer: **Sarah Conner, Ph. D.**
Date: **10/20/2010**

Type of Welder	# of Welding Stations	Electrode Usage Rate (lbs/hr/welder)	PM/PM10 Emisson Factor (lbs PM10/1,000 lbs electrode)	Manganese Emission Factor (lbs Mn/1,000 lbs electrode)	PTE of PM/PM10 Uncontrolled (lbs/hr)	PTE of PM/PM10 Uncontrolled (tons/yr)	PTE of Manganese Uncontrolled (tons/yr)	Control Effiicency (%)	*PTE of PM/PM10 Controlled (tons/yr)	PTE of Manganese Controlled (tons/yr)
Robotic	61	20	5.2	0.318	6.34	27.8	1.7	0%	27.8	1.70
Robotic	27	20	5.2	0.318	2.81	12.3	0.8	95%	0.61	0.04
Manual	5	10	5.2	0.318	0.26	1.14	0.07	95%	0.06	0.003
				Totals	**9.41**	**41.2**	**2.52**		**28.5**	**1.74**

Emissions from twenty-seven of the eighty-eight robotic welding stations and all five of the manual welding stations are controlled by three filter cartridge dust collectors. The filters have an efficiency of 95%.
*Assume all PM and PM 2.5 emissions are equal to PM10.
Emission factors are from AP 42, Chapter 12.19, Electric Arc Welding, Tables 12.19-1 and 12.19-2 (1/95).

Methodology
PTE PM/PM10/Mn Uncontrolled (tons/yr) = # of Welding Stations x Electrode Usage x Emission Factor (lbs/1,000 lbs electrode) x 8760 (hrs/yr) x 1 ton/2,000 lbs
PTE PM/PM10/Mn Controlled (tons/yr) = # of Welding Stations x Electrode Usage x Emission Factor (lbs/1,000 lbs electrode) x 8760 (hrs/yr) x 1 ton/2,000 lbs x (11 - Control Efficiency %)

Appendix A: Emission Calculations
Particulate and HAP Emissions from Welding Operations

Company Name: **Hendrickson Trailer Suspension Systems**
Address City IN Zip: **180 Mount Zion Road, Lebanon, Indiana 46052**
Significant Source Modification: **011-29872-00037**
Renewal Permit Number: **T011-29188-00037**
Reviewer: **Sarah Conner, Ph. D.**
Date: **10/20/2010**

	Type of Welder	# of Welding Stations	Electrode Usage Rate (lbs/hr/welder)	PM/PM10 Emisson Factor (lbs PM10/1,000 lbs electrode)	Manganese Emission Factor (lbs Mn/1,000 lbs electrode)	PTE of PM/PM10 Uncontrolled (lbs/hr)	PTE of PM/PM10 Uncontrolled (tons/yr)	PTE of Manganese Uncontrolled (tons/yr)	Control Effiicency (%)	*PTE of PM/PM10 Controlled (tons/yr)	PTE of Manganese Controlled (tons/yr)
EP-6A	Robotic	2	34.56	5.2	0.318	0.36	1.6	0.1	95%	0.1	0.00
	Manual	1	34.56	5.2	0.318	0.18	0.8	0.0	95%	0.0	0.00
EP-6B	Robotic	9	12.96	5.2	0.318	0.61	2.7	0.2	95%	0.1	0.01
	Manual	2	12.96	5.2	0.318	0.13	0.6	0.0	95%	0.0	0.00
EP-7	Robotic	10	15.60	5.2	0.318	0.81	3.6	0.2	95%	0.2	0.01
	Robotic	8	12.15	5.2	0.318	0.51	2.2	0.1	95%	0.1	0.01
EP-8A	Manual	1	0.17	5.2	0.318	0.00	0.0	0.0	95%	0.0	0.00
EP-8B	Robotic	4	15.60	5.2	0.318	0.32	1.4	0.1	95%	0.1	0.00
	Manual	2	2.42	5.2	0.318	0.03	0.1	0.0	95%	0.0	0.00
	Manual	4	7.34	5.2	0.318	0.15	0.7	0.0	95%	0.0	0.00
					Totals	**3.10**	**13.6**	**0.83**		**0.7**	**0.04**

Emissions from welding stations are controlled by filter cartridge dust collectors. The filters have an efficiency of 95%.
*Assume all PM and PM 2.5 emissions are equal to PM10.
Emission factors are from AP 42, Chapter 12.19, Electric Arc Welding, Tables 12.19-1 and 12.19-2 (1/95).

Methodology

PTE PM/PM10/Mn Uncontrolled (tons/yr) = # of Welding Stations x Electrode Usage x Emission Factor (lbs/1,000 lbs electrode) x 8760 (hrs/yr) x 1 ton/2,000 lbs

PTE PM/PM10/Mn Controlled (tons/yr) = # of Welding Stations x Electrode Usage x Emission Factor (lbs/1,000 lbs electrode) x 8760 (hrs/yr) x 1 ton/2,000 lbs x (11 - Control Efficiency %)

Appendix A: Emissions Calculations
Allowable Emissions Under 326 IAC 6-3-2

Company Name: Hendrickson Trailer Suspension Systems
Address City IN Zip: 180 Mount Zion Road, Lebanon, Indiana 46052
Significant Source Modification: 011-29872-00037
Renewal Permit Number: T011-29188-00037
Reviewer: Sarah Conner, Ph. D.
Date: 10/20/2010

Dust Collection system:

Emission unit	We have 5 collectors:	Operation Description	Number of Robots	Number of Manual Stations	MAX Units/hour	Lbs/Unit	Lbs of Electrode/Unit	Process Weight (lbs/hr)	Estimated Lbs of Electrode used/hr	Maximum Process Weight (tons/hour)	326 IAC 6-3 Limit (lbs/hr)	PM/PM10 Emisson Factor (lbs PM10/1,000 lbs electrode)	Max PTE Particulate (lb/hour)
EP-6A	iMaint: RoboVent Smoke Location: Outside/East Side Services: South Sub-rail & K-brace cells. Serial #: 19929 Capacity: 15,000 CFM Install date: February 2005	Sub-rail: Miller AutoAxcess 450 (x2); Robotic Tandem, L-56, .052" wire.	2		8	425	4.32	3435	34.56	1.72	5.89	5.20	0.18
		K-brace: Miller XMT 456 (x1); Manual Single, L-59, .045" wire.		1	8	425	4.32	3435	34.56	1.72	5.89	5.20	0.18
EP-6B	iMaint: Torit 002 Location: Outside/East Services: Final #1, Final #2 & Final #3 cells. Serial #: IG475403-001 Capacity: 22,000 CFM Install date: (was bought for Mitchell SD in 1998, don't know when we installed for finals)	Final #1: Miller AutoAxcess 450 (x2); Robotic Single, L-59, .045" wire.	1	2	3	425	4.32	1288	12.96	0.64	3.05	5.20	0.07
		Final #2: Miller AutoAxcess 450 (x4); Robotic Tandem, L-59, .045" wire.	4		3	425	4.32	1288	12.96	0.64	3.05	5.20	0.07
		Final #3: Miller AutoAxcess 450 (x4); Robotic Tandem, L-59, .045" wire.	4		3	425	4.32	1288	12.96	0.64	3.05	5.20	0.07
EP-7	iMaint: Torit 001 Location: Outside/North Services: 3 suspension welders & 7 beam robots. Serial #: IG374476-001 Capacity: 28,000 CFM Install date: in 1995	Suspension 451: Miller AutoAxcess 450 (x2); Robotic Single, L-59, .045" wire.	2		10	384	1.56	3856	15.60	1.93	6.36	5.20	0.08
		Suspension 680: Miller AutoAxcess 450 (x4); Robotic Tandem, L-59, .045" wire.	4		10	384	1.56	3856	15.60	1.93	6.36	5.20	0.08
		Suspension 1286: Cloos 503 (x4), Robotic Tandem, L-59, .045" wire.	4		10	384	1.56	3856	15.60	1.93	6.36	5.20	0.08
		All Beam robots (x7): Miller AutoAxcess 450; Robotic Single, L-59, .062" wire.	8		9	60	1.35	552	12.15	0.28	1.73	5.20	0.06
EP-8A	iMaint: Airflow Smoke Location: Inside/Suspension Repair Services: One Rework Station (suspension weld) Serial #: 1028209 Capacity: 1,200 CFM Install date: July 2007 (purchase date, was actually in place early 2008)	Hand Weld: Miller Maxitron 450; Manual Single, L-56, .045		1	0.125	60	1.35	8	0.17	0.00	0.10	5.20	0.00
EP-8B	NEW iMaint: Torit 003 Location: Outside/North Services: One suspension weld and hand weld stations Serial #: 3281771-1 Capacity: 24,000 CFM Install date: October 2010	One Robotic (4026): 4 Miller AutoAxcess, Tandem Torch, L-59, .045" wire.	4		10	384	1.56	3856	15.60	1.93	6.36	5.20	0.08
		6 Hand weld stations: Miller XMT 456, Manual Single, L-59, .045" wire.		2 hand weld Surelok	4.84	61.64	0.5	301	2.42	0.15	1.15	5.20	0.01
				4 handweld frame brackets	6.8	58.61	1.08	406	7.34	0.20	1.41	5.20	0.04
			33	10									

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

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

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

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

Pursuant to 326 IAC 6-3-2(e)(2), EP-8A shall not exceed five hundred fifty-one thousandths (0.551) pound per hour based on a process weight rate of less than 100 lbs/hour.

Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: Hendrickson Trailer Suspension Systems
Address City IN Zip: 180 Mount Zion Road, Lebanon, Indiana 46052
Significant Source Modification: 011-29872-00037
Renewal Permit Number: T011-29188-00037
Reviewer: Sarah Conner, Ph. D.
Date: 10/20/2010

Paved Roads at Industrial Site
The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (12/2003).

Vehicle Informtation (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	36.0	1.0	36.0	74.0	2664.0	1005	0.190	6.9	2501.1
Vehicle (leaving plant) (one-way trip)	36.0	1.0	36.0	74.0	2664.0	136	0.026	0.9	338.5
		Total	**72.0**		**5328.0**			**7.8**	**2839.5**

Average Vehicle Weight Per Trip = 74.0 tons/trip
Average Miles Per Trip = 0.11 miles/trip

Unmitigated Emission Factor, Ef = [k * (sL/2)^0.65 * (W/3)^1.5 - C] (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.082	0.016	0.0024	lb/mi = particle size multiplier (AP-42 Table 13.2.1-1)
W =	74.0	74.0	74.0	tons = average vehicle weight (provided by source)
C =	0.00047	0.00047	0.00036	lb/mi = emission factor for vehicle exhaust, brake wear, and tire wear (AP-42 Table 13.2.1-2)
sL =	0.6	0.6	0.6	g/m^2 = Ubitiguous Baseline Silt Loading Values of paved roads (Table 13.2.1-3 for summer months)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [1 - (p/4N)]
Mitigated Emission Factor, Eext = Ef * [1 - (p/4N)]
where p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	4.59	0.90	0.13	lb/mile
Mitigated Emission Factor, Eext =	4.20	0.82	0.12	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	5.74	1.12	0.17	5.25	1.02	0.15
Vehicle (leaving plant) (one-way trip)	0.78	0.15	0.02	0.71	0.14	0.02
	6.52	**1.27**	**0.19**	**5.96**	**1.16**	**0.17**

Methodology
Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip) / [5280 ft/mile]
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] * [1 - Dust Control Efficiency]

Abbreviations
PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particle Matter (<2.5 um)
PTE = Potential to Emit

Appendix A: Emissions Calculations Based on Purchasing
Summary

Company Name: **Hendrickson Trailer Suspension Systems**
Address City IN Zip: **180 Mount Zion Road, Lebanon, Indiana 46052**
Significant Source Modification: **011-29872-00037**
Renewal Permit Number: **T011-29188-00037**
Reviewer: **Sarah Conner, Ph. D.**
Date: **10/20/2010**

Actual PTE (tons/year) based on purchasing										
	Surface Coating Emission Units	PM/PM_{10}	VOC	Total HAPs	Xylene	Toluene	Methyl Isobutyl Ketone	Ethyl benzene	Hexane	Pseudo Cumene
Year 2006 (From Jan 1 to Dec 31)	EP-2, EP-9 and EP-12	57.15	102.58	2.30	0.72	0.72	0.57	0.00	0.29	0.00
2007 (From Jan 1 to Dec 31)	EP-2, EP-9 and EP-12	27.25	50.85	4.79	1.00	1.00	0.80	0.00	0.40	1.57
2008 (From Jan 1 to Dec 31)	EP-2, EP-9 and EP-12	26.76	44.40	6.48	0.54	0.53	0.42	0.00	0.21	4.77
2009 (From Jan 1 to Dec 31)	EP-2, EP-9 and EP-12	31.14	50.51	6.50	0.37	0.35	0.28	0.00	0.14	5.34
2010 (From Jan 1 to Date)	EP-2, EP-9 and EP-12	32.45	53.63	6.67	0.37	0.35	0.28	0.01	0.14	5.53

Appendix A: Emissions Calculations Based on Purchasing
VOC and Particulate Emissions from Surface Coating Operations

Company Name: Hendrickson Trailer Suspension Systems
Address City IN Zip: 180 Mount Zion Road, Lebanon, Indiana 46052
Significant Source Modification: 011-29872-00037
Renewal Permit Number: T011-29188-00037
Reviewer: Sarah Conner, Ph. D.
Date: 10/20/2010

Actual Emissions in 2006

Material	Density (lb/gal)	Weight % Volatile (H_20 & Organics)	Weight % Water (Non-volatile)	Weight % Organics	Weight % Solids	Amount Purchased (gallons/year)	Pounds VOC per Gallon of Coating	PTE of VOC (ton/yr)	Transfer Efficiency	PTE of PM/PM10 Uncontrolled (ton/yr)	Control Efficiency	PTE of PM/PM10 Controlled (ton/yr)
*Black A.D. Enamel	11.3	30.9%	0.00%	30.9%	69.1%	36423.00	3.49	63.6	70%	42.6	80%	8.51
SoftCoat SG-500B (black) and SG-500G (gray)	6.0	100.0%	55.00%	45.0%	65.0%	24941.00	2.70	33.7	70%	14.6	80%	2.92
**Sealant	9.90	9.0%	0.00%	9.0%	91.0%	910.00	0.89	0.4	100%	0.0	80%	0.00
*Lacquer Thinner 105	7.20	100%	0.00%	100%	0.00%	1375.00	7.20	5.0	70%	0.0	80%	0.00
						Actual Emission in 2006 (tons/year)	**Total**	**102.58**		**57.15**		**11.43**

Actual Emissions in 2007

Material	Density (lb/gal)	Weight % Volatile (H_20 & Organics)	Weight % Water (Non-volatile)	Weight % Organics	Weight % Solids	Amount Purchased (gallons/year)	Pounds VOC per Gallon of Coating	PTE of VOC (ton/yr)	Transfer Efficiency	PTE of PM/PM10 Uncontrolled (ton/yr)	Control Efficiency	PTE of PM/PM10 Controlled (ton/yr)
Valspar Black Primer 130	12.7	27.6%	0.00%	27.6%	72.4%	4960.8	3.49	8.7	70%	6.8	80%	1.36
*Black A.D. Enamel	11.3	30.9%	0.00%	30.9%	69.1%	12896.9	3.49	22.5	70%	15.1	80%	3.01
SoftCoat SG-500B (black) and SG-500G (gray)	6.0	100.0%	55.00%	45.0%	65.0%	9156.8	2.70	12.4	70%	5.4	80%	1.07
**Sealant	9.90	9.0%	0.00%	9.0%	91.0%	879.0	0.89	0.4	100%	0.0	80%	0.00
*Lacquer Thinner 105	7.20	100%	0.00%	100%	0.00%	1925.0	7.20	6.9	70%	0.0	80%	0.00
						Actual Emission in 2007 (tons/year)	**Total**	**50.85**		**27.25**		**5.45**

Actual Emissions in 2008

Material	Density (lb/gal)	Weight % Volatile (H_20 & Organics)	Weight % Water (Non-volatile)	Weight % Organics	Weight % Solids	Amount Purchased (gallons/year)	Pounds VOC per Gallon of Coating	PTE of VOC (ton/yr)	Transfer Efficiency	PTE of PM/PM10 Uncontrolled (ton/yr)	Control Efficiency	PTE of PM/PM10 Controlled (ton/yr)
Valspar Black Primer 130	12.7	27.6%	0.00%	27.6%	72.4%	15035.4	3.49	26.25	70%	20.68	80%	4.14
Valspar Gray Primer 120	12.1	32.4%	5.80%	26.6%	73.4%	28.2	3.21	0.05	70%	0.04	80%	0.01
*Black A.D. Enamel	11.3	30.9%	0.00%	30.9%	69.1%	0.0	3.49	0.00	70%	0.00	80%	0.00
SoftCoat SG-500B (black) and SG-500G (gray)	6.0	100.0%	55.00%	45.0%	65.0%	10330.0	2.70	13.95	70%	6.04	80%	1.21
**Sealant	9.90	9.0%	0.00%	9.0%	91.0%	1125.0	0.89	0.50	100%	0.00	80%	0.00
*Lacquer Thinner 105	7.20	100%	0.00%	100%	0.00%	1017.0	7.20	3.66	70%	0.00	80%	0.00
						Actual Emission in 2008 (tons/year)	**Total**	**44.40**		**26.76**		**5.35**

Actual Emissions in 2009

Material	Density (lb/gal)	Weight % Volatile (H_20 & Organics)	Weight % Water (Non-volatile)	Weight % Organics	Weight % Solids	Amount Purchased (gallons/year)	Pounds VOC per Gallon of Coating	PTE of VOC (ton/yr)	Transfer Efficiency	PTE of PM/PM10 Uncontrolled (ton/yr)	Control Efficiency	PTE of PM/PM10 Controlled (ton/yr)
Valspar Black Primer 130	12.7	27.6%	0.00%	27.6%	72.4%	16812.0	3.49	29.35	70%	23.12	80%	4.62
Valspar Gray Primer 120	12.1	32.4%	5.80%	26.6%	73.4%	65.9	3.21	0.11	70%	0.09	80%	0.02
*Black A.D. Enamel	11.3	30.9%	0.00%	30.9%	69.1%	0.0	3.49	0.00	70%	0.00	80%	0.00
SoftCoat SG-500B (black) and SG-500G (gray)	6.0	100.0%	55.00%	45.0%	65.0%	13551.4	2.70	18.29	70%	7.93	80%	1.59
**Sealant	9.90	9.0%	0.00%	9.0%	91.0%	723.0	0.89	0.32	100%	0.00	80%	0.00
*Lacquer Thinner 105	7.20	100%	0.00%	100%	0.00%	678.0	7.20	2.44	70%	0.00	80%	0.00
						Actual Emission in 2009 (tons/year)	**Total**	**50.51**		**31.14**		**6.23**

Actual Emissions in 2010

Material	Density (lb/gal)	Weight % Volatile (H_20 & Organics)	Weight % Water (Non-volatile)	Weight % Organics	Weight % Solids	Amount Purchased (gallons/year)	Pounds VOC per Gallon of Coating	PTE of VOC (ton/yr)	Transfer Efficiency	PTE of PM/PM10 Uncontrolled (ton/yr)	Control Efficiency	PTE of PM/PM10 Controlled (ton/yr)
Valspar Black Primer 130	12.7	27.6%	0.00%	27.6%	72.4%	17369.3	3.49	30.32	70%	23.89	80%	4.78
Valspar Gray Primer 120	12.1	32.4%	5.80%	26.6%	73.4%	92.1	3.21	0.15	70%	0.12	80%	0.02
*Black A.D. Enamel	11.3	30.9%	0.00%	30.9%	69.1%	0.0	3.49	0.00	70%	0.00	80%	0.00
SoftCoat SG-500B (black) and SG-500G (gray)	6.0	100.0%	55.00%	45.0%	65.0%	14422.9	2.70	19.47	70%	8.44	80%	1.69
**Sealant	9.90	9.0%	0.00%	9.0%	91.0%	2917.3	0.89	1.30	100%	0.00	80%	0.00
*Lacquer Thinner 105	7.20	100%	0.00%	100%	0.00%	664.2	7.20	2.39	70%	0.00	80%	0.00
						Actual Emission in 2010 (tons/year)	**Total**	**53.63**		**32.45**		**6.49**

*Black A.D. Enamel and Lacquer Thinner 105 were calculated in the previous renewal permit No. T011-20119-00037, issued on February 2, 2006. The source confirmed that these have not changed.

**Sealant is applied with caulking gun and transfer efficiency is 100 %.

Particulate emissions from the spray booths are controlled with dry filters.

Note: Valspar Black Primer 130, Valspar Grey Primer 120, Black A.D. Enamel and Softcoat Black SG-500B are all "single coatings". The source does not put on Valspar primer, then coat it with softcoat. It's either one or the other, not both on the product.

METHODOLOGY

Lbs VOC per gallon of coating (lbs/gal) = Density (lb/gal) x Weight % Organics
PTE VOC (tons/yr) = Density (lb/gal) x Weight % Organics x Amount Purchased (gal/yr) x 1 ton/2000 lbs
PTE PM/PM10 Uncontrolled (tons/yr) = Density (lb/gal) x Weight % Solids x Amount Purchased (gal/yr) x (1- Transfer Efficiency %) x 1 ton/2000 lbs
PTE PM/PM10 Controlled (tons/yr) = Density (lb/gal) x Weight % Solids x Amount Purchased (gal/yr) x (1- Transfer Efficiency %) x (1-Control Efficiency %) x 1 ton/2000 lbs

Appendix A: Emissions Calculations Based on Purchasing
HAP Emissions from Surface Coating Operations

Company Name: Hendrickson Trailer Suspension Systems
Address City IN Zip: 180 Mount Zion Road, Lebanon, Indiana 46052
Significant Source Modification: 011-29872-00037
Renewal Permit Number: T011-29188-00037
Reviewer: Sarah Conner, Ph. D.
Date: 10/20/2010

Actual Emissions in 2006

Material	Density (lb/gal)	Amount Purchased (gallons/year)	Weight % Xylene	Weight % Toluene	Weight % Methyl Isobutyl Ketone	Weight % Ethyl Benzene	Weight % Hexane	Weight % Pseudo Cumene
Lacquer Thinner 105	7.20	1375.0	14.5%	14.5%	11.6%	0.0%	5.80%	0.00%

Material	Density (lb/gal)	Amount Purchased (gallons/year)	PTE of Xylene (tons/yr)	PTE of Toluene (tons/yr)	PTE of Methyl Isobutyl Ketone (tons/yr)	PTE of Ethyl benzene (tons/yr)	PTE of Hexane (tons/yr)	PTE of Pseudo Cumene (tons/yr)	Total Combined HAPs
Lacquer Thinner 105	7.20	1375.00	0.72	0.72	0.57	0.00	0.29	0.00	**2.30**
	Actual Single HAP in 2006		**0.72**	**0.72**	**0.57**	**0.00**	**0.29**	**0.00**	
	Actual Total HAPs in 2006		**2.30**						

Actual Emissions in 2007

Material	Density (lb/gal)	Amount Purchased (gallons/year)	Weight % Xylene	Weight % Toluene	Weight % Methyl Isobutyl Ketone	Weight % Ethyl Benzene	Weight % Hexane	Weight % Pseudo Cumene
Valspar Black Primer 130	12.66	4960.80	0.0%	0.0%	0.0%	0.0%	0.00%	5.00%
Lacquer Thinner 105	7.20	1925.0	14.5%	14.5%	11.6%	0.0%	5.80%	0.00%

Material	Density (lb/gal)	Amount Purchased (gallons/year)	PTE of Xylene (tons/yr)	PTE of Toluene (tons/yr)	PTE of Methyl Isobutyl Ketone (tons/yr)	PTE of Ethyl benzene (tons/yr)	PTE of Hexane (tons/yr)	PTE of Pseudo Cumene (tons/yr)	Total Combined HAPs
Valspar Black Primer 130	12.66	4960.80	0.00	0.00	0.00	0.00	0.00	1.57	**1.57**
Lacquer Thinner 105	7.20	1925.00	1.00	1.00	0.80	0.00	0.40	0.00	**3.22**
	Actual Single HAP in 2007		**1.00**	**1.00**	**0.80**	**0.00**	**0.40**	**1.57**	**4.79**
	Actual Total HAPs in 2007		**4.79**						

Actual Emissions in 2008

Material	Density (lb/gal)	Amount Purchased (gallons/year)	Weight % Xylene	Weight % Toluene	Weight % Methyl Isobutyl Ketone	Weight % Ethyl Benzene	Weight % Hexane	Weight % Pseudo Cumene
Valspar Black Primer 130	12.66	15035.40	0.0%	0.0%	0.0%	0.0%	0.00%	5.00%
Valspar Gray Primer 120	12.05	28.20	5.0%	0.0%	0.0%	1.0%	0.00%	5.00%
Lacquer Thinner 105	7.20	1017.0	14.5%	14.5%	11.6%	0.0%	5.80%	0.00%

Material	Density (lb/gal)	Amount Purchased (gallons/year)	PTE of Xylene (tons/yr)	PTE of Toluene (tons/yr)	PTE of Methyl Isobutyl Ketone (tons/yr)	PTE of Ethyl benzene (tons/yr)	PTE of Hexane (tons/yr)	PTE of Pseudo Cumene (tons/yr)	Total Combined HAPs
Valspar Black Primer 130	12.66	15035.40	0.00	0.00	0.00	0.00	0.00	4.76	**4.76**
Valspar Gray Primer 120	12.05	28.20	0.01	0.00	0.00	0.00	0.00	0.01	**0.02**
Lacquer Thinner 105	7.20	1017.00	0.53	0.53	0.42	0.00	0.21	0.00	**1.70**
	Actual Single HAP in 2008		**0.54**	**0.53**	**0.42**	**0.00**	**0.21**	**4.77**	**6.48**
	Actual Total HAPs in 2008		**6.48**						

Notes:
SoftCoat SG-500B (black) and SG-500G (gray) do not contain any HAPs.
The Black A.D. Enamel 5-0444 does not contain any HAPs.
Lacquer Thinner 105 HAPs were calculated in the previous renewal permit No. T011-20119-00037, issued on February 2, 2006. The source confirmed that this has not changed.

METHODOLOGY
PTE of HAPS (tons/yr) = Density (lb/gal) x Amount Purchased (gal/yr) x Weight % HAP x 1 ton/2000 lbs

Appendix A: Emissions Calculations Based on Purchasing
HAP Emissions from Surface Coating Operations

Company Name: Hendrickson Trailer Suspension Systems
Address City IN Zip: 180 Mount Zion Road, Lebanon, Indiana 46052
Significant Source Modification: 011-29872-00037
Renewal Permit Number: T011-29188-00037
Reviewer: Sarah Conner, Ph. D.
Date: 10/20/2010

Actual Emissions in 2009

Material	Density (lb/gal)	Amount Purchased (gallons/year)	Weight % Xylene	Weight % Toluene	Weight % Methyl Isobutyl Ketone	Weight % Ethyl Benzene	Weight % Hexane	Weight % Pseudo Cumene
Valspar Black Primer 130	12.66	16812.00	0.0%	0.0%	0.0%	0.0%	0.00%	5.00%
Valspar Gray Primer 120	12.05	65.90	5.0%	0.0%	0.0%	1.0%	0.00%	5.00%
Lacquer Thinner 105	7.20	678.0	14.5%	14.5%	11.6%	0.0%	5.80%	0.00%

Material	Density (lb/gal)	Amount Purchased (gallons/year)	PTE of Xylene (tons/yr)	PTE of Toluene (tons/yr)	PTE of Methyl Isobutyl Ketone (tons/yr)	PTE of Ethyl benzene (tons/yr)	PTE of Hexane (tons/yr)	PTE of Pseudo Cumene (tons/yr)	Total Combined HAPs
Valspar Black Primer 130	12.66	16812.00	0.00	0.00	0.00	0.00	0.00	5.32	**5.32**
Valspar Gray Primer 120	12.05	65.90	0.02	0.00	0.00	0.00	0.00	0.02	**0.04**
Lacquer Thinner 105	7.20	678.00	0.35	0.35	0.28	0.00	0.14	0.00	**1.13**
	Actual Single HAP in 2009		**0.37**	**0.35**	**0.28**	**0.00**	**0.14**	**5.34**	**6.50**
	Actual Total HAPs in 2009		**6.50**						

Actual Emissions in 2010

Material	Density (lb/gal)	Amount Purchased (gallons/year)	Weight % Xylene	Weight % Toluene	Weight % Methyl Isobutyl Ketone	Weight % Ethyl Benzene	Weight % Hexane	Weight % Pseudo Cumene
Valspar Black Primer 130	12.66	17369.33	0.0%	0.0%	0.0%	0.0%	0.00%	5.00%
Valspar Gray Primer 120	12.05	92.10	5.0%	0.0%	0.0%	1.0%	0.00%	5.00%
Lacquer Thinner 105	7.20	664.2	14.5%	14.5%	11.6%	0.0%	5.80%	0.00%

Material	Density (lb/gal)	Amount Purchased (gallons/year)	PTE of Xylene (tons/yr)	PTE of Toluene (tons/yr)	PTE of Methyl Isobutyl Ketone (tons/yr)	PTE of Ethyl benzene (tons/yr)	PTE of Hexane (tons/yr)	PTE of Pseudo Cumene (tons/yr)	Total Combined HAPs
Valspar Black Primer 130	12.66	17369.33	0.00	0.00	0.00	0.00	0.00	5.50	**5.50**
Valspar Gray Primer 120	12.05	92.10	0.03	0.00	0.00	0.01	0.00	0.03	**0.06**
Lacquer Thinner 105	7.20	664.20	0.35	0.35	0.28	0.00	0.14	0.00	**1.11**
	Actual Single HAP in 2010		**0.37**	**0.35**	**0.28**	**0.01**	**0.14**	**5.53**	**6.67**
	Actual Total HAPs in 2010		**6.67**						

Notes:
SoftCoat SG-500B (black) and SG-500G (gray) do not contain any HAPs.
The Black A.D. Enamel 5-0444 does not contain any HAPs.
Lacquer Thinner 105 HAPs were calculated in the previous renewal permit No. T011-20119-00037, issued on February 2, 2006.
The source confirmed that this has not changed.

METHODOLOGY
PTE of HAPS (tons/yr) = Density (lb/gal) x Amount Purchased (gal/yr) x Weight % HAP x 1 ton/2000 lbs

Appendix A: Purchase Records

Company Name: Hendrickson Trailer Suspension Systems
Address City IN Zip: 180 Mount Zion Road, Lebanon, Indiana 46052
Significant Source Modification: 011-29872-00037
Renewal Permit Number: T011-29188-00037
Reviewer: Sarah Conner, Ph. D.
Date: 10/20/2010

Year	Material	Amount purchased in (gallons/year)
2006 (From Jan 1 to Dec 31)	Valspar Black Primer 130	0.0
	Valspar Gray Primer 120	0.0
	*Black A.D. Enamel	36423.0
	SoftCoat Gray	0.0
	SoftCoat Black SG-500B	24941.0
	Sealant	910.00
	Lacquer Thinner 105	1375.00

Year	Material	Amount purchased in (gallons/year)
2007 (From Jan 1 to Dec 31)	Valspar Black Primer 130	4960.8
	Valspar Gray Primer 120	0.0
	*Black A.D. Enamel	12896.9
	SoftCoat Gray	13.7
	SoftCoat Black SG-500B	9143.1
	Sealant	879.00
	Lacquer Thinner 105	1925.00

Year	Material	Amount purchased in (gallons/year)
2008 (From Jan 1 to Dec 31)	Valspar Black Primer 130	15035.4
	Valspar Gray Primer 120	28.2
	*Black A.D. Enamel	0.0
	SoftCoat Gray	1352.7
	SoftCoat Black SG-500B	8977.3
	Sealant	1125.00
	Lacquer Thinner 105	1017.00

Year	Material	Amount purchased in (gallons/year)
2009 (From Jan 1 to Dec 31)	Valspar Black Primer 130	16812.0
	Valspar Gray Primer 120	65.9
	*Black A.D. Enamel	0.0
	SoftCoat Gray	1912.9
	SoftCoat Black SG-500B	11638.5
	Sealant	723.00
	Lacquer Thinner 105	678.00

Year	Material	Amount purchased in (gallons/year)
2010 (From Jan 1 to Oct 20)	Valspar Black Primer 130	17369.3
	Valspar Gray Primer 120	92.1
	*Black A.D. Enamel	0.0
	SoftCoat Gray	2373.1
	SoftCoat Black SG-500B	12049.8
	Sealant	2917.32
	Lacquer Thinner 105	664.20

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: Frank Hezoucky
Hendrickson Trailer Suspension Systems
2070 Industrial Place SE
Canton, OH 44707

DATE: February 8, 2011

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

SUBJECT: Final Decision
Significant Source Modification
011-29872-00037

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:
Dave Arnold – Plant Manager
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07

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

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

February 8, 2011

TO: Lebanon Public Library

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

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

Applicant Name: Hendrickson Trailer Suspension Systems
Permit Number: 011-29872-00037

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

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

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	GHOTOPP 2/8/2011 Hendrickson Trailer Suspension Systems 011-29872-00037 Final			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		Frank Hezoucky Hendrickson Trailer Suspension Systems 2070 Industrial Place SE Canton OH 44707 (Source CAATS) via confirmed delivery									
2		Dave Arnold Plant Mgr Hendrickson Trailer Suspension Systems 180 Mount Zion Rd Lebanon IN 46052 *(RO CAATS)*									
3		Boone County Commisioners Courthouse Square Lebanon IN 46052 *(Local Official)*									
4		Boone County Health Department 116 W Washington St. #B202 Lebanon IN 46052-2174 *(Health Department)*									
5		Daryl & Lois Hoffman 7750 N. CR 75 E Lizton IN 46149 *(Affected Party)*									
6		Lebanon Public Library 104 E Washington St Lebanon IN 46052-2298 *(Library)*									
7		Lebanon City Council and Mayors Office 201 E. Main St. Lebanon IN 46052 *(Local Official)*									
8											
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14											
15											

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