



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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

TO: Interested Parties / Applicant

DATE: July 1, 2011

RE: Ficosa North America Corporation / 001-30158-00023

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

## Notice of Decision: Approval – Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) 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.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency  
401 M Street  
Washington, D.C. 20406

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.



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## Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**Ficosa North America Corporation  
917 Liechty Road and 725 Parr Road,  
Berne, Indiana 46711**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 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.

Operation Permit No.: T001-30158-00023	
Issued by:  Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: July 1, 2011 Expiration Date: July 1, 2016

## TABLE OF CONTENTS

### A. SOURCE SUMMARY

- A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]  
[326 IAC 2-7-5(15)]
- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
- A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

### B. GENERAL CONDITIONS

- B.1 Definitions [326 IAC 2-7-1]
- B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)]  
[IC 13-15-3-6(a)]
- B.3 Term of Conditions [326 IAC 2-1.1-9.5]
- B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]
- B.5 Severability [326 IAC 2-7-5(5)]
- B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
- B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]
- B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]
- B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]
- B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]
- B.11 Emergency Provisions [326 IAC 2-7-16]
- B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]
- B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]
- B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]
- B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]
- B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]
- B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]
- B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]  
[326 IAC 2-7-12(b)(2)]
- B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]
- B.20 Source Modification Requirement [326 IAC 2-7-10.5]
- B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]
- B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]
- B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]
- B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

### C. SOURCE OPERATION CONDITIONS

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

- C.1 Particulate Emission Limitations For Processes with Process Weight Rates  
Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]
- C.2 Opacity [326 IAC 5-1]
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
- C.6 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]
- C.7 Stack Height [326 IAC 1-7]
- C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

**Testing Requirements [326 IAC 2-7-6(1)]**

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

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

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

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

- C.11 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]
- C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)]  
[326 IAC 2-7-6(1)]

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

- C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]
- C.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]
- C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

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

- C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)]  
[326 IAC 2-6]
- C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
- C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

**Stratospheric Ozone Protection**

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

**D.1. EMISSIONS UNIT OPERATION CONDITIONS**

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

- D.1.1 Hazardous Air Pollutants (HAPs) Limitations [326 IAC 20-1]
- D.1.2 Best Available Control Technology (BACT) [326 IAC 8-1-6]
- D.1.3 PSD Minor Limit [326 IAC 2-2]
- D.1.4 VOC Limit for Metal Parts Coating [326 IAC 8-2-1]
- D.1.5 Volatile Organic Compounds (VOCs) [326 IAC 8-1-1]
- D.1.6 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]
- D.1.7 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]
- D.1.8 Particulate [326 IAC 6-3-2(d)]
- D.1.9 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

- D.1.10 Testing Requirements [326 IAC 2-7-6(1),(6)]
- D.1.11 Volatile Organic Compounds (VOC)
- D.1.12 Hazardous Air Pollutants (HAPs) [326 IAC 8-1-4][326 IAC 8-1-2(a)]

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

- D.1.13 Monitoring [40 CFR Part 64]
- D.1.14 Parametric Monitoring [40 CFR Part 64]

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

- D.1.15 Record Keeping Requirements
- D.1.16 Reporting Requirements

## **D.2. EMISSIONS UNIT OPERATION CONDITIONS**

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

- D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]
- D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]
- D.2.3 Particulate Emissions [326 IAC 6-3-2(c)]

Certification  
Emergency Occurrence Report  
Quarterly Report  
Quarterly Deviation and Compliance Monitoring Report

## 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)]

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The Permittee owns and operates a stationary molded plastic parts spray painting operation.

Source Address:	917 Liechty Road, Berne, Indiana 46711 and 725 Parr Road, Berne, Indiana 46711
General Source Phone Number:	(260) 589 7206
SIC Code:	3089
County Location:	Adams
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

#### **917 Liechty Road, Berne, Indiana 46711 (Plant 1)**

- (a) Two (2) prime coating booths used to coat plastic and metal parts, identified as EU-001 and EU-002, with a maximum capacity of 25.4 and 38 gallons of primer per hour, using water wash system CE-001 as particulate matter (PM) control and a natural gas 5.0 million British thermal units per hour (MMBtu/hr) thermal oxidizer CE-003 as volatile organic compound (VOC) control on the prime bake oven, and exhausting to stacks SV-007 and SV-008, and SV-009 and SV-010, respectively. These booths were constructed in 1987.
- (b) Three (3) base coating booths used to coat plastic and metal parts, identified as EU-003, EU-004, and EU-005, with a maximum capacity of 25.4, 38, and 25.4 gallons of base coating per hour, using water wash system CE-001 as PM control, and exhausting to stacks SV-013 and SV-014, and SV-015 and SV-016, and SV-017 and SV-018, respectively. These booths were constructed in 1987.
- (c) Two (2) clear coating booths used to coat plastic and metal parts, identified as EU-006 and EU-007, with a maximum capacity of 25.4 and 38 gallons of clear coat per hour, respectively, using water wash system CE-001 as PM control, and exhausting to stacks SV-019 and SV-020, and SV-021 and SV-022, respectively. These booths were constructed in 1987.
- (d) One (1) quality control booth used to coat plastic and metal parts, identified as EU-010, with a maximum capacity of 6.34 gallons of paint per hour, using dry panel filter CE-002 as PM control, and exhausting to stack SV-024. This unit was constructed in 1987.

- (e) One (1) mix room cleaning table, identified as EU-015, using no control, and exhausting to stack SV-025. This unit was constructed in 1987.

**725 Parr Road, Berne, Indiana 46711 (Plant 2)**

- (f) One (1) service booth, located in Plant 2, used to coat plastic and metal parts, identified as EU-016, with a maximum capacity of 8.4 gallons of coating per hour using dry panel filter CE-004 as PM control, and exhausting to stack SV-027. This unit was constructed in 2003.

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

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

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-5]
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; polymer sanding operations with particulate less than 25 lbs/day; and woodworking operations. [326 IAC 6-3]
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (d) Any unit emitting greater than 1 pound per day but less than 5 pounds per day or one ton per year of a single HAP; greater than 1 pound per day less than 12.5 pounds per day or 2.5 tons per year of any combination of HAPs; and VOC emissions less than 3 pounds per hour and 15 pounds per day. [326 IAC 20-1]
- (e) Mold release agents using low volatile products (vapor pressure less than or equal to two (2) kilopascals measured at 38 degrees C). [326 IAC 2-2][326 IAC 20-1]

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

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

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

## SECTION B GENERAL CONDITIONS

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

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

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

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- (a) This permit, T001-30158-00023, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

### B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

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

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

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

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

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

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

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

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

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- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

- (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(34), and
  - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
  - (c) A "responsible official" is defined at 326 IAC 2-7-1(34).

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

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

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

and

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

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

The submittal by the Permittee does require 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).

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

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- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP extension notification does not require 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).

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The

PMPs and their submittal do not 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).

- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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

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

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

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

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

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

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

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require 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).

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

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

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

- (a) All terms and conditions of permits established prior to T001-30158-00023 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or

anticipated noncompliance does not stay any condition of this permit.

[326 IAC 2-7-5(6)(C)] The notification by the Permittee does require 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).

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

**B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require 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).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
  - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes

final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

**B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]**

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(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application does 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).

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

**B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]**

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

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

**B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]**

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

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

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

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

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

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require 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).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.20 Source Modification Requirement [326 IAC 2-7-10.5]**

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

**B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]**

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Any such application does 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).

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

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

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

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

**C.2 Opacity [326 IAC 5-1]**

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

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

**C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]**

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

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

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

**C.5 Fugitive Dust Emissions [326 IAC 6-4]**

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

**C.6 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]**

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the attached plan as in Attachment A. The provisions of 326 IAC 6-5 are not federally enforceable.

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

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

### **Testing Requirements [326 IAC 2-7-6(1)]**

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

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- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require 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).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require 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).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

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

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

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

#### **C.11 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]**

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Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

The notification which shall be submitted by the Permittee does require 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).

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

**C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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

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

**C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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

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

**C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]**

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

**C.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]**

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Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

- (1) initial inspection and evaluation;
  - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system);  
or
  - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
- (1) monitoring results;
  - (2) review of operation and maintenance procedures and records; and/or
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

**C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require 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).

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

**C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

The emission statement does require 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).

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

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

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include 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). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

### **Stratospheric Ozone Protection**

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

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

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

#### 917 Liechty Road, Berne, Indiana 46711 (Plant 1)

- (a) Two (2) prime coating booths used to coat plastic and metal parts, identified as EU-001 and EU-002, with a maximum capacity of 25.4 and 38 gallons of primer per hour, using water wash system CE-001 as particulate matter (PM) control and a natural gas 5.0 million British thermal units per hour (MMBtu/hr) thermal oxidizer CE-003 as volatile organic compound (VOC) control on the prime bake oven, and exhausting to stacks SV-007 and SV-008, and SV-009 and SV-010, respectively. These booths were constructed in 1987.
- (b) Three (3) base coating booths used to coat plastic and metal parts, identified as EU-003, EU-004, and EU-005, with a maximum capacity of 25.4, 38, and 25.4 gallons of base coating per hour, using water wash system CE-001 as PM control, and exhausting to stacks SV-013 and SV-014, and SV-015 and SV-016, and SV-017 and SV-018, respectively. These booths were constructed in 1987.
- (c) Two (2) clear coating booths used to coat plastic and metal parts, identified as EU-006 and EU-007, with a maximum capacity of 25.4 and 38 gallons of clear coat per hour, respectively, using water wash system CE-001 as PM control, and exhausting to stacks SV-019 and SV-020, and SV-021 and SV-022, respectively. These booths were constructed in 1987.
- (d) One (1) quality control booth used to coat plastic and metal parts, identified as EU-010, with a maximum capacity of 6.34 gallons of paint per hour, using dry panel filter CE-002 as PM control, and exhausting to stack SV-024. This unit was constructed in 1987.
- (e) One (1) mix room cleaning table, identified as EU-015, using no control, and exhausting to stack SV-025. This unit was constructed in 1987.

#### (f) 725 Parr Road, Berne, Indiana 46711 (Plant 2)

- One (1) service booth, located in Plant 2, used to coat plastic and metal parts, identified as EU-016, with a maximum capacity of 8.4 gallons of coating per hour using dry panel filter CE-004 as PM control, and exhausting to stack SV-027. This unit was constructed in 2003.
- (g) Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)]
  - (1) Mold release agents using low volatile products (vapor pressure less than or equal to two (2) kilopascals measured at 38 degrees C).[326 IAC 2-2][326 IAC 20-1]

(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.1.1 Hazardous Air Pollutants (HAPs) Limitations [326 IAC 20-1]

- (a) The total usage of each individual HAP at all emission units at the source, including EU-001 through EU-007, EU-010, EU-015, EU-016, all insignificant activities, and mold release agents minus the amount of HAP in the solvent material shipped offsite for recovery shall be limited to less than ten (10) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

- (b) The total usage of the combination of all HAPs at the source, including EU-001 through EU-007, EU-010, EU-015, EU-016, insignificant activities, and mold release agents minus the amount of HAP in the solvent material shipped offsite for recovery shall be limited to less than twenty-four (24) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) Collected solvent materials shall be retained in closed containers until shipped offsite for recycling or disposal.

Compliance with the single and combination HAP usage limits in D.1.1(a) and (b), in conjunction with single and combination HAP emissions from all other emission units including insignificant activities, shall ensure that the source-wide emissions are less than ten (10) tons of a single HAP and less than twenty-five (25) tons of a combination of HAPs per twelve (12) consecutive month period, respectively.

#### D.1.2 Best Available Control Technology (BACT) [326 IAC 8-1-6]

Pursuant to BACT from the Construction Permit 001-2662-00030, issued on April 12, 1993, the coating operations identified as EU-001, EU-002, EU-003, EU-004, EU-005, EU-006, EU-007, and EU-010 have the following requirements:

- (a) The application method for primer shall be high volume low pressure (HVLP).
- (b) The VOC content of coatings shall be limited as follows:
  - (1) Primer VOC content shall not exceed 6.0 pounds per gallon,
  - (2) Basecoat VOC content shall not exceed 6.34 pounds per gallon,
  - (3) Clearcoat VOC content shall not exceed 4.8 pounds per gallon.

#### D.1.3 PSD Minor Limit [326 IAC 2-2]

Pursuant to CP 001-2662-00030, issued on April 12, 1993, the VOC input (including coatings, dilution solvents, and cleaning solvents) to the surface coating facilities shall be less than 248 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

The VOC input shall be calculated as follows:

$(\text{Input VOC to basecoat}) + (\text{Input VOC to clearcoat}) + (\text{VOC from solvent usage}) + \{(\text{VOC input to primer when control is operating}) * (100\% - (\% \text{ Efficiency}))\} + (\text{VOC input to primer when control is not operating})$

% Efficiency shall equal 22.5% or the value determined in the most recent stack test.

Where EF is the overall control efficiency of the thermal oxidizer CE-003.

#### D.1.4 VOC Limit for Metal Parts Coating [326 IAC 8-2-1]

The input VOC from metal parts adhesive coating to EU-001, EU-002, EU-003, EU-004, EU-005, EU-006, EU-007, and EU-010 shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period for each booth with compliance demonstrated at the end of each month, therefore 326 IAC 8-2-9 will not apply.

D.1.5 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The VOC input when coating plastic parts to the service booth EU-016 shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

D.1.6 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating), the service booth (EU-016) when coating metal parts shall not allow the discharge into the atmosphere of VOC in excess of for clear coats four and three-tenths (4.3), for air dried or forced warm air dried coatings three and five-tenths (3.5), for extreme performance coatings three and five-tenths (3.5), and for all other coatings three (3.0) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.

D.1.7 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), the service booth (EU-016) shall comply with the following:

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

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications. The control devices for particulate control shall be in operation and control emissions from the surface coating operating at all times the surface coating is in operation.

D.1.9 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 all 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.1.10 Testing Requirements [326 IAC 2-7-6(1),(6)]

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If the Permittee elects to use the thermal oxidizer (identified as CE-01) to comply with the VOC limit in Condition D.1.3, the Permittee shall perform stack testing to determine the overall VOC reduction efficiency of the primer coating line (EU-001 and EU-002) with its thermal oxidizer, using methods approved by the Commissioner. The stack tests shall be performed within 90 days of commencing operation of the thermal oxidizer and shall be repeated at least once every five (5) years. The overall control efficiency from the most recent stack tests shall be used for the calculations required in Condition D.1.3.

### D.1.11 Volatile Organic Compounds (VOC)

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Compliance with the VOC content and usage limitations contained in Conditions D.1.2, D.1.3, D.1.4, and D.1.5 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" or "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.1.12 Hazardous Air Pollutants (HAPs) [326 IAC 8-1-4][326 IAC 8-1-2(a)]

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- (a) Compliance with the HAP usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" Material Safety 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.
- (b) Pursuant to 326 IAC 8-1-2(a), the Permittee shall perform an analysis of the solvent materials shipped offsite for recovery once (1) per shipment to determine single and/or combined HAP content of this material when claiming credit for HAP shipped offsite in order to demonstrate compliance with D.1.1.

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

### D.1.13 Monitoring [40 CFR Part 64]

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- (a) Particulate Matter:
  - (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters and water flow to the water wash. To monitor the performance of the dry filters and water wash, weekly observations shall be made of the overspray from the surface coating booth stacks, SV-007, SV-008, SV-009, SV-010, SV-013, SV-014, SV-015, SV-016, SV-017, SV-018, SV-019, SV-020, SV-021, SV-022, SV-024, and SV-027, 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. 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 reasonable response steps shall be considered a deviation from this permit.
  - (2) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Response to Excursions or Exceedances for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. If a condition exists which should result in a response step the Permittee shall take reasonable response. 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 reasonable response steps shall be considered a deviation from this permit.

- (3) Daily inspections shall be performed to verify that the water level in the water wash meets the manufacturer's recommended level. To monitor the performance of the water flow, visual inspections of the water curtain shall be made weekly to identify any gaps or other disruptions in water flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water sheet. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. If a condition exists which should result in a response step the Permittee shall take reasonable response. 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 reasonable response steps shall be considered a deviation from this permit.

(b) Volatile Organic Compounds:

- (1) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature if the thermal oxidizer is operated. The output of this system shall be recorded as a three-hour average. From the date of issuance of this permit until the approved stack test results are available; the Permittee shall take reasonable response steps whenever the three-hour average temperature of the thermal oxidizer is below 1400°F. A three-hour average temperature that is below 1400°F is not a deviation from this permit. 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 reasonable response steps shall be considered a deviation from this permit.
- (2) The Permittee shall determine the three-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.1.3, as approved by IDEM if the thermal oxidizer is operated.
- (3) On and after the date the approved stack test results are available, the Permittee shall take reasonable response steps whenever the three-hour average temperature of the thermal oxidizer is below the three-hour average temperature as observed during the compliant stack test. A three-hour average temperature that is below the three-hour average temperature as observed during the compliant stack test is not a deviation from this permit. 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.

D.1.14 Parametric Monitoring [40 CFR Part 64]

- (a) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.3, as approved by IDEM if the thermal oxidizer is operated.
- (b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit.

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.1.15 Record Keeping Requirements**

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- (a) To document the compliance status with Conditions D.1.2, D.1.3, D.1.4, D.1.6, D.1.13(b) and D.1.14, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.2, D.1.3, D.1.4, D.1.5, and D.1.6.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
  - (6) The continuous temperature records (on a three-hour average basis) for the thermal oxidizer when the thermal oxidizer is operated and the three-hour average temperature used to demonstrate compliance during the most recent compliance stack test. To document the compliance status with Condition D.1.4, the Permittee shall record the dates and times, on an hourly basis, of all periods of startup and shutdown of the thermal oxidizer, identified as CE-003 when the thermal oxidizer is operated.
  - (7) Daily records of the duct pressure or fan amperage when the thermal oxidizer is operated.
- (b) To document the compliance status with Condition D.1.13(a), the Permittee shall maintain weekly observations of the water level for the water curtains, a log of weekly overspray observations, and daily and monthly inspections.
- (c) To document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with one (1) through six (6) below. Records maintained for one (1) through six (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits and the HAP emission limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.
- (1) The HAPs content of each coating material and solvent used including clean-up solvents.
  - (2) The amount of coating material and solvent used on a monthly basis.

- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The amount and HAP content of the solvent material shipped offsite for recovery for single and combined HAP.
  - (4) The calculated monthly single and combined HAP recovered from solvent material shipped offsite for recovery.
  - (5) The total single and combined HAPs usage for each month; and
  - (6) The source-wide single and combined HAPS emitted for each compliance period.
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

#### D.1.16 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1, D.1.3, D.1.4, and D.1.5 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does 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

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations [326 IAC 6-3].

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

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

#### D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control) for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
  - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.
  - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
  - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at

thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):

- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
  - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
  - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility, construction of which commenced after July 1, 1990 shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

#### D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

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

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

#### D.2.3 Particulate Emissions [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emission rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Ficosa North America Corporation  
Source Address: 917 Liechty Road and 725 Parr Road, Berne, Indiana 46711  
Part 70 Permit No.: T001-30158-00023

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**PART 70 OPERATING PERMIT**  
**EMERGENCY OCCURRENCE REPORT**

Source Name: Ficosa North America Corporation  
Source Address: 917 Liechty Road and 725 Parr Road, Berne, Indiana 46711  
Part 70 Permit No.: T001-30158-00023

**This form consists of 2 pages**

**Page 1 of 2**

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

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

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

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

**Page 2 of 2**

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**Part 70 Quarterly Report**

Source Name: Ficosa North America Corporation  
 Source Address: 917 Liechty Road and 725 Parr Road, Berne, Indiana 46711  
 Part 70 Permit No.: T001-30158-00023  
 Facility: Coating and Cleaning Operations (EU-001, EU-002, EU-003, EU-004, EU-005, EU-006, EU-007, EU-008, EU-009, EU-010, and EU-016)  
 Parameter: VOC input  
 Limit: 248 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR:

Month	VOC Input			Controls		Emissions		
	Primer	Basecoat and Clearcoat	Solvent	Overall Control Efficiency	Down Time	Monthly Total*	Prior 11 Months Total	12 Month Rolling Total**
Month 1								
Month 2								
Month 3								

\*{VOC Input Primer (1 - Overall Control Efficiency)} + VOC Input Basecoat and Clearcoat + VOC Input Solvent

\*\*Monthly Total + Prior 11 Months Total

No deviation occurred in this quarter.

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

Submitted by: \_\_\_\_\_  
 Title / Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

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

**Part 70 Quarterly Report**

Source Name: Ficosa North America Corporation  
 Source Address: 917 Liechty Road and 725 Parr Road, Berne, Indiana 46711  
 Part 70 Permit No.: T001-30158-00023  
 Facility: Entire Source  
 Parameter: Single and Combined HAPs Usage  
 Limit: Single HAP usage minus the amount of HAP in the solvent material shipped offsite for recovery shall be limited to less than ten (10) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Combined HAP usage minus the amount of HAP in the solvent material shipped offsite for recovery shall be limited to less than twenty-four (24) 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: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 COMPLIANCE AND ENFORCEMENT BRANCH  
 PART 70 OPERATING PERMIT  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Ficosa North America Corporation  
 Source Address: 917 Liechty Road and 725 Parr Road, Berne, Indiana 46711  
 Part 70 Permit No.: T001-30158-00023

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

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

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

**Source Background and Description**

<b>Source Name:</b>	<b>Ficosa North America Corporation</b>
<b>Source Location:</b>	<b>917 Liechty Road, Berne, Indiana 46711 and 725 Parr Road, Berne, Indiana 46711</b>
<b>County:</b>	<b>Adams</b>
<b>SIC Code:</b>	<b>3089</b>
<b>Operation Permit Renewal No.:</b>	<b>T 001-30158-00023</b>
<b>Permit Reviewer:</b>	<b>Madhurima Moulik</b>

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Ficosa North America Corporation (Ficosa) (formerly Ficosa N.A. Corp/Camryn Industries LLC/Integrated Manufacturing and Assembly, LLC) relating to the operation of a stationary molded plastic parts spray painting operation. On January 28, 2011, Ficosa submitted an application to the OAQ requesting to renew its operating permit. Ficosa (then known as Camryn Industries LLC) was issued its first Part 70 Operating Permit Renewal T001-19730-00023 on October 27, 2006. Ficosa owns and operates equipment at two plants located at adjacent sites (917 Liechty Road (Plant 1) and 725 Parr Road (Plant 2), Berne, Indiana).

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units:

**917 Liechty Road, Berne, Indiana 46711 (Plant 1)**

- (a) Two (2) prime coating booths used to coat plastic and metal parts, identified as EU-001 and EU-002, with a maximum capacity of 25.4 and 38 gallons of primer per hour, using water wash system CE-001 as particulate matter (PM) control and a natural gas 5.0 million British thermal units per hour (MMBtu/hr) thermal oxidizer CE-003 as volatile organic compound (VOC) control on the prime bake oven, and exhausting to stacks SV-007 and SV-008, and SV-009 and SV-010, respectively. These booths were constructed in 1987.
- (b) Three (3) base coating booths used to coat plastic and metal parts, identified as EU-003, EU-004, and EU-005, with a maximum capacity of 25.4, 38, and 25.4 gallons of base coating per hour, using water wash system CE-001 as PM control, and exhausting to stacks SV-013 and SV-014, and SV-015 and SV-016, and SV-017 and SV-018, respectively. These booths were constructed in 1987.
- (c) Two (2) clear coating booths used to coat plastic and metal parts, identified as EU-006 and EU-007, with a maximum capacity of 25.4 and 38 gallons of clear coat per hour, respectively, using water wash system CE-001 as PM control, and exhausting to stacks SV-019 and SV-020, and SV-021 and SV-022, respectively. These booths were constructed in 1987.
- (d) One (1) quality control booth used to coat plastic and metal parts, identified as EU-010, with a maximum capacity of 6.34 gallons of paint per hour, using dry panel filter CE-002 as PM control, and exhausting to stack SV-024. This unit was constructed in 1987.

- (e) One (1) mix room cleaning table, identified as EU-015, using no control, and exhausting to stack SV-025. This unit was constructed in 1987.

**725 Parr Road, Berne, Indiana 46711 (Plant 2)**

- (f) One (1) service booth, located in Plant 1, used to coat plastic and metal parts, identified as EU-016, with a maximum capacity of 8.4 gallons of coating per hour using dry panel filter CE-004 as PM control, and exhausting to stack SV-027. This unit was constructed in 2003.

<b>Insignificant Activities</b>
---------------------------------

The source also consists of the following insignificant activities:

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-5]
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; polymer sanding operations with particulate less than 25 lbs/day; and woodworking operations. [326 IAC 6-3]
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (d) Any unit emitting greater than 1 pound per day but less than 5 pounds per day or one ton per year of a single HAP; greater than 1 pound per day less than 12.5 pounds per day or 2.5 tons per year of any combination of HAPs; and VOC emissions less than 3 pounds per hour and 15 pounds per day.[326 IAC 20-1]
- (e) Mold release agents using low volatile products (vapor pressure less than or equal to two (2) kilopascals measured at 38 degrees C).[326 IAC 2-2][326 IAC 20-1]
- (f) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
  - (A) One (1) natural gas prime bake oven, identified as EU-013, with a maximum capacity of 2.5 mmBtu/hr, using no control, and exhausting to stack SV-011;
  - (B) One (1) natural gas final bake oven, identified as EU-014, with a maximum capacity of 2.5 mmBTU/hr, using no control, and exhausting to stack SV-023.
  - (C) One (1) natural gas thermal oxidizer, identified as CE-003, ith a maximum capacity of 5.0 mmBTU/hr, and exhausting to stack SV-026.
- (g) Noncontact cooling tower systems with either of the following: forced and induced draft cooling tower system not regulated under a NESHAP.
- (h) Closed loop heating and cooling systems.
- (i) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (j) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling.

- (k) A laboratory as defined in 326 IAC 2-7-1(21)(H).
- (l) Any unit emitting greater than 1 pound per day but less than 5 pounds per day or one ton per year of a single HAP: warehouse paint booth.
- (m) Other activities with emissions equal to or less than thresholds require listing only:
  - (A) Polymer sanding operations - particulate less than 25 lb/day
  - (B) Warehouse paint booth - volatile organic compounds less than 15 lb/day

**Existing Approvals**

The source was issued Part 70 Operating Permit Renewal No. T001-19730-00023 on October 27, 2006, the source has constructed or has been operating under the following additional approvals:

- (a) Administrative Amendment No. 001-28717-00023, issued on December 30, 2009;
- (b) Significant Permit Modification No. 001-24163-00023, issued on April 5, 2007;
- (c) Significant Permit Modification No. 001-29492-00023, issued on October 27, 2006.

**Enforcement Issue**

There are no enforcement actions pending.

**Emission Calculations**

Part 70 permit level was determined in a previous approval. Therefore, the potential to emit was not recalculated for this source.

**County Attainment Status**

The source is located in Adams County.

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

- (a) **Ozone Standards**  
 Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Adams County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM<sub>2.5</sub>**  
 Adams County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> emissions. 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 PM10 emissions as a surrogate for PM<sub>2.5</sub> emissions until 326 IAC 2-2 is revised.
- (c) **Other Criteria Pollutants**  
 Adams 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 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 and Part 70 Permit applicability.

**Unrestricted Potential Emissions**

This table reflects the unrestricted potential emissions of the source.

<b>Pollutant</b>	<b>Potential To Emit (tons/year)</b>
PM	>100
PM10	>100
SO <sub>2</sub>	0
VOC	>100
CO	0
NO <sub>x</sub>	0

<b>HAPs<sup>b</sup></b>	<b>Potential To Emit (tons/year)</b>
Single HAP	>10
TOTAL	>10

- (a) The unrestricted potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC and PM10 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 renewal.

- (b) The unrestricted 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 the unrestricted 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.

**Potential to Emit After Issuance**

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any new control equipment is considered federally enforceable only after issuance of this Part 70 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 (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
All coatings and cleanup solvents (EU-001, EU-002, EU-003, EU-004, EU-005, EU-006, EU-007, and EU-010) <sup>(b)</sup>	(a)	(a)	0	Less than 248 <sup>(c)</sup>	0	0	>25
Service Booth EU-016 <sup>(d)</sup>	(a)	(a)	0		0	0	<25
Total PTE	(a)	(a)	0	Less than 250	0	0	>25

- (a) The particulate emissions from the surface coating booths are limited by 326 IAC 6-3.  
 (b) The VOC input to booth EU-001, EU-002, EU-003, EU-004, EU-005, EU-006, EU-007, and EU-010, for application of adhesive to metal parts is limited to less than 25 tons per twelve (12) consecutive month period (See discussion of 326 8-2-9 applicability).  
 (c) The VOC input to all spray booths located at this source is limited to 248 tons per twelve (12) consecutive month period (see discussion of 326 IAC 2-2 limits).  
 (d) The VOC input to spray booth EU-016 for plastic part coating operations is limited to 25 tons per year (see discussion of 326 IAC 8-1-6 applicability).

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).  
 (b) Fugitive Emissions  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

**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 following table 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)
EU-001/VOC	oxidizer	Y	>100	<100	100	Y	N
EU-001/PM	water curtain	Y	>100	<100	100	Y	N
EU-002/VOC	oxidizer	Y	>100	<100	100	Y	N
EU-002/PM	water curtain	Y	>100	<100	100	Y	N
EU-003/PM	water curtain	Y	>100	<100	100	Y	N
EU-004/PM	water curtain	Y	>100	<100	100	Y	N
EU-005/PM	water curtain	Y	>100	<100	100	Y	N
EU-006/PM	water curtain	Y	>100	<100	100	Y	N
EU-007/PM	water curtain	Y	>100	<100	100	Y	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to EU-001 and EU-002 for VOC and PM and to EU-003, EU-004, EU-005, EU-006, and EU-007 for PM. A CAM plan has been submitted and the Compliance Determination and Monitoring Requirements section includes a detailed description of the CAM requirements.

- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (c) This source is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Plastic Parts Surface Coating (40 CFR Part 63, Subpart PPPP), and 326 IAC 20-1-1, because it is not a major source of hazardous air pollutants.
- (d) The source is not subject to 40 CFR Part 63, Subpart T for Halogenated Solvent Cleaning because it is not a major source of HAPs.

### State Rule Applicability - Entire Source

#### 326 IAC 1-5-2 (Emergency Reduction Plans)

The source submitted an Emergency Reduction Plan (ERP) on July 24, 1998.

#### 326 IAC 1-6-3 (Preventive Maintenance Plans)

The source submitted a Preventive Maintenance Plan (PMP) on July 24, 1998.

#### 326 IAC 2-2 (PSD Minor Limit)

Pursuant to CP 001-2662-00030, issued on April 12, 1993, the VOC input (including coatings, dilution solvents, and cleaning solvents) to the surface coating booths shall be less than 248 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable. The VOC input shall be calculated as follows:

$$(\text{Input VOC to basecoat}) + (\text{Input VOC to clearcoat}) + (\text{VOC from solvent usage}) + \{(\text{VOC input to primer when control is operating}) * (1 - \text{EF})\} + (\text{VOC input to primer when control is not operating}) \leq 248 \text{ tons of VOC per 12 month period.}$$

Where

EF = the overall control efficiency of the thermal oxidizer.

#### 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, 2012, 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)

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

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

#### 326 IAC 6-4 (Fugitive Dust Emissions)

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

#### 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is not subject to the requirements of 326 IAC 6-5 because this source does not have the potential to emit greater than 25 tons per year of fugitive particulate emissions.

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

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

The operation of this facility 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)

- (a) Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications. The control devices for particulate control shall be in operation and control emissions from the surface coating operating at all times the surface coating is in operation.
- (b) Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emission rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

#### 326 IAC 8-1-6 (New facilities; general reduction requirements)

Pursuant to BACT from the Construction Permit 001-2662-00030, issued on April 12, 1993, the coating operations identified as EU-001, EU-002, EU-003, EU-004, EU-005, EU-006, EU-007, and EU-010 have the following requirements:

- (a) The application method for primer shall be high volume low pressure (HVLP).
- (b) The VOC content of coatings shall be limited as follows:
  - (1) Primer VOC content shall not exceed 6.0 pounds per gallon,
  - (2) Basecoat VOC content shall not exceed 6.34 pounds per gallon,
  - (3) Clearcoat VOC content shall not exceed 4.8 pounds per gallon.

#### 326 IAC 8-1-6 (New facilities; general reduction requirements)

The VOC input when coating plastic parts to the service booth EU-016 shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

#### 326 IAC 8-2-9 (Volatile Organic Compounds)

The input VOC from metal parts adhesive coating to EU-001, EU-002, EU-003, EU-004, EU-005, EU-006, EU-007, and EU-010 shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period for each booth with compliance demonstrated at the end of each month, therefore 326 IAC 8-2-9 will not apply.

#### 326 IAC 8-2-9 (Volatile Organic Compounds (VOC) Limitations)

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating), the service booth (EU-016) when coating metal parts shall not allow the discharge of VOC for clear coats into the atmosphere in excess of four and three-tenths (4.3), for air dried or forced warm air dried coatings three and five-tenths (3.5), for extreme performance coatings three and five-tenths (3.5), and for all other coatings three (3.0) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.

326 IAC 8-2-9 (Volatile Organic Compound (VOC) Limitations, Clean-up Requirements)  
Pursuant to 326 IAC 8-2-9(f), the service booth (EU-016) shall comply with the following:

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.

326 IAC 8-3-5 (Volatile Organic Compounds (VOC))  
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.

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.

326 IAC 8-3-2 (Volatile Organic Compounds (VOC))

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

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

### **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 monitoring requirements applicable to this source are as follows:

(a) Particulate Matter:

- (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters and water flow to the water wash. To monitor the performance of the dry filters and water wash, weekly observations shall be made of the overspray from the surface coating booth stacks, SV-007, SV-008, SV-009, SV-010, SV-013, SV-014, SV-015, SV-016, SV-017, SV-018, SV-019, SV-020, SV-021, SV-022, SV-024, and SV-027, 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. 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 reasonable response steps shall be considered a deviation from this permit.
- (2) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Response to Excursions or Exceedances for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. If a condition exists which should result in a response step the Permittee shall take reasonable response. 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 reasonable response steps shall be considered a deviation from this permit.
- (3) Daily inspections shall be performed to verify that the water level in the water wash meets the manufacturer's recommended level. To monitor the performance of the water flow, visual inspections of the water curtain shall be made weekly to identify any gaps or other disruptions in water flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water sheet. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. If a condition exists which should result in a response step the Permittee shall take reasonable response. 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 reasonable response steps shall be considered a deviation from this permit.

(b) Volatile Organic Compounds:

- (1) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature if the thermal oxidizer is operated. The output of this system shall be recorded as a three-hour average. From the date of issuance of this permit until the approved stack test results are available; the Permittee shall take reasonable response steps whenever the three-hour average temperature of the thermal oxidizer is below 1400°F. A three-hour average temperature that is below 1400°F is not a deviation from this permit. 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 reasonable response steps shall be considered a deviation from this permit.

- (2) The Permittee shall determine the three-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.1.3, as approved by IDEM if the thermal oxidizer is operated.
- (3) On and after the date the approved stack test results are available, the Permittee shall take reasonable response steps whenever the three-hour average temperature of the thermal oxidizer is below the three-hour average temperature as observed during the compliant stack test. A three-hour average temperature that is below the three-hour average temperature as observed during the compliant stack test is not a deviation from this permit. 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) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.3, as approved by IDEM if the thermal oxidizer is operated.
  - (c) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. 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.

#### **Recommendation**

The staff recommends to the Commissioner that the 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 January 28, 2011.

#### **Conclusion**

The operation of this molded plastic parts spray painting operation shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T001-30158-00023.

#### **IDEM Contact**

- (a) Questions regarding this proposed permit can be directed to Madhurima Moulik 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) 233-0868 or toll free at 1-800-451-6027 extension 3-0868.

- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)

**Appendix A: Emissions Calculations  
VOC and Particulate from Service Booth EU-016**

**Company Name: Ficosa North America Corporation  
Address: 917 Liechty Road and 725 Parr Road, Berne, IN 46711  
Permit Number: T001-30158-00023  
Plt ID: 001-00030  
Reviewer: Madhurima Moulik**

Material	Density (lb/gal)	Weight % Volatile (H <sub>2</sub> O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Max. Usage (gal/unit)	Maximum Production (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE VOC (lbs/hour)	PTE VOC (lbs/day)	PTE VOC (tons/year)	PTE of PM/PM10 (tons/yr)	lb VOC/gal solids	Transfer Efficiency
Ultra System Reducer	7.08	99.0%	0.00%	99.0%	0.00%	1.00%	0.003	70.0	7.01	7.01	1.34	32.2	5.88	0.02	701	65.0%
Ultra 7000 Basecoat System	8.50	60.0%	0.00%	60.0%	0.00%	40.0%	0.005	70.0	5.10	5.10	1.95	46.9	8.55	2.00	12.8	65.0%
Ultra 7000 Clearcoat System	8.17	54.0%	0.00%	54.0%	0.00%	46.0%	0.012	70.0	4.41	4.41	3.71	88.9	16.2	4.84	9.59	65.0%
ABS/1	8.71	33.0%	0.00%	33.0%	0.00%	67.0%	0.001	70.0	2.87	2.87	0.27	6.41	1.17	0.83	4.29	65.0%
<b>Worst Case Material</b>											<b>3.71</b>	<b>88.9</b>	<b>16.2</b>	<b>4.84</b>		

**Notes**

The materials used in the paint booth are applied using two (2) high-volume-low, pressure guns. The paint booth is controlled by dry filters. The service booth would only apply the coatings listed above one at a time. The coatings would not be used simultaneously.

**Methodology**

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

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

PTE of VOC (lbs/hr) = Pounds of VOC per Gallon coating (lb/gal) \* Maximum Usage (gal/unit) \* Maximum Throughput (units/hr)

PTE of VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) \* Maximum Usage (gal/unit) \* Maximum Throughput (units/hr) \*24 (hr/day)

PTE of VOC (tons per year) = Pounds of VOC per Gallon coating (lb/gal) \* Maximum Usage (gal/unit) \* Maximum Throughput (units/hr) \* 8760 (hr/yr) \* 1 ton/2000 lbs

PTE of PM/PM10 (tons/yr) = Maximum Throughput (units/hour) \* Maximum Usage (gal/unit) \* Density (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*8760 (hrs/yr) \*1 ton/2000 lbs

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

**Appendix A: Emission Calculations**  
**HAP Emissions from Service Booth EU-016**

**Company Name:** Ficosa North America Corporation  
**Address:** 917 Liechty Road and 725 Parr Road, Berne, Indiana 46711  
**Permit Number:** T001-30158-00023  
**Pit ID:** 001-00023  
**Reviewer:** Madhurima Moulik

Material	Density of Material (lb/gal)	Maximum Usage (gal/unit)	Maximum Production Rate (units/hour)	Hazardous Air Pollutants													
				Xylene		Toluene		Methyl Ethyl Ketone		Ethylbenzene		Methyl Isobutyl Ketone		Hexamethylene Diisocyanate		Methyl n-Amyl ketone	
				Wt %	Emissions (ton/yr)	Wt %	Emissions (ton/yr)	Wt %	Emissions (ton/yr)	Wt %	Emissions (ton/yr)	Wt %	Emissions (ton/yr)	Wt %	Emissions (ton/yr)	Wt %	Emissions (ton/yr)
Ultra System Reducer	7.08	0.003	70.0	0.00%	0.00	3.00%	0.18	20.0%	1.17	0.00%	0.00	1.00%	0.06	0.00%	0.00	8.00%	0.47
Ultra 7000 Basecoat	8.50	0.005	70.0	33.0%	4.64	5.00%	0.70	0.00%	0.00	6.00%	0.84	2.00%	0.28	0.00%	0.00	0.00%	0.00
Ultra 7000 Clearcoat	8.17	0.011	70.0	0.00%	0.00	0.00%	0.00	7.00%	1.91	0.00%	0.00	4.00%	1.09	0.00%	0.00	5.00%	1.37
ABS/1	8.71	0.001	70.0	22.0%	0.76	20.0%	0.69	0.00%	0.00	4.00%	0.14	0.00%	0.00	0.01%	0.0003	0.00%	0.00
<b>Worst Case Material</b>					<b>4.64</b>		<b>0.70</b>		<b>1.91</b>		<b>0.84</b>		<b>1.09</b>		<b>0.0003</b>		<b>1.37</b>

**Notes**

The amount of materials used per unit is as reported by the source.  
 The weight percent of HAPs in materials is from Material Safety Data Sheets. Information provided by source.

**Methodology**

PTE for HAPs (tons/yr) = Density (lb/gal) x Maximum Usage (gal/unit) x Maximum Production Rate (unit/hr) x Weight % HAP x 8760 (hrs/yr) x 1 ton/2000 lbs

**Appendix A: Emissions Calculations  
VOC and Particulate from Existing Surface Coating  
Booths**

**Company Name: Ficosa North America Corporation  
Address: 917 Liechty Road and 725 Parr Road, Berne, IN 46711  
Permit Number: T001-30158-00023  
Plt ID: 001-00023  
Reviewer: Madhurima D. Moulik**

Emission Unit	Max. Usage (gal/hr) of Worst Case Coating	Density (lb/gal)	Weight % VOC	PTE VOC (lbs/hour)	PTE VOC (tons/year)
Primer Booth EU-001	25.4	8.40	65.0%	139	607
Primer Booth EU-002	38.0	8.40	65.0%	207	909
Base Booth EU-003	25.4	8.07	73.7%	151	662
Base Booth EU-004	38.0	8.07	73.7%	226	990
Base Booth EU-005	25.4	8.07	73.7%	151	662
Clear Booth EU-006	25.4	7.90	73.7%	148	648
Clear Booth EU-007	38.0	7.90	60.0%	180	789
QC Booth EU-010	6.34	8.40	60.0%	32.0	140

Emission Unit	Max. Usage (gal/hr) of Worst Case Coating	Density (lb/gal)	Weight % PM	Transfer Efficiency	PTE of PM/PM10 (lbs/hr)	PTE of PM/PM10 (tons/yr)
Primer Booth EU-001	25.4	11.9	78.7%	0.75	59.5	260
Primer Booth EU-002	38.0	11.9	78.7%	0.75	89.0	390
Base Booth EU-003	25.4	8.41	57.7%	0.75	30.8	135
Base Booth EU-004	38.0	8.41	57.7%	0.75	46.1	202
Base Booth EU-005	25.4	8.41	57.7%	0.75	30.8	135
Clear Booth EU-006	25.4	8.24	57.7%	0.75	30.2	132
Clear Booth EU-007	38.0	8.24	60.7%	0.75	47.5	208
QC Booth EU-010	6.34	11.9	60.7%	0.75	11.4	50.1

**Note:** Different coatings are used for VOC and PM in the calculations for PTE-worst case coatings.

**Methodology**

PTE of VOC (lbs/hr) = Max. Usage (gal/hr of worst case coating) \* Density (lb/gal) \* Weight % VOC

PTE of VOC (tons per year) = VOC (lbs/hr) \* 8760 (hr/yr) \* 1 ton/2000 lbs

PTE of PM/PM10 (lbs/hr) = Max. Usage (gal/hr of worst case coating) \* Density (lb/gal) \* Weight % PM/PM10 \* (1-Transfer efficiency)

PTE of PM/PM10 (tons/yr) = PM/PM10 (lbs/hr) \* 8760 (hr/yr) \* 1 ton/2000 lbs

**Appendix A: Emissions Calculations**  
**Summary- PTE for Criteria Pollutants of Entire Source**

**Company Name:** Ficosa North America Corporation  
**Address:** 917 Liechty Road and 725 Parr Road, Berne, IN 46705  
**Permit Number:** T001-30158-00023  
**Pit ID:** 001-00023  
**Reviewer:** Madhurima Moulik

<b>Emission Unit</b>	<b>VOC (tons/year)</b>	<b>PM/PM10 (tons/year)</b>
Primer Booth EU-001	607	260
Primer Booth EU-002	909	390
Base Booth EU-003	662	135
Base Booth EU-004	990	202
Base Booth EU-005	662	135
Clear Booth EU-006	648	132
Clear Booth EU-007	789	208
QC Booth EU-010	140	11.4
Service Booth EU-016	16.2	4.84
<b>Total Potential to Emit</b>	<b>5422</b>	<b>1479</b>



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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

*Thomas W. Easterly*  
**Commissioner**

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

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

TO: Carol Poling  
Ficosa North America Corporation  
917 Liechty Rd  
Berne, IN 46711

DATE: July 1, 2011

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

SUBJECT: Final Decision  
Part 70 Operating Permit Renewal  
001-30158-00023

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

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

A copy of the final decision and supporting materials has also been sent via standard mail to:  
Wade Bearman – Director of Operations  
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

July 1, 2011

TO: Berne Public Library

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

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

**Applicant Name: Ficosa North America Corporation**  
**Permit Number: 001-30158-00023**

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

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

Enclosures  
Final Library.dot 11/30/07

# Mail Code 61-53

IDEM Staff	GHOTOPP 7/1/2011 Ficosa North America Corporation 001-30158-00023 Final		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Carol Poling Ficosa North America Corporation 917 Liechty Rd Berne IN 46711 (Source CAATS) via confirmed delivery										
2		Wade Bearman Director of Operations Ficosa North America Corporation 917 Liechty Rd Berne IN 46711 (RO CAATS)										
3		Berne Public Library 166 N Sprunger Berne IN 46711-1595 (Library)										
4		Adams County Commissioners 313 West Jefferson Street Decatur IN 46733 (Local Official)										
5		Adams County Health Department County Svcs Complex, 313 W. Jefferson # 314 Decatur IN 46733-1673 (Health Department)										
6		Berne City Council and Mayors Office 158 W. Franklin St. Berne IN 46711 (Local Official)										
7		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 (Affected Party)										
8												
9												
10												
11												
12												
13												
14												
15												

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
<b>6</b>			