**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**
*We Protect Hoosiers and Our Environment.*
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

**Michael R. Pence**
*Governor*

**Thomas W. Easterly**
*Commissioner*

TO: Interested Parties / Applicant

DATE: June 18, 2013

RE: EA Technologies / 039-32455-00498

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

# Notice of Decision: Approval – Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204.

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

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

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

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

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

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

Enclosures
FNTVOP.dot 6/13/2013

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*Commissioner*

# Part 70 Operating Permit Renewal
# OFFICE OF AIR QUALITY

## EA Technologies, LLC
## 2501 Jeanwood Drive
## Elkhart, Indiana 46514

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

| Operation Permit No.: T039-32455-00498 | |
|---|---|
| Issued by:<br><br>Iryn Calilung, Section Chief<br>Permits Branch<br>Office of Air Quality | Issuance Date: June 18, 2013<br><br>Expiration Date: June 18, 2018 |

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Quarterly Report
Quarterly Deviation and Compliance Monitoring Report

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## SECTION A SOURCE SUMMARY

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

### A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary trailer frame fabrication and surface coating manufacturing plant.

| | |
|---|---|
| Source Address: | 2501 Jeanwood Drive, Elkhart, Indiana 46514 |
| General Source Phone Number: | 574-370-5088 |
| SIC Code: | 3499 (Fabricated Metal Products, Not Elsewhere Classified) and 3714 (Motor Vehicles and Motor Vehicle Equipment) |
| County Location: | Elkhart |
| Source Location Status: | Attainment for all criteria pollutants |
| Source Status: | Part 70 Operating Permit Program<br>Minor Source, under PSD and Emission Offset Rules<br>Minor Source, Section 112 of the Clean Air Act<br>Not 1 of 28 Source Categories |

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

(a) One (1) surface coating operation, identified as CARC1, constructed in 2001 and modified in 2009, consisting of the following equipment:

(1) One (1) spray booth, identified as CARC1 Spray Booth, consisting of two (2) spray guns, with a maximum capacity of 180 metal parts per hour, with emissions controlled by dry filters and exhausting to stack PB1;

(2) One (1) dip coating booth, identified as CARC1 Dip Coating Booth, with a maximum capacity of 558 metal parts per hour, no control and exhausting to Stack PB2;

(3) One (1) flash-off/cool down area, no control and exhausting to stack PB3; and

(4) One (1) natural gas-fired bake/cure oven, identified as BKO-1, with a maximum heat input capacity of 3.5 MMBtu/hr and exhausting to stack BO1.

(b) One (1) paint booth identified as CARC2 Spray Booth, constructed in 2009, consisting of 2 spray guns, with a maximum capacity of 8 metal parts per hour, with emissions controlled by dry filters, exhausting to stacks PB-4, PB-5 and PB-6.

(c) One (1) epoxy and acrylic electro coating operation, constructed in 1998, no control, consisting of the following equipment:

(1) Eighteen (18) dip tanks, with an aggregate maximum capacity of 181.2 pounds of resin per hour, coating 25.137 metal parts per hour and using 166.8 pounds of

aqueous cleaner per hour, using epoxy or acrylic dip application method. Emissions from the aqueous cleaning are vented to vents EF1 through EF4 and Stacks S1 and S2, and the emissions from epoxy or acrylic dip application process are vented to vent EF5.

(2) One (1) cool down area, no control and venting inside.

(3) One (1) natural gas-fired E-coat cure oven, identified as CO-1, with a maximum heat input capacity of 1.9 MMBtu/hr and exhausting to stack S3 through S6.

(4) One (1) natural gas-fired burn-off oven, identified as BOO-1, with a maximum heat input capacity of 1.6 MMBtu/hr and exhausting to stack S3 through S6.

(d) One (1) powder coat system, constructed in 2006, consisting of the following equipment:

(1) One (1) aqueous wash line with two (2) natural gas-fired process heaters, identified as WH-1 and WH-2, each with a maximum heat input capacity of 2.5 MMBtu/hr, no control and exhausting to stacks W-1 and W-2.

The wash line uses aqueous solutions containing less than or equal to one percent (1%) by weight of VOCs excluding HAPs.

(2) One (1) natural gas-fired drying oven, identified as DO-2, with a maximum heat input capacity of 1.5 MMBtu/hr and exhausting to stack DOS-2.

(3) One (1) powder coating booth, identified as PC-1, equipped with cartridge filters, with a maximum capacity of coating 3000 square feet of metal per hour and 4.91 tons per hour. The booth includes one (1) powder recycling unit which exhausts inside the plant.

(4) One (1) natural gas-fired cure oven, identified as CO-3, with a maximum heat input capacity of 4.0 MMBtu/hr, no control and exhausting to stack COS-3.

A.3 Specifically Regulated Insignificant Activities
[326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21) that have applicable requirements.

(a) Two (2) natural gas fired boilers, identified as BO-1 and BO-2, each with a maximum heat input capacity of 7.0 MMBtu/hr., used to provide indirect heat for hot water. [326 IAC 6-2-4]

(b) Activities with emissions equal to or less than the following thresholds: 5 tons per year PM or PM10, 1.0 ton per year of a single HAP, or 2.5 tons per year of any combination of HAPs: Ninety (90) MIG (Metal Inert Gas) welding stations with a capacity of 0.59 lb. of wire per hour per station. [326 IAC 6-3-2]

(c) Grinding and machining operations controlled with fabric filters with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, and abrasive blasting. [326 IAC 6-3-2]

(d) The following equipment related to manufacturing activities not resulting in the emissions of HAPs: brazing equipment, cutting torches, and soldering equipment. [326 IAC 6-3-2]

(e) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2]

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

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

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, T039-32455-00498, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

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

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

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

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

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

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

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

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

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

(1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) A "responsible official" is defined at 326 IAC 2-7-1(35).

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

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

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

and

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

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

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

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

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

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

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

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

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

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

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

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

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

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

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

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

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

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

(a) All terms and conditions of permits established prior to T039-32455-00498 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

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

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit.

[326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Request for renewal shall be submitted to:

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

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if,

subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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

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

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

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

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

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

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (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 preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

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

(4) The Permittee notifies the:

Indiana Department of Environmental Management

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

and

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

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

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b)(1) and (c)(1). The Permittee shall make such records available, upon reasonable request, for public review.

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

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

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

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

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

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

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

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

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

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

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

C.6 Stack Height [326 IAC 1-7]

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

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least

thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to

thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

C.8 Performance Testing [326 IAC 3-6]

(a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

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

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

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

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

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

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

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

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

(a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

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

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

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

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

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

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

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

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

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

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

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue

MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. 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 Part 70 permit.

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

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

**Stratospheric Ozone Protection**

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

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

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

**Emissions Unit Description:**

(a) One (1) surface coating operation, identified as CARC1, constructed in 2001 and modified in 2009, consisting of the following equipment:

(1) One (1) spray booth, identified as CARC1 Spray Booth, consisting of two (2) spray guns, with a maximum capacity of 180 metal parts per hour, with emissions controlled by dry filters and exhausting to stack PB1;

(2) One (1) dip coating booth, identified as CARC1 Dip Coating Booth, with a maximum capacity of 558 metal parts per hour, no control and exhausting to Stack PB2;

(3) One (1) flash-off/cool down area, no control and exhausting to stack PB3; and

(4) One (1) natural gas-fired bake/cure oven, identified as BKO-1, with a maximum heat input capacity of 3.5 MMBtu/hr and exhausting to stack BO1.

(b) One (1) paint booth identified as CARC2 Spray Booth, constructed in 2009, consisting of 2 spray guns, with a maximum capacity of 8 metal parts per hour, with emissions controlled by dry filters, exhausting to stacks PB-4, PB-5 and PB-6.

(c) One (1) epoxy and acrylic electro coating operation, constructed in 1998, exhausting to consisting of the following equipment:

(1) Eighteen (18) dip tanks, with an aggregate maximum capacity of 181.2 pounds of resin per hour, coating 25.137 metal parts per hour and using 166.8 pounds of aqueous cleaner per hour, using epoxy or acrylic dip application method, with emissions from aqueous cleaning are vented to vents EF1 through EF4 and Stacks S1 and S2, and emissions from epoxy or acrylic dip application process are vented to vent EF5.

(2) One (1) cool down area, no control and venting inside.

(3) One (1) natural gas-fired E-coat cure oven, identified as CO-1, with a maximum heat input capacity of 1.9 MMBtu/hr and exhausting to stack S3 through S6.

(4) One (1) natural gas-fired burn-off oven, identified as BOO-1, with a maximum heat input capacity of 1.6 MMBtu/hr and exhausting to stack S3 through S6.

(d) One (1) powder coat system, constructed in 2006, consisting of the following equipment:

(1) One (1) aqueous wash line with two (2) natural gas-fired process heaters, identified as WH-1 and WH-2, each with a maximum heat input capacity of 2.5 MMBtu/hr, no control and exhausting to stacks W-1 and W-2. The wash line uses aqueous solutions containing less than or equal to one percent (1%) by weight of VOCs excluding HAPs.

(2) One (1) natural gas-fired drying oven, identified as DO-2, with a maximum heat input capacity of 1.5 MMBtu/hr and exhausting to stack DOS-2.

(3) One (1) powder coating booth, identified as PC-1, equipped with cartridge filters, with a maximum capacity of coating 3000 square feet of metal per hour and 4.91 tons per

hour. The booth includes one (1) powder recycling unit which exhausts inside the plant.

(4) One (1) natural gas-fired cure oven, identified as CO-3, with a maximum heat input capacity of 4.0 MMBtu/hr, no control and exhausting to stack COS-3.

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

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

D.1.1 PSD Minor Limit - VOC [326 IAC 2-2]

In order to render 326 IAC 2-2 not applicable, the total VOC input, including coatings, dilution solvents, and cleaning solvents, to CARC1 Spray Booth, CARC1 Dip Coating Booth, CARC2 Spray Booth and Epoxy and Acrylic electro coating operation, shall not exceed 247.23 tons, combined, per twelve (12) consecutive month period with compliance determined at the end of each month.

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

D.1.2 PSD Minor Limit - PM, PM10 and PM2.5 [326 IAC 2-2]

In order to render 326 IAC 2-2 not applicable, the Permittee shall comply with the following limits:

(a) The PM emissions from PC-1 shall not exceed 10.27 pounds per hour.

(b) The PM10 emissions from PC-1 shall not exceed 10.27 pounds per hour.

(c) The PM2.5 emissions from PC-1 shall not exceed 10.27 pounds per hour.

Compliance with the above limits, combined with the potential to emit PM, PM10 and PM2.5 from other emission units at the source, shall limit the PM, PM10 and PM2.5 from the entire source to less than 250 tons per twelve (12) consecutive month period and render 326 IAC 2-2 (PSD) not applicable to this source.

D.1.3 Particulate emission limitations, work practices, and control technologies [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2(d), particulate emissions from the CARC1 Spray Booth and CARC2 Spray Booth shall be controlled by dry particulate filters and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

(b) Pursuant to 326 IAC 6-3-2(e), the particulate emissions from DO-2 and CO-3 shall not exceed 0.551 lbs./hour when operating at a process weight rate less than 100 pounds per hour.

(c) Pursuant to 326 IAC 6-3-2(e), the particulate emissions rate from Powder Coating Booth (PC-1) shall not exceed 11.91 pounds per hour when operating at a process weight rate of 4.91 tons per hour.

This pounds per hour limitation is based upon the following:

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

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

P = process weight rate in tons per hour

D.1.4 Miscellaneous Metal Coating Operations [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9(c)(2), the VOC content of coating applied to the fabricated metal surface at the CARC1 Spray Booth, CARC1 Dip Coating Booth,CARC2 Spray Booth and Epoxy and Acrylic electro coating operation shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator, for forced warm air dried coatings.

(b) Pursuant to 326 IAC 8-2-9(f), the work practices shall include the following:

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

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

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

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

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

D.1.5 General Provisions Relating to VOC Rules: Military Specifications [326 IAC 8-1-7]

Part of the source's operation consists of surface coating military vehicles, if emission limitations set forth in 326 IAC 8 conflict with military specifications, the owner or operator of a source may petition the commissioner to have military specifications be the controlling limitation. If the commissioner approves the petition, the modified limitation shall be submitted to the U.S. EPA as a SIP revision.

D.1.6 Preventative Maintenance Plan [326 IAC 2-7-4(9)]

A Preventative Maintenance Plan is required for these facilities and associated emission control devices (if applicable). 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.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC limitations contained in Conditions D.1.1 and D.1.4(a) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in coinjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.8 Particulate Control [326 IAC 2-7-6(6)]

(a) In order to comply with Conditions D.1.2 and D.1.3, the dry filters equipped on CARC1 Spray Booth and CARC2 Spray Booth, and cartridge filters equipped on PC-1 shall be in operation and control emissions at all times these emission units are in operation.

(b) In the event that cartridge filters failure is observed in a multi-compartment cartridge filters, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.1.9 Monitoring [40 CFR 64]

(a) Pursuant to 40 CFR 64, daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters and cartridge filters used to control emissions from PC-1.

(b) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters and cartridge filters used to control emissions from the spray coating operations CARC1 Spray Boothand CARC2 Spray Booth.

To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks PB1, PB2, PB3, and BO-1 while the associated booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

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

D.1.10 Record Keeping Requirement

(a) To document the compliance status with Conditions D.1.1 and D.1.4(a), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Conditions D.1.1 and D.1.4(a).

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

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

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

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

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

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

(5) The total VOC usage for each month.

(b) To document the compliance status with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily, and monthly inspections.

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

D.1.11 Reporting Requirement

A quarterly summary of the monthly VOC emissions from CARC1 Spray Booth, CARC1 Dip Coating Booth, CARC2 Spray Booth and Epoxy and Acrylic electro coating operation covered by Condition D.1.1 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting Requirements contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

**Insignificant Activities**

**Emissions Unit Description:**

(a) Two (2) natural gas fired boilers, identified as BO-1 and BO-2, each with a maximum heat input capacity of 7.0 MMBtu/hr., used to provide indirect heat for hot water. [326 IAC 6-2-4]

(b) Activities with emissions equal to or less than the following thresholds: 5 tons per year PM or PM10, 1.0 ton per year of a single HAP, or 2.5 tons per year of any combination of HAPs: Eighty-five (85) MIG (Metal Inert Gas) welding stations with a capacity of 0.59 lb. of wire per hour per station. [326 IAC 6-3-2]

(c) Grinding and machining operations controlled with fabric filters with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, and abrasive blasting. [326 IAC 6-3-2]

(d) The following equipment related to manufacturing activities not resulting in the emissions of HAPs: brazing equipment, cutting torches, and soldering equipment. [326 IAC 6-3-2]

(e) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]

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

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

D.2.1 Particulate Matter from Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, the particulate matter emissions from Boiler BO-1 and Boiler BO-2, shall each not exceed 0.55 pounds per MMBtu heat input.

This limitation is based on the following equation:

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

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input
Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. (Q = 14.0 MMBtu/hr)

D.2.2 Particulate emission limitations, work practices, and control technologies [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e), the particulate emissions from Welding stations, Grinding & machining operations, Cutting torches, brazing, and soldering equipment shall not exceed 0.551 lbs/hour when operating at a process weight rate less than 100 pounds per hour.

D.2.3 Cold Cleaner Operations [326 IAC 8-3-2]

(a) Pursuant to 326 IAC 8-3-2(a), the Permittee shall comply with the following requirements for the degreasers:

(1) Equip the degreaser with a cover.
(2) Equip the degreaser with a device for draining cleaned parts.

(3) Close the degreaser cover whenever parts are not being handled in the degreaser.
(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.
(5) Provide a permanent, conspicuous label that lists the operating requirements in items (3), (4), (6), and (7).
(6) Store waste solvent only in closed containers.
(7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

(b) Pursuant to 326 IAC 8-3-2(b), the Permittee shall ensure that the following additional control equipment and operating requirements are met for the degreasers:

(1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
(B) A water cover when solvent used is insoluble in, and heavier than, water.
(C) A refrigerated chiller.
(D) Carbon adsorption.
(E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.

(2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.

(3) If used, solvent spray:
(A) must be a solid, fluid stream; and
(B) shall be applied at a pressure that does not cause excessive splashing.

## SECTION E.1 FACILITY OPERATION CONDITIONS

**Facility Description [326 IAC 2-8-4(10)]:**

(a) One (1) surface coating operation, identified as CARC1, constructed in 2001 and modified in 2009, consisting of the following equipment:

(1) One (1) spray booth, identified as CARC1 Spray Booth, consisting of two (2) spray guns, with a maximum capacity of 180 metal parts per hour, with emissions controlled by dry filters and exhausting to stack PB1;

(3) One (1) flash-off/cool down area, no control and exhausting to stack PB3; and

(4) One (1) natural gas-fired bake/cure oven, identified as BKO-1, with a maximum heat input capacity of 3.5 MMBtu/hr and exhausting to stack BO1.

(b) One (1) paint booth identified as CARC2 Spray Booth, constructed in 2009, consisting of 2 spray guns, with a maximum capacity of 8 metal parts per hour, with emissions controlled by dry filters, exhausting to stacks PB-4, PB-5 and PB-6.

(d) One (1) powder coat system, constructed in 2006, consisting of the following equipment:

(1) One (1) aqueous wash line with two (2) natural gas-fired process heaters, identified as WH-1 and WH-2, each with a maximum heat input capacity of 2.5 MMBtu/hr, no control and exhausting to stacks W-1 and W-2. The wash line uses aqueous solutions containing less than or equal to one percent (1%) by weight of VOCs excluding HAPs.

(2) One (1) natural gas-fired drying oven, identified as DO-2, with a maximum heat input capacity of 1.5 MMBtu/hr and exhausting to stack DOS-2.

(3) One (1) powder coating booth, identified as PC-1, equipped with cartridge filters, with a maximum capacity of coating 3000 square feet of metal per hour. The booth includes one (1) powder recycling unit which exhausts inside the plant.

(4) One (1) natural gas-fired cure oven, identified as CO-3, with a maximum heat input capacity of 4.0 MMBtu/hr, no control and exhausting to stack COS-3.

Under 40 CFR 63, Subpart HHHHHH, these units are considered part of an affected source.

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

**National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements**

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

Pursuant to 40 CFR 63, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1, except as otherwise specified in 40 CFR 63, Subpart HHHHHH.

E.1.2 National Emission Standards for Hazardous Air Pollutants (NESHAP) for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources [40 CFR Part 63, Subpart HHHHHH]

The Permittee, which engages in miscellaneous surface coating, shall comply with the following provisions of 40 CFR 63, Subpart HHHHHH (included as Attachment A of this permit):

(1) 40 CFR 63.11169(c)
(2) 40 CFR 63.11170(a)(3) and (b)
(3) 40 CFR 63.11171(a), (b), and (e)
(4) 40 CFR 63.11172(b)
(5) 40 CFR 63.11173(e), (f), (g)(2), and (g)(3)
(6) 40 CFR 63.11174
(7) 40 CFR 63.11175(a)
(8) 40 CFR 63.11176(a)
(9) 40 CFR 63.11177(a), (b), (c), (d), and (g)
(10) 40 CFR 63.11178
(11) 40 CFR 63.11179
(12) 40 CFR 63.11180
(13) Table 1

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

Source Name: EA Technologies, LLC
Source Address: 2501 Jeanwood Drive, Elkhart, Indiana 46514
Part 70 Permit No.: T039-32455-00498

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)

☐ Report (specify)

☐ Notification (specify)

☐ Affidavit (specify)

☐ Other (specify)

| |
|---|
| I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. |
| Signature: |
| Printed Name: |
| Title/Position: |
| Phone: |
| Date: |

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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

## PART 70 OPERATING PERMIT
## EMERGENCY OCCURRENCE REPORT

Source Name: EA Technologies, LLC
Source Address: 2501 Jeanwood Drive, Elkhart, Indiana 46514
Part 70 Permit No.: T039-32455-00498

**This form consists of 2 pages** **Page 1 of 2**

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

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

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

| |
|---|
| Date/Time Emergency started: |
| Date/Time Emergency was corrected: |
| Was the facility being properly operated at the time of the emergency? Y N |
| Type of Pollutants Emitted: TSP, PM-10, $SO_2$, VOC, $NO_X$, CO, Pb, other: |
| Estimated amount of pollutant(s) emitted during emergency: |
| Describe the steps taken to mitigate the problem: |
| Describe the corrective actions/response steps taken: |
| Describe the measures taken to minimize emissions: |
| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

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

# Part 70 Quarterly Report

| | |
|---|---|
| Source Name: | EA Technologies, LLC |
| Source Address: | 2501 Jeanwood Drive, Elkhart, Indiana 46514 |
| Part 70 Permit No.: | T039-32455-00498 |
| Facility: | CARC1 Spray Booth, CARC1 Dip Coating Booth and CARC2 Spray Booth and Epoxy and Acrylic electro coating operation |
| Parameter: | The VOC input, including coatings, dilution solvents, and cleaning solvents |
| Limit: | 247.23 tons, combined, per twelve (12) consecutive month period with compliance determined at the end of each month |

QUARTER : YEAR:

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

☐ No deviation occurred in this quarter.

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

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

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

Source Name: EA Technologies, LLC
Source Address: 2501 Jeanwood Drive, Elkhart, Indiana 46514
Part 70 Permit No.: T039-32455-00498

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

Page 1 of 2

| | |
|---|---|
| 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". | |
| ☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD. | |
| ☐ 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:** | |

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

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

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

**Attachment A**

| | |
|---|---|
| Source Name: | EA Technologies, LLC |
| Source Location: | 2501 Jeanwood Drive, Elkhart, IN 46514 |
| County: | Elkhart |
| SIC Code: | 3499, 3714 |
| Permit Renewal No.: | T039-32455-00498 |
| Permit Reviewer: | Mehul Sura |

**Title 40: Protection of Environment**

**Subpart HHHHHH—National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources**

**Source:** 73 FR 1759, Jan. 9, 2008, unless otherwise noted.

**What This Subpart Covers**

**§ 63.11169 What is the purpose of this subpart?**

Except as provided in paragraph (d) of this section, this subpart establishes national emission standards for hazardous air pollutants (HAP) for area sources involved in any of the activities in paragraphs (a) through (c) of this section. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission standards contained herein.

(a) Paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl), Chemical Abstract Service number 75092, in paint removal processes;

(b) Autobody refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations;

(c) Spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), collectively referred to as the target HAP 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) This subpart does not apply to any of the activities described in paragraph (d)(1) through (6) of this section.

(1) Surface coating or paint stripping performed on site at installations owned or operated by the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State), the National Aeronautics and Space Administration, or the National Nuclear Security Administration.

(2) Surface coating or paint stripping of military munitions, as defined in §63.11180, manufactured by or for the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State) or equipment directly and exclusively used for the purposes of transporting military munitions.

(3) Surface coating or paint stripping performed by individuals on their personal vehicles, possessions, or property, either as a hobby or for maintenance of their personal vehicles, possessions, or property. This subpart also does not apply when these operations are performed by individuals for others without compensation. An individual who spray applies surface coating to more than two motor vehicles or pieces of mobile equipment per year is subject to the requirements in this subpart that pertain to motor vehicle and mobile equipment surface coating regardless of whether compensation is received.

(4) Surface coating or paint stripping that meets the definition of “research and laboratory activities” in §63.11180.

(5) Surface coating or paint stripping that meets the definition of “quality control activities” in §63.11180.

(6) Surface coating or paint stripping activities that are covered under another area source NESHAP.

### § 63.11170 Am I subject to this subpart?

(a) You are subject to this subpart if you operate an area source of HAP as defined in paragraph (b) of this section, including sources that are part of a tribal, local, State, or Federal facility and you perform one or more of the activities in paragraphs (a)(1) through (3) of this section:

(1) Perform paint stripping using MeCl for the removal of dried paint (including, but not limited to, paint, enamel, varnish, shellac, and lacquer) from wood, metal, plastic, and other substrates.

(2) Perform spray application of coatings, as defined in §63.11180, to motor vehicles and mobile equipment including operations that are located in stationary structures at fixed locations, and mobile repair and refinishing operations that travel to the customer's location, except spray coating applications that meet the definition of facility maintenance in §63.11180. However, if you are the owner or operator of a motor vehicle or mobile equipment surface coating operation, you may petition the Administrator for an exemption from this subpart if you can demonstrate, to the satisfaction of the Administrator, that you spray apply no coatings that contain the target HAP, as defined in §63.11180. Petitions must include a description of the coatings that you spray apply and your certification that you do not spray apply any coatings containing the target HAP. If circumstances change such that you intend to spray apply coatings containing the target HAP, you must submit the initial notification required by 63.11175 and comply with the requirements of this subpart.

(3) Perform spray application of coatings that contain the target HAP, as defined in §63.11180, to a plastic and/or metal substrate on a part or product, except spray coating applications that meet the definition of facility maintenance or space vehicle in §63.11180.

(b) An area source of HAP is a source of HAP that is not a major source of HAP, is not located at a major source, and is not part of a major source of HAP emissions. A major source of HAP emissions is any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit any single HAP at a rate of 9.07 megagrams (Mg) (10 tons) or more per year, or emit any combination of HAP at a rate of 22.68 Mg (25 tons) or more per year.

### § 63.11171 How do I know if my source is considered a new source or an existing source?

(a) This subpart applies to each new and existing affected area source engaged in the activities listed in §63.11170, with the exception of those activities listed in §63.11169(d) of this subpart.

(b) The affected source is the collection of all of the items listed in paragraphs (b)(1) through (6) of this section. Not all affected sources will have all of the items listed in paragraphs (b)(1) through (6) of this section.

(1) Mixing rooms and equipment;

(2) Spray booths, ventilated prep stations, curing ovens, and associated equipment;

(3) Spray guns and associated equipment;

(4) Spray gun cleaning equipment;

(5) Equipment used for storage, handling, recovery, or recycling of cleaning solvent or waste paint; and

(6) Equipment used for paint stripping at paint stripping facilities using paint strippers containing MeCl.

(c) An affected source is a new source if it meets the criteria in paragraphs (c)(1) and (c)(2) of this section.

(1) You commenced the construction of the source after September 17, 2007 by installing new paint stripping or surface coating equipment. If you purchase and install spray booths, enclosed spray gun cleaners, paint stripping equipment to reduce MeCl emissions, or purchase new spray guns to comply with this subpart at an existing source, these actions would not make your existing source a new source.

(2) The new paint stripping or surface coating equipment is used at a source that was not actively engaged in paint stripping and/or miscellaneous surface coating prior to September 17, 2007.

(d) An affected source is reconstructed if it meets the definition of reconstruction in §63.2.

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

## General Compliance Requirements

### § 63.11172 When do I have to comply with this subpart?

The date by which you must comply with this subpart is called the compliance date. The compliance date for each type of affected source is specified in paragraphs (a) and (b) of this section.

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

(1) If the initial startup of your new or reconstructed affected source is after September 17, 2007, the compliance date is January 9, 2008.

(2) If the initial startup of your new or reconstructed affected source occurs after January 9, 2008, the compliance date is the date of initial startup of your affected source.

(b) For an existing affected source, the compliance date is January 10, 2011.

### § 63.11173 What are my general requirements for complying with this subpart?

(a) Each paint stripping operation that is an affected area source must implement management practices to minimize the evaporative emissions of MeCl. The management practices must address, at a minimum, the practices in paragraphs (a)(1) through (5) of this section, as applicable, for your operations.

(1) Evaluate each application to ensure there is a need for paint stripping (e.g., evaluate whether it is possible to re-coat the piece without removing the existing coating).

(2) Evaluate each application where a paint stripper containing MeCl is used to ensure that there is no alternative paint stripping technology that can be used.

(3) Reduce exposure of all paint strippers containing MeCl to the air.

(4) Optimize application conditions when using paint strippers containing MeCl to reduce MeCl evaporation (e.g., if the stripper must be heated, make sure that the temperature is kept as low as possible to reduce evaporation).

(5) Practice proper storage and disposal of paint strippers containing MeCl (e.g., store stripper in closed, air-tight containers).

(b) Each paint stripping operation that has annual usage of more than one ton of MeCl must develop and implement a written MeCl minimization plan to minimize the use and emissions of MeCl. The MeCl minimization plan must address, at a minimum, the management practices specified in paragraphs (a)(1) through (5) of this section, as applicable, for your operations. Each operation must post a placard or sign outlining the MeCl minimization plan in each area where paint stripping operations subject to this subpart occur. Paint stripping operations with annual usage

of less than one ton of MeCl, must comply with the requirements in paragraphs (a)(1) through (5) of this section, as applicable, but are not required to develop and implement a written MeCl minimization plan.

(c) Each paint stripping operation must maintain copies of annual usage of paint strippers containing MeCl on site at all times.

(d) Each paint stripping operation with annual usage of more than one ton of MeCl must maintain a copy of their current MeCl minimization plan on site at all times.

(e) Each motor vehicle and mobile equipment surface coating operation and each miscellaneous surface coating operation must meet the requirements in paragraphs (e)(1) through (e)(5) of this section.

(1) All painters must be certified that they have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment. The minimum requirements for training and certification are described in paragraph (f) of this section. The spray application of surface coatings is prohibited by persons who are not certified as having completed the training described in paragraph (f) of this section. The requirements of this paragraph do not apply to the students of an accredited surface coating training program who are under the direct supervision of an instructor who meets the requirements of this paragraph.

(2) All spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure that meets the requirements of paragraph (e)(2)(i) of this section and either paragraph (e)(2)(ii), (e)(2)(iii), or (e)(2)(iv) of this section.

(i) All spray booths, preparation stations, and mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least 98-percent capture of paint overspray. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, “Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992” (incorporated by reference, see §63.14 of subpart A of this part). The test coating for measuring filter efficiency shall be a high solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-HVLP) air-atomized spray gun operating at 40 pounds per square inch (psi) air pressure; the air flow rate across the filter shall be 150 feet per minute. Owners and operators may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement. The requirements of this paragraph do not apply to waterwash spray booths that are operated and maintained according to the manufacturer's specifications.

(ii) Spray booths and preparation stations used to refinish complete motor vehicles or mobile equipment must be fully enclosed with a full roof, and four complete walls or complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls or preparation station curtains. However, if a spray booth is fully enclosed and has seals on all doors and other openings and has an automatic pressure balancing system, it may be operated at up to, but not more than, 0.05 inches water gauge positive pressure.

(iii) Spray booths and preparation stations that are used to coat miscellaneous parts and products or vehicle subassemblies must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so that air is drawn into the booth. The walls and roof of a booth may have openings, if needed, to allow for conveyors and parts to pass through the booth during the coating process.

(iv) Mobile ventilated enclosures that are used to perform spot repairs must enclose and, if necessary, seal against the surface around the area being coated such that paint overspray is retained within the enclosure and directed to a filter to capture paint overspray.

(3) All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which written approval has been obtained from the Administrator. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's “Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989” and “Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002” (incorporated by reference, see §63.14 of subpart A of this part). The requirements of this paragraph do not apply to painting performed by students and instructors at paint training

centers. The requirements of this paragraph do not apply to the surface coating of aerospace vehicles that involves the coating of components that normally require the use of an airbrush or an extension on the spray gun to properly reach limited access spaces; to the application of coatings on aerospace vehicles that contain fillers that adversely affect atomization with HVLP spray guns; or to the application of coatings on aerospace vehicles that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 in.).

(4) All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent. Spray gun cleaning may be done with, for example, hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of non-atomizing methods may also be used.

(5) As provided in §63.6(g), we, the U.S. Environmental Protection Agency, may choose to grant you permission to use an alternative to the emission standards in this section after you have requested approval to do so according to §63.6(g)(2).

(f) Each owner or operator of an affected miscellaneous surface coating source must ensure and certify that all new and existing personnel, including contract personnel, who spray apply surface coatings, as defined in §63.11180, are trained in the proper application of surface coatings as required by paragraph (e)(1) of this section. The training program must include, at a minimum, the items listed in paragraphs (f)(1) through (f)(3) of this section.

(1) A list of all current personnel by name and job description who are required to be trained;

(2) Hands-on and classroom instruction that addresses, at a minimum, initial and refresher training in the topics listed in paragraphs (f)(2)(i) through (2)(iv) of this section.

(i) Spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate.

(ii) Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke.

(iii) Routine spray booth and filter maintenance, including filter selection and installation.

(iv) Environmental compliance with the requirements of this subpart.

(3) A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. Owners and operators who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in paragraph (f)(2) of this section are not required to provide the initial training required by that paragraph to these painters.

(g) As required by paragraph (e)(1) of this section, all new and existing personnel at an affected motor vehicle and mobile equipment or miscellaneous surface coating source, including contract personnel, who spray apply surface coatings, as defined in §63.11180, must be trained by the dates specified in paragraphs (g)(1) and (2) of this section. Employees who transfer within a company to a position as a painter are subject to the same requirements as a new hire.

(1) If your source is a new source, all personnel must be trained and certified no later than 180 days after hiring or no later than July 7, 2008, whichever is later. Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in paragraph (f)(2) of this section satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed.

(2) If your source is an existing source, all personnel must be trained and certified no later than 180 days after hiring or no later than January 10, 2011, whichever is later. Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in paragraph (f)(2) of this section satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed.

(3) Training and certification will be valid for a period not to exceed five years after the date the training is completed, and all personnel must receive refresher training that meets the requirements of this section and be re-certified every five years.

[73 FR 1760, Jan. 9, 2008; 73 FR 8408, Feb. 13, 2008]

### § 63.11174 What parts of the General Provisions apply to me?

(a) Table 1 of this subpart shows which parts of the General Provisions in subpart A apply to you.

(b) If you are an owner or operator of an area source subject to this subpart, you are exempt from the obligation to obtain a permit under 40 CFR part 70 or 71, provided you are not required to obtain a permit under 40 CFR 70.3(a) or 71.3(a) for a reason other than your status as an area source under this subpart. Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart applicable to area sources.

## Notifications, Reports, and Records

### § 63.11175 What notifications must I submit?

(a) Initial Notification. If you are the owner or operator of a paint stripping operation using paint strippers containing MeCl and/or a surface coating operation subject to this subpart, you must submit the initial notification required by §63.9(b). For a new affected source, you must submit the Initial Notification no later than 180 days after initial startup or July 7, 2008, whichever is later. For an existing affected source, you must submit the initial notification no later than January 11, 2010. The initial notification must provide the information specified in paragraphs (a)(1) through (8) of this section.

(1) The company name, if applicable.

(2) The name, title, street address, telephone number, e-mail address (if available), and signature of the owner and operator, or other certifying company official;

(3) The street address (physical location) of the affected source and the street address where compliance records are maintained, if different. If the source is a motor vehicle or mobile equipment surface coating operation that repairs vehicles at the customer's location, rather than at a fixed location, such as a collision repair shop, the notification should state this and indicate the physical location where records are kept to demonstrate compliance;

(4) An identification of the relevant standard (i.e., this subpart, 40 CFR part 63, subpart HHHHHH);

(5) A brief description of the type of operation as specified in paragraph (a)(5)(i) or (ii) of this section.

(i) For all surface coating operations, indicate whether the source is a motor vehicle and mobile equipment surface coating operation or a miscellaneous surface coating operation, and include the number of spray booths and preparation stations, and the number of painters usually employed at the operation.

(ii) For paint stripping operations, identify the method(s) of paint stripping employed (e.g., chemical, mechanical) and the substrates stripped (e.g., wood, plastic, metal).

(6) Each paint stripping operation must indicate whether they plan to annually use more than one ton of MeCl after the compliance date.

(7) A statement of whether the source is already in compliance with each of the relevant requirements of this subpart, or whether the source will be brought into compliance by the compliance date. For paint stripping operations, the relevant requirements that you must evaluate in making this determination are specified in §63.11173(a) through (d) of this subpart. For surface coating operations, the relevant requirements are specified in §63.11173(e) through (g) of this subpart.

(8) If your source is a new source, you must certify in the initial notification whether the source is in compliance with each of the requirements of this subpart. If your source is an existing source, you may certify in the initial notification that the source is already in compliance. If you are certifying in the initial notification that the source is in compliance with the relevant requirements of this subpart, then include also a statement by a responsible official with that official's name, title, phone number, e-mail address (if available) and signature, certifying the truth, accuracy, and completeness of the notification, a statement that the source has complied with all the relevant standards of this subpart, and that this initial notification also serves as the notification of compliance status.

(b) Notification of Compliance Status. If you are the owner or operator of a new source, you are not required to submit a separate notification of compliance status in addition to the initial notification specified in paragraph (a) of this subpart provided you were able to certify compliance on the date of the initial notification, as part of the initial notification, and your compliance status has not since changed. If you are the owner or operator of any existing source and did not certify in the initial notification that your source is already in compliance as specified in paragraph (a) of this section, then you must submit a notification of compliance status. You must submit a Notification of Compliance Status on or before March 11, 2011. You are required to submit the information specified in paragraphs (b)(1) through (4) of this section with your Notification of Compliance Status:

(1) Your company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different.

(2) The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance. For paint stripping operations, the relevant requirements that you must evaluate in making this determination are specified in §63.11173(a) through (d). For surface coating operations, the relevant requirements are specified in §63.11173(e) through (g).

(3) The date of the Notification of Compliance Status.

(4) If you are the owner or operator of an existing affected paint stripping source that annually uses more than one ton of MeCl, you must submit a statement certifying that you have developed and are implementing a written MeCl minimization plan in accordance with §63.11173(b).

### § 63.11176 What reports must I submit?

(a) Annual Notification of Changes Report. If you are the owner or operator of a paint stripping, motor vehicle or mobile equipment, or miscellaneous surface coating affected source, you are required to submit a report in each calendar year in which information previously submitted in either the initial notification required by §63.11175(a), Notification of Compliance, or a previous annual notification of changes report submitted under this paragraph, has changed. Deviations from the relevant requirements in §63.11173(a) through (d) or §63.11173(e) through (g) on the date of the report will be deemed to be a change. This includes notification when paint stripping affected sources that have not developed and implemented a written MeCl minimization plan in accordance with §63.11173(b) used more than one ton of MeCl in the previous calendar year. The annual notification of changes report must be submitted prior to March 1 of each calendar year when reportable changes have occurred and must include the information specified in paragraphs (a)(1) through (2) of this section.

(1) Your company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different.

(2) The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance.

(b) If you are the owner or operator of a paint stripping affected source that has not developed and implemented a written MeCl minimization plan in accordance with §63.11173(b) of this subpart, you must submit a report for any calendar year in which you use more than one ton of MeCl. This report must be submitted no later than March 1 of

the following calendar year. You must also develop and implement a written MeCl minimization plan in accordance with §63.11173(b) no later than December 31. You must then submit a Notification of Compliance Status report containing the information specified in §63.11175(b) by March 1 of the following year and comply with the requirements for paint stripping operations that annually use more than one ton of MeCl in §§63.11173(d) and 63.11177(f).

### § 63.11177 What records must I keep?

If you are the owner or operator of a surface coating operation, you must keep the records specified in paragraphs (a) through (d) and (g) of this section. If you are the owner or operator of a paint stripping operation, you must keep the records specified in paragraphs (e) through (g) of this section, as applicable.

(a) Certification that each painter has completed the training specified in §63.11173(f) with the date the initial training and the most recent refresher training was completed.

(b) Documentation of the filter efficiency of any spray booth exhaust filter material, according to the procedure in §63.11173(e)(3)(i).

(c) Documentation from the spray gun manufacturer that each spray gun with a cup capacity equal to or greater than 3.0 fluid ounces (89 cc) that does not meet the definition of an HVLP spray gun, electrostatic application, airless spray gun, or air assisted airless spray gun, has been determined by the Administrator to achieve a transfer efficiency equivalent to that of an HVLP spray gun, according to the procedure in §63.11173(e)(4).

(d) Copies of any notification submitted as required by §63.11175 and copies of any report submitted as required by §63.11176.

(e) Records of paint strippers containing MeCl used for paint stripping operations, including the MeCl content of the paint stripper used. Documentation needs to be sufficient to verify annual usage of paint strippers containing MeCl (e.g., material safety data sheets or other documentation provided by the manufacturer or supplier of the paint stripper, purchase receipts, records of paint stripper usage, engineering calculations).

(f) If you are a paint stripping source that annually uses more than one ton of MeCl you are required to maintain a record of your current MeCl minimization plan on site for the duration of your paint stripping operations. You must also keep records of your annual review of, and updates to, your MeCl minimization plan.

(g) Records of any deviation from the requirements in §§63.11173, 63.11174, 63.11175, or 63.11176. These records must include the date and time period of the deviation, and a description of the nature of the deviation and the actions taken to correct the deviation.

(h) Records of any assessments of source compliance performed in support of the initial notification, notification of compliance status, or annual notification of changes report.

### § 63.11178 In what form and for how long must I keep my records?

(a) If you are the owner or operator of an affected source, you must maintain copies of the records specified in §63.11177 for a period of at least five years after the date of each record. Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two year period.

## Other Requirements and Information

### § 63.11179 Who implements and enforces this subpart?

(a) This subpart can be implemented and enforced by us, the U.S. Environmental Protection Agency (EPA), or a delegated authority such as your State, local, or tribal agency. If the Administrator has delegated authority to your State, local, or tribal agency, then that agency (as well as the EPA) has the authority to implement and enforce this

subpart. You should contact your EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to your State, local, or tribal agency.

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

(c) The authority in §63.11173(e)(5) will not be delegated to State, local, or tribal agencies.

## § 63.11180 What definitions do I need to know?

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

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

*Administrator* means, for the purposes of this rulemaking, the Administrator of the U.S. Environmental Protection Agency or the State or local agency that is granted delegation for implementation of this subpart.

*Aerospace vehicle or component* means any fabricated part, processed part, assembly of parts, or completed unit, with the exception of electronic components, of any aircraft including but not limited to airplanes, helicopters, missiles, rockets, and space vehicles.

*Airless and air-assisted airless spray* mean any paint spray technology that relies solely on the fluid pressure of the paint to create an atomized paint spray pattern and does not apply any atomizing compressed air to the paint before it leaves the paint nozzle. Air-assisted airless spray uses compressed air to shape and distribute the fan of atomized paint, but still uses fluid pressure to create the atomized paint.

*Appurtenance* means any accessory to a stationary structure coated at the site of installation, whether installed or detached, including but not limited to: bathroom and kitchen fixtures; cabinets; concrete forms; doors; elevators; fences; hand railings; heating equipment, air conditioning equipment, and other fixed mechanical equipment or stationary tools; lamp posts; partitions; pipes and piping systems; rain gutters and downspouts; stairways, fixed ladders, catwalks, and fire escapes; and window screens.

*Architectural coating* means a coating to be applied to stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs.

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

*Coating* means, for the purposes of this subpart, a material spray-applied to a substrate for decorative, protective, or functional purposes. For the purposes of this subpart, coating does not include the following materials:

(1) Decorative, protective, or functional materials that consist only of protective oils for metal, acids, bases, or any combination of these substances.

(2) Paper film or plastic film that may be pre-coated with an adhesive by the film manufacturer.

(3) Adhesives, sealants, maskants, or caulking materials.

(4) Temporary protective coatings, lubricants, or surface preparation materials.

(5) In-mold coatings that are spray-applied in the manufacture of reinforced plastic composite parts.

*Compliance date* means the date by which you must comply with this subpart.

*Deviation* means any instance in which an affected source, subject to this subpart, or an owner or operator of such a source fails to meet any requirement or obligation established by this subpart.

*Dry media blasting* means abrasive blasting using dry media. Dry media blasting relies on impact and abrasion to remove paint from a substrate. Typically, a compressed air stream is used to propel the media against the coated surface.

*Electrostatic application* means any method of coating application where an electrostatic attraction is created between the part to be coated and the atomized paint particles.

*Equipment cleaning* means the use of an organic solvent to remove coating residue from the surfaces of paint spray guns and other painting related equipment, including, but not limited to stir sticks, paint cups, brushes, and spray booths.

*Facility maintenance* means, for the purposes of this subpart, surface coating performed as part of the routine repair or renovation of the tools, equipment, machinery, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity. *Facility maintenance* also includes surface coating associated with the installation of new equipment or structures, and the application of any surface coating as part of janitorial activities. *Facility maintenance* includes the application of coatings to stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs. *Facility maintenance* also includes the refinishing of mobile equipment in the field or at the site where they are used in service and at which they are intended to remain indefinitely after refinishing. Such mobile equipment includes, but is not limited to, farm equipment and mining equipment for which it is not practical or feasible to move to a dedicated mobile equipment refinishing facility. Such mobile equipment also includes items, such as fork trucks, that are used in a manufacturing facility and which are refinished in that same facility. *Facility maintenance* does not include surface coating of motor vehicles, mobile equipment, or items that routinely leave and return to the facility, such as delivery trucks, rental equipment, or containers used to transport, deliver, distribute, or dispense commercial products to customers, such as compressed gas canisters.

*High-volume, low-pressure (HVLP) spray equipment* means spray equipment that is permanently labeled as such and used to apply any coating by means of a spray gun which is designed and operated between 0.1 and 10 pounds per square inch gauge (psig) air atomizing pressure measured dynamically at the center of the air cap and at the air horns.

*Initial startup* means the first time equipment is brought online in a paint stripping or surface coating operation, and paint stripping or surface coating is first performed.

*Materials that contain HAP* or *HAP-containing materials* mean, for the purposes of this subpart, materials that contain 0.1 percent or more by mass of any individual HAP that is an OSHA-defined carcinogen as specified in 29 CFR 1910.1200(d)(4), or 1.0 percent or more by mass for any other individual HAP.

*Military munitions* means all ammunition products and components produced or used by or for the U.S. Department of Defense (DoD) or for the U.S. Armed Services for national defense and security, including military munitions under the control of the Department of Defense, the U.S. Coast Guard, the National Nuclear Security Administration (NNSA), U.S. Department of Energy (DOE), and National Guard personnel. The term military munitions includes: confined gaseous, liquid, and solid propellants, explosives, pyrotechnics, chemical and riot control agents, smokes, and incendiaries used by DoD components, including bulk explosives and chemical warfare agents, chemical munitions, biological weapons, rockets, guided and ballistic missiles, bombs, warheads, mortar rounds, artillery ammunition, small arms ammunition, grenades, mines, torpedoes, depth charges, cluster munitions and dispensers, demolition charges, nonnuclear components of nuclear weapons, wholly inert ammunition products, and all devices and components of any items listed in this definition.

*Miscellaneous parts and/or products* means any part or product made of metal or plastic, or combinations of metal and plastic. Miscellaneous parts and/or products include, but are not limited to, metal and plastic components of the following types of products as well as the products themselves: motor vehicle parts and accessories for automobiles, trucks, recreational vehicles; automobiles and light duty trucks at automobile and light duty truck assembly plants;

boats; sporting and recreational goods; toys; business machines; laboratory and medical equipment; and household and other consumer products.

*Miscellaneous surface coating operation* means the collection of equipment used to apply surface coating to miscellaneous parts and/or products made of metal or plastic, including applying cleaning solvents to prepare the surface before coating application, mixing coatings before application, applying coating to a surface, drying or curing the coating after application, and cleaning coating application equipment, but not plating. A single surface coating operation may include any combination of these types of equipment, but always includes at least the point at which a coating material is applied to a given part. A surface coating operation includes all other steps (such as surface preparation with solvent and equipment cleaning) in the affected source where HAP are emitted from the coating of a part. The use of solvent to clean parts (for example, to remove grease during a mechanical repair) does not constitute a miscellaneous surface coating operation if no coatings are applied. A single affected source may have multiple surface coating operations. Surface coatings applied to wood, leather, rubber, ceramics, stone, masonry, or substrates other than metal and plastic are not considered miscellaneous surface coating operations for the purposes of this subpart.

*Mobile equipment* means any device that may be drawn and/or driven on a roadway including, but not limited to, heavy-duty trucks, truck trailers, fleet delivery trucks, buses, mobile cranes, bulldozers, street cleaners, agriculture equipment, motor homes, and other recreational vehicles (including camping trailers and fifth wheels).

*Motor vehicle* means any self-propelled vehicle, including, but not limited to, automobiles, light duty trucks, golf carts, vans, and motorcycles.

*Motor vehicle and mobile equipment surface coating* means the spray application of coatings to assembled motor vehicles or mobile equipment. For the purposes of this subpart, it does not include the surface coating of motor vehicle or mobile equipment parts or subassemblies at a vehicle assembly plant or parts manufacturing plant.

*Non-HAP solvent* means, for the purposes of this subpart, a solvent (including thinners and cleaning solvents) that contains less than 0.1 percent by mass of any individual HAP that is an OSHA-defined carcinogen as specified in 29 CFR 1910.1200(d)(4) and less than 1.0 percent by mass for any other individual HAP.

*Paint stripping and/or miscellaneous surface coating source or facility* means any shop, business, location, or parcel of land where paint stripping or miscellaneous surface coating operations are conducted.

*Paint stripping* means the removal of dried coatings from wood, metal, plastic, and other substrates. A single affected source may have multiple paint stripping operations.

*Painter* means any person who spray applies coating.

*Plastic* refers to substrates containing one or more resins and may be solid, porous, flexible, or rigid. Plastics include fiber reinforced plastic composites.

*Protective oil* means organic material that is applied to metal for the purpose of providing lubrication or protection from corrosion without forming a solid film. This definition of protective oil includes, but is not limited to, lubricating oils, evaporative oils (including those that evaporate completely), and extrusion oils.

*Quality control activities* means surface coating or paint stripping activities that meet all of the following criteria:

(1) The activities associated with a surface coating or paint stripping operation are intended to detect and correct defects in the final product by selecting a limited number of samples from the operation, and comparing the samples against specific performance criteria.

(2) The activities do not include the production of an intermediate or final product for sale or exchange for commercial profit; for example, parts that are surface coated or stripped are not sold and do not leave the facility.

(3) The activities are not a normal part of the surface coating or paint stripping operation; for example, they do not include color matching activities performed during a motor vehicle collision repair.

(4) The activities do not involve surface coating or stripping of the tools, equipment, machinery, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity; that is, the activities are not facility maintenance.

*Research and laboratory activities* means surface coating or paint stripping activities that meet one of the following criteria:

(1) Conducted at a laboratory to analyze air, soil, water, waste, or product samples for contaminants, or environmental impact.

(2) Activities conducted to test more efficient production processes, including alternative paint stripping or surface coating materials or application methods, or methods for preventing or reducing adverse environmental impacts, provided that the activities do not include the production of an intermediate or final product for sale or exchange for commercial profit.

(3) Activities conducted at a research or laboratory facility that is operated under the close supervision of technically trained personnel, the primary purpose of which is to conduct research and development into new processes and products and that is not engaged in the manufacture of products for sale or exchange for commercial profit.

*Solvent* means a fluid containing organic compounds used to perform paint stripping, surface prep, or cleaning of surface coating equipment.

*Space Vehicle* means vehicles designed to travel beyond the limit of the earth's atmosphere, including but not limited to satellites, space stations, and the Space Shuttle System (including orbiter, external tanks, and solid rocket boosters).

*Spray-applied coating operations* means coatings that are applied using a hand-held device that creates an atomized mist of coating and deposits the coating on a substrate. For the purposes of this subpart, spray-applied coatings do not include the following materials or activities:

(1) Coatings applied from a hand-held device with a paint cup capacity that is equal to or less than 3.0 fluid ounces (89 cubic centimeters).

(2) Surface coating application using powder coating, hand-held, non-refillable aerosol containers, or non-atomizing application technology, including, but not limited to, paint brushes, rollers, hand wiping, flow coating, dip coating, electrodeposition coating, web coating, coil coating, touch-up markers, or marking pens.

(3) Thermal spray operations (also known as metallizing, flame spray, plasma arc spray, and electric arc spray, among other names) in which solid metallic or non-metallic material is heated to a molten or semi-molten state and propelled to the work piece or substrate by compressed air or other gas, where a bond is produced upon impact.

*Surface preparation* or *Surface prep* means use of a cleaning material on a portion of or all of a substrate prior to the application of a coating.

*Target HAP* are compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).

*Target HAP containing coating* means a spray-applied coating that contains any individual target HAP that is an Occupational Safety and Health Administration (OSHA)–defined carcinogen as specified in 29 CFR 1910.1200(d)(4) at a concentration greater than 0.1 percent by mass, or greater than 1.0 percent by mass for any other individual target HAP compound. For the purpose of determining whether materials you use contain the target HAP compounds, you may rely on formulation data provided by the manufacturer or supplier, such as the material safety data sheet (MSDS), as long as it represents each target HAP compound in the material that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other target HAP compounds.

*Transfer efficiency* means the amount of coating solids adhering to the object being coated divided by the total amount of coating solids sprayed, expressed as a percentage. Coating solids means the nonvolatile portion of the coating that makes up the dry film.

*Truck bed liner coating* means any coating, excluding color coats, labeled and formulated for application to a truck bed to protect it from surface abrasion.

**Table 1 to Subpart HHHHHH of Part 63—Applicability of General Provisions to Subpart HHHHHH of Part 63**

| Citation | Subject | Applicable to subpart HHHHHH | Explanation |
|---|---|---|---|
| §63.1(a)(1)–(12) | General Applicability | Yes | |
| §63.1(b)(1)–(3) | Initial Applicability Determination | Yes | Applicability of subpart HHHHHH is also specified in §63.11170. |
| §63.1(c)(1) | Applicability After Standard Established | Yes | |
| §63.1(c)(2) | Applicability of Permit Program for Area Sources | Yes | (63.11174(b) of Subpart HHHHHH exempts area sources from the obligation to obtain Title V operating permits. |
| §63.1(c)(5) | Notifications | Yes | |
| §63.1(e) | Applicability of Permit Program to Major Sources Before Relevant Standard is Set | No | (63.11174(b) of Subpart HHHHHH exempts area sources from the obligation to obtain Title V operating permits. |
| §63.2 | Definitions | Yes | Additional definitions are specified in §63.11180. |
| §63.3(a)–(c) | Units and Abbreviations | Yes | |
| §63.4(a)(1)–(5) | Prohibited Activities | Yes | |
| §63.4(b)–(c) | Circumvention/Fragmentation | Yes | |
| §63.5 | Construction/Reconstruction of major sources | No | Subpart HHHHHH applies only to area sources. |
| §63.6(a) | Compliance With Standards and Maintenance Requirements—Applicability | Yes | |
| §63.6(b)(1)–(7) | Compliance Dates for New and Reconstructed Sources | Yes | §63.11172 specifies the compliance dates. |
| §63.6(c)(1)–(5) | Compliance Dates for Existing Sources | Yes | §63.11172 specifies the compliance dates. |
| §63.6(e)(1)–(2) | Operation and Maintenance | Yes | |
| §63.6(e)(3) | Startup, Shutdown, and Malfunction Plan | No | No startup, shutdown, and malfunction plan is required by subpart HHHHHH. |

| | | | |
|---|---|---|---|
| §63.6(f)(1) | Compliance Except During Startup, Shutdown, and Malfunction | Yes | |
| §63.6(f)(2)–(3) | Methods for Determining Compliance | Yes | |
| §63.6(g)(1)–(3) | Use of an Alternative Standard | Yes | |
| §63.6(h) | Compliance With Opacity/Visible Emission Standards | No | Subpart HHHHHH does not establish opacity or visible emission standards. |
| §63.6(i)(1)–(16) | Extension of Compliance | Yes | |
| §63.6(j) | Presidential Compliance Exemption | Yes | |
| §63.7 | Performance Testing Requirements | No | No performance testing is required by subpart HHHHHH. |
| §63.8 | Monitoring Requirements | No | Subpart HHHHHH does not require the use of continuous monitoring systems. |
| §63.9(a)–(d) | Notification Requirements | Yes | §63.11175 specifies notification requirements. |
| §63.9(e) | Notification of Performance Test | No | Subpart HHHHHH does not require performance tests. |
| §63.9(f) | Notification of Visible Emissions/Opacity Test | No | Subpart HHHHHH does not have opacity or visible emission standards. |
| §63.9(g) | Additional Notifications When Using CMS | No | Subpart HHHHHH does not require the use of continuous monitoring systems. |
| §63.9(h) | Notification of Compliance Status | No | §63.11175 specifies the dates and required content for submitting the notification of compliance status. |
| §63.9(i) | Adjustment of Submittal Deadlines | Yes | |
| §63.9(j) | Change in Previous Information | Yes | §63.11176(a) specifies the dates for submitting the notification of changes report. |
| §63.10(a) | Recordkeeping/Reporting—Applicability and General Information | Yes | |
| §63.10(b)(1) | General Recordkeeping Requirements | Yes | Additional requirements are specified in §63.11177. |
| §63.10(b)(2)(i)–(xi) | Recordkeeping Relevant to Startup, Shutdown, and Malfunction Periods and CMS | No | Subpart HHHHHH does not require startup, shutdown, and malfunction plans, or CMS. |
| §63.10(b)(2)(xii) | Waiver of recordkeeping requirements | Yes | |
| §63.10(b)(2)(xiii) | Alternatives to the relative accuracy test | No | Subpart HHHHHH does not require the use of CEMS. |

| | | | |
|---|---|---|---|
| §63.10(b)(2)(xiv) | Records supporting notifications | Yes | |
| §63.10(b)(3) | Recordkeeping Requirements for Applicability Determinations | Yes | |
| §63.10(c) | Additional Recordkeeping Requirements for Sources with CMS | No | Subpart HHHHHH does not require the use of CMS. |
| §63.10(d)(1) | General Reporting Requirements | Yes | Additional requirements are specified in §63.11176. |
| §63.10(d)(2)–(3) | Report of Performance Test Results, and Opacity or Visible Emissions Observations | No | Subpart HHHHHH does not require performance tests, or opacity or visible emissions observations. |
| §63.10(d)(4) | Progress Reports for Sources With Compliance Extensions | Yes | |
| §63.10(d)(5) | Startup, Shutdown, and Malfunction Reports | No | Subpart HHHHHH does not require startup, shutdown, and malfunction reports. |
| §63.10(e) | Additional Reporting requirements for Sources with CMS | No | Subpart HHHHHH does not require the use of CMS. |
| §63.10(f) | Recordkeeping/Reporting Waiver | Yes | |
| §63.11 | Control Device Requirements/Flares | No | Subpart HHHHHH does not require the use of flares. |
| §63.12 | State Authority and Delegations | Yes | |
| §63.13 | Addresses of State Air Pollution Control Agencies and EPA Regional Offices | Yes | |
| §63.14 | Incorporation by Reference | Yes | Test methods for measuring paint booth filter efficiency and spray gun transfer efficiency in §63.11173(e)(2) and (3) are incorporated and included in §63.14. |
| §63.15 | Availability of Information/Confidentiality | Yes | |
| §63.16(a) | Performance Track Provisions—reduced reporting | Yes | |
| §63.16(b)–(c) | Performance Track Provisions—reduced reporting | No | Subpart HHHHHH does not establish numerical emission limits. |

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

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

## Source Background and Description

| | |
|---|---|
| Source Name: | EA Technologies, LLC |
| Source Location: | 2501 Jeanwood Drive, Elkhart, IN 46514 |
| County: | Elkhart |
| SIC Code: | 3499 (Fabricated Metal Products, Not Elsewhere Classified) and 3714 (Motor Vehicles and Motor Vehicle Equipment) |
| Permit Renewal No.: | T039-32455-00498 |
| Permit Reviewer: | Mehul Sura |

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from EA Technologies, LLC relating to the operation of a stationary trailer frame fabrication and surface coating plant. On October 26, 2012, EA Technologies, LLC submitted an application to the OAQ requesting to renew its operating permit. EA Technologies, LLC was issued its first Part 70 Operating Permit Renewal T039-24691-00498 on August 1, 2008.

## Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

(a) One (1) surface coating operation, identified as CARC1, constructed in 2001 and modified in 2009, consisting of the following equipment:

(1) One (1) spray booth, identified as CARC1 Spray Booth, consisting of two (2) spray guns, with a maximum capacity of 180 metal parts per hour, with emissions controlled by dry filters and exhausting to stack PB1;

(2) One (1) dip coating booth, identified as CARC1 Dip Coating Booth, with a maximum capacity of 558 metal parts per hour, no control and exhausting to Stack PB2;

(3) One (1) flash-off/cool down area, no control and exhausting to stack PB3; and

(4) One (1) natural gas-fired bake/cure oven, identified as BKO-1, with a maximum heat input capacity of 3.5 MMBtu/hr and exhausting to stack BO1.

(b) One (1) paint booth identified as CARC2 Spray Booth, constructed in 2009, consisting of 2 spray guns, with a maximum capacity of 8 metal parts per hour, with emissions controlled by dry filters, exhausting to stacks PB-4, PB-5 and PB-6.

(c) One (1) epoxy and acrylic electro coating operation, constructed in 1998, no control, consisting of the following equipment:

(1) Eighteen (18) dip tanks, with an aggregate maximum capacity of 181.2 pounds of resin per hour, coating 25.137 metal parts per hour and using 166.8 pounds of aqueous cleaner per hour, using epoxy or acrylic dip application method. Emissions from the aqueous cleaning are vented to vents EF1 through EF4 and Stacks S1 and S2, and the emissions from epoxy or acrylic dip application process are vented to vent EF5.

(2) One (1) cool down area, no control and venting inside.

(3) One (1) natural gas-fired E-coat cure oven, identified as CO-1, with a maximum heat input capacity of 1.9 MMBtu/hr and exhausting to stack S3 through S6.

(4) One (1) natural gas-fired burn-off oven, identified as BOO-1, with a maximum heat input capacity of 1.6 MMBtu/hr and exhausting to stack S3 through S6.

(d) One (1) powder coat system, constructed in 2006, consisting of the following equipment:

(1) One (1) aqueous wash line with two (2) natural gas-fired process heaters, identified as WH-1 and WH-2, each with a maximum heat input capacity of 2.5 MMBtu/hr, no control and exhausting to stacks W-1 and W-2. The wash line uses aqueous solutions containing less than or equal to one percent (1%) by weight of VOCs excluding HAPs.

(2) One (1) natural gas-fired drying oven, identified as DO-2, with a maximum heat input capacity of 1.5 MMBtu/hr and exhausting to stack DOS-2.

(3) One (1) powder coating booth, identified as PC-1, equipped with cartridge filters, with a maximum capacity of coating 3000 square feet of metal per hour and 4.91 tons per hour. The booth includes one (1) powder recycling unit which exhausts inside the plant.

(4) One (1) natural gas-fired cure oven, identified as CO-3, with a maximum heat input capacity of 4.0 MMBtu/hr, no control and exhausting to stack COS-3.

Note: This powder coat system is listed as Insignificant Activities under Part 70 Operating Permit Renewal T039-24691-00498.

## Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit

There are no unpermitted emission units operating at this source during this review process.

## Emission Units and Pollution Control Equipment Removed From the Source

No emission unit or pollution control equipment has been removed from the source since the Part 70 Operating Permit Renewal No. T039-24691-00498 was issued on August 1, 2008.

## Insignificant Activities

The source also consists of the following insignificant activities:

(a) Two (2) natural gas fired boilers, identified as BO-1 and BO-2, each with a maximum heat input capacity of 7.0 MMBtu/hr, used to provide indirect heat for hot water. [326 IAC 6-2-4]

(b) Activities with emissions equal to or less than the following thresholds: 5 tons per year PM or PM10, 1.0 ton per year of a single HAP, or 2.5 tons per year of any combination of HAPs: Ninety (90) MIG (Metal Inert Gas) welding stations with a capacity of 0.59 lb. of wire per hour per station. [326 IAC 6-3-2]

(c) Grinding and machining operations controlled with fabric filters with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, and abrasive blasting. [326 IAC 6-3-2]

(d) The following equipment related to manufacturing activities not resulting in the emissions of HAPs: brazing equipment, cutting torches, and soldering equipment. [326 IAC 6-3-2]

(e) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2]

## Existing Approvals

Since the issuance of the Part 70 Operating Permit T039-24691-00498 on August 1, 2008, the source has constructed or has been operating under the following additional approvals:

(a) Minor Permit Modification No. 039-27696-00498, issued on June 2, 2009.

(b) Administrative Amendment No. 039-31052-00498, issued on November 21, 2011.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

## Enforcement Issue

There are no enforcement actions pending.

## Emission Calculations

See Appendix A of this document for detailed emission calculations.

## County Attainment Status

The source is located in Elkhart County.

| Pollutant | Designation |
|---|---|
| $SO_2$ | Better than national standards. |
| CO | Unclassifiable or attainment effective November 15, 1990. |
| $O_3$ | Attainment effective July 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]Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005.
Unclassifiable or attainment effective April 5, 2005, for PM2.5.

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides ($NO_x$) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and $NO_x$ emissions are considered when evaluating the rule applicability relating to ozone. Elkhart 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) $PM_{2.5}$
Elkhart County has been classified as attainment for PM2.5. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 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 PM2.5 significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM2.5 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
Elkhart County has been classified as attainment or unclassifiable in Indiana for all other 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.

## Unrestricted Potential Emissions

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

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM, PM10, PM2.5 and VOC, each, is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit Renewal.

## Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, because the source met the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

## Potential to Emit After Issuance

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

| Process/Emission Unit | **Potential To Emit of the Entire Source After Issuance of Renewal (tons/year) *** | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| Emission Unit | PM | PM10 | PM2.5 | SO2 | NOx | VOC | CO | GHGs | Total HAPs | Worst Single HAP |
| Epoxy and Acrylic electro coating operation | -- | -- | -- | -- | -- | 247.23 ** | -- | -- | -- | -- |
| CARC1 Spray Booth | 24.16 | 24.16 | 24.16 | -- | -- | | -- | -- | 1.51 | 1.51 |
| CARC1 Dip Coating Booth | -- | -- | -- | -- | -- | | -- | -- | 0.00 | 0.00 |
| CARC2 Spray Booth | 12.90 | 12.90 | 12.90 | -- | -- | | -- | -- | 0.80 | 0.43 |
| PC-1 | 44.81 *** | 44.81 *** | 44.81 *** | -- | -- | -- | -- | -- | -- | -- |
| Welding | 1.28 | 1.28 | 1.28 | -- | -- | -- | -- | -- | 1.28 | 1.28 |
| Paved Roads | 0.44 | 0.08 | 0.08 | -- | -- | -- | -- | -- | -- | -- |
| Natural Gas Combustion | 0.61 | 2.42 | 2.42 | 0.19 | 31.89 | 1.75 | 26.78 | 38496.55 | 0.60 | 0.60 |
| **Total PTE of Entire Source** | **54.54** | **56.01** | **56.01** | **0.19** | **31.89** | **248.98** | **26.78** | **38496.55** | **4.19** | **3.82** |
| PSD Major Source Thresholds | 250 | 250 | 250 | 250 | 250 | 250 | 250 | 100,000 CO2e | NA | NA |

* All PTEs (except VOC PTE of the coating operations and PM, PM10 and PM2.5 PTE of PC-1) are uncontrolled emission rates.

** VOC PTE is based on existing PSD minor limit (specified below) in the permit. The Permittee shall continue to comply with this limit.

The VOC input, including coatings, dilution solvents, and cleaning solvents, to Epoxy and Acrylic electro coating operation, CARC1 Spray Booth, CARC1 Dip Coating Booth and CARC2 Spray Booth shall not exceed 247.23 tons, combined, per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limit in combination with potential VOC emissions from other emission units will limit the source-wide VOC emissions to less than 250, tons per twelve (12) consecutive month period each, and will render 326 IAC 2-2 (PSD) not applicable.

This is an existing applicable requirement and being carried over to this renewal.

*** PM, PM10 and PM2.5 PTE of PC-1 is based on the following PSD minor limit:

| **Emission Unit** | **PM Limit (lb/hr)** | **PM10 Limit (lb/hr)** | **PM2.5 Limit (lb/hr)** |
|---|---|---|---|
| PC-1 | 10.27 | 10.27 | 10.27 |

The PM limit for PC-1 is calculated as follows:

PM = Controlled Emissions (tons/yr) x 2000 (lbs/ton) / 8760 (hours/year)
= 45 x 2000 / 8760 = 10.27

Similarly, PM10 and PM2.5 emission limits are calculated for PC-1.

Note: These are new applicable requirements. These are Title I changes

Compliance with the above limits, combined with the potential to emit PM, PM10 and PM2.5 from other emission units at the source, shall limit the PM, PM10 and PM2.5 from the entire source to less than 250 tons per twelve (12) consecutive month period and render 326 IAC 2-2 (PSD) not applicable to this source.

The cartridge filters equipped on PC-1 shall be in operation and a control particulate emissions at all times PC-1 in operation.

This existing stationary source is not major for PSD because the emissions of each regulated pollutant, excluding GHGs, are less than two hundred fifty (<250) tons per year, emissions of GHGs are less than one hundred thousand (<100,000) tons of $CO_2$ equivalent emissions ($CO_2e$) per year, and it is not in one of the twenty-eight (28) listed source categories.

## Federal Rule Applicability

**Compliance Assurance Monitoring (CAM)**
Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:

(1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;

(2) is subject to an emission limitation or standard for that pollutant; and

(3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

CAM Applicability - PM, PM10 and PM2.5
CAM for CARC1 Spray Booth, CARC2 Spray Booth, and PC-1 is evaluated as shown in the table below because these units have control devices.

| Emission Unit | Pollutant | Control Device Used (Y/N) | Emission Limitation (Y/N) | Uncontrolled PTE (tons/year) | Controlled PTE (tons/year) | Major Source Threshold (tons/year) | CAM Applicable (Y/N) | Large Unit (Y/N) |
|---|---|---|---|---|---|---|---|---|
| CARC1 Spray Booth | PM, PM10 and PM2.5 | Yes (Dry filters) | N | 24.16 | 4.83 | 100 | N | N |
| CARC2 Spray Booth | PM, PM10 and PM2.5 | Yes (Dry filters) | N | 12.9 | 2.58 | 100 | N | N |
| PC-1 | PM, PM10 and PM2.5 | Yes (cartridge filters) | Y | 448.07 | 44.81 | 100 | Y | N |

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to PC-1 for PM, PM10 and PM2.5. The Compliance Determination and Monitoring Requirements section includes a detailed description of the CAM requirements.

VOC

None of the emission units at this source is equipped with VOC control equipment. Therefore, CAM for VOC does not apply to any emission unit at this source.

**National Emission Standards for Hazardous Air Pollutants (NESHAPs, 40 CFR 63)**

(a) The source-wide PTE of single HAP and combined HAPs are less than 10 and 25 tons per year, respectively. Therefore this source is an area source under NESHAP. There are no major source NESHAP (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

(b) Subpart JJJJJJ—National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources

Boiler BO-1 and Boiler BO-2 are not subject to the requirements of this NESHAP because these boilers are considered Gas-fired boiler under this NESHAP.

(c) Subpart HHHHHH—National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

Paint Stripping operations are not performed at this source.

The following emissiosn units are not subject to the requirements of this NESHAP because these emission units do not spray any coatings that contain chromium, lead, manganese, nickel, or cadmium:

(1) CARC1 Dip Coating Booth, located at surface coating operation (CARC1)

(2) Epoxy and Acrylic electro coating operation

The following emission units are subject to the requirements of this NESHAP because these facilities are engaged in spray coating operations and the coating material contains more than 0.1 percent chromium (Cr). Under this NESHAP this source is considered existing affected source:

(a) CARC1 Spray Booth, flash-off/cool down area and BKO-1, located at surface coating operation (CARC1)

(b) CARC2 Spray Booth

(c) Powder coating booth (PC-1) and natural gas-fired cure ovens (DO-2 and CO-3) located at powder coat system

Non applicable portions of the NESHAP will not be included in the permit. The above listed facilities are subject to the following portions of 40 CFR 63, Subpart HHHHHH:

(1) 40 CFR 63.11169(c)
(2) 40 CFR 63.11170(a)(3) and (b)
(3) 40 CFR 63.11171(a), (b), and (e)
(4) 40 CFR 63.11172(b)
(5) 40 CFR 63.11173(e), (f), (g)(2), and (g)(3)
(6) 40 CFR 63.11174
(7) 40 CFR 63.11175(a)
(8) 40 CFR 63.11176(a)
(9) 40 CFR 63.11177(a), (b), (c), (d), and (g)
(10) 40 CFR 63.11178
(11) 40 CFR 63.11179
(12) 40 CFR 63.11180

(13) Table 1

The provisions of 40 CFR 63 Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1 apply to the above listed facilities except when otherwise specified in 40 CFR 63, Subpart HHHHHH.

This is a new applicable requirement. This is a Title I change.

(b) There are no other NESHAP (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

**New Source Performance Standards (NSPS, 40 CFR 60)**
There are no NSPS (326 IAC 12 and 40 CFR Part 60) included in this permit renewal.

## State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)
Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). The source-wide limited PTE of CO, NOx, VOC and PM10, each, is less than 250 tons per year and this source is not located in Lake, Porter or LaPorte county. In accordance with the compliance schedule in 326 IAC 2-6-3(b)(1), an emission statement must be submitted triennially by July 1 beginning in 2004 and every 3 years after. The next report is due no later than July 1, 2013, and subsequent reports are due every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

This is an existing applicable requirement.

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

326 IAC 6-4 (Fugitive Dust Emissions)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), fugitive dust shall not be visible crossing the boundary or property line of a source. Observances of visible emissions crossing property lines may be refuted by factual data expressed in 326 IAC 6-4-2(1), (2) or (3).

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source-wide fugitive particulate emissions are less than 25 tons per year; therefore, this rule does not apply to this source.

## State Rule Applicability – Individual Facilities

**326 IAC 6-2-4 (Particulate Matter from Sources of Indirect Heating)**
(a) Pursuant to 326 IAC 6-2-4, the particulate matter emissions from Boiler BO-1 and Boiler BO-2, shall each not exceed 0.55 pounds per MMBtu heat input.

This limitation is based on the following equation:

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

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input
Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input (Q = 14.0 MMBtu/hr)

Pt = 0.55 lb/MMBtu

Based on AP-42 emission factor, the PM emissions from the boiler is 0.0019 pounds per million British thermal units. Therefore, these boilers can comply with this rule.

(b) None of the ovens at this source is indirect heating source, therefore, the requirements of 326 IAC 6-2 are not applicable to any of the oven at this source.

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

(a) CARC1 Spray Booth and CARC2 Spray Booth
Pursuant to 326 IAC 6-3-2(d), particulate emissions from the CARC1 Spray Booth and CARC2 Spray Booth shall be controlled by dry particulate filters and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

(b) CARC1 Dip Coating Booth
CARC1 Dip Coating Booth is not subject to 326 IAC 6-3, because this type of manufacturing process is listed in 326 IAC 6-3-1(b), and therefore CARC1 Dip Coating Booth is exempt from the requirements of this rule.

(c) Epoxy and acrylic electro coating operation
Epoxy and acrylic electro coating operation does not emit particulate. Therefore, it is not subject to this rule.

(d) All ovens
The uncontrolled particulate emissions from each oven at this source is is less than 0.551 pounds per hour, therefore, as pursuant to 326 IAC 6-3-1(b)(14), all the ovens at this source are exempt from 326 IAC 6-3.

(e) Pursuant to 326 IAC 6-3-2(e), the particulate emissions from DO-2, CO-3, Welding stations, Grinding & machining operations, Cutting torches, brazing, and soldering equipment shall not exceed 0.551 lbs/hour when operating at a process weight rate less than 100 pounds per hour.

(f) Powder Coating Booth (PC-1)
Pursuant to 326 IAC 6-3-2(e), the particulate emissions rate from Powder Coating Booth (PC-1) shall not exceed 11.91 pounds per hour when operating at a process weight rate of 4.91 tons per hour. This pounds per hour limitation is based upon the following:

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

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

Powder Coating Booth (PC-1) can comply with the limit because the controlled emission rates from Powder Coating Booth (PC-1) are less than the limit.

The cartridge filters equipped on Powder Coating Booth (PC-1) shall be in operation and control particulate emissions at all times Powder Coating Booth (PC-1) is in operation in order to comply with this limit.

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

(a) CARC1 Spray Booth, CARC1 Dip Coating Booth, CARC2 Spray Booth and the Epoxy and Acrylic electro coating operation
These facilities are subject to this rule because surface coating of metal parts or products (under the Standard Industrial Classification (SIC) Code of major group #34) are performed at these facilities.

Pursuant to 326 IAC 8-2-9(c)(2), the VOC content of coating applied to the fabricated metal surface at the CARC1 Spray Booth, CARC1 Dip Coating Booth, CARC2 Spray Booth and Epoxy and Acrylic electro coating operation shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator, for forced warm air dried coatings. This is an existing applicable requirement.

The Permittee is using compliant coatings in the paint booths to comply with 326 IAC 8-2-9.

Based on the MSDS submitted by the source and calculations made, the Permittee can comply with this requirement.

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

In addition, pursuant to 326 IAC 8-2-9(f), the work practices shall include the following:

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

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

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

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

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

This is new applicable requirement based on the most recent version of the rule. This is a Title I change.

(b) Powder coating booth (PC-1)
The coating material used at Powder coating booth (PC-1) does not contain VOC. Therefore, the Powder coating booth (PC-1) is not subject to VOC rule (326 IAC 8).

**326 IAC 8-1-7 (Military Specifications)**
Part of the source's operation consists of surface coating military vehicles, if emission limitations set forth in 326 IAC 8 conflict with military specifications, the owner or operator of a source may petition the commissioner to have military specifications be the controlling limitation. If the commissioner approves the petition, the modified limitation shall be submitted to the U.S. EPA as a SIP revision.

This is an existing condition in the permit, and is being carried over in the renewal.

**326 IAC 8-3-2 (Cold cleaner degreaser control equipment and operating requirements)**
The Degreasing operations are subject to this rule because these Degreasing operations are cold cleaning operations using solvents containing VOC. These Degreasing operations are constructed after January 1, 1980 and are located at the source that has potential VOC emissions more than 100 tons per year.

(a) Pursuant to 326 IAC 8-3-2(a), the Permittee shall comply with the following requirements for the degreasers:
  (1) Equip the degreaser with a cover.
  (2) Equip the degreaser with a device for draining cleaned parts.
  (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
  (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.
  (5) Provide a permanent, conspicuous label that lists the operating requirements in items (3), (4), (6), and (7).
  (6) Store waste solvent only in closed containers.
  (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

(b) Pursuant to 326 IAC 8-3-2(b) (Cold Cleaner Degreaser Operation and Control), the Permittee shall ensure that the following additional control equipment and operating requirements are met:
  (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
    (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    (B) A water cover when solvent used is insoluble in, and heavier than, water.
    (C) A refrigerated chiller.
    (D) Carbon adsorption.
    (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
  (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
  (3) If used, solvent spray:
    (A) must be a solid, fluid stream; and
    (B) shall be applied at a pressure that does not cause excessive splashing.

These are new applicable requirements based on the most recent version of the rule.

**326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)**
This rule has been repealed. Therefore, the requirements of this rule will be removed from the permit through this renewal.

**Compliance Determination and Monitoring Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

| Emission Units | Control | Parameter | Frequency | Reason for compliance monitoring |
|---|---|---|---|---|
| CARC1 Spray Booth and CARC2 Spray Booth | Dry Filters | filter inspection | Daily | To ensure that the dry filters operate properly in order to comply with 326 IAC 6-3-2, 326 IAC 2-2 (PSD), CAM and 326 IAC 2-7 (Part 70). |
| | | overspray observation | Weekly | |
| | | overspray on the rooftops and the nearby ground | Monthly | |
| PC-1* | cartridge filters | filter inspection | Daily | |
| | | overspray observation | Weekly | |

* PC-1 is venting inside, threfore, the requirements of monthly monitoring of overspray on the rooftops and the nearby ground are not required for PC-1.

## Recommendation

The staff recommends to the Commissioner that the Part 70 Operating Permit Renewal Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on October 26, 2012.

## Conclusion

The operation of this stationary trailer frame fabrication and surface coating plant shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T039-32455-00498.

## IDEM Contact

(a) Questions regarding this proposed permit can be directed to Mehul Sura at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-6868 or toll free at 1-800-451-6027 extension3-6868.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

**Appendix A: Emissions Calculations**
**Emissions summary**

**Company Name:** EA Technologies, LLC
**ddress City IN Zip:** 2501 Jeanwood Drive, P.O. Box 189
**Permit Number:** T039-32455-00498
**Reviewer:** Mehul Sura
**Date:** 3/6/2013

| | **Uncontrolled Potential Emissions (tons/year)** | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| Emission Unit | PM | PM10 | PM2.5 | SO2 | NOx | VOC | CO | GHGs | Total HAPs | Worst Single HAP |
| Epoxy and Acrylic electro coating operation | -- | -- | -- | -- | -- | 176.72 | -- | -- | -- | -- |
| CARC1 Spray Booth | 24.16 | 24.16 | 24.16 | -- | -- | 45.57 | -- | -- | 1.51 | 0.00 |
| CARC1 Dip Coating Booth | -- | -- | -- | -- | -- | 48.13 | -- | -- | | |
| CARC2 Spray Booth | 12.90 | 12.90 | 12.90 | -- | -- | 22.14 | -- | -- | 0.80 | 0.00 |
| Powder Coating PC-1 | 448.07 | 448.07 | 448.07 | | | | | | | |
| Welding | 1.28 | 1.28 | 1.28 | -- | -- | -- | -- | -- | 1.28 | 1.28 |
| Paved Roads | 0.44 | 0.08 | 0.08 | -- | -- | -- | -- | -- | -- | -- |
| Natural Gas Combustion | 0.61 | 2.42 | 2.42 | 0.19 | 31.89 | 1.75 | 26.78 | 38496.55 | 0.60 | 0.60 |
| **PTE of Entire Source** | **487.46** | **488.92** | **488.92** | **0.19** | **31.89** | **294.31** | **26.78** | **38496.55** | **4.19** | **1.88** |

| | **Limited/Controlled Emissions (tons/year)*** | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| Emission Unit | PM | PM10 | PM2.5 | SO2 | NOx | VOC | CO | GHGs | Total HAPs | Worst Single HAP |
| Epoxy and Acrylic electro coating operation | -- | -- | -- | -- | -- | | -- | -- | -- | -- |
| CARC1 Spray Booth | 4.83 *** | 4.83 *** | 4.83 *** | -- | -- | 247.23 ** | -- | -- | 1.51 | 0.00 |
| CARC1 Dip Coating Booth | -- | -- | -- | -- | -- | | -- | -- | 0.00 | 0.00 |
| CARC2 Spray Booth | 2.58 *** | 2.58 *** | 2.58 *** | -- | -- | | -- | -- | 0.80 | 0.00 |
| Powder Coating PC-1 | 44.81 *** | 44.81 *** | 44.81 *** | -- | -- | -- | -- | -- | -- | -- |
| Welding | 1.28 | 1.28 | 1.28 | -- | -- | -- | -- | -- | 1.28 | 1.28 |
| Paved Roads | 0.44 | 0.08 | 0.08 | -- | -- | -- | -- | -- | -- | -- |
| Natural Gas Combustion | 0.61 | 2.42 | 2.42 | 0.19 | 31.89 | 1.75 | 26.78 | 38496.55 | 0.60 | 0.60 |
| **Limited PTE of Entire Source** | **54.54** | **56.01** | **56.01** | **0.19** | **31.89** | **248.98** | **26.78** | **38496.55** | **4.19** | **1.88** |

* All PTEs (except VOC PTE of the coating operations and PM, PM10 and PM2.5 PTE of the spray coating operations) are uncontrolled emission rates.
** VOC PTE is based on existing PSD minor limit.
*** PM, PM10 and PM2.5 PTEs are based on the PSD minor limits.

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

**Company Name:** EA Technologies, LLC
**Address City IN Zip:** 2501 Jeanwood Drive, P.O. Box 189, Elkhart, IN 46515
**Permit Number:** T039-32455-00498
**Reviewer:** Mehul Sura
**Date:** 3/6/2013

| Material | | Density (Lb/Gal) | Weight % Volatile (H20 & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential (ton/yr) | Control Efficiency | Controlled Particulate Potential (ton/yr) | lb VOC/gal solids | Transfer Efficiency |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Epoxy and Acrylic electro coating operation** | | | | | | | | | | | | | | | | | | | |
| Acrylics (as supplied) - Powercron CR935 (Resin) | | 8.7 | 76.50% | 68.5% | 8.0% | 71.1% | 23.50% | 3.78600 | 15.400 | 2.39 | 0.69 | 40.35 | 968.32 | 176.72 | 0.00 | N/A | 0.00 | 2.94 | 100% |
| Acrylics (as supplied) - Powercron 639J (Paste) | | 9.5 | 58.00% | 45.7% | 12.3% | 51.8% | 33.00% | 0.32500 | 15.400 | 2.42 | 1.17 | 5.85 | 140.36 | 25.62 | 0.00 | N/A | 0.00 | 3.54 | 100% |
| Epoxy (as supplied) - Powercron CR590 | | 9.1 | 61.50% | 59.6% | 1.9% | 64.8% | 33.00% | 1.88000 | 18.390 | 0.49 | 0.17 | 5.94 | 142.68 | 26.04 | 0.00 | N/A | 0.00 | 0.52 | 100% |
| | | | | | | | | | | | | | worst case | 176.72 | 0.00 | | | | |
| **CARC1 Spray Booth** | | | | | | | | | | | | | | | | | | | |
| Dynaspec Black (as applied) | Spray | 9.8 | 39.79% | 11.3% | 28.5% | 16.7% | 43.17% | 0.02000 | 180.000 | 3.34 | 2.78 | 10.02 | 240.50 | 43.89 | 23.17 | 80% | 4.63 | 6.45 | 75% |
| Dynaspec Tan (as applied) | Spray | 10.1 | 39.32% | 10.9% | 28.4% | 16.7% | 43.33% | 0.02000 | 180.000 | 3.45 | 2.87 | 10.34 | 248.09 | 45.28 | 24.16 | 80% | 4.83 | 6.63 | 75% |
| Hentzen Green 383 (as applied) | Spray | 9.8 | 40.89% | 11.3% | 29.6% | 16.7% | 40.95% | 0.02000 | 180.000 | 3.47 | 2.89 | 10.40 | 249.69 | 45.57 | 22.74 | 80% | 4.55 | 7.06 | 75% |
| | | | | | | | | | | | | | worst case | 45.57 | 24.16 | | | | |
| **CARC1 Dip Coating Booth** | | | | | | | | | | | | | | | | | | | |
| Springs | | 10.05 | 34.30% | 2.78% | 31.52% | 3.59% | 49.58% | 0.00557 | 279 | 3.29 | 3.17 | 4.92 | 118.18 | 21.57 | 0.00 | N/A | 0.00 | 6.39 | 100% |
| Large Screen | Dip | 10.05 | 34.30% | 2.78% | 31.52% | 3.59% | 49.58% | 0.00932 | 372 | 3.29 | 3.17 | 10.99 | 263.72 | 48.13 | 0.00 | N/A | 0.00 | 6.39 | 100% |
| Small Screen | Dip | 10.05 | 34.30% | 2.78% | 31.52% | 3.59% | 49.58% | 0.00514 | 558 | 3.29 | 3.17 | 9.09 | 218.17 | 39.82 | 0.00 | N/A | 0.00 | 6.39 | 100% |
| Cups | Dip | 10.05 | 34.30% | 2.78% | 31.52% | 3.59% | 49.58% | 0.00171 | 558 | 3.29 | 3.17 | 3.03 | 72.72 | 13.27 | 0.00 | N/A | 0.00 | 6.39 | 100% |
| Spring Seat | Dip | 10.05 | 34.30% | 2.78% | 31.52% | 3.59% | 49.58% | 0.00382 | 558 | 3.29 | 3.17 | 6.75 | 161.98 | 29.56 | 0.00 | N/A | 0.00 | 6.39 | 100% |
| Huron Casting | Dip | 10.05 | 34.30% | 2.78% | 31.52% | 3.59% | 49.58% | 0.00156 | 558 | 3.29 | 3.17 | 2.75 | 66.11 | 12.07 | 0.00 | N/A | 0.00 | 6.39 | 100% |
| | | | | | | | | | | | | | worst case | 48.13 | 0.00 | | | | |
| **CARC2 Spray Booth** | | | | | | | | | | | | | | | | | | | |
| Gun Racks | Spray | 10.45 | 32.90% | 4.11% | 28.79% | 5.53% | 50.02% | 0.13000 | 8 | 3.19 | 3.01 | 3.13 | 75.12 | 13.71 | 7.99 | 80% | 1.60 | 6.02 | 75% |
| Ammo Cabniants | Spray | 10.45 | 32.90% | 4.11% | 28.79% | 5.53% | 50.02% | 0.27000 | 4 | 3.19 | 3.01 | 3.25 | 78.00 | 14.24 | 8.29 | 80% | 1.66 | 6.02 | 75% |
| Containers | Spray | 10.45 | 32.90% | 4.11% | 28.79% | 5.53% | 50.02% | 0.84000 | 2 | 3.19 | 3.01 | 5.06 | 121.34 | 22.14 | 12.90 | 80% | 2.58 | 6.02 | 75% |
| Floors | Spray | 11.20 | 42.05% | 38.38% | 8.39% | 38.35% | 55.29% | 0.27000 | 2 | 1.52 | 0.94 | 0.51 | 12.18 | 2.22 | 3.84 | 80% | 0.77 | 1.70 | 75% |
| | | | | | | | | | | | | | worst case | 22.14 | 12.90 | | | | |

METHODOLOGY
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Solvent

| Material | Density (Lb/Gal) | Weight % Volatile (H20 & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/year) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC tons per year | lb VOC/gal solids |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Dowanol PPH Glycol Ether | 8.8 | 100.00% | 0.0% | 100.0% | 0.0% | 0.00% | 220.00000 | 8.80 | 8.80 | **0.97** | N/A |

METHODOLOGY
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/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

Powder Coating PC-1

| | | Density (Lb/Gal) | Weight % Volatile (H20 & Organics) | Powder Usage Rate (lb/square feet) | maximum sqaure footage per hour | Transfer Efficiency | Uncontrolled PM (tons/yr) | Controlled PM (tons/yr) | Controlled PM (lb/hr) |
|---|---|---|---|---|---|---|---|---|---|
| RV Black 11 | Spray | 10.76 | 0.00% | 0.341 | 3000 | 90.00% | 448.1 | 45 | 10 |

METHODOLOGY
Uncontrolled emissions tons/yr = Powder Usage (lb/hr) * transfer efficiency * 8760 (hrs/yr)
controlled emissions tons/yr = Uncontrolled emissions tons/yr * filter efficiency (90%)

**Appendix A: Emissions Calculations**
**HAP's**
**Surface Coating Operations**

**Company Name:** EA Technologies, LLC
**Address City IN Zip:** 2501 Jeanwood Drive, P.O. Box 189, Elkhart, IN 46515
**Permit Number:** T039-32455-00498
**Reviewer:** Mehul Sura
**Date:** 3/6/2013

| Material | Density (Lb/Gal) | Gallons of Material (gal/unit) | Maximum (unit/hour) | Weight % Chromium Compounds | Weight % Cobalt Compounds | Chromium Compound Emissions uncontrolled (ton/yr) | Chromium Compound Emissions controlled (ton/yr) | Cobalt Compound Emissions uncontrolled (ton/yr) | Cobalt Compound Emissions controlled (ton/yr) | Transfer Efficiency** | Control Efficiency |
|---|---|---|---|---|---|---|---|---|---|---|---|
| **E-Coat Line** | | | | | | | | | | | |
| Powercron CR935 (Resin) | This product contains no Hazardous Air Pollutants (HAPs) | | | | | | | | | | |
| Powercron 639J (Paste) | This product contains no Hazardous Air Pollutants (HAPs) | | | | | | | | | | |
| Powercron CR590 | This product contains no Hazardous Air Pollutants (HAPs) | | | | | | | | | | |
| **CARC1 Spray Booth** | | | | | | | | | | | |
| Dynaspec Black | 9.8 | 0.020000 | 180.00 | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 75% | 80% |
| Dynaspec Tan | 10.1 | 0.020000 | 180.00 | 5.00% | 0.00% | 1.99 | 0.40 | 0.00 | 0.00 | 75% | 80% |
| Hentzen Green 383 | 9.8 | 0.020000 | 180.00 | 9.11% | 3.26% | 3.52 | 0.70 | 1.26 | 0.25 | 75% | 80% |
| CARC1 Dip Coating Booth | | | | | | | | | | | |
| Springs | 10.05 | 0.005571 | 279.00 | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 75% | 80% |
| Large Screen | 10.05 | 0.009325 | 372.00 | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 75% | 80% |
| Small Screen | 10.05 | 0.005143 | 558.00 | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 75% | 80% |
| Cups | 10.05 | 0.001714 | 558.00 | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 75% | 80% |
| Spring Seat | 10.05 | 0.003818 | 558.00 | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 75% | 80% |
| Huron Casting | 10.05 | 0.001558 | 558.00 | 0.00% | 0.00% | 0.00 | 0.00 | 0.00 | 0.00 | 75% | 80% |
| CARC2 Spray Booth | | | | | | | | | | | |
| Gun Racks | 10.45 | 0.130000 | 8.00 | 7.80% | 0.56% | 0.93 | 0.19 | 0.07 | 0.01 | 75% | 80% |
| Ammo Cabniants | 10.45 | 0.270000 | 4.00 | 7.80% | 0.56% | 0.96 | 0.19 | 0.07 | 0.01 | 75% | 80% |
| Containers | 10.45 | 0.840000 | 2.00 | 7.80% | 0.56% | 1.50 | 0.30 | 0.11 | 0.02 | 75% | 80% |
| Floors | 11.20 | 0.270000 | 2.00 | 1.00% | 0.00% | 0.07 | 0.01 | 0.00 | 0.00 | 75% | 80% |
| | | | | | | | | | | | |
| **Solvents** | | | | | | | | | | | |
| Dowanol PPH Glycol Ether | This product contains no Hazardous Air Pollutants (HAPs) | | | | | | | | | | |

**METHODOLOGY**

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs*0.25 (transfer efficiency)*0.20 (control efficiency)

**Appendix A: Emissions Calculations**
**Welding**

**Company Name:** EA Technologies, LLC
**Address City IN Zip:** 2501 Jeanwood Drive, P.O. Box 189, Elkhart, IN 46515
**Permit Number:** T039-32455-00498
**Reviewer:** Mehul Sura
**Date:** 3/6/2013

| PROCESS | Number of Stations | Max. electrode consumption per station (lbs/hr) | | EMISSION FACTORS* (lb pollutant/lb electrode) | | | | EMISSIONS (lbs/hr) | | | | HAPS (lbs/hr) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Welding | | | | PM = PM10 | Mn | Ni | Cr | PM = PM10 | Mn | Ni | Cr | |
| | | | | | | | | | | | | |
| Metal Inert Gas (MIG)(carbon steel) | 90 | 0.59 | | 0.0055 | 0.0005 | | | 0.292 | 0.027 | 0.000 | 0.000 | 0.027 |
| | | | | | | | | | | | | |
| EMISSION TOTALS | | | | | | | | | | | | |
| | | | | | | | | | | | | |
| Potential Emissions lbs/hr | | | | | | | | 0.29 | 0.03 | | | 0.03 |
| | | | | | | | | | | | | |
| Potential Emissions lbs/day | | | | | | | | 7.01 | 0.64 | | | 0.64 |
| | | | | | | | | | | | | |
| Potential Emissions tons/year | | | | | | | | 1.28 | 0.12 | | | 0.12 |

METHODOLOGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculting the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick
Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)
Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

**Appendix A: Emissions Calculations**
**Fugitive PM Emissions**

**Company Name:** EA Technologies, LLC
**Address City IN Zip:** 2501 Jeanwood Drive, P.O. Box 189, Elkhart, IN 46515
**Permit Number:** T039-32455-00498
**Reviewer:** Mehul Sura
**Date:** 3/6/2013

**Paved Roads**

| | | |
|---|---|---|
| Maximum Vehicular Speed: | 10 | mph |
| Average Distance of Haul: | 0.12 | miles |
| Weighted Average Gross Weight: | 26.7 | tons |
| Number of One Way trips per hour: | 3 | trips/hour |

Calculations:
E = k(sL/2)^0.65 * (W/3)^1.5

| | | |
|---|---|---|
| E = | Emission factor (lbs/vehicle miles traveled(VMT)) | |
| k = | 0.016 | particle size multiplier for PM-10 |
| | 0.082 | particle size multiplier for PM |
| sL | 1.5 | road surface silt content (g/m^2) |
| W | 26.7 | weighted average vehicle weight (tons) |

source: AP-42, chapter 13.2.1, p. 13.2.1-6.

VMT= 481.8 (miles/yr)

PM
E = 1.805879 lbs/VMT
Potential PM Emissions (ton/yr) = Emission factor (lbs/VMT) * VMT / 2000 (lbs/ton)
**Potential PM Emissions (ton/yr) = 0.44 tpy**

PM10/PM2.5
E = 0.352367 lbs/VMT
Potential PM-10 Emissions (ton/yr) = Emission factor (lbs/VMT) * VMT / 2000 (lbs/ton)
**Potential PM10/PM2.5 Emissions (ton/yr) = 0.08 tpy**

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

Company Name: EA Technologies, LLC
Address City IN Zip: 2501 Jeanwood Drive, P.O. Box 189, Elkhart, IN 46515
Minor Source Modification No.: T039-32455-00498
Reviewer: Mehul Sura
Date: 3/6/2013

Natural Gas Combustion

| | Heat Input Capacity MMBtu/hr | HHV mmBtu/mmscf | Potential Throughput MMCF/yr |
|---|---|---|---|
| BCO-1 | 1.6 | | |
| BKO-1 | 3.5 | | |
| BO-1 | 7.0 | | |
| BO-2 | 7.0 | | |
| BOO-1 | 0.7 | | |
| CO-1 | 1.9 | | |
| CO-3 | 4.0 | | |
| DO-2 | 1.5 | | |
| WH-1 | 2.5 | | |
| WH-2 | 2.5 | | |
| Building comfort & u | 40.6 | | |
| | 72.8 | 1000 | 637.7 |

| | Pollutant | | | | | | |
|---|---|---|---|---|---|---|---|
| | PM* | PM10* | direct PM2.5* | SO2 | NOx | VOC | CO |
| Emission Factor in lb/MMCF | 1.9 | 7.6 | 7.6 | 0.6 | 100<br>**see below | 5.5 | 84 |
| Potential Emission in tons/yr | 0.61 | 2.42 | 2.42 | 0.19 | 31.89 | 1.75 | 26.78 |

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
PM2.5 emission factor is filterable and condensable PM2.5 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

| | HAPs - Organics | | | | |
|---|---|---|---|---|---|
| | Benzene | Dichlorobenzene | Formaldehyde | Hexane | Toluene |
| Emission Factor in lb/MMcf | 2.1E-03 | 1.2E-03 | 7.5E-02 | 1.8E+00 | 3.4E-03 |
| Potential Emission in tons/yr | 6.696E-04 | 3.826E-04 | 2.391E-02 | 5.740E-01 | 1.084E-03 |

| | HAPs - Metals | | | | |
|---|---|---|---|---|---|
| | Lead | Cadmium | Chromium | Manganese | Nickel |
| Emission Factor in lb/MMcf | 5.0E-04 | 1.1E-03 | 1.4E-03 | 3.8E-04 | 2.1E-03 |
| Potential Emission in tons/yr | 1.594E-04 | 3.508E-04 | 4.464E-04 | 1.212E-04 | 6.696E-04 |

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

| | Greenhouse Gas | | |
|---|---|---|---|
| | CO2 | CH4 | N2O |
| Emission Factor in lb/MMcf | 120,000 | 2.3 | 2.2 |
| Potential Emission in tons/yr | 38,264 | 1 | 1 |
| Summed Potential Emissions in tons/yr | 38,265 | | |
| CO2e Total in tons/yr | 38,497 | | |

**Methodology**
The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**
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**Michael R. Pence**
*Governor*

**Thomas W. Easterly**
*Commissioner*

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

TO: John Loomis
Coatings Manager
EA Technologies
2501 Jeanwood Dr.
Elkhart, Indiana 46514

DATE: June 18, 2013

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

SUBJECT: Final Decision
Title V Renewal
039-32455-00498

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:
John Brasseur/TEAM Consulting
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 6/13/2013

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**Michael R. Pence**
*Governor*

**Thomas W. Easterly**
*Commissioner*

June 18, 2013

TO: Elkhart Public Library

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

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

**Applicant Name: EA Technologies**
**Permit Number: 039-32455-00498**

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 6/13/2013

# Mail Code 61-53

| IDEM Staff | AWELLS 6/18/2013<br>EA Technologies 039-32455-00498 Final | | | AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING |
|---|---|---|---|---|
| Name and address of Sender | ▶ | Indiana Department of Environmental Management<br>Office of Air Quality – Permits Branch<br>100 N. Senate<br>Indianapolis, IN 46204 | Type of Mail:<br>**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<br>Remarks |
|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | | John Loomis Coatings Mgr EA Technologies 2501 Jeanwood Dr Elkhart IN 46514 (RO CAATS) confirmed delivery | | | | | | | | | |
| 2 | | Elkhart City Council and Mayors Office 229 South Second Street Elkhart IN 46516 *(Local Official)* | | | | | | | | | |
| 3 | | Elkhart Public Library 300 S 2nd St Elkhart IN 46516-3184 *(Library)* | | | | | | | | | |
| 4 | | Elkhart County Health Department 608 Oakland Avenue Elkhart IN 46516 *(Health Department)* | | | | | | | | | |
| 5 | | Elkhart County Board of Commissioners 117 North Second St. Goshen IN 46526 *(Local Official)* | | | | | | | | | |
| 6 | | Melisa & Bryan Bucklen 140 Hemlock Hollow Dr Cogan Station PA 17728-8216 *(Affected Party)* | | | | | | | | | |
| 7 | | John Brasseur TEAM Consulting 514 E. Marion Street Mishawaka IN 46545 *(Consultant)* | | | | | | | | | |
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|---|---|---|---|
| 6 | | | |

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