



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: February 1, 2012

RE: Valeo Sylvania / 071-31066-00006

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**

**Valeo Sylvania
1231 Avenue A North
Seymour, Indiana 47274**

(herein known as the Permittee) is hereby authorized to construct and 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.

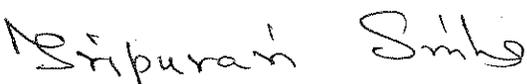
Operation Permit No.: T071-31066-00006	
Issued by:  Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: February 1, 2012 Expiration Date: February 1, 2017

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary stationary source producing automotive plastic lighting assemblies.

Source Address:	1231 Avenue A North, Seymour, Indiana 47274
General Source Phone Number:	812-574-5744
SIC Code:	3647
County Location:	Jackson
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD 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)]

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

- (a) One (1) spray paint booth, South wing Manual Spray Paint Booth, installed in 1996, using conventional spray application, identified as emission unit #3, for coating plastic automotive lighting assembly components with a maximum capacity of 100 units per hour, using dry filters for overspray control, and exhausting to stack PP-E-40.
- (b) One (1) paint booth, Hard Coat #2, installed in 1996, using conventional spray application, identified as emission unit # 9, for coating plastic automotive lighting assembly components with a maximum capacity of 720 units per hour, using an Oscar VIII Overspray Collection and Recovery System for overspray control and exhausting to stack PP-E-84.
- (c) One (1) robotic spray booth, installed in 2003, using high volume low pressure spray application, identified as emission unit #10, for coating plastic automotive lighting assembly components, with a maximum capacity of 200 units per hour, using dry filters for overspray control exhausting to one (1) stack, identified as PP-E-03-101.
- (d) Six (6) Thermoset Closed Injection Molding Presses, installed in 1994, collectively identified as BMC, for closed injection molding of automotive lighting reflectors with a throughput capacity of 712.6 pounds of bulk mold compound per hour.
- (e) One (1) flow coating line, identified as emission unit #6, installed in 1994, for coating plastic automotive lighting assembly components, maximum capacity of 1,440 units per hour, and uses a regenerative thermal oxidizer to reduce volatile organic compound emissions and exhausting to stacks PP-E-10, 11 and 7.
- (f) One (1) lens surface coating booth, installed in 2006, using flowcoating application method, with a maximum throughput of 144 lenses per hour, identified as emission unit

#13, with VOC controlled by one (1) regenerative thermal oxidizer, which exhausts to one (1) stack, identified as HC-05-01.

- (g) Two (2) Thermal Cure Spray Coating Booths, permitted in 2011, identified as Units #14 and #25, using HVLP guns and dry filters as control, and exhausting to stacks TC1 and TC2.
- (h) Five (5) Lean Lens Coaters, permitted in 2011, identified as Units #20 through #24, using dry filters and overspray collection baffles as control, and exhausting to stack LL1 through LL5.

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
 - (1) Six (6) natural gas fired boilers, listed as follows: [326 IAC 6-2-4]
 - (A) Three (3) 0.75 MMBtu/hr boilers, identified as 70926, 70877 and 70935, each constructed in 1994.
 - (B) Two (2) 3.21 MMBtu/hr boilers, identified as 23997 and 23914, each constructed in 1996.
 - (C) One (1) 0.63 MMBtu/hr boiler, identified as 507, constructed in 2005.
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]
- (c) One baghouse controlling dust from the BMC press area [326 IAC 6-3-2].
- (d) Five (5) Lean Reflector Coaters, permitted in 2011, identified as Units #15 through #19, using dry filters and overspray collection baffles as control, and exhausting to stack LRC1 through LRC5. [326 IAC 6-3-2]

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, T071-31066-00006, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

- (a) 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)]

- (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]

- (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, or Southeast Regional Office 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
Southeast Regional Office phone: (812) 358-2027; fax: (812) 358-2058.

- (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 T071-31066-00006 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)]

- (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]

- (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)]

- (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]

- (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]

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]

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]

- (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 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.7 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.8 Performance Testing [326 IAC 3-6]

- (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.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

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

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

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

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

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

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

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

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

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

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

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall 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.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 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.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, 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.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported 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.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) spray paint booth, South wing Manual Spray Paint Booth, installed in 1996, using conventional spray application, identified as emission unit #3, for coating plastic automotive lighting assembly components with a maximum capacity of 100 units per hour, using dry filters for overspray control, and exhausting to stack PP-E-40.
- (b) One (1) paint booth, Hard Coat #2, installed in 1996, using conventional spray application, identified as emission unit # 9, for coating plastic automotive lighting assembly components with a maximum capacity of 720 units per hour, using an Oscar VIII Overspray Collection and Recovery System for overspray control and exhausting to stack PP-E-84.
- (c) One (1) robotic spray booth, installed in 2003, using high volume low pressure spray application, identified as emission unit #10, for coating plastic automotive lighting assembly components, with a maximum capacity of 200 units per hour, using dry filters for overspray control exhausting to one (1) stack, identified as PP-E-03-101.
- (e) One (1) flow coating line, identified as emission unit #6, installed in 1994, for coating plastic automotive lighting assembly components. The flowcoater has a maximum capacity of 1,440 units per hour, and uses a regenerative thermal oxidizer to reduce volatile organic compound emissions and exhausts to stacks PP-E-10, 11 and 7.
- (f) One (1) lens surface coating booth, installed in 2006, using flowcoating application method, with a maximum throughput of 144 lenses per hour, identified as emission unit #13, with VOC controlled by one (1) regenerative thermal oxidizer, which exhausts to one (1) stack, identified as HC-05-01.
- (g) Two (2) Thermal Cure Spray Coating Booths, permitted in 2011, identified as Unit #14 and #25, using HVLP guns and dry filters as control, and exhausting to stacks TC1 and TC2.
- (h) Five (5) Lean Lens Coaters, permitted in 2011, identified as Units #20 through #24, using dry filters and overspray collection baffles as control, and exhausting to stack LL1 through LL5.

Insignificant Activities:

- (d) Five (5) Lean Reflector Coaters, permitted in 2011, identified as Units #15 through #19, using dry filters and overspray collection baffles as control, and exhausting to stack LRC1 through LRC5. [326 IAC 6-3-2]

(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 Volatile Organic Compounds (VOC) BACT [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (Requirements for new facilities) and Construction Permit CP-071-2037, issued on October 16, 1991, BACT for the one (1) flow coating line, identified as emission unit #6, has been determined to be:

The use of a thermal oxidizer system with a capture efficiency of 100% and a destruction efficiency of 95%. The minimum oxidizer operation temperature shall not fall below 1,400 degrees Fahrenheit or a temperature and fan amperage established during the latest stack test.

D.1.2 Volatile Organic Compounds (VOC) BACT [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (Requirements for new facilities), and SSM 071-21822-00006, issued on March 23, 2006, BACT for the lens surface coating line, identified as emission unit #13, has been determined to be:

- (a) The use of a thermal oxidizer system with a capture efficiency of 100% and a destruction efficiency of 95%; and
- (b) The total amount of VOC delivered to the coating applicators of the lens surface coating booth shall be limited to less than 60.41 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month.

This limit, in conjunction with (a), limits the potential to emit VOC from the lens coating booth to less than 3.02 tons per year.

D.1.3 Volatile Organic Compounds (VOC) PSD Minor Limit [326 IAC 2-2]

- (a) The VOC input from the flow coating line, unit #6, shall be less than 948.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The VOC input from the lens surface coating booth, unit #13, shall be less than 60.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) The minimum overall control efficiency of the thermal oxidizer for flow coating line, unit #6 and lens surface coating booth, unit #13 shall be at least 95%.

Compliance with this limit in combination with potential emissions from other emission units, shall keep the source-wide emissions of VOC to less than 250 tons per year and shall render the requirements of 326 IAC 2-2 not applicable to the entire source.

D.1.4 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2(d)]

Pursuant 326 IAC 6-3-2(d), particulate from the spray booths (identified as units #3, #9, #10, #14 - #25 and base coat surface coating process) shall be controlled by dry filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications and control emissions from the spray booths (identified as units #3, #9, #10, and base coat surface coating process) at all times when the spray booths are in operation.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these facilities and their 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.1.6 Volatile Organic Compounds (VOC) Emissions

Compliance with Condition D.1.3 shall be determined by the following equation:

VOC emissions by units #6 and #13 = ((amount of VOC delivered to coating applicators of unit #6) * (1 – overall control efficiency of thermal oxidizer system from the latest compliant stack test)) + ((amount of VOC delivered to coating applicators of unit #13) * (1 – overall control efficiency of thermal oxidizer system from the latest compliant stack test)).

D.1.7 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

In order to demonstrate the compliance status with D.1.1 and D.1.2, the Permittee shall conduct a performance test to verify the overall control efficiency of the thermal oxidizers, fan amperage and

operating temperatures utilizing methods as approved by the Commissioner at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

D.1.8 Thermal Oxidizer Temperature [40 CFR 64]

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizers for measuring operating temperature. For purposes of this condition, continuous shall mean temperature measurement no less than once every fifteen (15) minutes. The output of this system shall be recorded as 3-hour block averages. The Permittee shall operate the thermal oxidizers at or above the 3-hour average temperature established during the most recent valid stack test. When a temperature is outside the normal ranges listed above or ranges established during the latest stack test, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
- (b) On and after the date the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature as observed during the compliant stack test.

D.1.9 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

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

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

D.1.10 Parametric Monitoring [40 CFR 64]

The fan amperage shall be observed at least once per day when the thermal oxidizers are in operation. When for any one reading, the fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

D.1.11 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks and from surface coating booths #14 - #25 while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. Section C - Response to

Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.12 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Conditions D.1.2.
 - (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on 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 monthly cleanup solvent usage; and
 - (4) The total VOC usage for each month.
 - (5) The continuous temperature records for the thermal oxidizer and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.
 - (6) Daily records of the fan amperage.
- (b) To document the compliance status with Condition D.1.11, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections. The Permittee shall include in its daily record when an inspection is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

D.1.13 Reporting Requirements

Quarterly summaries of the information to document the compliance status with Conditions D.1.2 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting Requirements contains the Permittee's obligation with regard to the reporting required by this condition. 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) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
 - (1) Six (6) natural gas fired boilers, listed as follows: [326 IAC 6-2-4]
 - (A) Three (3) 0.75 MMBtu/hr boilers, identified as 70926, 70877 and 70935, each constructed in 1994.
 - (B) Two (2) 3.21 MMBtu/hr boilers, identified as 23997 and 23914, each constructed in 1996.
 - (C) One (1) 0.63 MMBtu/hr boiler, identified as 507, constructed in 2005.
- (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 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations [326 IAC 6-3-2].
- (c) Manufacturing activities such as brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-3-2].
- (d) One baghouse controlling dust from the BMC press area [326 IAC 6-3-2].

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

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

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from the brazing equipment, cutting torches, soldering equipment, welding equipment, grinding and machining operations, deburring; buffing, polishing, abrasive blasting, pneumatic conveying, woodworking operations and BMC press area, each with a process weight rate of less than one hundred (100) pounds per hour, shall not exceed 0.551 pounds per hour.

D.2.2 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), PM emissions from each of the six (6) boilers shall be limited to 0.6 pounds per MMBtu heat input.

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

Source Name: Valeo Sylvania
Source Address: 1231 Avenue A North, Seymour, Indiana 47274
Part 70 Permit No.: T071-31066-00006

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: Valeo Sylvania
Source Address: 1231 Avenue A North, Seymour, Indiana 47274
Part 70 Permit No.: T071-31066-00006

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 ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Report

Source Name: Valeo Sylvania
Source Address: 1231 Avenue A North, Seymour, Indiana 47274
Part 70 Permit No.: T071-31066-00006
Facility: One (1) lens surface coating booth, identified as #13
Parameter: VOC
Limit: Less than 60.41 tons per twelve consecutive month period VOC delivered to the coating applicators of the lens surface coating booth, identified as emission unit #13.

QUARTER :

YEAR:

Month	VOC Usage This Month	VOC Usage Previous 11 Months	VOC Usage 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: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Valeo Sylvania, LLC
 Source Address: 1231 A Avenue North, Seymour, Indiana 47274
 Part 70 Permit No.: T071-31066-00006
 Facility: Units #6 and #13
 Parameter: VOC
 Limit: unit #6 shall be less than 948.5 tons per twelve (12) consecutive month period and
 unit #13 shall be less than 60.4 tons per twelve (12) consecutive month period.

QUARTER :

YEAR:

Month	VOC Emissions This Month	VOC Emissions Previous 11 Months	VOC Emissions 12 Month Total
Month 1			
Month 2			
Month 3			

VOC emissions by units #6 and #13 = ((amount of VOC delivered to coating applicators of unit #6) * (1 – overall control efficiency of thermal oxidizer system from the latest compliant stack test)) + ((amount of VOC delivered to coating applicators of unit #13) * (1 – overall control efficiency of thermal oxidizer system from the latest compliant stack test)), as stated in Condition D.1.6.

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.
 Deviation has been reported on:

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

Attach a signed certification to complete this report.

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

Source Name: Valeo Sylvania
Source Address: 1231 Avenue A North, Seymour, Indiana 47274
Part 70 Permit No.: T071-31066-00006

Months: _____ **to** _____ **Year:** _____

Page 1 of 2

<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>	
<p><input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Indiana Department of Environmental Management Office of Air Quality

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

Source Description and Location

Source Name:	Valeo Sylvania
Source Location:	1231 Avenue A North, Seymour, IN 47274
County:	Jackson
SIC Code:	3647
Permit Renewal No.:	T071-31066-00006
Permit Reviewer:	Heath Hartley

Public Notice Information

On December 3, 2011, the Office of Air Quality (OAQ) had a notice published in the Tribune in Seymour, Indiana, stating that the Valeo Sylvania had applied for a Part 70 Operating Permit Renewal. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments Received

OAQ received comments from the following people (and groups of people):

- Valeo Sylvania

The comments are summarized in the subsequent pages, with IDEM's corresponding responses.

The IDEM does not amend the Technical Support Document (TSD). The TSD is maintained to document the original review. This addendum to the TSD is used to document comments, responses to comments and changes made from the time the permit was drafted until a final decision is made.

Company Comments and IDEM's Responses

On December 29, 2011, OAQ received comments from Valeo Sylvania. The summary of the comments and IDEM, OAQ responses, including changes to the permit (language deleted is shown in ~~strikeout~~ and language added is shown in **bold**) are as follows:

Company Comment 1:

Our most major concern is the requirement for the oxidizer temperature lowpoint being set at the 3-hour average taken during the stack test. Our current lowpoint is set at 1410 (1400 being lowpoint in our current permit). We understand that the temperature of our most recent compliance test averaged a 1500, however, that was due to our solvent loading while making sure we were running at necessary capacity. With various solvent loadings, our range would more accurately fall between 1410-1500. If we are required to run at 1500, we will have to run at a rate that is costlier and produces more emissions from operating the gas unit.

IDEM Response 1:

The approved stack test results reflect the correct operating temperature; therefore the permit will not be changed.

Company Comment 2:

The two thermal cure spray coaters will exhaust to different stacks and can be represented as TC2 and TC3 or TC1 and TC2.

IDEM Response 2:

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

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

.....

- (g) Two (2) Thermal Cure Spray Coating Booths, permitted in 2011, identified as Units #14 and #25, using HVLP guns and dry filters as control, and exhausting to stacks **TC1 and TC2**.

And

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

.....

- (g) Two (2) Thermal Cure Spray Coating Booths, permitted in 2011, identified as Units #14 and #25, using HVLP guns and dry filters as control, and exhausting to stacks **TC1 and TC2**.

Company Comment 3:

We should have more boilers listed in the insignificant activities and facility description. There are two listed and we currently have (2) in Hardcoat, (3) in Flowcoat, and (1) at the Lens Coater for a total of 6 boiler units. I have asked the facility engineer to send me the MMBtu/hr listed for these units.

IDEM Response 3:

All 6 boilers have been included in the permit.

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
 - ~~(5) One (1) natural gas fired boiler with a maximum heat input capacity of 4.69 MMBtu/hr, installed after June 1989; [326 IAC 6-2-4]~~
 - ~~(6) One (1) natural gas fired boiler with a maximum heat input capacity of 6.42 MMBtu/hr, installed after June 1989. [326 IAC 6-2-4]~~
 - (1) **Six (6) natural gas fired boilers, listed as follows:** [326 IAC 6-2-4]
 - (A) **Three (3) 0.75 MMBtu/hr boilers, identified as 70926, 70877 and 70935, each constructed in 1994.**
 - (B) **Two (2) 3.21 MMBtu/hr boilers, identified as 23997 and 23914, each constructed in 1996.**
 - (C) **One (1) 0.63 MMBtu/hr boiler, identified as 507, constructed in 2005.**

And

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
- ~~(5) One (1) natural gas fired boiler with a maximum heat input capacity of 4.69 MMBtu/hr, installed after June 1989; [326 IAC 6-2-4]~~
 - ~~(6) One (1) natural gas fired boiler with a maximum heat input capacity of 6.42 MMBtu/hr, installed after June 1989; [326 IAC 6-2-4]~~
 - (1) **Six (6) natural gas fired boilers, listed as follows:** [326 IAC 6-2-4]
 - (A) **Three (3) 0.75 MMBtu/hr boilers, identified as 70926, 70877 and 70935, each constructed in 1994.**
 - (B) **Two (2) 3.21 MMBtu/hr boilers, identified as 23997 and 23914, each constructed in 1996.**
 - (C) **One (1) 0.63 MMBtu/hr boiler, identified as 507, constructed in 2005.**

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

.....
D.2.2 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating), PM emissions from each of the ~~two (2)~~ **six (6)** boilers shall be limited to ~~0.58~~ **0.6** pounds per MMBtu heat input.

IDEM Contact

Questions regarding this proposed permit can be directed to Heath Hartley at the Indiana Department Environmental Management, Office of Air Quality, MC 61-53, Room 1003, 100 North Senate Avenue, Indianapolis, Indiana 46204-2251 or by telephone at (317) 232-8217 or toll free at 1-800-451-6027 extension 2-8217.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Significant Source Modification and Part 70
Operating Permit Renewal

Source Background and Description

Source Name:	Valeo Sylvania
Source Location:	1231 Avenue A North, Seymour, IN 47274
County:	Jackson
SIC Code:	3647
Significant Source Modification No.:	T071-30915-00006
Permit Renewal No.:	T071-31066-00006
Permit Reviewer:	Heath Hartley

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Valeo Sylvania relating to the operation of a source producing automotive plastic lighting assemblies. On September 13, 2011, Valeo Sylvania submitted an application to the OAQ requesting to add new equipment and renew its operating permit. Valeo Sylvania was issued its first Part 70 Operating Permit Renewal (T071-18360-00006) on June 7, 2007.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

- (a) One (1) spray paint booth, South wing Manual Spray Paint Booth, installed in 1996, using conventional spray application, identified as emission unit #3, for coating plastic automotive lighting assembly components with a maximum capacity of 100 units per hour, using dry filters for overspray control, and exhausting to stack PP-E-40.
- (b) One (1) paint booth, Hard Coat #2, installed in 1996, using conventional spray application, identified as emission unit # 9, for coating plastic automotive lighting assembly components with a maximum capacity of 720 units per hour, using an Oscar VIII Overspray Collection and Recovery System for overspray control and exhausting to stack PP-E-84.
- (c) One (1) robotic spray booth, installed in 2003, using high volume low pressure spray application, identified as emission unit #10, for coating plastic automotive lighting assembly components, with a maximum capacity of 200 units per hour, using dry filters for overspray control exhausting to one (1) stack, identified as PP-E-03-101.
- (d) Six (6) Thermoset Closed Injection Molding Presses, installed in 1994, collectively identified as BMC, for closed injection molding of automotive lighting reflectors with a throughput capacity of 712.6 pounds of bulk mold compound per hour.
- (e) One (1) flow coating line, identified as emission unit #6, installed in 1994, for coating plastic automotive lighting assembly components, maximum capacity of 1,440 units per hour, and uses a regenerative thermal oxidizer to reduce volatile organic compound emissions and exhausting to stacks PP-E-10, 11 and, 7.
- (f) One (1) lens surface coating booth, installed in 2006, using flowcoating application method, with a maximum throughput of 144 lenses per hour, identified as emission unit #13, with VOC controlled by one (1) regenerative thermal oxidizer, which exhausts to one (1) stack, identified as HC-05-01.

Emission Units and Pollution Control Equipment Removed From the Source

The source has removed the following emission units:

- (b) One (1) paint booth, Hard Coat #1, installed in 1994, using high volume low pressure spray application, identified as emission unit #8, for coating plastic automotive lighting assembly components with a maximum capacity of 720 units per hour, using an Oscar VIII Overspray Collection and Recovery System for overspray control and exhausting to stacks PP-E-30, 32, 33, and 34.
- (c) Five (5) Thermoset Closed Injection Molding Presses, installed in 1994, collectively identified as BMC, for closed injection molding of automotive lighting reflectors with a throughput capacity of 1194.20 pounds of bulk mold compound per hour.

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Valeo Sylvania on September 13, 2011, relating to the addition of One Anti Fog Booth, five lean reflector coaters and eight lean lens coaters. The following is a list of the proposed emission unit(s) and pollution control device(s):

- (a) Two (2) Thermal Cure Spray Coating Booths, permitted in 2011, identified as Unit #14 and #25, using HVLP guns and dry filters as control, and exhausting to stack TC2.
- (b) Five (5) Lean Reflector Coaters, permitted in 2011, identified as Units #15 through #19, using dry filters and overspray collection baffles as control, and exhausting to stack LRC1 through LRC5.
- (c) Five (5) Lean Lens Coaters, permitted in 2011, identified as Units #20 through #24, using dry filters and overspray collection baffles as control, and exhausting to stack LL1 through LL5.

Insignificant Activities

The source also consists of the following insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
 - (1) Two (2) thermal oxidizers with a maximum heat input capacity of 0.17 MMBtu/hr;
 - (2) Seventeen (17) HVAC units with a combined total heat input capacity of 3.2 MMBtu/hr;
 - (3) Eighteen (18) AMU units with a combined total heat input capacity of 50.00 MMBtu/hr;
 - (4) Seventeen (17) miscellaneous heaters with a combined total heat input capacity of 29.79 MMBtu/hr;
 - (5) One (1) natural gas fired boiler with a maximum heat input capacity of 4.69 MMBtu/hr, installed after June 1989; [326 IAC 6-2-4]
 - (6) One (1) natural gas fired boiler with a maximum heat input capacity of 6.42 MMBtu/hr, installed after June 1989. [326 IAC 6-2-4]
- (b) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (c) Cleaners and solvents characterized as follows:
 - (A) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or;

- (B) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20°C (68°F);
the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]
- (e) Closed loop heating and cooling systems.
- (f) Infrared cure equipment.
- (g) Exposure chambers (“towers”, “columns”), for curing of ultraviolet inks and ultra-violet coatings where heat is the intended discharge.
- (h) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (i) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (j) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (k) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (l) Paved and unpaved roads and parking lots with public access.
- (m) Enclosed conveyor systems for conveying plastic raw materials and plastic finished goods.
- (n) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (o) 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 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3-2]
- (p) Any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP; in this case, molding presses for ABS resin which emit styrene.
- (q) Vacuum metalizing units which have emissions less than or equal to insignificant thresholds.
- (r) One baghouse controlling dust from the BMC press area. [326 IAC 6-3-2].

Existing Approvals

Since the issuance of the Part 70 Operating Permit (T071-18360-00006) on June 7, 2007, there have been no additional approvals.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Jackson County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective December 29, 2005, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM _{2.5} .	

- (a) **Ozone Standards**
 Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Jackson County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM_{2.5}**
 Jackson County has been classified as attainment for PM_{2.5}. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM_{2.5} significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

- (c) **Other Criteria Pollutants**
 Jackson County has been classified as attainment or unclassifiable in Indiana for SO₂, CO, PM₁₀, NO₂, and Pb. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source:

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	92
*PM ₁₀	94
PM _{2.5}	94
SO ₂	0.2
VOC	1110
CO	35
NO _x	41
GHGs as CO ₂ e	49,850
Single HAP	5.4
Total HAP	11
*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".	

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

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC, PM₁₀ and PM_{2.5} is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit Renewal.
- (b) The potential to emit any single HAP is <10 tons per year, and the potential to emit any combination of HAP is <25 tons per year. Therefore, the Permittee is an area source of HAPs.

New Units - Permit Level Determination – Part 70

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

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

PTE Before Controls of the Modification	
Pollutant	Potential To Emit (ton/yr)
PM	25.4
PM ₁₀	25.4
PM _{2.5}	25.4
SO ₂	0
VOC	43.8
CO	0
NO _x	0
Methanol	2.04
Total HAPs	2.04

This source modification is subject to 326 IAC 2-7-10.5(f)(4) since the potential emissions of VOC are greater than 25 tons per year. Additionally, the modification will be incorporated into the Part 70 Operating Permit Renewal No.T071-31066-00006.

Actual Emissions

The following table shows the actual emissions as reported by the source. This information reflects the 2008 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	NA
PM ₁₀	1
SO ₂	0
VOC	30
CO	2
NO _x	3
Lead	0

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.

Potential to Emit After Issuance - New Units

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 of the Entire Source After Issuance of Renewal (tons/year)									
	PM	PM ₁₀	PM _{2.5} *	SO ₂	NO _x	VOC	CO	GHGs	Toluen e	Total HAPs
Anti Fog / Unit 14	0.7	0.7	0.7	0	0	18.4	0	0	0	1.02
Anti Fog / Unit 25	0.7	0.7	0.7	0	0	18.4	0	0	0	1.02
Lean Reflector Booths (5 Units)	1.1	1.1	1.1	0	0	1.1	0	0	0	0
Lean Lens (5 Units)	22.5	22.5	22.5	0	0	24.3	0	0	0	0
New Units	23.7	23.7	23.7	0	0	62.2	0	0	0	1.3
Total PTE of Entire Source	92	94	94	0.2	41	152	34.7	49,850	5.4	11
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000 CO ₂ e	10	25
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000 CO ₂ e	NA	NA
*PM _{2.5} listed is direct PM _{2.5} .										

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 of the Entire Source After Issuance of Renewal (tons/year)									
	PM	PM ₁₀	PM _{2.5} *	SO ₂	NO _x	VOC	CO	GHGs	Toluen e	Total HAPs
Argent Paint 303LE21326H/ Unit 3	11	11	11	0	0	10.6	0	0	5.38	5.38
UVB63R2VS / Unit 6	0	0	0	0	0	21.4	0	0	0	0
butyl acetate/ Unit 6	0	0	0	0	0	26.1	0	0	0	0
UVT2000V1 / Unit 9	54.4	54.4	54.4	0	0	6.3	0	0	0	0
acetone / Unit 9	0	0	0	0	0	0	0	0	0	0
Anti Fog / Unit 10	0.66	0.66	0.66	0	0	18.4	0	0	0	5.4
UV SRC topcoat/Unit 13	0	0	0	0	0	0.3	0	0	0	0
Isopropyl Alcohol/Unit 13	0	0	0	0	0	2.7	0	0	0	0
Thermal Cure Spray Coat/ Unit 14	0.7	0.7	0.7	0	0	18.4	0	0	0	1.02
Thermal Cure Spray Coat/ Unit 25	0.7	0.7	0.7	0	0	18.4	0	0	0	1.02
Lean Reflector Booths (5 Units)	1.1	1.1	1.1	0	0	1.1	0	0	0	0
Lean Lens (5 Units)	22.5	22.5	22.5	0	0	24.3	0	0	0	0
Closed Molding Operations	0	0	0	0	0	1.8	0	0	0	1.8
Natural Gas Combustion	1	3	3	0.2	41.3	2.3	34.7	49,850	0	0.8
Total PTE of Entire Source	92	94	94	0.2	41	152	34.7	49,850	5.4	11
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000 CO ₂ e	10	25
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000 CO ₂ e	NA	NA
*PM _{2.5} listed is direct PM _{2.5} .										

This existing stationary source is not major for PSD because the emissions of each regulated pollutant, excluding GHGs, are less than two hundred fifty (<250) tons per year, emissions of GHGs are less than one hundred thousand (<100,000) tons of CO₂ equivalent emissions (CO₂e) per year, and it is not in one of the twenty-eight (28) listed source categories.

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)
Unit 6 / VOC	RTO	Y	948.5	47.4	100	Y	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to the flow coating line, unit #6 for VOC and have been included in this Title V Renewal. All other units have emissions less than major source thresholds.

- (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) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.
- (1) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart PPPP] because the potential to emit of single HAPs at this source is less than ten (10) tons per year and the potential to emit the combination of HAPs is less than twenty-five (25) tons per year. 40 CFR Part 63, Subpart PPPP only applies to Major Sources of HAPs.

State Rule Applicability - Entire Source

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

The source is subject to 326 IAC 1-5-2.

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, NO_x, 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(b)(3) by July 1 and every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

This source is subject to the opacity limitations specified in 326 IAC 5-1-2(1).

State Rule Applicability – Individual Facilities

326 IAC 8-1-6 (VOC BACT)

- (a) The potential VOC emissions from the coating booths identified as units #3, #9, #10 and base coat surface coating process, and the closed molding area, identified as BMC area, are each less than 25 tons per year. Therefore, 326 IAC 8-1-6 does not apply.

- (b) The potential VOC emissions from flow coating line emission units #6, are greater than 25 tons per year. Therefore, 326 IAC 8-1-6 apply to emission unit #6. Pursuant to CP 071-2037, issued on October 16, 1991, BACT for the flow coating line has been determined to be the use of a thermal oxidizer system with a capture efficiency of 100% and a destruction efficiency of 95%. The minimum oxidizer operation temperature shall not fall below 1,400 degrees Fahrenheit or a temperature and fan amperage established during the latest stack test.
- (c) Pursuant to significant permit modification no. 071-21932-00006, IDEM, OAQ has determined that the BACT for the one (1) lens surface coating booth, identified as unit #13 is the use of a RTO with an overall control efficiency of 95% to control VOC emissions from the lens surface coating booth. In addition, the source shall comply with the following emission limitations:
- (1) The exhaust shall be vented to Regenerative Thermal Oxidizer with a minimum of 95% destruction and 100% capture efficiency for VOC;
 - (2) The total amount of VOC delivered to the coating applicators of the lens surface coating booth shall be limited to less than 60.41 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. This limit, in conjunction with (c), limits the potential to emit VOC from the lens surface coating booth to less than 3.02 tons per year.

Compliance with the above limits and conditions will satisfy the requirements of 326 IAC 8-1-6.

- d) The potential VOC emissions from the new units, Anti fog booth #14, lean reflector coaters #15 through #19 and lean lens coaters #20 through #25, are each less than 25 tons per year. Therefore, 326 IAC 8-1-6 does not apply.

326 IAC 2-2 (PSD)

- (a) The VOC input from the flow coating line, unit #6, shall be less than 948.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The VOC input from the lens surface coating booth, unit #13, shall be less than 60.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) The minimum overall control efficiency of the thermal oxidizer for flow coating line, unit #6 and lens surface coating booth, unit #13 shall be at least 95%.

Compliance with this limit in combination with potential emissions from other emission units shall keep the source-wide emissions of VOC to less than 250 tons per year and shall render the requirements of 326 IAC 2-2 not applicable to the entire source.

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

- (a) The operation of each emission unit at the source 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.
- (b) In the previous Title V Permit 071-18360-00006, there was a requirement in D.2.1 for a HAPs Minor Limit. The source HAPs are less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs, therefore a HAPs Minor Limit is not required. This limit has been removed from the permit. This is a Title I change.
- (c) The operation of each new emission unit at the source, Units #14 - #25, will each 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 to Units #14 - #25.

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-4, the (2) boilers shall limit particulate matter (PM) emissions according to the equation at 326 IAC 6-2-4 as follows:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where: Pt = pounds of PM emitted per MMBtu heat input (lb/MMBtu)
Q = total source operating capacity rating (MMBtu/hr) = 4.69 + 6.42 = 11.11 MMBtu/hr

$$Pt = 1.09/11.11^{0.26} = 0.58 \text{ lb/MMBtu}$$

Therefore, the emission limit for each of the two (2) boilers is 0.58 lb/MMBtu.

Actual PM emissions are less than allowable PM limit, therefore the boilers can comply with the requirements of 326 IAC 6-2-4.

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

- (a) Pursuant to 326 IAC 6-3-2(d), particulate from units #3, #9, #10 and the base coat surface coating process shall be controlled by particulate dry filters, and the Permittee shall operate the control devices in accordance with manufacturer's specifications.
- (b) Pursuant to 326 IAC 6-3-2(d), particulate from units #14 - #25 shall be controlled by particulate dry filters, and the Permittee shall operate the control devices in accordance with manufacturer's specifications.
- (c) Pursuant to 326 IAC 6-3-1(b)(7), the flow coating line, identified as unit #6, and the one (1) lens coating booth, using flow coating application, identified as emission unit #13, are exempt from 326 IAC 6-3.
- (d) 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. Therefore, the particulate emissions from the brazing equipment, cutting torches, soldering equipment, welding equipment, grinding and machining operations, deburring; buffing, polishing, abrasive blasting, pneumatic conveying, woodworking operations and BMC press area, each with a process weight rate of less than one hundred (100) pounds per hour, shall not exceed 0.551 pounds per hour.

326 IAC 8-2-9 (VOC Miscellaneous Metal and Plastic Parts Coating Operations)

Since the units at this source coat plastic parts and not metal, the requirements of 326 IAC 8-2-9 are not applicable to the units at this source.

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. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would

serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance determination requirements applicable to this source are as follows:

Emission Unit	Control Device	Pollutant	Frequency of Testing
Unit #6	RTO	VOC	Every 5 years since last valid compliance demonstration
Unit #13	RTO	VOC	Every 5 years since last valid compliance demonstration

- Unit #6 and Unit #13 require testing to comply with the provisions of 326 IAC 8-1-6.

The compliance monitoring requirements applicable to this source are as follows:

Control	Parameter	Frequency	Range	Excursions and Exceedances
RTO for Unit #6 and RTO for #13	Temperature	Continuous / 3-Hour Block Average	Temperature from latest IDEM approved stack test	Response Steps
	Fan Amperage	Daily	Range from latest IDEM approved stack test	
Dry Filters for Units #3 and #9 - #25	Filters and over spray	Daily	Inspection shall be perform to verify the placement, integrity, and particle loading of the dry filters.	Response Steps
		Weekly	Observation shall be made of the over spray from the spray booth stack to monitor the performance of the dry filters	
		Monthly	Inspection shall be performed of the coating emissions from the stack and the presence of over spray on the rooftops and the nearby ground.	

These monitoring conditions are necessary because:

- The RTO for Units #6 and #13 must operate properly to ensure compliance with 326 IAC 8-1-6, 326 IAC 2-2 Minor Limit and 40 CFR 64.
- The dry filters must operate properly to ensure compliance with 326 IAC 6-3-2(d).

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 September 13, 2011.

Conclusion

The operation of this source producing automotive plastic lighting assemblies shall be subject to the conditions of the attached SSM 071-30915-00006 and Part 70 Operating Permit Renewal No. T071-31066-00006.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Heath Hartley 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) 232-8217 or toll free at 1-800-451-6027 extension.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

**Appendix A: Emissions Calculations
Entire Source Emissions**

Company Name: Valeo Sylvania, LLC
Address City IN Zip: 1231 A Avenue North, Seymour, IN 47274
Part 70 Permit: T071-31066-00006
Reviewer: Heath Hartley
Date: September 13, 2011

Unlimited Potential to Emit

Process / Emission Unit	PM (ton/yr)	PM ₁₀ (ton/yr)	PM _{2.5} (ton/yr)	SO ₂ (ton/yr)	NO _x (ton/yr)	VOC (ton/yr)	CO (ton/yr)	CO _{2e} (ton/yr)	Toluene (ton/yr)	HAPs (ton/yr)
Argent Paint 303LE21326H / Unit 3 (worst case)	11.21	11.21	11.21	0	0	10.6	0	0	5.38	5.38
UVB63R2VS / Unit 6	0	0	0	0	0	427.1	0	0	0	0.00
butyl acetate/ Unit 6	0	0	0	0	0	521.4	0	0	0	0
UVT2000V1 / Unit 9	54.39	54.39	54.39	0	0	6.3	0	0	0	0
acetone / Unit 9	N/A	N/A	N/A	0	0	0.0	0	0	0	0
Anti Fog / Unit 10	0.66	0.66	0.66	0	0	18.4	0	0	0	1.02
UV SRC topcoat/Unit 13	0	0	0	0	0	6.4	0	0	0	0
Isopropyl Alcohol/Unit 13	N/A	N/A	N/A	0	0	54.0	0	0	0	0
Thermal Cure Spray Coat / Unit 14	0.66	0.66	0.66	0	0	18.4	0	0	0	1.02
Thermal Cure Spray Coat / Unit 25	0.66	0.66	0.66	0	0	18.4	0	0	0	1.02
Lean Reflector Booths (5 Units)	1.13	1.13	1.13	0	0	1.1	0	0	0	0
Lean Lens (8 Units)	22.55	22.55	22.55	0	0	24.3	0	0	0	0
Closed Molding Ops.	0	0	0	0	0	1.8	0	0	0	1.75
Natural gas combustion	0.78	3.14	3.14	0.25	41.29	2.3	34.68	49,850	0	0.78
Total	92.05	94.4	94.4	0.2	41.3	1110.5	34.7	49849.9	5.4	11.0

Limited Potential to Emit

Process / Emission Unit	PM (ton/yr)	PM ₁₀ (ton/yr)	PM _{2.5} (ton/yr)	SO ₂ (ton/yr)	NO _x (ton/yr)	VOC (ton/yr)	CO (ton/yr)	CO _{2e} (ton/yr)	Toluene (ton/yr)	HAPs (ton/yr)
Argent Paint 303LE21326H / Unit 3 (worst case)	11.2	11.2	11.2	0	0	10.6	0	0	5	5.4
UVB63R2VS / Unit 6	0	0	0	0	0	21.4	0	0	0	0
butyl acetate/ Unit 6	0	0	0	0	0	26.1	0	0	0	0
UVT2000V1 / Unit 9	54.4	54.4	54.4	0	0	6.3	0	0	0	0
acetone / Unit 9	N/A	N/A	N/A	0	0	0.0	0	0	0	0
Anti Fog / Unit 10	0.7	0.7	0.7	0	0	18.4	0	0	0.0	1.0
UV SRC topcoat/Unit 13	0.0	0.0	0.0	0	0	0.3	0	0	0	0
Isopropyl Alcohol/Unit 13	N/A	N/A	N/A	0	0	2.7	0	0	0	0
Thermal Cure Spray Coat / Unit 14	0.7	0.7	0.7	0	0	18.4	0	0	0	1.0
Thermal Cure Spray Coat / Unit 25	0.7	0.7	0.7	0	0	18.4	0	0	0	1.0
Lean Reflector Booths (5 Units)	1.1	1.1	1.1	0	0	1.1	0	0	0	0
Lean Lens (5 Units)	22.5	22.5	22.5	0	0	24.3	0	0	0	0
Closed Molding Ops.	0	0	0	0	0	1.8	0	0	0	1.8
Natural gas combustion	0.8	3.1	3.1	0.2	41.3	2.3	34.7	49849.9	0.0	0.8
Total	92.05	94.4	94.4	0.2	41.3	152.0	34.7	49849.9	5.4	11.0

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Valeo Sylvania, LLC
Address City IN Zip: 1231 A Avenue North, Seymour, IN 47274
Part 70 Permit: T071-31066-00006
Reviewer: Heath Hartley
Date: September 13, 2011

Material / Emission unit	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Wabash Black / Unit 3	8.45	58.90%	0.0%	58.9%	0.0%	41.10%	0.00130	100	4.98	4.98	2.83	1.78	12.11	10%
Argent Paint 303LE21326H/Unit 3	8.54	59.04%	0.0%	59.0%	0.0%	30.62%	0.00480	100	5.04	5.04	10.60	11.21	16.46	10%
Hardener LE9425B / Unit 3	8.05	59.01%	0.0%	59.0%	0.0%	35.00%	0.00038	100	4.75	4.75	0.79	0.49	13.57	10%
Acetone / Unit 3	6.60	0.00%	0.0%	0.0%	0.0%	0.00%	0.00480	100	0.00	0.00	0.00	N/A	N/A	N/A
UVB63R2VS / Unit 6	8.8	35.03%	0.0%	35.0%	0.0%	57.93%	0.02200	1440	3.08	3.08	427.14	0.00	5.31	100%
butyl acetate/ Unit 6	7.5	100.00%	0.0%	100.0%	0.0%	0.00%	0.01100	1440	7.52	7.52	521.40	0.00	N/A	100%
UVT2000V1 / Unit 9	7.70	9.50%	0.0%	9.5%	0.0%	32.09%	0.00275	720	0.73	0.73	6.34	54.39	2.28	10%
acetone / Unit 9	6.60	0.00%	0.0%	0.0%	0.0%	0.00%	0.00275	720	0.00	0.00	0.00	N/A	N/A	N/A
UV SRC Topcoat/Unit 13	7.35	68.73%	0.0%	68.7%	0.0%	23.86%	0.00200	144	5.05	5.05	6.37	0.00	21.17	100%
Isopropyl Alcohol/Unit 13	6.59	100.00%	0.0%	100.0%	0.0%	0.00%	0.01300	144	6.59	6.59	54.03	N/A	N/A	N/A

Potential Emissions

Add worst case coating to all solvents

1029.51

67.87

PM Removal Efficiency of 90%:

6.79

METHODOLOGY

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

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

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

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

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

Total = Worst Coating + Sum of all solvents used

**Appendix A: Emissions Calculations
VOC and Particulate
HAPS from Coating Operations**

Company Name: Valeo Sylvania, LLC
Address City IN Zip: 1231 A Avenue North, Seymour, IN 47274
Part 70 Permit: T071-31066-00006
Reviewer: Heath Hartley
Date: September 13, 2011

Material / Emission Unit	Density (lb/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Styrene	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Styrene Emissions (ton/yr)	Methanol Emissions (ton/yr)
Wabash Black / Unit 3	8.5	0.00130	100	0%	15%	0%	0%	0	0.72	0	0
Argent Paint 303LE21326H/Unit 3	8.537	0.004800	200	0%	15%	0%	0.00%	0	5.38	0	0
Hardener LE9425B / Unit 3	8.05	0.000380	200	7%	0%	0%	0.00%	0.19	0.00	0	0
UVB63R2VS / Unit 6	8.8	0.02200	1440	0.00%	0.00%	0.00%	0.00%	0	0	0	0
butyl acetate/ Unit 6	7.5	0.01100	1440	0.00%	0.00%	0.00%	0.00%	0	0	0	0
UVT2000V1 / Unit 9	7.7	0.00275	720	0%	0%	0%	0.00%	0	0	0	0
Thermal Cure Spray Coat / Unit 10	7.15	0.00452	144	0%	0%	0%	5.00%	0	0	0	1.02
Thermal Cure Spray Coat / Unit 14	7.15	0.00452	144	0%	0%	0%	5.00%	0	0	0	1.02
Thermal Cure Spray Coat / Unit 25	7.15	0.00452	144	0%	0%	0%	5.00%	0	0	0	1.02
Lean Reflector Booth 1/Unit 15	9.41	0.003200	144	0%	0%	0%	0.00%	0.00	0.00	0	0
Lean Lens 1/ Unit 20	7.66	0.003800	144	0%	0%	0%	0.00%	0.00	0.00	0	0

METHODOLOGY

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

**Appendix A: Emissions Calculations
VOC and Particulate
Emissions from Closed Molding Operations**

Company Name: Valeo Sylvania, LLC
Address City IN Zip: 1231 A Avenue North, Seymour, IN 47274
Part 70 Permit: T071-31066-00006
Reviewer: Heath Hartley
Date: September 13, 2011

BMC Press #	PRODUCT	TYPE	V [cm ³]	sg [g/cm ³]	BOM [lb]	BOM as of 4/8/03	Cycle Time [sec]	Refl per year	lbs molded per year		% Styrene in BMC	Max tons of Styrene Input	Max tons of Styrene Emitted	
27	2003 CLIO	H/L	156	1.838	0.632	0.683	53	1,190,038	812,796	BMCI	11.2%	45.5	0.5	
28	GMX 320	H/L	248	1.900	1.039	0.995	81.0	778,667	774,773	BMCI	11.2%	43.4	0.4	
29	03 ST22 Chrysler	H/L	327	1.900	1.370	1.295	65.0	970,338	1,256,588	REC T70	3.7%	23.2	0.2	
39	05 WK	H/L (BUX-RHD)	266	1.838	1.078	1.078	60.0	1,051,200	1,132,878	REC T70	3.7%	21.0	0.2	
40	05 WK	H/L (BUX-LHD)	266	1.838	1.078	1.078	60.0	1,051,200	1,132,878	REC T70	3.7%	21.0	0.2	
44	05 WK	H/L (DOM.)	266	1.838	1.078	1.078	60.0	1,051,200	1,132,878	REC T70	3.7%	21.0	0.2	
									6,242,792			Total:	1.75	
									tons/yr	713				

lbs molded per year (lb/yr) = Refl per year * BOM

Tons Styrene Input (ton/yr) = % Styrene in BMC * lbs molded per year / 2000 lb

Tons Styrene Emitted = 1% styrene emitted, based on information supplied by manufacturer.

Emissions based on worst case material and maximum load for each press.

500 ton presses

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

Company Name: Valeo Sylvania, LLC
Address City IN Zip: 1231 A Avenue North, Seymour, IN 47274
Part 70 Permit: T071-31066-00006
Reviewer: Heath Hartley
Date: September 13, 2011

Heat Input Capacity Potential Throughput
MMBtu/hr MMCF/yr
94.27 825.8

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM ₁₀ *	direct PM _{2.5} *	SO ₂	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.78	3.14	3.14	0.25	41.29	2.27	34.68

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu. MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

Total heat input capacity =

seventeen (17) HVAC units with a combined total heat input capacity of 3.2 MMBtu/hr.

eighteen (18) AMU units with a combined total heat input capacity of 50.0 MMBtu/hr.

seventeen (17) miscellaneous heaters with a combined total heat input capacity of 29.79 MMBtu/hr.

one (1) RTO with a heat input capacity of 0.17 MMBtu/hr.

one (1) boiler with a heat input capacity of 4.69 MMBtu/hr and one (1) boiler with a heat input capacity of 6.42 MMBtu/hr

See page 2 for HAPs emissions calculations.

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

Company Name: Valeo Sylvania, LLC
Address City IN Zip: 1231 A Avenue North, Seymour, IN 47274
Permit Number: T071-31066-00006
Reviewer: Heath Hartley
Date: September 13, 2011

HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	8.671E-04	4.955E-04	3.097E-02	7.432E-01	1.404E-03

HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	2.065E-04	4.542E-04	5.781E-04	1.569E-04	8.671E-04

0.78

Methodology is the same as page 1.
 The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.
 See Page 3 for Greenhouse Gas calculations.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Greenhouse Gas Emissions

Company Name: Valeo Sylvania, LLC

Address City IN Zip: 1231 A Avenue North, Seymour, IN 47274

Permit Number: T071-31066-00006

Reviewer: Heath Hartley

Date: September 13, 2011

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	49,548	0.9	0.9
Summed Potential Emissions in tons/yr	49,550		
CO2e Total in tons/yr	49,850		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4

**Appendix A: Emissions Calculations
VOC and Particulate From Surface Coating Operations**

Company Name: Valeo Sylvania, LLC
Address City IN Zip: 1231 A Avenue North, Seymour, IN 47274
Part 70 Permit: T071-31066-00006
Reviewer: Heath Hartley
Date: September 13, 2011

New Units

SSM 071-30915-00006

Material / Emission unit	Density (lbs/gal)	Max. Coated Surface (in ²)	Dry Film Thickness (microns)	Dry Vol. on part (gal)	% volatile by volume	Weight % Solids	Wet volume on part (gal)	Transfer Eff.	Gallons Sprayed per part	Cycle Time (sec/part)	Production Rate (part/hr)	gal. sprayed per hr.	*VOC lb / gal	Potential VOC (ton/yr)	PTE of PM/PM ₁₀ (tons/yr)	Control Efficiency (%)	Controlled PM/PM ₁₀ (tons/yr)
Thermal Cure Spray Coat / Unit 14	7.15	350	3	0.0002	93.4%	9.3%	0.0029	65%	0.00452	25	144	0.65	6.46	18.41	0.66	90%	0.066
Thermal Cure Spray Coat / Unit 25	7.15	350	3.25	0.00019	93.4%	9.3%	0.0029	65%	0.00452	25	144	0.65	6.46	18.41	0.66	90%	0.066
Lean Reflector Booth 1 - Red Spot UVB325 UV Basecoating Material																	
LRB 1/Unit 15	9.41	223	35	0.0013	0.2894%	7.3%	0.0013	65%	0.00205	25	144	0.30	0.02	0.03	0.31	90%	0.031
LRB 1/Unit 16	9.41	223	35	0.0013	0.2894%	7.3%	0.0013	65%	0.00205	25	144	0.30	0.02	0.03	0.31	90%	0.031
LRB 1/Unit 17	9.41	223	35	0.0013	0.2894%	7.3%	0.0013	65%	0.00205	25	144	0.30	0.02	0.03	0.31	90%	0.031
LRB 1/Unit 18	9.41	223	35	0.0013	0.2894%	7.3%	0.0013	65%	0.00205	25	144	0.30	0.02	0.03	0.31	90%	0.031
LRB 1/Unit 19	9.41	223	35	0.0013	0.2894%	7.3%	0.0013	65%	0.00205	25	144	0.30	0.02	0.03	0.31	90%	0.031
Lean Reflector Booth 1 - BASF QN11-0117 UVGloss Primer for BMC																	
LRB 1/Unit 15	9.41	223	25	0.00095	2.0%	7.3%	0.0010	65%	0.00149	25	144	0.21	0.24	0.22	0.23	90%	0.023
LRB 1/Unit 16	9.41	223	25	0.00095	2.0%	7.3%	0.0010	65%	0.00149	25	144	0.21	0.24	0.22	0.23	90%	0.023
LRB 1/Unit 17	9.41	223	25	0.00095	2.0%	7.3%	0.0010	65%	0.00149	25	144	0.21	0.24	0.22	0.23	90%	0.023
LRB 1/Unit 18	9.41	223	25	0.00095	2.0%	7.3%	0.0010	65%	0.00149	25	144	0.21	0.24	0.22	0.23	90%	0.023
LRB 1/Unit 19	9.41	223	25	0.00095	2.0%	7.3%	0.0010	65%	0.00149	25	144	0.21	0.24	0.22	0.23	90%	0.023
Lean Lens 1/Unit 20	7.66	450	10	0.0008	63.6%	44.3%	0.0021	50%	0.00421	25	144	0.61	1.83	4.86	4.51	90%	0.451
Lean Lens 1/Unit 21	7.66	450	10	0.0008	63.6%	44.3%	0.0021	50%	0.00421	25	144	0.61	1.83	4.86	4.51	90%	0.451
Lean Lens 1/Unit 22	7.66	450	10	0.0008	63.6%	44.3%	0.0021	50%	0.00421	25	144	0.61	1.83	4.86	4.51	90%	0.451
Lean Lens 1/Unit 23	7.66	450	10	0.0008	63.6%	44.3%	0.0021	50%	0.00421	25	144	0.61	1.83	4.86	4.51	90%	0.451
Lean Lens 1/Unit 24	7.66	450	10	0.0008	63.6%	44.3%	0.0021	50%	0.00421	25	144	0.61	1.83	4.86	4.51	90%	0.451
FKK UVX0947 / Unit 10	7.15	350	3.25	0.00019	93.4%	9.3%	0.0029	65%	0.00452	25	144	0.65	6.46	18.41	0.66	90%	0.066

Worst Case 43.8 25.4

METHODOLOGY

Dry Volume on part (gal) = Max coated surface area (sq. in) * dry film thickness (micron) * 1in/25400 micron * 1 gal / 231 cubic inch

Wet Volume on part (gal) = dry volume on part (gal) / (1-% volatile by volume)

Gallons sprayed per part (gal/part) = wet volume per part (gal) / transfer efficiency

*Maximum, from product data sheet, UVB325 Series, 3/23/2009

*VOC EF (lb/gal) = coating QN11-0117 density 9.405 lb/gal * solvent n-butyl acetate 2.5 wt%

Potential VOC (ton/yr) = VOC (lb/gal) * gal sprayed per hr * 8760/2000

Potential PM (ton/yr) = Density (lb/gal) * Weight % Solid * Gallons sprayed per part (gal/part) * Production Rate (part/hr) * (1-Transfer Eff.) * 8760/2000

	Theor. VOC lb/ga	Mix Ratio	Parts Volatile
UVX0947 Paint	6.43	6	38.56
ICK105VL-B Catalyst	6.64	1	6.64
		7	45.20
Anti Fog combined theor VOC lb/gal			6.46



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Valeo Sylvania, L.L.C.
1231 Ave A North
Seymour, IN 47274

DATE: February 1, 2012

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

SUBJECT: Final Decision
Title V
071-31066-00006

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:
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

February 1, 2012

TO: Jackson County Public Library

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

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

Applicant Name: Valeo Sylvania
Permit Number: 071-31066-00006

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	CDENNY 2/1/2012 Valeo Sylvania, L.L.C. 071-31066-00006 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

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2		Paul Rogers Dir - Ops Valeo Sylvania, L.L.C. 1231 Ave A North Seymour IN 47274 (RO CAATS)									
3		Jackson County Commissioner Jackson County Courthouse Brownstown IN 47220 (Local Official)									
4		Mr. Wendell Hibdon Plumbers & Steam Fitters Union, Local 136 2300 St. Joe Industrial Park Dr Evansville IN 47720 (Affected Party)									
5		Mr. Tome Earnhart 3960 N. CR 300 W. North Vernon IN 47265 (Affected Party)									
6		Seymour City Council and Mayors Office 301 North Chestnut Street Seymour IN 47274 (Local Official)									
7		Jackson County Health Department 801 West 2nd Street Seymour IN 47274-2711 (Health Department)									
8		Jackson Co Public Library 303 W 2nd Street Seymour IN 47274-2184 (Library)									
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