



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: January 3, 2013

RE: Greenville Technology, Inc. - Anderson / 095-32281-00136

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

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot12/03/07



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New Source Construction and Federally Enforceable State Operating Permit OFFICE OF AIR QUALITY

Greenville Technology, Inc. - Anderson
3511 West 73rd Street
Anderson, Indiana 46013

(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. 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 2-8 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.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Operation Permit No.: F095-32281-00136	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: January 3, 2013 Expiration Date: January 3, 2018

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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 2-8-3(b)]

The Permittee owns and operates a stationary plastic automobile parts manufacturing plant.

Source Address:	3511 West 73rd Street, Anderson, Indiana 46013
General Source Phone Number:	(937) 548-1471
SIC Code:	3714 (Motor Vehicle Parts and Accessories)
County Location:	Madison
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) plastic parts surface coating line, identified as EU01, approved for construction in 2012, and consisting of the following:
- (1) One (1) conveyor system;
 - (2) One (1) deionization booth;
 - (3) One (1) paint booth, consisting of two (2) robotic HVLP spray guns, with a maximum coating usage of 8.3 gallons per hour and maximum clean up solvent usage of 1.0 gallons per hour, using a water wash curtain to control particulate emissions, identified as CE02, and exhausting to one (1) stack, identified as EP01;
 - (4) One (1) flash off tunnel; and
 - (5) One (1) natural gas-fired cure oven, with a maximum heat input capacity of 0.80 MMBtu per hour.

Note: The paint booth, flash off tunnel, and natural gas-fired cure oven are contained within a permanent total enclosure, use a natural gas-fired regenerative thermal oxidizer (RTO) for VOC control, identified as CE01, which has a maximum heat input of 5.24 MMBtu per hour, and exhausting to one (1) stack, identified as EP01;

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

- (a) Twenty-two (22) automated plastic injection molding machines, identified as EU02, approved for construction in 2012, each with a maximum capacity of 100 pounds of polypropylene per hour, using 1 gallon of mold releaser per day, and exhausting to the indoors.
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
 - (1) One (1) natural gas-fired heater, identified as EU03, approved for construction in 2012, with a maximum heat input capacity of 0.40 MMBtu per hour, and exhausting to one (1) stack, identified as EP03.
 - (2) Six (6) natural gas-fired heaters, identified as EU04, approved for construction in 2012, each with a maximum heat input capacity of 0.40 MMBtu per hour, and exhausting to one (1) stack, identified as EP04.
 - (3) One (1) natural gas-fired heater, identified as EU05, approved for construction in 2012, with a maximum heat input capacity of 0.15 MMBtu per hour, and exhausting to one (1) stack, identified as EP05.
 - (4) One (1) natural gas-fired heater, identified as EU06, approved for construction in 2012, with a maximum heat input capacity of 0.23 MMBtu per hour, and exhausting to one (1) stack, identified as EP06.
 - (5) One (1) natural gas-fired heater, identified as EU07, approved for construction in 2012, with a maximum heat input capacity of 0.24 MMBtu per hour, and exhausting to one (1) stack, identified as EP07.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

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 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-8 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, F095-32281-00136, 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, until the renewal permit has been issued or denied.

B.5 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.6 Enforceability [326 IAC 2-8-6] [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.7 Severability [326 IAC 2-8-4(4)]

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.8 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.9 Duty to Provide Information [326 IAC 2-8-4(5)(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.10 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
 - (1) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), 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) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent 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

- (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 2-8-4(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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

- (a) If required by specific condition(s) in Section D of this permit, 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (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 except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

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

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

The notice fulfills the requirement of 326 IAC 2-8-4(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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-3(c)(6) 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 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) 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.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F095-32281-00136 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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 2-8-3(h) and 326 IAC 2-8-9.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State 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 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 2-8-8(a)]
- (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 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(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 2-8-8(c)]

B.18 Permit Renewal [326 IAC 2-8-3(h)]

- (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 2-8-3. 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least 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 2-8 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 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.19 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) 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 approval required by 326 IAC 2-8-11.1 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 2-8-15(b)(1) and (c). 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 2-8-15(b)(1) and (c).

- (b) **Emission Trades [326 IAC 2-8-15(b)]**
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 2-8-15(b).
- (c) **Alternative Operating Scenarios [326 IAC 2-8-15(c)]**
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 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.22 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

B.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than 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) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][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 2-8-4(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 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
- (1) The potential to emit any regulated pollutant, except particulate matter (PM) and greenhouse gases (GHGs), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
 - (4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

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

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

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator 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.6 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).

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

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

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

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

(C) Waste disposal site.

- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

Testing Requirements [326 IAC 2-8-4(3)]

C.9 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 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 2-8-4][326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(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 2-8-4][326 IAC 2-8-5(a)(1)]

C.13 Risk Management Plan [326 IAC 2-8-4] [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 2-8-4] [326 IAC 2-8-5]

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 2-8-4][326 IAC 2-8-5]

- (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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following:
 - (AA) All calibration and maintenance records.
 - (BB) All original strip chart recordings for continuous monitoring instrumentation.
 - (CC) Copies of all reports required by the FESOP.Records of required monitoring information include the following:
 - (AA) The date, place, as defined in this permit, and time of sampling or measurements.
 - (BB) The dates analyses were performed.
 - (CC) The company or entity that performed the analyses.
 - (DD) The analytical techniques or methods used.
 - (EE) The results of such analyses.
 - (FF) The operating conditions as existing at the time of sampling or measurement.

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.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). 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) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. 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.18 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) plastic parts surface coating line, identified as EU01, approved for construction in 2012, and consisting of the following:
- (1) One (1) conveyor system;
 - (2) One (1) deionization booth;
 - (3) One (1) paint booth, consisting of two (2) robotic HVLP spray guns, with a maximum coating usage of 8.3 gallons per hour and maximum clean up solvent usage of 1.0 gallons per hour, using a water wash curtain to control particulate emissions, identified as CE02, and exhausting to one (1) stack, identified as EP01;
 - (4) One (1) flash off tunnel; and
 - (5) One (1) natural gas-fired cure oven, with a maximum heat input capacity of 0.80 MMBtu per hour.

Note: The paint booth, flash off tunnel, and natural gas-fired cure oven are contained within a permanent total enclosure, use a natural gas-fired regenerative thermal oxidizer (RTO) for VOC control, identified as CE01, which has a maximum heat input of 5.24 MMBtu per hour, and exhaust to one (1) stack, identified as EP01;

(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 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render 326 IAC 2-2 not applicable, the VOC emissions from the regenerative thermal oxidizer (CE01), which is used to control the emissions from the paint booth, flash off tunnel, and natural gas-fired cure oven of the plastic parts surface coating line (EU01) shall not exceed 8.36 pounds per hour.

Compliance with this limit, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 100 tons per 12 consecutive month period, and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

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

Pursuant to 326 IAC 8-1-6 (BACT), the Permittee shall control the VOC emissions from the paint booth, flash off tunnel, and natural gas-fired cure oven of the plastic parts surface coating line (EU01) using Best Available Control Technology (BACT). The BACT for the plastic parts surface coating line (EU01) has been determined to be the following:

- (a) The VOC emissions from the paint booth, flash off tunnel, and natural gas-fired cure oven of the plastic parts surface coating line (EU01) shall be controlled by a combination of a permanent total enclosure and a regenerative thermal oxidizer with an overall control efficiency (including the capture efficiency and destruction efficiency) equal to or greater than 95% or the VOC outlet concentration shall not exceed 12 ppmv as VOC.
- (b) The regenerative thermal oxidizer shall operate at all times when the paint booth, flash off tunnel, and natural gas-fired cure oven of the plastic parts surface coating line (EU01) is in operation.

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

Pursuant to 326 IAC 6-3-2(d), particulate from the paint booth of the plastic parts surface coating line (EU01) shall be controlled by dry particulate filters, waterwash, or an equivalent control device, and the Permittee shall operate each control device in accordance with manufacturer's specifications.

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for the plastic parts surface coating line (EU01) and its control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Conditions D.1.1 and D.1.2(a) the Permittee shall perform VOC (including emission rate, destruction efficiency, and capture efficiency) testing for the plastic parts surface coating line (EU01) regenerative thermal oxidizer (CE01) no later than sixty (60) days after achieving maximum capacity, but not later than one hundred and eighty (180) days after initial startup. This testing shall be conducted utilizing methods approved by the Commissioner and shall be repeated at least once every five (5) 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.1.6 VOC and Particulate Control

- (a) In order to comply with Conditions D.1.1 and D.1.2, the regenerative thermal oxidizer (CE01) for VOC control shall be in operation at all times when the paint booth, flash off tunnel, and natural gas-fired cure oven of the plastic parts surface coating line (EU01) is in operation.
- (b) In order to comply with Condition D.1.3, the water wash curtain (CE02) for particulate control shall be in operation at all times when the paint booth of the plastic parts surface coating line (EU01) is in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

D.1.7 Thermal Oxidizer Temperature

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the regenerative thermal oxidizer (CE01) for measuring operating temperature. For the purpose of this condition, continuous means no less than once per fifteen (15) minutes. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature of 1,550°F.
- (b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.1 and D.1.2(a).
- (c) On and after the date the stack test results are available, the Permittee shall operate the regenerative thermal oxidizer (CE01) at or above the 3-hour average temperature as observed during the compliant stack test.

D.1.8 Parametric Monitoring

- (a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.1 and D.1.2(a).
- (b) The duct pressure or fan amperage shall be observed at least once per day when the regenerative thermal oxidizer (CE01) is in operation. On and after the date the stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the plastic parts surface coating line stack (EP01) while the plastic parts surface coating line is in operation. If a condition exists which should result in a response, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response required by this condition. Failure to take a reasonable response shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. If a condition exists which should result in a response, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response required by this condition. Failure to take a reasonable response shall be considered a deviation from this permit.

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

D.1.10 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.7, the Permittee shall maintain continuous temperature records for the regenerative thermal oxidizer (CE01) and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.
- (b) To document the compliance status with Condition D.1.8, the Permittee shall maintain daily records of the duct pressure or fan amperage for the regenerative thermal oxidizer (CE01). The Permittee shall include in its daily record when a duct pressure or fan amperage reading is not taken and the reason for the lack of a duct pressure or fan amperage reading (e.g. the process did not operate that day).
- (c) To document the compliance status with Condition D.1.9, the Permittee shall maintain a log of the weekly overspray observations, weekly observations of the water level in the pans, and the daily, weekly, and monthly inspections.
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Greenville Technology, Inc. - Anderson
Source Address: 3511 West 73rd Street, Anderson, Indiana 46013
FESOP Permit No.: F095-32281-00136

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Greenville Technology, Inc. - Anderson
Source Address: 3511 West 73rd Street, Anderson, Indiana 46013
FESOP Permit No.: F095-32281-00136

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) 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 Describe:
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
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Greenville Technology, Inc. - Anderson
Source Address: 3511 West 73rd Street, Anderson, Indiana 46013
FESOP Permit No.: F095-32281-00136

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

Page 1 of 2

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Greenville Technology, Inc. - Anderson
3511 West 73rd Street
Anderson, Indiana 46013

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)
4. I hereby certify that Greenville Technology, Inc. - Anderson 3511 West 73rd Street, Anderson, Indiana 46013, completed construction of the plastic automobile parts manufacturing plant on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on September 7, 2012 and as permitted pursuant to New Source Construction Permit and Federally Enforceable State Operating Permit No. F095-32281-00136, Plant ID No. 095-00136 issued on _____.
5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature _____
Date _____

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana
on this _____ day of _____, 20____. My Commission expires: _____.

Signature _____
Name _____ (typed or printed)

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

Technical Support Document (TSD) for a New Source Construction and
Federally Enforceable State Operating Permit (FESOP)

Source Description and Location

Source Name: Greenville Technology, Inc. - Anderson
Source Location: 3511 West 73rd Street, Anderson, IN 46013
County: Madison
SIC Code: 3714 (Motor Vehicle Parts and Accessories)
Operation Permit No.: F 095-32281-00136
Permit Reviewer: Brian Williams

On September 7, 2012, the Office of Air Quality (OAQ) received an application from Greenville Technology, Inc. related to the construction and operation of a new plastic automobile parts manufacturing plant.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Madison County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective October 19, 2007, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for 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. Madison 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}**
Madison 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**
Madison County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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.

Background and Description of New Source Construction

The Office of Air Quality (OAQ) has reviewed an application, submitted by Greenville Technology, Inc. - Anderson on September 7, 2012, relating to the construction and operation of a new plastic automobile parts manufacturing plant.

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

- (a) One (1) plastic parts surface coating line, identified as EU01, approved for construction in 2012, and consisting of the following:
- (1) One (1) conveyor system;
 - (2) One (1) deionization booth;
 - (3) One (1) paint booth, consisting of two (2) robotic HVLP spray guns, with a maximum coating usage of 8.3 gallons per hour and maximum clean up solvent usage of 1.0 gallons per hour, using a water wash curtain to control particulate emissions, identified as CE02, and exhausting to one (1) stack, identified as EP01;
 - (4) One (1) flash off tunnel; and
 - (5) One (1) natural gas-fired cure oven, with a maximum heat input capacity of 0.80 MMBtu per hour.
- Note: The paint booth, flash off tunnel, and natural gas-fired cure oven are contained within a permanent total enclosure, use a natural gas-fired regenerative thermal oxidizer (RTO) for VOC control, identified as CE01, which has a maximum heat input of 5.24 MMBtu per hour, and exhausting to one (1) stack, identified as EP01;

- (b) Insignificant activities consisting of the following:
- (1) Twenty-two (22) automated plastic injection molding machines, identified as EU02, approved for construction in 2012, each with a maximum capacity of 100 pounds of polypropylene per hour, using 1 gallon of mold releaser per day, and exhausting to the indoors.
 - (2) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
 - (i) One (1) natural gas-fired heater, identified as EU03, approved for construction in 2012, with a maximum heat input capacity of 0.40 MMBtu per hour, and exhausting to one (1) stack, identified as EP03.
 - (ii) Six (6) natural gas-fired heaters, identified as EU04, approved for construction in 2012, each with a maximum heat input capacity of 0.40 MMBtu per hour, and exhausting to one (1) stack, identified as EP04.
 - (iii) One (1) natural gas-fired heater, identified as EU05, approved for construction in 2012, with a maximum heat input capacity of 0.15 MMBtu per hour, and exhausting to one (1) stack, identified as EP05.
 - (iv) One (1) natural gas-fired heater, identified as EU06, approved for construction in 2012, with a maximum heat input capacity of 0.23 MMBtu per hour, and exhausting to one (1) stack, identified as EP06.
 - (v) One (1) natural gas-fired heater, identified as EU07, approved for construction in 2012, with a maximum heat input capacity of 0.24 MMBtu per hour, and exhausting to one (1) stack, identified as EP07.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – FESOP

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	42.13
PM10 ⁽¹⁾	42.38
PM2.5	42.38
SO ₂	0.03
NO _x	4.44
VOC	255.93
CO	3.73
GHGs as CO ₂ e	5,359.37

(1) 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".

HAPs	Potential To Emit (tons/year)
Naphthalene	0.58
Xylene	0.81
All Other HAPs	0.10
TOTAL HAPs	1.23

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of VOC is greater than one hundred (100) tons per year. The PTE of all other regulated criteria pollutants are each less than one hundred (100) tons per year. The source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a New Source Construction Permit (326 IAC 2-5.1-3) and a Federally Enforceable State Operating Permit (FESOP) (326 IAC 2-8), because the source will limit emissions to less than the Title V major source threshold levels.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).
- (c) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year.

PTE of the Entire Source After Issuance of the FESOP

The table below summarizes the potential to emit of the entire source after issuance of this FESOP, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP, 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 FESOP (tons/year)									
	PM	PM10 ¹	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e	Total HAPs	Worst Single HAP
Plastic Parts Surface Coating Line (EU01) ^{2,3}	2.14	2.31	2.31	0.02	2.94	36.62	2.47	3,553.53	0.64	0.26 Xylene
Plastic Injection Molding (EU02)	0.29	0.29	0.29	0	0	2.28	0	0	0.56	0.55, Xylene
Natural Gas Heater (EU03)	0.003	0.01	0.01	0.001	0.18	0.01	0.15	211.52	0.003	0.003, Hexane
Natural Gas Heater (EU04)	0.020	0.08	0.08	0.01	1.05	0.06	0.88	1,269.12	0.020	0.019, Hexane
Natural Gas Heater (EU05)	0.001	0.005	0.005	0.0004	0.07	0.00	0.06	79.32	0.001	0.001, Hexane
Natural Gas Heater (EU06)	0.002	0.01	0.01	0.001	0.10	0.01	0.08	118.98	0.002	0.002, Hexane
Natural Gas Heater (EU07)	0.002	0.01	0.01	0.001	0.11	0.01	0.09	126.91	0.002	0.002, Hexane
Total PTE of Entire Source	2.46	2.72	2.72	0.03	4.44	38.98	3.73	5,359.37	1.23	0.81 Xylene
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000	NA	NA
negl. = negligible ¹ 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". ² Pursuant to 326 IAC 6-3-2(d), the source is required to control particulate matter emissions using a water wash curtain. Therefore, the limited potential to emit PM, PM10, and PM2.5 is after control. ³ Source has limited VOC emissions to render 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70 Permits) not applicable.										

(a) FESOP Status

This new source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels. In addition, this new source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

- (1) The VOC emissions from the regenerative thermal oxidizer (CE01), which is used to control the emissions from the plastic parts surface coating line (EU01) shall not exceed 8.36 pounds per hour.

Note: Pursuant to 326 IAC 8-1-6 (BACT), the source is required to control VOC emissions using a combination of a permanent total enclosure and a regenerative thermal oxidizer with an overall control efficiency (including the capture efficiency and destruction efficiency) equal to or greater than 95% or the VOC outlet concentration shall not exceed 12 ppmv as VOC. Assuming the plastic parts surface coating line (EU01) is operating at maximum capacity results in controlled VOC emissions of 2.89 pounds per hour. However, the limited potential to emit VOC is based on the VOC outlet concentration limit because this results in the worst case pound per hour VOC emissions (see Appendix A for detailed emission calculations and Appendix B for the BACT analysis).

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 100 tons per 12 consecutive month period, and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

(b) PSD Minor Source

This new source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit VOC is limited to less than 250 tons per year, the potential to emit all other attainment regulated criteria pollutants are less than 250 tons per year, the potential to emit greenhouse gases (GHGs) is less than the PSD subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM (326 IAC 12), are not included in the permit, since this source does not assemble automobiles or light-duty trucks. This source manufactures plastic automobile parts.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR 63, Subpart IIII (326 IAC 20-85), are not included in the permit, since this source does not surface coat automobile or new light-duty truck bodies or body parts for new automobiles or new light-duty trucks and is not a major source for hazardous air pollutants. A major source of HAP emissions is any stationary source that emits or has the potential to emit any single HAP at a rate of 10 tons or more per year or any combination of HAP at a rate of 25 tons or more per year.
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Plastic Parts and Products, 40 CFR 63, Subpart PPPP (326 IAC 20-81), are not included in the permit, since this source is not a major source for hazardous air pollutants.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH, are not included in the permit because the source does not have paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl), does not perform autobody refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations, and does not perform spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-8-4 (FESOP)
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
This source is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the entire source is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (d) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

- (e) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
 - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (h) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year.
- (j) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (k) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Plastic Parts Surface Coating Line (EU01)

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
 - (1) Pursuant to 326 IAC 6-3-2(d)(1), particulate from the paint booth of the plastic parts surface coating line (EU01), shall be controlled by particulate filters, waterwash, or an equivalent control device, and the Permittee shall operate each control device in accordance with manufacturer's specifications.
 - (2) The natural gas-fired cure oven and regenerative thermal oxidizer are exempt from the requirements of 326 IAC 6-3-2, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight.
- (b) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The plastic parts surface coating line (EU01) will be constructed after January 1, 1980 and has potential VOC emissions greater than twenty-five (25) tons per year. Therefore, the paint booth flash off tunnel, and natural gas-fired cure oven of the plastic parts surface coating line (EU01) is subject to 326 IAC 8-1-6 and the Permittee is required to control the VOC emissions using the Best Available Control Technology (BACT).

According to the BACT analysis contained in Appendix B, IDEM, OAQ has determined that the following requirements represent BACT for the plastic parts surface coating line (EU01):

- (1) The VOC emissions from the paint booth, flash off tunnel, and natural gas-fired cure oven of the plastic parts surface coating line (EU01) shall be controlled by a combination of a permanent total enclosure and a regenerative thermal oxidizer with an overall control efficiency (including the capture efficiency and destruction efficiency) equal to or greater than 95% or the VOC outlet concentration shall not exceed 12 ppmv as VOC.

(2) The regenerative thermal oxidizer shall operate at all times when the paint booth, flash off tunnel, and natural gas-fired cure oven of the plastic parts surface coating line (EU01) is in operation.

(c) There are no other 326 IAC 8 Rules that are applicable to the plastic parts surface coating line.

Plastic Injection Molding (EU02)

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
 Pursuant to 326 IAC 6-3-1(b)(14), the plastic injection molding machines are exempt from the requirements of 326 IAC 6-3-2 since the potential particulate emissions are less than 0.551 pounds per hour, each.
- (b) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
 Each plastic injection molding machine is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each machine is less than twenty-five (25) tons per year.

Natural Gas-Fired Heaters (EU03 - EU07)

- (a) 326 IAC 6-2-1 (Particulate Emission Limitations for Sources of Indirect Heating)
 The insignificant natural gas-fired units are not subject to 326 IAC 6-2-1, since they are not sources of indirect heating.
- (b) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
 The insignificant natural gas-fired units are exempt from the requirements of 326 IAC 6-3-2, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight.

Compliance Determination, Monitoring and Testing Requirements
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(a) The compliance determination and monitoring requirements applicable to this source are as follows:

Emission Unit/Control	Operating Parameters	Frequency
Paint Booth of the Plastic Parts Surface Coating Line (EU01)/Water Wash Curtain (CE02)	Water level of the water pans meet the manufacturer's recommended level	Once per day
	Water level of the pans shall be maintained at a level where surface agitation indicates impact of the air flow	Once per week
	Baffle Panel Inspections	Once per week
	Overspray Observations	Once per week
	Stack Exhaust Inspections	Once per month
Paint Booth of the Plastic Parts Surface Coating Line (EU01)/Regenerative Thermal Oxidizer (CE01)	Operating Temperature	Continuous
	Fan Amperage or Duct Pressure	Once per day

(b) The testing requirements applicable to this source are as follows:

Testing Requirements				
Emission Unit	Control Device	Pollutant	Timeframe for Testing	Frequency of Testing
Paint Booth of the Plastic Parts Surface Coating Line (EU01)	Regenerative Thermal Oxidizer (CE01)	VOC	No later than 60 days after achieving maximum capacity or 180 days after initial startup	Once every five (5) years

Conclusion and Recommendation

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 7, 2012.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and FESOP No. 095-32281-00136. The staff recommends to the Commissioner that this New Source Construction and FESOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Brian Williams at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5375 or toll free at 1-800-451-6027 extension 4-5375.
- (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.in.gov/idem

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

Company Name: Greenville Technology, Inc. - Anderson
Address City IN Zip: 3511 West 73rd Street, Anderson, IN 46013
Permit Number: 095-32281-00136
Permit Reviewer: Brian Williams

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water and VOC Exempt Solvents	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Coatings															
R-1280 Black	8.04	71.50%	0.0%	71.5%	0.0%	19.60%	8.32	5.75	5.75	47.83	1,147.88	209.49	41.75	29.33	50%
NH-861	7.52	85.90%	0.0%	85.9%	0.0%	9.00%	8.32	6.46	6.46	53.74	1,289.87	235.40	19.32	71.77	50%
									Subtotal	53.74	1,289.87	235.40	41.75		
Solvents															
Clean Up Solvent**	7.09	100.00%	42.0%	58.0%	0.0%	0.00%	1.00	4.11	4.11	4.11	98.68	18.01	0.00	NA	100%

Uncontrolled Potential Emissions	57.86	1,388.55	253.41	41.75
Controlled Potential Emissions***	2.89	69.43	12.67	2.09
Limited Emissions****	8.36		36.62	2.09

Notes

* Per the application the spray coating booths can only operate 18 hours per day (6,570 hours per year) due to the need to clean the booth each day for proper operation. However, IDEM has conservatively assumed the booth can operate 24 hours per day (8,760 hours per year) since this results in the worst case potential to emit VOC, PM, and HAPs.

** Per the MSDS the clean up solvent contains 42% acetone, which is an exempt VOC per 40 CFR 51.1

*** Per the source and manufacturer the RTO will have an overall control efficiency of 95%. In addition, the manufacturer guarantees that the VOC outlet concentration will not exceed 20 ppmv as propane when the VOC inlet concentration is less than 500 ppmv as propane. IDEM has also conservatively assumed the water wash curtain will achieve an overall control efficiency of 95% for particulate matter emissions.

**** Limited VOC emissions include emissions from coating booth and natural gas combustion in the RTO and cure oven. The source has accepted a higher VOC emission limit to ensure compliance with the VOC outlet concentration limit of 12 ppmv as VOC.

METHODOLOGY

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

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

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

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

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

Particulate Potential Tons per Year = (gal/hr) * (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

Controlled Potential Emissions = Uncontrolled Potential Emissions * (1 - % Control Efficiency)

Limited VOC (lb/hr) = [2,700,000 Flowrate (scfh) * 20 PPMV as Propane * (3 carbons in propane / 5.07 Weighted Average of Carbon in Coating) * 91.67 (As Applied Molecular Weight of NH-861)] / [385.23 * 10^6 (scf/lb-mol)] * 110% (10% Safety Factor)

Limited VOC Emissions (ton/yr) = Limited VOC (lb/hr) * 8760 (hr/yr) * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
Plastic Injection Molding**

Company Name: Greenville Technology, Inc. - Anderson
Address City IN Zip: 3511 West 73rd Street, Anderson, IN 46013
Permit Number: 095-32281-00136
Permit Reviewer: Brian Williams

Plastic Injection Molding - Process

Maximum Throughput Per Unit lb/hr	Total Number of Units	Potential Throughput lb/hr
100	22	2200

Emission Factor in lb/million lb	Pollutant							Total HAPs
	PM	VOC	Formaldehyde	Acrolein	Acetaldehyde	Propionaldehyde	Acrylic Acid	
	30.30	104.00	0.74	0.01	0.46	0.05	0.08	
Potential Emission in tons/yr	0.29	1.00	0.007	9.64E-05	0.004	4.82E-04	0.001	0.013

Methodology

Emission factors are from Air & Waste Management Association Journal, Volume 49, Jan 1999, "Development of Emission Factors for Polypropylene Processing", Table 5 for extrusion of controlled rheology homopolymer at melt temp of 400°F.
 Potential Throughput (lb/hr) = Maximum Throughput Per Unit (lb/hr) x Total Number of Units
 Potential Emission (tons/yr) = Potential Throughput (lb/hr) x Emission Factor (lb/million lb) x 1/1,000,000 x 8,760 (hr/yr) x 1/2,000 (ton/lb)

Plastic Injection Molding - Mold Release

Material	Density (Lb/Gal)	Weight % VOC	Maximum Usage (Gal/Day)	Potential VOC Emissions (ton/yr)	Weight % Xylene	Potential Xylene Emissions (ton/yr)
Non Chlorinated Cleaner	6.7	95.00%	1.00	1.16	45.0%	0.55
Biodegradable Mold Cleaner	7.0	100.00%	1.00	1.28	0.0%	0.00

Potential Emissions

1.28

0.55

Methodology

Potential Emissions (ton/yr) = Density (lb/gal) x Maximum Usage (gal/day) x Weight % VOC/Xylene x 365 (day/yr) x 1/2,000 (ton/lb)
Bold = "Worst Case Solvent for each pollutant"

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

**Company Name: Greenville Technology, Inc. - Anderson
Address City IN Zip: 3511 West 73rd Street, Anderson, IN 46013
Permit Number: 095-32281-00136
Permit Reviewer: Brian Williams**

1. Process Description

Emission Unit ID	Heat Input Capacity (MMBtu/hr)
RTO	5.92
Cure Oven	0.80
EU03 Heater	0.40
Six (6) 0.4 MMBtu/hr Heaters (EU04)	2.40
EU05 Heater	0.15
EU06 Heater	0.23
EU07 Heater	0.24
Total	10.14

2. Combustion Emissions - Criteria Pollutants

NOx Burner Type	Fuel Heat Value (MMBtu/MMCF)	Emission Factor (lbs/MMCF)						
		PM*	PM10*	direct PM2.5	SO ₂	NOx**	VOC	CO
Ordinary Burners	1,000	1.9	7.6	7.6	0.6	100	5.5	84.0

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

** Emission factors for NOx: Uncontrolled = 100 lbs/MMCF, Low NOx Burners = 50 lbs/MMCF

Emission factors are from AP 42, Chapter 1.4, Tables 1.4-1, and 1.4-2, SCC 1-01-006-02, 1-02-006-02, 1-03-006-02, 1-03-006-03. (7/98)

Emission Unit ID	Potential Throughput (MMCF/yr)	Potential To Emit (tons/yr)						
		PM	PM10	direct PM2.5	SO ₂	NOx	VOC	CO
RTO	51.86	0.05	0.20	0.20	0.02	2.59	0.14	2.18
Cure Oven	7.01	0.01	0.03	0.03	0.002	0.35	0.02	0.29
EU03 Heater	3.50	0.003	0.01	0.01	0.001	0.18	0.01	0.15
Six (6) 0.4 MMBtu/hr Heaters (EU04)	21.02	0.02	0.08	0.08	0.01	1.05	0.06	0.88
EU05 Heater	1.31	0.001	0.005	0.005	0.0004	0.07	0.004	0.06
EU06 Heater	1.97	0.002	0.01	0.01	0.001	0.10	0.01	0.08
EU07 Heater	2.10	0.002	0.01	0.01	0.001	0.11	0.01	0.09
Total	88.78	0.08	0.34	0.34	0.03	4.44	0.24	3.73

Methodology

Maximum Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 (hrs/yr) x 1 MMCF/1,020 MMBtu

Potential To Emit (tons/year) = Throughput (MMCF/yr) x Emission Factor (lbs/MMCF) x 1 ton/2,000 lbs

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

**Company Name: Greenville Technology, Inc. - Anderson
Address City IN Zip: 3511 West 73rd Street, Anderson, IN 46013
Permit Number: 095-32281-00136
Permit Reviewer: Brian Williams**

3. Combustion Emissions - HAP Pollutants

Emission Factor (lbs/MMCF)									
Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Cadmium	Chromium	Manganese	Mercury	Nickel
2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	1.1E-03	1.4E-03	3.8E-04	2.6E-04	2.1E-03

Potential To Emit (tons/yr)										
Emission Unit ID	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Cadmium	Chromium	Manganese	Mercury	Nickel
RTO	5.45E-05	3.11E-05	1.94E-03	4.67E-02	8.82E-05	2.85E-05	3.63E-05	9.85E-06	6.74E-06	5.45E-05
Cure Oven	7.36E-06	4.20E-06	2.63E-04	6.31E-03	1.19E-05	3.85E-06	4.91E-06	1.33E-06	9.11E-07	7.36E-06
EU03 Heater	3.68E-06	2.10E-06	1.31E-04	3.15E-03	5.96E-06	1.93E-06	2.45E-06	6.66E-07	4.56E-07	3.68E-06
Six (6) 0.4 MMBtu/hr Heaters (EU04)	2.21E-05	1.26E-05	7.88E-04	1.89E-02	3.57E-05	1.16E-05	1.47E-05	3.99E-06	2.73E-06	2.21E-05
EU05 Heater	1.38E-06	7.88E-07	4.93E-05	1.18E-03	2.23E-06	7.23E-07	9.20E-07	2.50E-07	1.71E-07	1.38E-06
EU06 Heater	2.07E-06	1.18E-06	7.39E-05	1.77E-03	3.35E-06	1.08E-06	1.38E-06	3.74E-07	2.56E-07	2.07E-06
EU07 Heater	2.21E-06	1.26E-06	7.88E-05	1.89E-03	3.57E-06	1.16E-06	1.47E-06	3.99E-07	2.73E-07	2.21E-06
Total	9.32E-05	5.33E-05	3.33E-03	7.99E-02	1.51E-04	4.88E-05	6.21E-05	1.69E-05	1.15E-05	9.32E-05

HAP emission factors are from AP 42, Chapter 1.4, Tables 1.4-3 and 1.4-4. (7/98)

Methodology

Potential To Emit (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lbs/MMCF) x 1 ton/2,000 lbs

Total HAP =	0.08
Highest Single HAP =	7.99E-02
	Hexane

4. Combustion Emissions - Greenhouse Gas Emissions

Emission Factor (lbs/MMCF)		
CO2	CH4	N2O
120,000	2.3	2.2

Potential To Emit (tons/yr)				
Emission Unit ID	CO2	CH4	N2O	CO2e
RTO	3,111.55	0.06	0.06	3,130.49
Cure Oven	420.48	0.01	0.01	423.04
EU03 Heater	210.24	0.004	0.004	211.52
Six (6) 0.4 MMBtu/hr Heaters (EU04)	1,261.44	0.02	0.02	1,269.12
EU05 Heater	78.84	0.002	0.001	79.32
EU06 Heater	118.26	0.002	0.002	118.98
EU07 Heater	126.14	0.002	0.002	126.91
Total	5,326.96	0.102	0.098	5,359.37

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.

Global 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 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

**Appendix A: Emissions Calculations
Summary of Emissions**

**Company Name: Greenville Technology, Inc. - Anderson
Address City IN Zip: 3511 West 73rd Street, Anderson, IN 46013
Permit Number: 095-32281-00136
Permit Reviewer: Brian Williams**

Unlimited Potential to Emit (tons/year)											
Process	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Single HAP	
Plastic Parts Surface Coating Line (EU01)*	41.81	41.97	41.97	0.02	2.94	253.57	2.47	3,553.53	0.64	0.26	Xylene
Plastic Injection Molding (EU02)	0.29	0.29	0.29	0	0	2.28	0	0	0.56	0.55	Xylene
Natural Gas Heater (EU03)	0.003	0.01	0.01	0.001	0.18	0.01	0.15	211.52	0.003	0.003	Hexane
Natural Gas Heater (EU04)	0.020	0.08	0.08	0.01	1.05	0.06	0.88	1,269.12	0.02	0.019	Hexane
Natural Gas Heater (EU05)	0.001	0.005	0.005	0.0004	0.07	0.004	0.06	79.32	0.001	0.001	Hexane
Natural Gas Heater (EU06)	0.002	0.01	0.01	0.001	0.10	0.01	0.08	118.98	0.002	0.002	Hexane
Natural Gas Heater (EU07)	0.002	0.01	0.01	0.001	0.11	0.01	0.09	126.91	0.002	0.002	Hexane
Total	42.13	42.38	42.38	0.03	4.44	255.93	3.73	5,359.37	1.23	0.81	Xylene

Limited Potential to Emit (tons/year)											
Process	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Single HAP	
Plastic Parts Surface Coating Line (EU01)*	2.14	2.31	2.31	0.02	2.94	36.62	2.47	3,553.53	0.64	0.26	Xylene
Plastic Injection Molding (EU02)	0.29	0.29	0.29	0	0	2.28	0	0	0.56	0.55	Xylene
Natural Gas Heater (EU03)	0.003	0.01	0.01	0.001	0.18	0.01	0.15	211.52	0.003	0.003	Hexane
Natural Gas Heater (EU04)	0.020	0.08	0.08	0.01	1.05	0.06	0.88	1,269.12	0.020	0.019	Hexane
Natural Gas Heater (EU05)	0.001	0.005	0.005	0.0004	0.07	0.00	0.06	79.32	0.001	0.001	Hexane
Natural Gas Heater (EU06)	0.002	0.01	0.01	0.001	0.10	0.01	0.08	118.98	0.002	0.002	Hexane
Natural Gas Heater (EU07)	0.002	0.01	0.01	0.001	0.11	0.01	0.09	126.91	0.002	0.002	Hexane
Total	2.46	2.72	2.72	0.03	4.44	38.98	3.73	5,359.37	1.23	0.81	Xylene

*Includes emissions from all equipment associated with the coating line operations (spray coating booth, cure oven and RTO)

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

**Appendix B
Best Available Control Technology (BACT) Determination**

Source Description and Location

Source Name:	Greenville Technology, Inc. - Anderson
Source Location:	3511 West 73rd Street, Anderson, Indiana 46013
County:	Madison
SIC Code:	3714 (Motor Vehicle Parts and Accessories)
Operation Permit No.:	F 095-32281-00136
Permit Reviewer:	Brian Williams

Introduction

The Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) has performed the following Best Available Control Technology (BACT) review for construction and operation of a new plastic parts surface coating line at a new plastic automobile parts manufacturing plant.

Description of Process and Potential Emissions

Greenville Technology, Inc. - Anderson is proposing to install the following emission unit:

- (a) One (1) plastic parts surface coating line, identified as EU01, approved for construction in 2012, and consisting of the following:
- (1) One (1) conveyor system;
 - (2) One (1) deionization booth;
 - (3) One (1) paint booth, consisting of two (2) robotic HVLP spray guns, with a maximum coating usage of 8.3 gallons per hour and maximum clean up solvent usage of 1.0 gallons per hour, using a water wash curtain to control particulate emissions, identified as CE02, and exhausting to one (1) stack, identified as EP01;
 - (4) One (1) flash off tunnel; and
 - (5) One (1) natural gas-fired cure oven, with a maximum heat input capacity of 0.80 MMBtu per hour.

Note: The paint booth, flash off tunnel, and natural gas-fired cure oven are contained within a permanent total enclosure, use a natural gas-fired regenerative thermal oxidizer (RTO) for VOC control, identified as CE01, which has a maximum heat input of 5.24 MMBtu per hour, and exhausting to one (1) stack, identified as EP01;

Pursuant to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), BACT is required for all facilities constructed after January 1, 1980 that have potential Volatile Organic Compound (VOC) emissions of equal to or greater than twenty-five (25) tons per year and are not regulated by other rules in 326 IAC 8. Based on the calculations (see TSD Appendix A) and the analysis of applicable state regulations (see State Rule Applicability section of TSD), the paint booth, flash off tunnel, and natural gas-fired cure oven, which are part of the plastic parts surface coating line (EU01) are subject to the requirements of 326 IAC 8-1-6, since these emission units have combined potential VOC emissions of

253.01 tons per year and are not regulated by other rules in 326 IAC 8. Therefore, the Permittee is required to control VOC emissions from the plastic parts surface coating line pursuant to the provisions of 326 IAC 8-1-6 (BACT).

BACT Description

IDEM, OAQ conducts BACT analyses in accordance with the "*Top-Down*" *Best Available Control Technology* process, which outlines the steps for conducting a top-down BACT analysis. Those steps are listed below:

- (1) Identify all potentially available control options;
- (2) Eliminate technically infeasible control options;
- (3) Rank remaining control technologies by control effectiveness;
- (4) Evaluate the most effective controls and document the results as necessary; and
- (5) Select BACT.

In accordance with EPA guidance, the BACT analysis should take into account the energy, environmental, and economic impacts. Emission reductions may be achieved through the application of available control techniques, changes in process design, and/or operational limitations.

A summary of the BACT review for the plastic parts surface coating line is provided below. This BACT determination is based on the following information:

- (1) The BACT analysis information submitted by Greenville Technology, Inc. - Anderson on September 7, 2012;
- (2) The EPA RACT/BACT/LAER (RBLCL) Clearinghouse; and
- (3) State and local air quality permits.

VOC BACT Analysis

Step 1 – Identify All Potentially Available Control Options

Based on the information reviewed for this BACT determination, the following potentially available control technologies were identified for controlling VOC emissions from the plastic parts surface coating line (EU01):

- (1) Inherently Lower-Polluting Processes or Practices:

Inherently lower-polluting processes or practices include the use of materials, production processes, and work practices that prevent emissions and result in lower "production-specific" emissions. For example, the use of a water-based coating instead of solvent-based coating.

- (2) Permanent Total Enclosures:

Permanent total enclosures (PTEs) are permanently installed structures that completely surround a source of emissions. A ventilation system is used to capture organic hazardous air pollutants (HAPs) and VOC, which can be vented to an add on control device. An enclosure must meet the criteria in EPA Method 204 Criteria for and Verification of a Permanent or Temporary Total Enclosure in order to qualify as a PTE. If the PTE meets the criteria, the capture efficiency is assumed to be 100 percent and the source is not required to test the capture efficiency of the PTE. Overall control efficiency (i.e. capture and destruction) will be equal to the control device reduction efficiency.

(3) Regenerative Thermal Oxidizer:

Thermal oxidation is the process of oxidizing organic contaminants in a waste gas stream by raising the temperature above the auto ignition point in the presence of oxygen for sufficient time to completely oxidize the organic contaminants to carbon dioxide and water. The residence time, temperature, flow velocity and mixing, and the oxygen concentration in the combustion chamber affect the oxidation rate and destruction efficiency. Thermal oxidizers typically require combustion of an auxiliary fuel (e.g., natural gas) to maintain combustion chamber temperature high enough to completely oxidize the contaminant gases. Thermal oxidizers are typically designed to have a residence time of one second or less and combustion chamber temperatures between 1,200 and 2,000°F.

A regenerative thermal oxidizer uses a high-density media such as a packed ceramic bed, which was heated in a previous cycle, to preheat the incoming waste gas stream, resulting in improved oxidizer efficiency and significant fuel cost savings. In general, thermal oxidizers are less efficient at treating waste gas streams with highly variable flow rates, since the variable flow rate results in varying residence times, combustion chamber temperature, and poor mixing. Based on information provide by the Environmental Protection Agency (EPA), thermal oxidizer are able to achieve VOC destruction efficiencies from 95% to 99% for VOC laden waste streams under certain operating conditions.

(4) Catalytic Incinerator:

In a catalytic incinerator, a catalyst is used to lower the activation energy for oxidation. When a preheated gas stream is passed through a catalytic oxidizer, the catalyst bed initiates and promotes the oxidation of VOCs without being permanently altered itself. In catalytic incineration, combustion occurs at significantly lower temperatures than that of direct flame units and can achieve a destruction efficiency of 95%. However, steps must be taken to ensure complete combustion. Common types of catalysts used include platinum, platinum alloys, copper chromate, copper oxide, chromium, manganese, and nickel. These catalysts are typically deposited in thin layers on an inert substrate, usually a honeycomb shaped ceramic. Catalytic incineration are not suited to systems with high exhaust volumes, variable types and concentrations of VOC, and where catalyst poisons or fouling contaminants are present.

(5) Concentrator:

In the concentrator process, a rotating wheel carbon or zeolite adsorber is used to concentrate and remove the VOCs. The adsorbents are regenerated using a hot inert gas with a high humidity content. The desorbed VOCs are oxidized in a thermal oxidizer. Based on need and economics varying degrees of heat recovery can be incorporated into the system. In a typical concentrator system the pollutant stream is passed through the various chambers of a segmented rotating bed. While the larger volume process gas stream is passing through a "clean" segment, a smaller volume of steam desorbs a "dirty" segment. The cleaned process gas is then discharged to the atmosphere, while desorbing gas is vented to the thermal oxidizer before discharge.

The process is designed to remove VOCs such as chlorinated and non-chlorinated hydrocarbons, esters, ethers, alcohols, and ketones. This process combines the technologies of adsorption with granular activated carbon or zeolite, thermal regeneration with hot gases, and controlled oxidation of the VOCs. As a result, this process combines three technologies, which historically have been used independently of each other. The concentrator process is effective for treatment of large volumes of air or gas streams that contain low concentrations of volatile organic contaminants. The concentrator process is well-suited for applications where the recovery of the volatile organics is not desirable or economically justified.

Step 2 – Eliminate Technically Infeasible Control Options

Based on the information reviewed for this BACT determination, IDEM, OAQ has determined that no possible inherently lower-polluting processes or practices exist for this source for the following reason:

- (1) The proposed materials to be used contain the lowest VOC content possible while still maintaining the characteristics required for the processes at this source. This source produces automotive plastic parts and must use the coatings approved by the customer. In addition, the source cannot accept a material throughput limitation to reduce VOC emissions because their production schedule is variable.

Step 3 – Rank Remaining Control Technologies by Control Effectiveness

IDEM, OAQ has ranked the technically feasible control technologies and combinations of control technologies as follows:

Control Technology	Overall Control Efficiency (%)
Regenerative Thermal Oxidizer with Permanent Total Enclosure	95%*
Catalytic Incineration	95%
Concentrator	90%

* Overall Control Efficiency (%) = 100 % Capture Efficiency x 95% Destruction Efficiency

IDEM, OAQ is aware that the above-mentioned control technologies may periodically achieve control efficiencies that exceed the listed values under certain operating conditions. However, one factor to consider when evaluating BACT is that the BACT limit must be achievable on a consistent basis under normal operational conditions. BACT limitations should not necessarily reflect the highest possible control efficiency achievable by the technology on which the emission limitation is based. The permitting authority has the discretion to base the emission limitation on a control efficiency that can be lower than the optimal level. There are several reasons why the permitting authority might choose to do this. One reason is that the control efficiency achievable using the technology may fluctuate, so that it would not always achieve its optimal control efficiency. In that case, setting the emission limitation to reflect the highest control efficiency would make violations of the permit unavoidable. To account for this possibility, a permitting authority must be allowed a certain degree of discretion to set the emission limitation at a level that does not necessarily reflect the highest possible control efficiency, but will allow the Permittee to achieve compliance consistently. While IDEM, OAQ recognizes that a greater control efficiency may be achievable as an average during compliance testing, IDEM, OAQ allows sources to include a safety factor, or margin of error, to allow for minor variations in the operation of the emission units and the control device.

Step 4 – Evaluate the Most Effective Controls and Document Results

A review of EPA's RACT/BACT/LAER Clearinghouse (RBLC) and Indiana Air Permits identified the following previous BACT determinations for sources that operate under the SIC Codes 3711 (Motor Vehicles and Passenger Car Bodies and 3714 (Motor Vehicle Parts and Accessories) or for process type codes 41.002 (Automobiles and Trucks Surface Coating (OEM)) and 41.016 (Plastic Parts & Products Surface Coating):

Plant	RBLC ID or Permit #	Date Issued and State	Facility	BACT Determination
Greenville Technology, Inc. - Anderson	095-32281-00136	Pending IN	Plastic Parts Surface Coating Line	Regenerative Thermal Oxidizer with Permanent Total Enclosure 95% overall control efficiency or VOC outlet concentration less than 12 ppmv as VOC (BACT-State)
Honda Manufacturing of Indiana, LLC	031-23360-00026	10/19/2006 IN	Body Painting Operations (Primer Surfacer Coating Line)	Regenerative Thermal Oxidizer with 95% destruction efficiency VOC emission limit: 3.46 lb/gal of applied coating solids, based on a daily volume weighted average (BACT - PSD)
			Body Painting Operations (Topcoat Coating Operation)	Regenerative Thermal Oxidizer with 95% destruction efficiency VOC emission limit: 5.2 lb/gal of applied coating solids, based on a daily volume weighted average (BACT - PSD)
			Plastics Operation (Fascia/Bumper Coating Line)	Regenerative Thermal Oxidizer with 95% destruction efficiency VOC emission limits: primer, basecoat, and clearcoat coating booths shall not exceed 0.90 lb/gal, 1.15 lb/gal, and 3.25 lb/gal of coating applied, based on a daily volume weighted average, respectively Good Work Practices (BACT - PSD)
Subaru of Indiana Automotive, Inc.	157-22702-00050	06/09/2006 IN	Plastic Fascia Paint Line	Thermal Oxidizer 95% destruction efficiency VOC emission limits: primer shall not exceed 0.90 lb/gal, basecoat 1.15 lb/gal, and clearcoat 3.25 lb/gal, after controls; Good work practices (BACT - State)
Valeo Sylvania, LLC	071-21822-00006	03/23/2006 IN	Lens Surface Coating Booth (Automotive Plastic Lighting Assemblies)	Regenerative Thermal Oxidizer with a minimum destruction efficiency of 95% and 100% capture efficiency VOC emission limit: Total amount of VOC delivered to the coating applicators shall be limited to < 60.41 tons per year (BACT - State)
Kenworth Truck Co.	OH-0312	01/29/2008 OH	Robotic Cab Paint Booths, Line 1	Thermal Oxidizer 93% overall control efficiency VOC emission limits: 1.66 lbs/hr and 7.27 tpy (BACT-PSD)
			Robotic Cab Paint Booths, Line 2	Thermal Oxidizer 93% overall control efficiency VOC emission limits: 3.22 lbs/hr and 14.54 tpy (BACT-PSD)

Plant	RBLC ID or Permit #	Date Issued and State	Facility	BACT Determination
Daimler Chrysler Corporation Toledo Supplier Park-Paint Shop	OH-0309	05/03/2007 OH	Topcoat Booths (2) for Basecoat and Clearcoat	Thermal Incinerator 95% overall control efficiency VOC emission limits: 247.0 lb/hr, 300.60 tpy 5.42 lb/gal of applied coating solids, based on a daily volume weighted average (LAER)
Hyundai Motor Manufacturing Alabama, LLC	AL-0211	03/14/2005 AL	Painting Booth, Rocker Panel Primer (RP-1)	Regenerative Thermal Oxidizer 95% Destruction Efficiency Pollution Prevention: Airless Guns VOC emission limit: 1.0 lb/gal of applied coating solids after controls (BACT - PSD)
Honda Manufacturing of Alabama, LLC	AL-0192	10/18/2002 AL	Plastic Parts Coating Line No. 2	Low VOC content coatings, Regenerative Thermal Oxidizer, and good work practices VOC content limits: 4.3 lb/gal; primer 1.3, basecoat 4.3, clearcoat 4.0 lb VOC/gal coating; 9 tpy Misc Assembly MATL Limit Facility-wide; 24 tpy Cleanup/Purge/Solvent Facility-wide; (BACT - PSD)
Latex Technology	CA-0986	05/07/2002 CA	Coating Operation	Regenerative Thermal Oxidizer emissions controlled to an overall capture and destruction efficiency of >90% by weight VOC emissions from the application of VOC containing rubber materials from dipping and flash-off operations are vented to a Regenerative Thermal Oxidizer with an overall efficiency of 95% (LAER)
Dart Container of Kentucky	KY-0080	04/26/2001 KY	Printers, UV Ink and Off Line	Pollution Prevention VOC emission limits: 9.3460 tpy combined 0.876 tpy for UV Ink Printers, 1.17 tpy for in-line UV ink printers and off line printers, 7.3 tpy, 8 lb/hr, and 40 lb/day for cleanup solvent usage (BACT - State)
Venture Industries, Inc.	MI-0260	01/17/2001 MI	Painting Plastic Automotive Parts	Permanent Total Enclosure, Carbon Concentrators, and Regenerative Thermal Oxidizer 95% overall control efficiency VOC emission limits: 2,500 lb/day and 228.30 tpy (BACT - State)

Plant	RBLC ID or Permit #	Date Issued and State	Facility	BACT Determination
Orion Paint and Plastic LLC	MI-0333	10/02/1996 MI	Painting Lines, Plastic Parts	Regenerative Thermal Oxidizer 95% overall control efficiency VOC emission limits: 49.0 lb/hr and 201.0 tpy (BACT - PSD) VOC as applied limits: Adhesion Promoter 6.8 lb/gal Primer 4.10 lb/gal Basecoat 4.80 lb/gal Clearcoat 4.0 lb/gal Cleaning Solvent 504 lb/day and 85.0 tpy (BACT - State)
Ford Motor Company - Saline Plant	MI-0233	08/16/1993 MI	Coating Process, Plastic (Manual Spray Booth)	Catalytic Oxidizer 95% overall control efficiency VOC emission limits: 7.10 lbs/hr and 17.1 tpy (BACT-State)
			Coating Process, Plastic (Robotic)	Catalytic Oxidizer 95% overall control efficiency VOC emission limits: 9.30 lbs/hr and 22.4 tpy (BACT-State)

Step 5 – Select BACT

Greenville Technology, Inc. - Anderson has proposed to use a permanent total enclosure and regenerative thermal oxidizer to control the VOC emissions from the paint booth, flash off tunnel, and natural gas-fired cure oven of the plastic parts surface coating line, which is the most stringent BACT requirement. Therefore, an economic, energy, or environmental impact analysis is not required.

Pursuant to 326 IAC 8-1-6, based on the BACT analysis mentioned above, IDEM, OAQ has determined that the following requirements represent BACT for the plastic parts surface coating line:

- (a) The VOC emissions from the paint booth, flash off tunnel, and natural gas-fired cure oven of the plastic parts coating line (EU01) shall be controlled by a combination of a permanent total enclosure and a regenerative thermal oxidizer with an overall control efficiency (including the capture efficiency and destruction efficiency) equal to or greater than 95% or the VOC outlet concentration shall not exceed 12 ppmv as VOC.
- (b) The regenerative thermal oxidizer shall operate at all times when the paint booth, flash off tunnel, and natural gas-fired cure oven plastic parts surface coating line (EU01) is in operation.

In addition to an overall control efficiency limit, IDEM has included a VOC outlet concentration limit. IDEM is aware that no other BACT determinations identified in the table above require a VOC outlet concentration limit. However, Greenville Technology, Inc. - Anderson has requested a VOC limit to allow the source to operate the RTO at very low inlet and outlet concentrations, due to the variable VOC inlet concentration to the coating booth. The RTO manufacturer guarantees that when the inlet VOC concentration is below 500 ppmv, the outlet non-methane VOC concentration will not exceed 20 ppmv as propane. Based on the worst case coating (NH-861), this equates to a VOC outlet concentration of 12 ppmv as VOC. For vent streams with VOC concentrations below approximately 2,000 ppmv, reaction rates decrease, maximum VOC destruction efficiency decreases, and outlet VOC concentrations of 20 ppmv, or lower may be achieved. Therefore, when the RTO has low VOC inlet concentrations the source may not be able to comply with the 95% overall control efficiency limit, but will be able to demonstrate compliance with the VOC outlet concentration limit.

IDEM has previously included VOC outlet concentration limits for thermal oxidizers required under 326 IAC 8-1-6 (BACT) for the baking industry and 326 IAC 8-5-6 (Fuel Grade Ethanol Production at Dry Mills) at dry mill ethanol plants.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

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

TO: Lee Siegler
Greenville Technology, Inc. - Anderson
5755 SR 571 E
Greenville, OH 45331

DATE: January 3, 2013

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

SUBJECT: Final Decision
New Source Construction & FESOP
095-32281-00136

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:
Tom Moore – Vice President Production & Plant Manager
Stephanie Madden – EHS Technology Group, LLC
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Toll Free (800) 451-6027
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January 3, 2013

TO: Anderson Public Library

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

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

Applicant Name: Greenville Technology, Inc. - Anderson
Permit Number: 095-32281-00136

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

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

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	GHOTOPP 1/3/2013 Greenville Technology, Inc. - Anderson 095-32281-00136 final		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Lee Siegler Greenville Technology, Inc. - Anderson 5755 SR 571 E Greenville OH 45331 (Source CAATS) via confirmed delivery										
2		Tom Moore VP - Production & Plant Mgr Greenville Technology, Inc. - Anderson 5755 SR 571 E Greenville OH 45331 (RO CAATS)										
3		Madison County Commissioners 16 E. 9th Suite 104 Anderson IN 46016 (Local Official)										
4		Anderson Public Library 111 E. 12th St. Anderson IN 46016-2701 (Library)										
5		Anderson Town Council & Mayors Office P.O. Box 2100 Anderson IN 46018 (Local Official)										
6		Madison County Health Department 206 E 9th St Anderson IN 46016-1512 (Health Department)										
7		Stephanie Madden EHS Technology Group, LLC PO Box 187 <oa,osbirg PJ 45443 (Consultant)										
8		Nestle USA, Inc. 4300 West 73rd Street Amderspm OM 46013 (Affected Party)										
9		FedEx Distribution Center 4025 West 73rd Street Anderson IN 46013 (Affected Party)										
10		Precision Strip Manufacturing 3518 West 73rd Street Anderson IN 46013 (Affected Party)										
11		Air Side Systems Distribution 3620 West 73rd Street Anderson IN 46013 (Affected Party)										
12		Carter Logistics 4020 West 73rd Street Anderson IN 46013 (Affected Party)										
13		Braunstein Family Trust 2467 White River Way Tustin CA 92782 (Affected Party)										
14		Anderson Corporation for Economic Development 2701 Enterprise Drive Anderson IN 46013 (Affected Party)										
15		Altairano 3019 Enterprise Drive Anderson IN 46013 (Affected Party)										

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1		Alliance One 7311 Quality Circle Anderson IN 46013 (Affected Party)										
2		Lincare 2915 Enterprise Drive Anderson IN 46013 (Affected Party)										
3		MetLife 2907 Enterprise Drive Anderson IN 46013 (Affected Party)										
4		WR Dunkin 2911 Enterprise Drive Anderson IN 46013 (Affected Party)										
5		TeleServices Direct 2903 Enterprise Drive Anderson IN 46013 (Affected Party)										
6		Midwest POS 2907 Enterprise Drive Anderson IN 46013 (Affected Party)										
7		Zatkoff Distribution Center 2730 Enterprise Drive Anderson IN 46013 (Affected Party)										
8		Affiliated Computer Services 2828 Enterprise Drive Anderson IN 46013 (Affected Party)										
9		Anderson University Flagship Center 2705 Enterprise Drive Anderson IN 46013 (Affected Party)										
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