



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: March 19, 2013

RE: Toyota Industrial Equipment Manufacturing, Inc. / 005-32849-00040

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

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-AM.dot12/3/07



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MC 61-53 IGCN 1003
Indianapolis, Indiana 46204
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Mr. Ron Allen
Toyota Industrial Equipment Manufacturing, Inc.
5555 Ironwood Dr.
PO Box 2487
Columbus, Indiana 47202-2487

March 19, 2013

Re: 005-32849-00040
Administrative Amendment to
Part 70 Operating Permit T005-30305-00040

Dear Mr. Allen:

On February 26, 2013, the Office of Air Quality (OAQ) received an application from Toyota Industrial Equipment Manufacturing, Inc. to administratively amend their existing Title V operating permit T005-30305-00040, issued on October 11, 2011.

Toyota Industrial Equipment Manufacturing, Inc. requested that the permit be updated to include one (1) Robotic Welding station. The unrestricted PM (PM10) potential to emit from the additional welding station is estimated to be 0.046 tons/yr and the unrestricted manganese (single HAP) is estimated to be 0.003 ton/yr. Both are at exempt levels under 326 IAC 2-7-1(42)(C)(i),(ii)(c). The emissions will not be controlled. There will be no new applicable requirements triggered or existing permit terms violated.

Pursuant to the provisions of 326 IAC 2-7-1(21), an Administrative Amendment is hereby approved as described below. The permit is hereby administratively amended as follows with deleted language as ~~strikeouts~~ and new language bolded:

Change 1: addition of an insignificant

A.4 Other Insignificant Activities

...
Plant 2

(b) **One (1) robotic welder with a maximum capacity of 2 pounds of weld wire per hour.**

Change A:

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

...
(b) Other activities or categories with emissions equal to or less than the insignificant activity thresholds: **[326 IAC 6-3-2]**

~~Multiple metal inert gas (MIG) welding stations, each operated independently of the others, consisting of multiple manual welders with a maximum machine capacity of 36.7 pounds of weld wire per hour, each, multiple robotic welders with a maximum capacity of 26.2 pounds of weld wire per hour, each, and additional welders with a maximum capacity of 15.8 pounds per hour, each. [326 IAC 6-3-2]~~

(1) **167 Metal Inert Gas (MIG)(carbon steel) (E70S) constructed in 1997,**

capacity of 36.7 pounds of weld wire per hour.

- (2) 25 robotic MIG welders constructed in 1997 with a maximum capacity of 26.2 pounds of weld wire per hour.
- (3) 2 Metal Inert Gas (MIG)(carbon steel) (E70S) constructed in 1997, capacity of 15.8 pounds of weld wire per hour.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

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

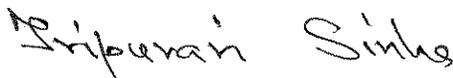
- (a) ...
- (b) Other activities or categories with emissions equal to or less than the insignificant activity thresholds: [326 IAC 6-3-2]
 - (1) One hundred sixty-seven (167) Metal Inert Gas (MIG)(carbon steel) (E70S) Constructed in 1997, capacity of 36.7 pounds of weld wire per hour.
 - (2) Twenty Five (25) robotic MIG welders constructed in 1997 with a maximum capacity of 26.2 pounds of weld wire per hour.
 - (3) Two (2) Metal Inert Gas (MIG)(carbon steel) (E70S) constructed in 1997, capacity of 15.8 pounds of weld wire per hour.

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

All other conditions of the permit shall remain unchanged and in effect.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Anh Nguyen at the Indiana Department Environmental Management, Office of Air Quality, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-5334 or toll free at 1-800-451-6027 extension 3-5334.

Sincerely,



Tripurari P. Sinha, Ph.D., Section Chief
Permits Branch
Office of Air Quality

cc: File – Bartholomew County
U.S. EPA, Region V
Bartholomew County Health Department
Air Compliance and Enforcement Branch



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Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

Toyota Industrial Equipment Manufacturing, Inc.
5555 Inwood Drive
Columbus, Indiana 47202

(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.

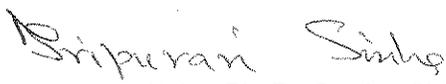
Operation Permit No.: 005-30305-00040	
Issued by: Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: October 11, 2011 Expiration Date: October 11, 2016
Significant Source Modification No. 005-30614-00040, issued on September 21, 2011 Administrative Amendment No. 005-31536-00040, issued on February 28, 2012.	
Second Administrative Amendment No.: 005-32849-00040	
Issued by:  Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: March 19, 2013 Expiration Date: October 11, 2016

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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 industrial lift truck manufacturing source.

Source Address:	5555 Inwood Drive, Columbus, Indiana 47202
General Source Phone Number:	(812) 342-5211
SIC Code:	3537
County Location:	Bartholomew
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

PLANT 1

- (a) One (1) primer coat paint booth, identified as U001, constructed in 1989, equipped with a robotic spray system using air assisted airless, electrostatic spray guns and a horizontal water curtain with a downdraft water-floor followed by a demister as overspray control, exhausting to stacks S001a and S001b, capacity: 30.7 gallons and 327.9 pounds of coatings per hour.
- (b) One (1) top coat paint booth, identified as U002, constructed in 1989, equipped with air-assisted airless, electrostatic spray guns and a horizontal water curtain with a downdraft water-floor followed by a demister as overspray control, exhausting to stacks S002a and S002b, capacity: 30.7 gallons and 327.9 pounds of coatings per hour.
- (c) One (1) touch-up paint booth, identified as U004, constructed in 1989, equipped with air-assisted airless spray guns and dry filters as overspray control, exhausting to stack S004, capacity: 42.1 gallons and 443.8 pounds of coatings per hour.
- (d) One (1) D-line paint booth, identified as U005, constructed in 1996, equipped with air-assisted airless spray guns and dry filters as overspray control, exhausting to stack S005a, capacity: 7.68 gallons and 82.0 pounds of coatings per hour.
- (e) One (1) counter-weight paint line, identified as U013, constructed in 2006, consisting of:
 - (1) One (1) paint booth, identified as U013a, equipped with electrostatic air atomized spray guns and a dry filter as overspray control, exhausting through stack S013b, capacity: 15 gallons of coating per hour.

- (2) One (1) paint booth, identified as U013b, equipped with electrostatic air atomized spray guns and a dry filter as overspray control, exhausting to stack S013d, capacity: 15 gallons of coating per hour.
- (3) Three (3) infrared ovens, each exhausting to one (1) stack, S013a, S013c and S013e.
- (f) One (1) large parts shot blast cabinet, identified as U009, constructed in 1989, exhausting to a cartridge dust collector (C009) and exiting inside the building, capacity: 132,000 pounds of steel shot per hour.
- (g) One (1) compressed natural gas (CNG) fueling station for the one (1) time filling of fork lift fuel tanks and the testing of the CNG forklift engines, maximum capacity: one thousand (1,000) forklift fuel tanks per twelve (12) consecutive month period, and heat input capacities no more than 0.521 million British thermal units per hour per engine.
- (h) One (1) Repair Spray Booth, identified as U014, to be constructed in 2007, equipped with air-assisted airless spray guns and dry filters as over spray control, exhausting to stack S014, maximum coating usage: seven (7) gallons per hour (gal/hr).

PLANT 2

- (i) One (1) shot blast cabinet, identified as U015, approved for construction in 2011, emissions controlled by a cartridge dust collector (C015) and exhausting indoors, capacity: 38,400 pounds of steel shot per hour.
- (j) One (1) steel shot blast unit, identified as U011, constructed in 1999, exhausting to a cartridge dust collector (C011) and exiting inside the building, capacity: 115,500 pounds of steel shot per hour.

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

PLANT 1

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour. Emission units with a plant-wide total heat input capacity of 149.2 million British thermal units per hour, including two (2) boilers, constructed in 1989, rated at 0.75 million British thermal units per hour, each.
[326 IAC 6-2-4]
- (b) Other activities or categories with emissions equal to or less than the insignificant activity thresholds: [326 IAC 6-3-2]
 - (1) 167 Metal Inert Gas (MIG)(carbon steel) (E70S) constructed in 1997, capacity of 36.7 pounds of weld wire per hour.
 - (2) 25 robotic MIG welders constructed in 1997 with a maximum capacity of 26.2 pounds of weld wire per hour.
 - (3) 2 Metal Inert Gas (MIG)(carbon steel) (E70S) constructed in 1997, capacity of 15.8 pounds of weld wire per hour.

A.4 Other Insignificant Activities

Plant 1

- (a) Six laser cutting machines, approved for construction in 2011, emissions controlled by a dust collector, exhausting indoors.

Plant 2

- (b) One (1) robotic welders with a maximum capacity of 2 pounds of weld wire per hour.

A.5 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, T005-30305-00040, 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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

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

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

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

The Permittee shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35) .
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Southeast Regional Office phone: (812) 358-2027; fax: (812) 358-2058.

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

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

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

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

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

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(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 T005-30305-00040 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) or (c). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(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 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

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

C.7 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 prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval 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 ninety (90) days after the date of issuance of this permit.

The ERP 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) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) 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(11)] [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]
Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

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

The statement must be submitted to:

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

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(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) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.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

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

- (a) One (1) primer coat paint booth, identified as U001, constructed in 1989, equipped with a robotic spray system using air assisted airless, electrostatic spray guns and a horizontal water curtain with a downdraft water-floor followed by a demister as overspray control, exhausting to stacks S001a and S001b, capacity: 30.7 gallons and 327.9 pounds of coatings per hour.
- (b) One (1) top coat paint booth, identified as U002, constructed in 1989, equipped with air-assisted airless, electrostatic spray guns and a horizontal water curtain with a downdraft water-floor followed by a demister as overspray control, exhausting to stacks S002a and S002b, capacity: 30.7 gallons and 327.9 pounds of coatings per hour.
- (c) One (1) touch-up paint booth, identified as U004, constructed in 1989, equipped with air-assisted airless spray guns and dry filters as overspray control, exhausting to stack S004, capacity: 42.1 gallons and 443.8 pounds of coatings per hour.
- (d) One (1) D-line paint booth, identified as U005, constructed in 1996, equipped with air-assisted airless spray guns and dry filters as overspray control, exhausting to stack S005a, capacity: 7.68 gallons and 82.0 pounds of coatings per hour.
- (e) One (1) counter-weight paint line, identified as U013, constructed in 2006, consisting of:
 - (1) One (1) paint booth, identified as U013a, equipped with electrostatic air atomized spray guns and a dry filter as overspray control, exhausting through stack S013b, capacity: 15 gallons of coating per hour.
 - (2) One (1) paint booth, identified as U013b, equipped with electrostatic air atomized spray guns and a dry filter as overspray control, exhausting to stack S013d, capacity: 15 gallons of coating per hour.
 - (3) Three (3) infrared ovens, each exhausting to one (1) stack, S013a, S013c and S013e.
- (f) One (1) Repair Spray Booth, identified as U014, to be constructed in 2007, equipped with air-assisted airless spray guns and dry filters as over spray control, exhausting to stack S014, maximum coating usage: seven (7) gallons per hour (gal/hr).

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

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

D.1.1 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.

D.1.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of six (6) surface coating facilities, identified as U001, U002, U004, U005, U013 and U014, during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

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

- (a) Pursuant to 326 IAC 6-3-2(d), the horizontal water curtains with downdraft water-floors followed by demisters for particulate control shall be operation in accordance with manufacturer's specifications and control emissions from the one (1) primer coat paint booth, identified as U001, and one (1) topcoat paint booth, identified as U002, at all times when the paint booths are in operation.
- (b) Pursuant to 326 IAC 6-3-2(d), the dry filters for particulate control shall be operation in accordance with manufacturer's specifications and control emissions from the one (1) touch-up paint booth, identified as U004, one (1) D-Line paint booth, identified as U005, one (1) counter-weight paint line, identified as U013, and one (1) Repair Spray Booth, identified as U014, at all times when the paint booths are in operation.

D.1.4 PSD Minor Limit [326 IAC 2-2]

The Permittee shall comply with the following conditions:

- (a) VOC input to the surface coating facilities at this source (U001, U002, U004, U005, U013 and U014) shall be less than 245 tons of VOC, total, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) PM, PM10 and PM2.5 emissions from surface coating booth U001 shall not exceed 6.10 lb/hr.
- (c) PM, PM10 and PM2.5 emissions from surface coating booth U002 shall not exceed 8.36 lb/hr.
- (d) PM, PM10 and PM2.5 emissions from surface coating booth U005 shall not exceed 1.53 lb/hr.
- (e) PM, PM10 and PM2.5 emissions from surface coating booth U013a shall not exceed 2.98 lb/hr.
- (f) PM, PM10 and PM2.5 emissions from surface coating booth U013b shall not exceed 2.98 lb/hr.
- (g) PM, PM10 and PM2.5 emissions from surface coating booth U014 shall not exceed 1.39 lb/hr.

Compliance with these conditions in conjunction with Conditions D.2.1, D.3.1 and D.3.2, and potential emissions of VOC, PM, PM10, and PM2.5 from other emission units, will limit the potential to emit of VOC, PM, PM10 and PM2.5 for the entire source to less than 250 tons per year each from the entire source and renders 326 IAC 2-2, PSD not applicable to the entire source.

D.1.5 HAPs Minor Limit

- (a) The input of each individual organic HAP at the six (6) surface coating facilities, identified as U001, U002, U004, U005, U013 and U014, shall not exceed 9.90 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The input of total organic HAP at the six (6) surface coating facilities, identified as U001, U002, U004, U005, U013 and U014, shall not exceed 18.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this condition, in conjunction with Conditions D.2.2 and D.3.3, and potential HAPs emissions from other emission units will limit each individual HAP and total HAP emissions from the entire source to less than ten (10) tons per year and twenty five (25) tons per year, respectively, and renders 40 CFR 63, Subpart Mmmm not applicable to the surface coating facilities identified as U001, U002, U004, U005, U013 and U014.

D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

Compliance Determination Requirements

D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

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

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

D.1.8 Monitoring [40 CFR 64] [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters and water curtains. To monitor the performance of the dry filters and water curtains, weekly observations shall be made of the overspray from the touch-up paint booth, primer coat paint booth, top coat paint booth, counter-weight paint booth and repair spray booth stacks while the booth exhausting to that stack is in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.1.9 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.1.1, D.1.4 and D.1.5, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and the VOC content limit established in Conditions D.1.1, D.1.4 and D.1.5. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The cleanup solvent usage for each month; and
 - (2) The total VOC, individual HAP, and total HAP 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, and daily and monthly inspections. The Permittee shall include in its logs when an observation or inspection is not made and the reason for the lack of a required observation or inspection, (e.g. the process did not operate that day).
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

D.1.10 Reporting Requirements

A quarterly report of the information to document the compliance status with Conditions D.1.4 and D.1.5 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1 (35) .

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

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

- (a) One (1) large parts shot blast cabinet, identified as U009, constructed in 1989, exhausting to a cartridge dust collector (C009) and exiting inside the building, capacity: 132,000 pounds of steel shot per hour.
- (b) One (1) steel shot blast unit, identified as U011, constructed in 1999, exhausting to a cartridge dust collector (C011) and exiting inside the building, capacity: 115,500 pounds of steel shot per hour.
- (c) One (1) shot blast cabinet, identified as U015, approved for construction in 2011, emissions controlled by a cartridge dust collector (C015) and exhausting indoors, capacity: 38,400 pounds of steel shot per hour.

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

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

D.2.1 PSD Minor Limit [326 IAC 2-2][326 IAC 6-3-2]

- (a) The PM and PM10/PM2.5 emissions from the one (1) large parts shot blast cabinet, identified as U009, shall not exceed 5.28 and 4.54 pounds per hour (lb/hr), respectively.
- (b) The PM and PM10/PM2.5 emissions from the one (1) steel shot blast unit, identified as U011, shall not exceed 4.62 and 3.97 pounds per hour (lb/hr), respectively.
- (c) The PM and PM10/2.5 emissions from the one (1) steel shot blast unit, identified as U015, shall not exceed 0.23 and 0.23 pounds per hour (lb/hr), respectively.

Compliance with this condition, in conjunction with Conditions D.1.4, D.3.1 and D.3.2 and potential emissions of PM, PM10, and PM2.5 from other emission units, will limit the potential to emit of VOC, PM, PM10 and PM2.5 for the entire source to less than 250 tons per year each from the entire source and renders 326 IAC 2-2, PSD not applicable to the entire source.

The above condition will also satisfy the rule 326 IAC 6-3-2.

D.2.2 HAPs Minor Limit

- (a) The emission of each individual metallic HAP from the one (1) large parts shot blast cabinet, identified as U009, shall not exceed 0.106 pounds per hour and the emissions of total metallic HAP shall not exceed 0.212 pounds per hour.
- (b) The emission of each individual metallic HAP from the one (1) steel shot blast unit, identified as U011, shall not exceed 0.092 pounds per hour and the emissions of total metallic HAP shall not exceed 0.184 pounds per hour.
- (c) The emission of each individual metallic HAP from the one (1) steel shot blast unit, identified as U015, shall not exceed 0.002 pounds per hour and the emissions of total metallic HAP shall not exceed 0.003 pounds per hour.

Compliance with this condition, in conjunction with Conditions D.1.5 and D.3.3, and potential HAPs emissions from other emission units, will limit each individual HAP and total HAP emissions from the entire source to less than ten (10) tons per year and twenty five (25) tons per year, respectively, and makes the source an area source for HAPs.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

Compliance Determination Requirements

D.2.4 Particulate Control [326 IAC 2-7-6(6)]

- (a) In order to comply with Conditions D.2.1, D.2.2 and D.2.3, the dust collector (C009) must be in operation at all times and control emissions from the one (1) large parts shot blast cabinet, identified as U009, at all times when U009 is in operation.
- (b) In order to comply with Conditions D.2.1, D.2.2 and D.2.3, the dust collector (C011) must be in operation at all times and control emissions from the one (1) steel shot blast unit, identified as U011, at all times when U011 is in operation.
- (c) In order to comply with Conditions D.2.1, D.2.2 and D.2.3, the dust collector (C015) must be in operation at all times and control emissions from the one (1) steel shot blast unit, identified as U015, at all times when U015 is in operation.
- (d) In the event that filter failure is observed in a multi-compartment dust collector, 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.2.5 Dust Collector Parametric Monitoring [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)] [40 CFR 64]

- (a) The Permittee shall record the pressure drop across the dust collectors used in conjunction with the three (3) shot blast units, identified as U009, U011 and U015, at least once per day when the shot blast unit exhausting to that dust collector is in operation. When for any one reading, the pressure drop across the dust collector is outside the normal range of 1.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.
- (b) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

D.2.6 Broken or Failed Dust Collector Detection

- (a) For a single compartment dust collector controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment dust collector controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Dust collector failure can be indicated by a significant drop in the dust collector's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, or dust traces.

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

D.2.7 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.6, the Permittee shall maintain records once per day of the pressure drop during normal operation when the dust collector is in operation. The Permittee shall include in its log when a visible emission notation is not made and the reason for the lack of a visible emission notation, (e.g. the process did not operate that day).
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour. Emission units with a plant-wide total heat input capacity of 149.2 million British thermal units per hour, including two (2) boilers, constructed in 1989, rated at 0.75 million British thermal units per hour, each. [326 IAC 6-2-4]
- (b) Other activities or categories with emissions equal to or less than the insignificant activity thresholds: [326 IAC 6-3-2]
 - (1) One hundred sixty-seven (167) Metal Inert Gas (MIG)(carbon steel) (E70S) Constructed in 1997, capacity of 36.7 pounds of weld wire per hour.
 - (2) Twenty Five (25) robotic MIG welders constructed in 1997 with a maximum capacity of 26.2 pounds of weld wire per hour.
 - (3) Two (2) Metal Inert Gas (MIG)(carbon steel) (E70S) constructed in 1997, capacity of 15.8 pounds of weld wire per hour.

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

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

D.3.1 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a) (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the two (2) 0.75 million British thermal units per hour heat input boilers shall be limited to 0.6 pounds per million British thermal units heat input, each.

D.3.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the welding operations, shall not exceed 9.32 pounds per hour based on a process weight rate of 3.4 tons per hour.

The above limitation was calculated with the following equation:

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

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

D.3.3 HAPs Minor Limit [40 CFR 63]

The total weld wire and rod usage shall not exceed 20,000,000 pounds per twelve (12) consecutive month period, with compliance determined at the end of each month, the individual metallic HAP emissions shall not exceed 0.000318 pounds per pound of weld wire or rod used and the total metallic HAP emissions shall not exceed 0.000320 pounds per pound of weld wire or rod used.

Compliance with this condition, in conjunction with Conditions D.1.5 and D.2.2, and potential HAPs emissions from other emission units will limit each individual HAP and total HAP emissions from the entire source to less than ten (10) tons per year and twenty five (25) tons

per year, respectively, and renders 40 CFR 63, Subpart M not applicable to the surface coating facilities identified as U001, U002, U004, U005, U013 and U014.

D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

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

D.3.5 Record Keeping Requirements

- (a) To document the compliance status with Condition D.3.3, the Permittee shall maintain monthly records the amount of weld wire or rod used.
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

D.3.6 Reporting Requirements

A quarterly report of the information to document the compliance status with Conditions D.3.3 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1 (35) .

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

Source Name: Toyota Industrial Equipment Manufacturing, Inc.
Source Address: 5555 Inwood Drive, Columbus, Indiana 47202
Part 70 Permit No.: T005-30305-00040

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: Toyota Industrial Equipment Manufacturing, Inc.
Source Address: 5555 Inwood Drive, Columbus, Indiana 47202
Part 70 Permit No.: T005-30305-00040

This form consists of 2 pages

Page 1 of 2

<input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), no later than 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 no later than 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: Toyota Industrial Equipment Manufacturing, Inc.
Source Address: 5555 Inwood Drive, Columbus, Indiana 47202
Part 70 Permit No.: T005-30305-00040
Facilities: Six (6) Surface Coating Processes (U001, U002, U004, U005, U013 & U014)
Parameter: VOC Input
Limit: 245 tons of VOC, total, including coatings, dilution solvents, and cleaning solvents, 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 Quarterly Report

Source Name: Toyota Industrial Equipment Manufacturing, Inc.
 Source Address: 5555 Inwood Drive, Columbus, Indiana 47202
 Part 70 Permit No.: T005-30305-00040
 Facilities: Six (6) Surface Coating Processes (U001, U002, U004, U005, U013 & U014)
 Parameter: HAP Input
 Limit: Single HAP shall not exceed 9.9 and total HAP shall not exceed 18 tons per twelve consecutive month period.

QUARTER : _____

YEAR: _____

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

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Report

Source Name: Toyota Industrial Equipment Manufacturing, Inc.
Source Address: 5555 Inwood Drive, Columbus, Indiana 47202
Part 70 Permit No.: T005-30305-00040
Facilities: Welding Operations
Parameter: weld wire and rod usage
Limit: 20,000,000 pounds 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: Toyota Industrial Equipment Manufacturing, Inc.
Source Address: 5555 Inwood Drive, Columbus, Indiana 47202
Part 70 Permit No.: T005-30305-00040

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

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

**Technical Support Document (TSD) for a
Part 70 Operating Permit Administrative Amendment**

Source Description and Location

Source Name:	Toyota Industrial Equipment Manufacturing, Inc.
Source Location:	5555 Inwood Drive, Columbus, Indiana 47202
County:	Bartholomew County
SIC Code:	3537
Administrative Amendment No.:	005-32849-00040
Operation Permit No.:	T 005-30305-00040
Operation Permit Issuance Date:	October 11, 2011
Permit Reviewer:	Anh Nguyen

On February 26, 2013, Toyota Industrial Equipment Manufacturing, Inc. submitted an application to administratively amend their existing Title V operating permit T005-30305-00040, T 005-30305-00040, issued on October 11, 2011. Toyota Industrial Equipment Manufacturing, Inc. requested that the permit be updated to include one (1) Robotic Welding station.

This is an Environmental Stewardship Program (ESP) source.

Existing Approvals

The source was issued Part 70 Operating Permit No. T005-30305-00040 on October 11, 2011. The source has since received the following approvals:

- (a) Significant Source Modification No. 005-30614-00040, issued on September 21, 2011; and
- (b) Administrative Amendment No. 005-31536-00040, issued on February 28, 2012.

County Attainment Status

The source is located in Bartholomew County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM2.5.	

- (a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone.

Bartholomew 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}**
Bartholomew County has been classified as attainment for PM_{2.5}. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM_{2.5} significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**
Bartholomew County has been classified as attainment or unclassifiable in Indiana for SO₂, CO, N₂O, PM₁₀ and lead. 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.

Potential Emissions Prior to the Modification

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

Pollutant	Tons/year
PM	233.78
PM ₁₀	231.41
PM _{2.5}	231.41
SO ₂	0.40
VOC	2,854
CO	55.86
NO _x	65.93
GHGs	76,575
Single HAP	< 10
Total HAP	< 25

See Appendix A of this Technical Support Document for detailed emission calculations.

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) These emissions are based upon the Technical Support Document for Significant Source Modification No. 005-30614-00040 issued September 21, 2011.

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Toyota Industrial Equipment Manufacturing, Inc. on February 26, 2013, relating to the addition of one (1) Robotic Welding station. The following is the emission unit description of the proposed emission unit and pollution control device:

Emission Units

A.4 Other Insignificant Activities

...
Plant 2

- (b) **One (1) robotic welder with a maximum capacity of 2 pounds of weld wire per hour, approved for installation in 2013.**

Enforcement Issues

There are no pending enforcement actions related to this modification.

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.

Permit Level Determination – Part 70

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

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

PTE of the New Unit	
Pollutant	Potential To Emit (ton/yr)
PM	0.05
PM ₁₀	0.05
PM _{2.5}	0.05
SO ₂	0.0
VOC	0.0
CO	0.0
NO _x	0.0
GHG	0.0
Single HAPs (Mn)	Less than 10
Total HAPs	less than 25

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

The modification will be incorporated into the Part 70 Operating Permit through an Administrative Amendment issued pursuant to 326 IAC2-7-1(42)(C)(i),(ii)(c); because it incorporates an insignificant activity as defined in 326 IAC 2-7-1(21)..

Permit Level Determination – PSD

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 Administrative Amendment, 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 Proposed Units (TPY)							
	PM	PM ₁₀	PM _{2.5} *	SO ₂	VOC	CO	NO _x	CO _{2e}
Robotic MIG Welder (carbon steel) (E70S)	0.05	0.05	0.05	0.00	0.00	0.00	0.00	0.00
Total for Modification	0.05	0.05	0.05	0.00	0.00	0.00	0.00	0.00
Total Source Emissions Before the Modification	233.78	231.41	231.41	0.40	< 250	55.86	65.93	76,575
Total Source Emissions After the Modification	233.83	231.46	231.46	0.40	< 250	55.86	65.93	76,575
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000 CO _{2e}

This modification to an existing minor stationary source is not major; because, the source wide emissions of all pollutants are still less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply to this modification.

Federal Rule Applicability Determination

CAM

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to emission units that involve a pollutant-specific emission unit and meet the following criteria:
- (1) has a potential to emit before or after controls equal to or greater than the major source threshold for the pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant; and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the applicability criteria, under 40 CFR 64.1, to each emission unit:

CAM Applicability Analysis							
Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (ton/yr)	Controlled PTE (ton/yr)	Part 70 Major Source Threshold (ton/yr)	CAM Applicable (Y/N)	Large Unit (Y/N)
Robotic welder	N	N	0.05	NA	<100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable the new unit because there is no emission limit for Robotic Welder emission unit.

NSPS

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed amendment.

NESHAP

- (b) There are no new National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) applicable to this proposed amendment.

State Rule Applicability - Entire Source

326 IAC 2-2 and 2-3 (PSD)

PSD applicability is discussed under the Permit Level Determination – PSD

326 IAC2-4.1 (New Source Toxics Control)

The operation of one (1) Robotic Welder will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

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

Pursuant to 326 IAC 6-3-1(b), one (1) Robotic Welder is exempt from 326 IAC 6-3-2 because it has potential emissions less than 0.551 pounds per hour.

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.

There are no new compliance monitoring or determination requirements as a result of this modification.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T005-32849-00040. Deleted language appears as strikethroughs and new language appears in **bold**:

Change A:

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

(b) ... Other activities or categories with emissions equal to or less than the insignificant activity thresholds: **[326 IAC 6-3-2]**

~~Multiple metal inert gas (MIG) welding stations, each operated independently of the others, consisting of multiple manual welders with a maximum machine capacity of 36.7 pounds of weld wire per hour, each, multiple robotic welders with a maximum capacity of 26.2 pounds of weld wire per hour, each, and additional welders with a maximum capacity of 15.8 pounds per hour, each. [326 IAC 6-3-2]~~

- (1) **167 Metal Inert Gas (MIG)(carbon steel) (E70S) constructed in 1997, capacity of 36.7 pounds of weld wire per hour.**
- (2) **25 robotic MIG welders constructed in 1997 with a maximum capacity of 26.2 pounds of weld wire per hour.**
- (3) **2 Metal Inert Gas (MIG)(carbon steel) (E70S) constructed in 1997, capacity of 15.8 pounds of weld wire per hour.**

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

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

- (a) ...
- (b) Other activities or categories with emissions equal to or less than the insignificant activity thresholds: [326 IAC 6-3-2]
- (1) **One hundred sixty-seven (167) Metal Inert Gas (MIG)(carbon steel) (E70S) Constructed in 1997, capacity of 36.7 pounds of weld wire per hour.**
 - (2) **Twenty Five (25) robotic MIG welders constructed in 1997 with a maximum capacity of 26.2 pounds of weld wire per hour.**
 - (3) **Two (2) Metal Inert Gas (MIG)(carbon steel) (E70S) constructed in 1997, capacity of 15.8 pounds of weld wire per hour.**

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

Summary of Global Permit Changes to Section A, B, C, D and E

Change B: The rule site for responsible official has changed from ~~326 IAC 2-7-1 (34)~~ to **326 IAC 2-7-1 (35)** for the following sections below:

Section B.8 Certification,
Section B.9 Annual Compliance Certification,
Section B.10 Preventive Maintenance Plan,
Section B.11 Emergency Provision,
Section B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination,
Section B.16 Permit Renewal,
Section B.17 Permit Amendment or Modification,
Section B.19 Operational Flexibility,
Section B.22 Transfer of Ownership of Operational Control,
Section C.7 Asbestos Abatement Projects,
Section C.8 Performance Testing,
Section C.10 Compliance Monitoring,
Section C.12 Emergency Reduction Plans,
Section C.15 Actions Related to Noncompliance Demonstrated by a Stack Test,
Section C.16 Emission Statement,
Section C.18 General Reporting Requirements, and
Section D.1.10, D.3.6 Reporting Requirements.

Change C: IDEM, OAQ has clarified the rule sites for the Preventive Maintenance Plan has made the following changes throughout the permit:

A.1 General Information [~~326 IAC 2-7-4(c)~~][~~326 IAC 2-7-5 (15) (14)~~][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary Petroleum Bulk Terminal Operation.

A.2 Emission Units and Pollution Control Equipment Summary [~~326 IAC 2-7-4(c)(3)~~][~~326 IAC 2-7-5 (15) (14)~~]

A.3 Specifically Regulated Insignificant Activities [~~326 IAC 2-7-1(21)~~][~~326 IAC 2-7-4(c)~~] 326 IAC 2-7-5 (15) (14)

B.10 Preventive Maintenance Plan [~~326 IAC 2-7-5(1),(3) and (13) (12)~~] [~~326 IAC 2-7-6(1) and (6)~~][326 IAC 1-6-3]

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

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under ~~326 IAC 2-7-4(c)(9) (8)~~ be revised in response to an emergency.

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), or (e)~~ without a prior permit revision, if each of the following conditions is met:

(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), ~~or (c), or (e)~~. The Permittee shall make such records available, upon

reasonable request, for public review.

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

C.13 Risk Management Plan [326 IAC 2-7-5(1142)] [40 CFR 68]

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.

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(34). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

Conclusion and Recommendation

The proposed of a new unit shall be subject to the conditions of the attached Administrative Amendment 005-32849-00040 and Part 70 Operating Permit No. T005-30305-00040. The staff recommend to the Commissioner that this Administrative Amendment and Part 70 Operating Permit Renewal be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Anh Nguyen 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) 233-5334 or toll free at 1-800-451-6027 extension (3-5334).
- (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

Technical Support Document - Appendix A - Emission Summary Sheet

Company Name: Toyota Industrial Equipment Manufacturing, Inc.
Address City IN Zip: 5555 Inwood Drive, Columbus, IN 47202
Part 70: T 005-32849-00040
Reviewer: Anh Nguyen
Date: 2/26/2013

Uncontrolled Potential to Emit (ton/yr)										
Emission Unit	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Total HAP	Mn	CO _{2e}
Surface Coating Booth - U001	267	267	267	0.00	0.00	464	0.00	72.61	0.00	0.00
Surface Coating Booth - U002	267	267	267	0.00	0.00	464	0.00	72.61	0.00	0.00
Surface Coating Booth - U004	367	367	367	0.00	0.00	636	0.00	99.57	0.00	0.00
Surface Coating Booth - U005	67	67	67	0.00	0.00	116	0.00	18.16	0.00	0.00
Surface Coating Booth - U0013a	131	131	131	0.00	0.00	453	0.00	35.48	0.00	0.00
Surface Coating Booth - U0013b	131	131	131	0.00	0.00	453	0.00	35.48	0.00	0.00
Repair Paint Booth - U0014	61	61	61	0.00	0.00	106	0.00	16.56	0.00	0.00
Cleanup Solvent Emissions	0.00	0.00	0.00	0.00	0.00	155	0.00	0.00	0.00	0.00
Shot Blasting - U009	2,313	1,989	1,989	0.00	0.00	0.00	0.00	38.17	27.76	0.00
Shot Blasting - U011	2,024	1,741	1,741	0.00	0.00	0.00	0.00	33.40	24.29	0.00
Shot Blasting - U015	673	579	579	0.00	0.00	0.00	0.00	11.11	8.08	0.00
Engines	0.01	0.01	0.01	0.01	0.58	0.01	0.97	0.020	0.00	270
Natural Gas Combustion	1.24	4.97	4.97	0.39	65.35	3.59	54.89	1.23	0.00	76,305
Phosphate Wash	4.69	4.69	4.69	0.00	0.00	0.47	0.00	0.00	0.00	0.00
Powder Coat	0.03	0.03	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Other Insignificant	0.00	0.00	0.00	0.00	0.00	0.70	0.00	negl.	0.00	0.00
Welding	155.23	155.23	155.23	0.00	0.00	0.00	0.00	9.55	9.49	negligible
Laser Cutting Operation	2.40	2.40	2.40	0.00	0.00	0.00	0.00	0.04	0.03	0.00
New Robotic MIG Welder	0.05	0.05	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total PTE - Entire Source	6,465	5,767	5,767	0.40	65.93	2,854	55.86	445.00	70.00	76,575

Company Name: Toyota Industrial Equipment Manufacturing, Inc.
Address City IN Zip: 5555 Inwood Drive, Columbus, IN 47202
Part 70: T 005-32849-00040
Reviewer: Anh Nguyen
Date: 2/26/2013

Limited Potential to Emit (ton/yr)										
Emission Unit	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Total HAP	Mn	CO _{2e}
Surface Coating Booth - U001	26.73	26.73	26.73	0.00	0.00	All Units Less Than 245 TPY	0.00	All Units Less Than 18 TPY	0.00	0.00
Surface Coating Booth - U002	26.73	26.73	26.73	0.00	0.00		0.00		0.00	0.00
Surface Coating Booth - U004	36.66	36.66	36.66	0.00	0.00		0.00		0.00	0.00
Surface Coating Booth - U005	6.69	6.69	6.69	0.00	0.00		0.00		0.00	0.00
Surface Coating Booth - U0013a	13.06	13.06	13.06	0.00	0.00		0.00		0.00	0.00
Surface Coating Booth - U0013b	13.06	13.06	13.06	0.00	0.00		0.00		0.00	0.00
Repair Paint Booth - U0014	6.10	6.10	6.10	0.00	0.00		0.00		0.00	0.00
Cleanup Solvent Emissions	0.00	0.00	0.00	0.00	0.00		0.00		0.00	0.00
Shot Blasting - U009	23.13	19.89	19.89	0.00	0.00	0.00	0.00	0.93	0.46	0.00
Shot Blasting - U011	20.24	17.39	17.39	0.00	0.00	0.00	0.00	0.81	0.40	0.00
Shot Blasting - U015	1.00	1.00	1.00	0.00	0.00	0.00	0.00	0.01	0.01	0.00
Engines	0.01	0.01	0.01	0.01	0.58	0.01	0.97	0.02	0.00	270
Natural Gas Combustion	1.24	4.97	4.97	0.39	65.35	3.59	54.89	1.23	0.00	76,305
Phosphate Wash	4.69	4.69	4.69	0.00	0.00	0.47	0.00	0.00	0.00	0.00
Powder Coat	0.03	0.03	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Other Insignificant	0.00	0.00	0.00	0.00	0.00	0.70	0.00	negl.	0.00	0.00
Welding	52.00	52.00	52.00	0.00	0.00	0.00	0.00	3.20	3.18	negligible
Laser Cutting Operation	2.40	2.40	2.40	0.00	0.00	0.00	0.00	0.04	0.029	0.00
New Robotic MIG Welder	0.05	0.05	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total PTE - Entire Source	233.83	231.46	231.46	0.40	65.93	< 250	55.86	< 25	< 10	76,575
Title V Major Source Threshold	100	100	100	100	100	100	100	25	10	100,000
PSD Major Source Threshold	250	250	250	250	250	250	250	---	---	100,000

* Results of PTE before Modification came from Part 70 Operating Permit T 005-30305-00040 issued on October 11, 2011

Appendix A: Emissions Calculations Insignificant Welding

Company Name: Toyota Industrial Equipment Manufacturing, Inc.
Address City IN Zip: 5555 Inwood Drive, Columbus, IN 47202
Part 70: T 005-32849-00040
Reviewer: Anh Nguyen
Date: 2/26/2013

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)	
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr		
WELDING												
Existing Welding Equipment												
Metal Inert Gas (MIG)(carbon steel) (E70S)*	167	36.7	0.0052	0.000318	0.000001	0.000001	31.870	1.949	0.006	0.0061289	1.961	
Metal Inert Gas (MIG)(carbon steel) (E70S)	25	26.2	0.0052	0.000318	0.000001	0.000001	3.406	0.208	0.001	0.000655	0.210	
Metal Inert Gas (MIG)(carbon steel) (E70S)	2	15.8	0.0052	0.000318	0.000001	0.000001	0.164	0.010	0.000	0.0000316	0.010	
New Welding Equipment												
New Robotic MIG Welder (carbon steel) (E70S)	1	2	0.0052	0.000318	0.000001	0.000001	0.010	0.001	0.000	0.000002	0.001	
						Ton/yr	0.046	0.003				
EMISSION TOTALS FOR ALL WELDING EQUIPMENT												
Potential Emissions lbs/hr							35.50	2.17	0.01	0.01	2.18	
Potential Emissions lbs/day							851.92	52.10	0.16	0.16	52.4	
Potential Emissions tons/year							155.47	9.51	0.030	0.030	9.56	

METHODOLOGY

the addition unit for this Administrative Amendment

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.

*carbon steel (E70S) GMAW (SCC 3-09-052) Table 12.19-1 for PM and 12.19-2 for HAP

**Appendix A: Emission Calculations
Particulate Emissions
Powder Coating**

**Company Name: Toyota Industrial Equipment Manufacturing, Inc.
Address City IN Zip: 5555 Inwood Drive, Columbus, IN 47202
Part 70: T 005-32849-00040
Reviewer: Anh Nguyen
Date: 2/26/2013**

Provided by the Applicant

Emission Unit ID (Stack ID)	Emission Unit Description	Maximum Powder Usage (lb/hr)	* Maximum Powder Usage (TPY)	Transfer Efficiency (%)	^b Maximum Material Overspray (lb/hr)	^b Primary Filter Efficiency (%)	^b Secondary Filter Efficiency (%)	^c PM / PM ₁₀ / PM _{2.5} Potential To Emit (PTE)	
								(lb/yr)	(TPY)
I011f (C011a,b)	Dry Powder Coat Line: Powder Coat Booth No.1 (Reclaim)	84.0	368	96	3.36	94.38	98.0	33.08	0.017
I011f (C011a,b)	Dry Powder Coat Line: Powder Coat Booth No.2 (Reclaim)	84.0	368	96	3.36	94.38	98.0	33.08	0.017
I011f (C011a,b)	Dry Powder Coat Line: Powder Coat Booth No.3 (Non-Reclaim)	84.0	368	96	3.36	94.38	98.0	33.08	0.017
^{d,e} PM/PM₁₀ Emission Totals for I011 (exhausting to climate controlled room equipped with own HVAC system):								33.1	0.017
I012f (C012a,b)	Dry Powder Coat Line: Powder Coat Booth No.1 (Reclaim)	84.0	368	96	3.36	94.38	98.0	33.08	0.017
I012f (C012a,b)	Dry Powder Coat Line: Powder Coat Booth No.2 (Reclaim)	84.0	368	96	3.36	94.38	98.0	33.08	0.017
^{d,f} PM/PM₁₀ Emission Totals for I012 (exhausting to climate controlled room equipped with own HVAC system):								33.1	0.017
^d PM/PM₁₀ Emission Totals for I011 + I012:								66.2	0.033

^a Potential usage based on an operating schedule of 8,760 hours/year. Normal operating schedule is 8 hours/day, 5 days/week, 50 weeks/year (2,000 hours year).

^b Material Overspray (lb/hr) is based on a transfer efficiency of 96% and is calculated according to the following:

$$\begin{aligned} \text{Overspray (lb/hr)} &= (\text{Maximum hourly usage, lb/hr}) * (1 - \text{transfer efficiency, \%}) / 100 \\ &= \text{Maximum amount (lb/hr) of material overspray} \end{aligned}$$

Primary and Secondary filters efficiencies consist of the following: Primary filters (94.38%) and Secondary filters (98%)

^c PTE for particulate matter (PM) assumes that all PM is PM₁₀ and is calculated according to the following:

$$\begin{aligned} \text{PM/PM}_{10} \text{ (lb/yr)} &= (\text{Maximum material overspray, lb/hr}) * (1 - \text{Primary filter efficiency, \%}) * (1 - \text{Secondary filter efficiency, \%}) * (8,760 \text{ hr/yr}) \\ &= (\text{lb/hr}) * (1 - \text{primary filter efficiency}/100) * (1 - \text{secondary filter efficiency}/100) * (8,760 \text{ hr/yr}) \\ &= \text{lb PM}_{10}/\text{yr} \end{aligned}$$

^d PTE for particulate matter (PM) is negligible. Emissions calculated in the table above are based on powder coat booths integrated with a two-stage filtration system consisting of both primary and secondary filters and are located within a climate-controlled room equipped with its own HVAC system having no ambient exhaust. This applies to both insignificant units I011 & I012.

^e Insignificant Emission Unit I011 is equipped with two (2) separate powder coat booths; however, TIEM can only spray in one (1) booth at any given time.

^f Insignificant Emission Unit I012 is equipped with two (2) separate powder coat booths; however, TIEM can only spray in one (1) booth at any given time.

**Appendix A: Emission Calculations
VOC and Particulate Matter Emissions from Surface Coating Operations**

**Company Name: Toyota Industrial Equipment Manufacturing, Inc.
Address City IN Zip: 5555 Inwood Drive, Columbus, IN 47202
Permit Number T005-32849-00040
Reviewer: Anh Nguyen
Date: 02/26/13**

It is assumed that PM = PM10 = PM2.5

U001																
Material	Density (lb/gal)	Wt. % Volatile	Wt. % Water	Wt. % Organic	Vol % Water	Vol % Non-Vol (solids)	Gallon of Material (gal/hr)	Flash Off	lb VOC per gal, less water	lb VOC per gal coating	PTE VOC (lb/hr)	PTE VOC (lb/day)	PTE VOC (TPY)	PM PTE (TPY)	lb VOC/gal solids	Transfer Efficiency
Buff Primer (AXDA204)	11.40	30.2%	0.0%	30.2%	0.0%	82.00%	30.70	1.000	3.45	3.45	105.83	2540.01	463.55	267.34	4.20	75%
Black Top Coat (KAA0121)	10.80	32.0%	0.0%	32.0%	0.0%	69.99%	30.70	1.000	3.45	3.45	105.93	2542.40	463.99	247.06	4.93	75%
Grey Polyurethane Enamel	10.81	29.6%	0.0%	29.6%	0.0%	72.40%	30.70	1.000	3.20	3.20	98.37	2360.77	430.84	255.68	4.43	75%
Orange Polyurethane Enamel	9.51	34.7%	0.0%	34.7%	0.0%	61.80%	30.70	1.000	3.30	3.30	101.37	2432.82	443.99	208.70	5.34	75%
65 AAK474 - Black	9.61	35.8%	0.0%	35.8%	0.0%	58.72%	30.70	1.000	3.44	3.44	105.74	2537.70	463.13	207.27	5.87	75%
AXA0589 - Black	9.06	37.1%	0.0%	37.1%	0.0%	54.28%	30.70	1.000	3.36	3.36	103.16	2475.91	451.85	191.60	6.19	75%
AXA0588 - Gray	9.07	37.6%	0.0%	37.6%	0.0%	53.87%	30.70	1.000	3.41	3.41	104.81	2515.40	459.06	190.14	6.34	75%
AXE0039 - Orange	9.58	34.1%	0.0%	34.1%	0.0%	60.13%	30.70	1.000	3.27	3.27	100.29	2406.96	439.27	212.23	5.43	75%
													Uncontrolled / Worst Case	463.99	267.34	
													Limited PM Emissions - Controlled	90.00%	26.73	

U002																
Material	Density (lb/gal)	Wt. % Volatile	Wt. % Water	Wt. % Organic	Vol % Water	Vol % Non-Vol (solids)	Gallon of Material (gal/hr)	Flash Off	lb VOC per gal, less water	lb VOC per gal coating	PTE VOC (lb/hr)	PTE VOC (lb/day)	PTE VOC (TPY)	PM PTE (TPY)	lb VOC/gal solids	Transfer Efficiency
Buff Primer (AXDA204)	11.40	30.2%	0.0%	30.2%	0.0%	82.00%	30.70	1.000	3.45	3.45	105.83	2540.01	463.55	267.34	4.20	75%
Black Top Coat (KAA0121)	10.80	32.0%	0.0%	32.0%	0.0%	69.99%	30.70	1.000	3.45	3.45	105.93	2542.40	463.99	247.06	4.93	75%
Grey Polyurethane Enamel	10.81	29.6%	0.0%	29.6%	0.0%	72.40%	30.70	1.000	3.20	3.20	98.37	2360.77	430.84	255.68	4.43	75%
Orange Polyurethane Enamel	9.51	34.7%	0.0%	34.7%	0.0%	61.80%	30.70	1.000	3.30	3.30	101.37	2432.82	443.99	208.70	5.34	75%
65 AAK474 - Black	9.61	35.8%	0.0%	35.8%	0.0%	58.72%	30.70	1.000	3.44	3.44	105.74	2537.70	463.13	207.27	5.87	75%
AXA0589 - Black	9.06	37.1%	0.0%	37.1%	0.0%	54.28%	30.70	1.000	3.36	3.36	103.16	2475.91	451.85	191.60	6.19	75%
AXA0588 - Gray	9.07	37.6%	0.0%	37.6%	0.0%	53.87%	30.70	1.000	3.41	3.41	104.81	2515.40	459.06	190.14	6.34	75%
AXE0039 - Orange	9.58	34.1%	0.0%	34.1%	0.0%	60.13%	30.70	1.000	3.27	3.27	100.29	2406.96	439.27	212.23	5.43	75%
													Uncontrolled / Worst Case	463.99	267.34	
													Limited PM Emissions - Controlled	90.00%	26.73	

Appendix A: Emission Calculations VOC and Particulate Matter Emissions from Surface Coating Operations

Company Name: Toyota Industrial Equipment Manufacturing, Inc.
Address City IN Zip: 5555 Inwood Drive, Columbus, IN 47202
Permit Number T005-32849-00040
Reviewer: Anh Nguyen
Date: 02/26/13

U004																
Material	Density (lb/gal)	Wt. % Volatile	Wt. % Water	Wt. % Organic	Vol % Water	Vol % Non-Vol (solids)	Gallon of Material (gal/hr)	Flash Off	lb VOC per gal, less water	lb VOC per gal coating	PTE VOC (lb/hr)	PTE VOC (lb/day)	PTE VOC (TPY)	PM PTE (TPY)	lb VOC/gal solids	Transfer Efficiency
Buff Primer (AXDA204)	11.40	30.2%	0.0%	30.2%	0.0%	82.00%	42.10	1.000	3.45	3.45	145.13	3483.21	635.69	366.61	4.20	75%
Black Top Coat (KAA0121)	10.80	32.0%	0.0%	32.0%	0.0%	69.99%	42.10	1.000	3.45	3.45	145.27	3486.49	636.28	338.80	4.93	75%
Grey Polyurethane Enamel	10.81	29.6%	0.0%	29.6%	0.0%	72.40%	42.10	1.000	3.20	3.20	134.89	3237.41	590.83	350.63	4.43	75%
Orange Polyurethane Enamel	9.51	34.7%	0.0%	34.7%	0.0%	61.80%	42.10	1.000	3.30	3.30	139.01	3336.21	608.86	286.19	5.34	75%
65 AAK474 - Black	9.61	35.8%	0.0%	35.8%	0.0%	58.72%	42.10	1.000	3.44	3.44	145.00	3480.04	635.11	284.24	5.87	75%
AXA0589 - Black	9.06	37.1%	0.0%	37.1%	0.0%	54.28%	42.10	1.000	3.36	3.36	141.47	3395.30	619.64	262.75	6.19	75%
AXA0588 - Gray	9.07	37.6%	0.0%	37.6%	0.0%	53.87%	42.10	1.000	3.41	3.41	143.73	3449.45	629.53	260.74	6.34	75%
AXE0039 - Orange	9.58	34.1%	0.0%	34.1%	0.0%	60.13%	42.10	1.000	3.27	3.27	137.53	3300.75	602.39	291.04	5.43	75%
												Uncontrolled / Worst Case		636.28	366.61	
												Limited PM Emissions - Controlled		90.00%	36.66	

U005																
Material	Density (lb/gal)	Wt. % Volatile	Wt. % Water	Wt. % Organic	Vol % Water	Vol % Non-Vol (solids)	Gallon of Material (gal/hr)	Flash Off	lb VOC per gal, less water	lb VOC per gal coating	PTE VOC (lb/hr)	PTE VOC (lb/day)	PTE VOC (TPY)	PM PTE (TPY)	lb VOC/gal solids	Transfer Efficiency
Buff Primer (AXDA204)	11.40	30.2%	0.0%	30.2%	0.0%	82.00%	7.68	1.000	3.45	3.45	26.48	635.42	115.96	66.88	4.20	75%
Black Top Coat (KAA0121)	10.80	32.0%	0.0%	32.0%	0.0%	69.99%	7.68	1.000	3.45	3.45	26.50	636.01	116.07	61.81	4.93	75%
Grey Polyurethane Enamel	10.81	29.6%	0.0%	29.6%	0.0%	72.40%	7.68	1.000	3.20	3.20	24.61	590.58	107.78	63.96	4.43	75%
Orange Polyurethane Enamel	9.51	34.7%	0.0%	34.7%	0.0%	61.80%	7.68	1.000	3.30	3.30	25.36	608.60	111.07	52.21	5.34	75%
65 AAK474 - Black	9.61	35.8%	0.0%	35.8%	0.0%	58.72%	7.68	1.000	3.44	3.44	26.45	634.84	115.86	51.85	5.87	75%
AXA0589 - Black	9.06	37.1%	0.0%	37.1%	0.0%	54.28%	7.68	1.000	3.36	3.36	25.81	619.38	113.04	47.93	6.19	75%
AXA0588 - Gray	9.07	37.6%	0.0%	37.6%	0.0%	53.87%	7.68	1.000	3.41	3.41	26.22	629.26	114.84	47.57	6.34	75%
AXE0039 - Orange	9.58	34.1%	0.0%	34.1%	0.0%	60.13%	7.68	1.000	3.27	3.27	25.09	602.13	109.89	53.09	5.43	75%
												Uncontrolled / Worst Case		116.07	66.88	
												Limited PM Emissions - Controlled		90.00%	6.69	

**Appendix A: Emission Calculations
VOC and Particulate Matter Emissions from Surface Coating Operations**

**Company Name: Toyota Industrial Equipment Manufacturing, Inc.
Address City IN Zip: 5555 Inwood Drive, Columbus, IN 47202
Permit Number T005-32849-00040
Reviewer: Anh Nguyen
Date: 02/26/13**

U013a - Paint Booth 1																
Material	Density (lb/gal)	Wt. % Volatile	Wt. % Water	Wt. % Organic	Vol % Water	Vol % Non-Vol (solids)	Gallon of Material (gal/hr)	Flash Off	lb VOC per gal, less water	lb VOC per gal coating	PTE VOC (lb/hr)	PTE VOC (lb/day)	PTE VOC (TPY)	PM PTE (TPY)	lb VOC/gal solids	Transfer Efficiency
Buff Primer (AXDA204)	11.40	30.2%	0.0%	30.2%	0.0%	82.00%	15.00	1.000	3.45	3.45	51.71	1241.05	226.49	130.62	4.20	75%
Black Top Coat (KAA0121)	10.80	32.0%	0.0%	32.0%	0.0%	69.99%	15.00	2.000	3.45	3.45	51.76	2484.43	453.41	120.71	9.86	75%
Grey Polyurethane Enamel	10.81	29.6%	0.0%	29.6%	0.0%	72.40%	15.00	1.000	3.20	3.20	48.06	1153.47	210.51	124.93	4.43	75%
Orange Polyurethane Enamel	9.51	34.7%	0.0%	34.7%	0.0%	61.80%	15.00	1.000	3.30	3.30	49.53	1188.67	216.93	101.97	5.34	75%
65 AAK474 - Black	9.61	35.8%	0.0%	35.8%	0.0%	58.72%	15.00	1.000	3.44	3.44	51.66	1239.92	226.29	101.27	5.87	75%
AXA0589 - Black	9.06	37.1%	0.0%	37.1%	0.0%	54.28%	15.00	1.000	3.36	3.36	50.41	1209.73	220.78	93.62	6.19	75%
AXA0588 - Gray	9.07	37.6%	0.0%	37.6%	0.0%	53.87%	15.00	1.000	3.41	3.41	51.21	1229.02	224.30	92.90	6.34	75%
AXE0039 - Orange	9.58	34.1%	0.0%	34.1%	0.0%	60.13%	15.00	1.000	3.27	3.27	49.00	1176.04	214.63	103.69	5.43	75%
												Uncontrolled / Worst Case		453.41	130.62	
												Limited PM Emissions - Controlled		90.00%	13.06	

U013b - Paint Booth 1																
Material	Density (lb/gal)	Wt. % Volatile	Wt. % Water	Wt. % Organic	Vol % Water	Vol % Non-Vol (solids)	Gallon of Material (gal/hr)	Flash Off	lb VOC per gal, less water	lb VOC per gal coating	PTE VOC (lb/hr)	PTE VOC (lb/day)	PTE VOC (TPY)	PM PTE (TPY)	lb VOC/gal solids	Transfer Efficiency
Buff Primer (AXDA204)	11.40	30.2%	0.0%	30.2%	0.0%	82.00%	15.00	1.000	3.45	3.45	51.71	1241.05	226.49	130.62	4.20	75%
Black Top Coat (KAA0121)	10.80	32.0%	0.0%	32.0%	0.0%	69.99%	15.00	2.000	3.45	3.45	51.76	2484.43	453.41	120.71	9.86	75%
Grey Polyurethane Enamel	10.81	29.6%	0.0%	29.6%	0.0%	72.40%	15.00	1.000	3.20	3.20	48.06	1153.47	210.51	124.93	4.43	75%
Orange Polyurethane Enamel	9.51	34.7%	0.0%	34.7%	0.0%	61.80%	15.00	1.000	3.30	3.30	49.53	1188.67	216.93	101.97	5.34	75%
65 AAK474 - Black	9.61	35.8%	0.0%	35.8%	0.0%	58.72%	15.00	1.000	3.44	3.44	51.66	1239.92	226.29	101.27	5.87	75%
AXA0589 - Black	9.06	37.1%	0.0%	37.1%	0.0%	54.28%	15.00	1.000	3.36	3.36	50.41	1209.73	220.78	93.62	6.19	75%
AXA0588 - Gray	9.07	37.6%	0.0%	37.6%	0.0%	53.87%	15.00	1.000	3.41	3.41	51.21	1229.02	224.30	92.90	6.34	75%
AXE0039 - Orange	9.58	34.1%	0.0%	34.1%	0.0%	60.13%	15.00	1.000	3.27	3.27	49.00	1176.04	214.63	103.69	5.43	75%
												Uncontrolled / Worst Case		453.41	130.62	
												Limited PM Emissions - Controlled		90.00%	13.06	

**Appendix A: Emission Calculations
VOC and Particulate Matter Emissions from Surface Coating Operations**

**Company Name: Toyota Industrial Equipment Manufacturing, Inc.
Address City IN Zip: 5555 Inwood Drive, Columbus, IN 47202
Permit Number: T005-32849-00040
Reviewer: Anh Nguyen
Date: 02/26/13**

U014 - Repair Paint Booth

PTE VOC	105.96	TPY	Emissions from MSM 005-24996-00040, issued October 9, 2007
PTE PM	60.96	TPY	Emissions from MSM 005-24996-00040, issued October 9, 2007
Controlled PTE PM	6.10	TPY	90% control efficiency

Cleanup Solvents																	
Material	Density (lb/gal)	Wt. % Volatile	Wt. % Water	Wt. % Organic	Vol % Water	Vol % Non-Vol (solids)	Material Used (gal/hr)	Units per Hour	Flash Off fraction	lb VOC / gal, less water	lb VOC / gal coating	PTE VOC (lb/hr)	PTE VOC (lb/day)	PTE VOC (TPY)	PTE PM (TPY)	lb VOC/gal solids	Transfer Efficiency
TEM112	6.76	100.00%	0.0%	100.0%	0.0%	0.00%	0.35	15.00	1.00	6.76	6.76	35.49	851.76	155.45	0.00	n/a	75%

Polyurethane Enamels (KAA0121, KAA0054 and KAEA019) are mixed with CTC0075. The information in these calculations represents the "as applied" data.

Surface Coating Potential to Emit				
Emission Unit	Uncontrolled PTE PM (TPY)	Uncontrolled PTE VOC (TPY)	Controlled PTE PM (TPY)	Limited PTE VOC (TPY)
U001	267.34	463.99	26.73	Total VOC - All Units Less than 245 (TPY)
U002	267.34	463.99	26.73	
U004	366.61	636.28	36.66	
U005	66.88	116.07	6.69	
U013a	130.62	453.41	13.06	
U013b	130.62	453.41	13.06	
U014	60.96	105.96	6.10	
Cleanup	0.00	155.45	0.00	
Total	1,290	2,849	129.04	

Methodology

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) * Flash-off
 Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day) * Flash-off
 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) * Flash-off
 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) * Flash-off
 Total = Worst Coating + Sum of all solvents used
 Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Appendix A: Emission Calculations
VOC and Particulate Matter Emissions from Surface Coating Operations

Company Name: Toyota Industrial Equipment Manufacturing, Inc.
Address City IN Zip: 5555 Inwood Drive, Columbus, IN 47202
Permit Number: T005-32849-00040
Reviewer: Anh Nguyen
Date: 02/26/13

U001								
Material	Density (lb/gal)	Gal of Mat (gal/hr)	Flash-off (fraction)	Weight % Glycol Ethers	Weight % Naphthalene	Glycol Ethers Emissions (tons/yr)	Naphthalene Emissions (tons/yr)	Total Emissions (tons/yr)
Buff Primer (AXDA204)	11.40	30.70	1.00	0.00%	0.00%	0.00	0.00	0.00
Black Top Coat (KAA0121)	10.80	30.70	1.00	5.00%	0.00%	72.61	0.00	72.61
Grey Polyurethane Enamel	10.81	30.70	1.00	2.80%	0.00%	40.70	0.00	40.70
Orange Polyurethane Enamel	9.51	30.70	1.00	3.70%	0.00%	47.31	0.00	47.31
65 AAK474 - Black	9.61	30.70	1.00	5.00%	0.00%	64.61	0.00	64.61
AXA0589 - Black	9.06	30.70	1.00	0.00%	1.00%	60.91	0.00	60.91
AXA0588 - Gray	9.07	30.70	1.00	0.00%	1.00%	0.00	12.20	12.20
AXE0039 - Orange	9.58	30.70	1.00	0.00%	1.00%	0.00	12.88	12.88
Worst Case Emissions						72.61	12.88	72.61

U002								
Material	Density (lb/gal)	Gal of Mat (gal/hr)	Flash-off (fraction)	Weight % Glycol Ethers	Weight % Naphthalene	Glycol Ethers Emissions (tons/yr)	Naphthalene Emissions (tons/yr)	Total Emissions (tons/yr)
Buff Primer (AXDA204)	11.40	30.70	1.00	0.00%	0.00%	0.00	0.00	0.00
Black Top Coat (KAA0121)	10.80	30.70	1.00	5.00%	0.00%	72.61	0.00	72.61
Grey Polyurethane Enamel	10.81	30.70	1.00	2.80%	0.00%	40.70	0.00	40.70
Orange Polyurethane Enamel	9.51	30.70	1.00	3.70%	0.00%	47.31	0.00	47.31
65 AAK474 - Black	9.61	30.70	1.00	5.00%	0.00%	64.61	0.00	64.61
AXA0589 - Black	9.06	30.70	1.00	0.00%	1.00%	60.91	0.00	60.91
AXA0588 - Gray	9.07	30.70	1.00	0.00%	1.00%	0.00	12.20	12.20
AXE0039 - Orange	9.58	30.70	1.00	0.00%	1.00%	0.00	12.88	12.88
Worst Case Emissions						72.61	12.88	72.61

U004								
Material	Density (lb/gal)	Gal of Mat (gal/hr)	Flash-off (fraction)	Weight % Glycol Ethers	Weight % Naphthalene	Glycol Ethers Emissions (tons/yr)	Naphthalene Emissions (tons/yr)	Total Emissions (tons/yr)
Buff Primer (AXDA204)	11.40	42.10	1.00	0.00%	0.00%	0.00	0.00	0.00
Black Top Coat (KAA0121)	10.80	42.10	1.00	5.00%	0.00%	99.57	0.00	99.57
Grey Polyurethane Enamel	10.81	42.10	1.00	2.80%	0.00%	55.81	0.00	55.81
Orange Polyurethane Enamel	9.51	42.10	1.00	3.70%	0.00%	64.88	0.00	64.88
65 AAK474 - Black	9.61	42.10	1.00	5.00%	0.00%	88.60	0.00	88.60
AXA0589 - Black	9.06	42.10	1.00	0.00%	1.00%	83.53	0.00	83.53
AXA0588 - Gray	9.07	42.10	1.00	0.00%	1.00%	0.00	16.72	16.72
AXE0039 - Orange	9.58	42.10	1.00	0.00%	1.00%	0.00	17.67	17.67
Worst Case Emissions						99.57	17.67	99.57

Appendix A: Emission Calculations
VOC and Particulate Matter Emissions from Surface Coating Operations

Company Name: **Toyota Industrial Equipment Manufacturing, Inc.**
 Address City IN Zip: **5555 Inwood Drive, Columbus, IN 47202**
 Permit Number: **T005-32849-00040**
 Reviewer: **Anh Nguyen**
 Date: **02/26/13**

U005								
Material	Density (lb/gal)	Gal of Mat (gal/hr)	Flash-off (fraction)	Weight % Glycol Ethers	Weight % Naphthalene	Glycol Ethers Emissions (tons/yr)	Naphthalene Emissions (tons/yr)	Total Emissions (tons/yr)
Buff Primer (AXDA204)	11.40	7.68	1.00	0.00%	0.00%	0.00	0.00	0.00
Black Top Coat (KAA0121)	10.80	7.68	1.00	5.00%	0.00%	18.16	0.00	18.16
Grey Polyurethane Enamel	10.81	7.68	1.00	2.80%	0.00%	10.18	0.00	10.18
Orange Polyurethane Enamel	9.51	7.68	1.00	3.70%	0.00%	11.84	0.00	11.84
65 AAK474 - Black	9.61	7.68	1.00	5.00%	0.00%	16.16	0.00	16.16
AXA0589 - Black	9.06	7.68	1.00	0.00%	1.00%	15.24	0.00	15.24
AXA0588 - Gray	9.07	7.68	1.00	0.00%	1.00%	0.00	3.05	3.05
AXE0039 - Orange	9.58	7.68	1.00	0.00%	1.00%	0.00	3.22	3.22
Worst Case Emissions						18.16	3.22	18.16

U013a								
Material	Density (lb/gal)	Gal of Mat (gal/hr)	Flash-off (fraction)	Weight % Glycol Ethers	Weight % Naphthalene	Glycol Ethers Emissions (tons/yr)	Naphthalene Emissions (tons/yr)	Total Emissions (tons/yr)
Buff Primer (AXDA204)	11.40	15.00	1.00	0.00%	0.00%	0.00	0.00	0.00
Black Top Coat (KAA0121)	10.80	15.00	1.00	5.00%	0.00%	35.48	0.00	35.48
Grey Polyurethane Enamel	10.81	15.00	1.00	2.80%	0.00%	19.89	0.00	19.89
Orange Polyurethane Enamel	9.51	15.00	1.00	3.70%	0.00%	23.12	0.00	23.12
65 AAK474 - Black	9.61	15.00	1.00	5.00%	0.00%	31.57	0.00	31.57
AXA0589 - Black	9.06	15.00	1.00	0.00%	1.00%	29.76	0.00	29.76
AXA0588 - Gray	9.07	15.00	1.00	0.00%	1.00%	0.00	5.96	5.96
AXE0039 - Orange	9.58	15.00	1.00	0.00%	1.00%	0.00	6.29	6.29
Worst Case Emissions						35.48	6.29	35.48

U013b								
Material	Density (lb/gal)	Gal of Mat (gal/hr)	Flash-off (fraction)	Weight % Glycol Ethers	Weight % Naphthalene	Glycol Ethers Emissions (tons/yr)	Naphthalene Emissions (tons/yr)	Total Emissions (tons/yr)
Buff Primer (AXDA204)	11.40	15.00	1.00	0.00%	0.00%	0.00	0.00	0.00
Black Top Coat (KAA0121)	10.80	15.00	1.00	5.00%	0.00%	35.48	0.00	35.48
Grey Polyurethane Enamel	10.81	15.00	1.00	2.80%	0.00%	19.89	0.00	19.89
Orange Polyurethane Enamel	9.51	15.00	1.00	3.70%	0.00%	23.12	0.00	23.12
65 AAK474 - Black	9.61	15.00	1.00	5.00%	0.00%	31.57	0.00	31.57
AXA0589 - Black	9.06	15.00	1.00	0.00%	1.00%	29.76	0.00	29.76
AXA0588 - Gray	9.07	15.00	1.00	0.00%	1.00%	0.00	5.96	5.96
AXE0039 - Orange	9.58	15.00	1.00	0.00%	1.00%	0.00	6.29	6.29
Worst Case Emissions						35.48	6.29	35.48

Cleaning Solvents									
Material	Density (lb/gal)	Gal of Mat (gal/hr)	Maximum (unit/hour)	Flash-off (fraction)	Weight % Glycol Ethers	Weight % Naphthalene	Glycol Ethers Emissions (tons/yr)	Naphthalene Emissions (tons/yr)	Total Emissions (tons/yr)
TEM112	6.8	0.35	15.000	1.00	0.00%	0.00%	0.00	0.00	0.00

Potential to Emit			
Emission Unit	Glycol Ethers (TPY)	Naph. (TPY)	Total HAP (TPY)
U001	72.61	12.88	72.61
U002	72.61	12.88	72.61
U004	99.57	17.67	99.57
U005	18.16	3.22	18.16
U013a	35.48	6.29	35.48
U013b	35.48	6.29	35.48
U015	16.56	0.00	16.56
Cleanup	0.00	0.00	0.00
Total	350.48	59.24	350.48

Notes:

Polyurethane Enamels (KAA0121, KAA0054 and KAEA019) are mixed with CTC0075. The information in these calculations represents the "as applied" data.

Methodology:

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

Appendix A: Emission Calculations
Potential to Emit from Phosphate Wash

Company Name: Toyota Industrial Equipment Manufacturing, Inc.
Address City IN Zip: 5555 Inwood Drive, Columbus, IN 47202
Permit Number: T005-32849-00040
Reviewer: Anh Nguyen
Date: 02/26/13

Emission Unit ID (Stack ID)	Emission Unit Description	Product Material Used	^a Potential Annual Usage (gallons)	Density (lb/gal)	^b VOC Content % (w/w)	^b % Solids (% w/w)	^c % Solids Emitted	^d VOC Potential To Emit - PTE		^e PM / PM ₁₀ / PM _{2.5} Potential To Emit (PTE)	
								(lb/yr)	(TPY)	(lb/yr)	(TPY)
I011a,b (S011a,b)	5-Stage Iron Phosphate Washer - Stage 1	Nalco Texolite 1391SL	6,569	10.05	0.0	34.3	5.0	0.0	0.00	1,131.8	0.57
	5-Stage Iron Phosphate Washer - Stage 3	Nalco Globrite 704DS	5,276	10.41	0.0	36.2	5.0	0.0	0.00	994.1	0.50
	5-Stage Iron Phosphate Washer - Stage 5	Nalco Sealtex 8800NCS	502	8.40	4.29	4.7	5.0	180.9	0.09	9.9	0.00
VOC Emission Totals (I011):								181	0.090	2,136	1.07

Emission Unit ID (Stack ID)	Emission Unit Description	Product Material Used	^a Potential Annual Usage (gallons)	Density (lb/gal)	^b VOC Content % (w/w)	^b % Solids (% w/w)	^c % Solids Emitted	^d VOC Potential To Emit - PTE		^e PM / PM ₁₀ / PM _{2.5} Potential To Emit (PTE)	
								(lb/yr)	(TPY)	(lb/yr)	(TPY)
I012	5-Stage Iron Phosphate Washer - Stage 1	Nalco Texolite 1391SL	8,526	10.05	0.0	34.3	5.0	0.0	0.00	1,469.1	0.73
	5-Stage Iron Phosphate Washer - Stage 3	Nalco Globrite 704DS	7,704	10.41	0.0	36.2	5.0	0.0	0.00	1,451.6	0.73
	5-Stage Iron Phosphate Washer - Stage 5	Nalco Sealtex 8800NCS	703	8.40	4.29	4.7	5.0	253.2	0.13	13.9	0.01
VOC Emission Totals (I012):								253	0.127	2,935	1.47

Emission Unit ID (Stack ID)	Emission Unit Description	Product Material Used	^a Potential Annual Usage (gallons)	Density (lb/gal)	^b VOC Content % (w/w)	^b % Solids (% w/w)	^c % Solids Emitted	^d VOC Potential To Emit - PTE		^e PM / PM ₁₀ Potential To Emit (PTE)	
								(lb/yr)	(TPY)	(lb/yr)	(TPY)
#7 Frame Washer	4-Stage Iron Phosphate Washer - Stage 1	Nalco Texolite 1391SL	7,962	10.05	0.0	34.3	5.0	0.0	0.00	1,371.9	0.69
	4-Stage Iron Phosphate Washer - Stage 3	Nalco Globrite 704DS	7,194	10.41	0.0	36.2	5.0	0.0	0.00	1,355.6	0.68
	NA	Nalco Sealtex 8800NCS	0	NA	NA	NA	NA	NA	NA	NA	NA
VOC Emission Totals (#7 Frame Washer):								253	0.253	4,306	2.15

Appendix A: Emission Calculations
Potential to Emit from Phosphate Wash

Company Name: Toyota Industrial Equipment Manufacturing, Inc.
Address City IN Zip: 5555 Inwood Drive, Columbus, IN 47202
Permit Number: T005-32849-00040
Reviewer: Anh Nguyen
Date: 02/26/13

Emission Unit ID (Stack ID)	^d VOC Potential To Emit - PTE		^e PM / PM ₁₀ Potential To Emit (PTE)	
	(lb/yr)	(TPY)	(lb/yr)	(TPY)
VOC Emission Totals (I011):	181	0.090	2,136	1.07
VOC Emission Totals (I012):	253	0.127	2,935	1.47
VOC Emission Totals (#7 Frame Washer):	253	0.253	4,306	2.15
VOC Emission Totals (I011 + I012 + #7 Frame Washer):	687	0.470	9,377	4.69

- a Quantities based on an operating schedule of 8,760 hours/year. Normal operating schedule is 8 hours/day, 5 days/week, 50 weeks/year (2,000 hours year).
- b VOC and solids data obtained from Product Vendor (Nalco). There are no HAPs associated with these products.
- c Conservative estimate based on U.S. EPA HEW Study on particulate emissions from chemical metal treatment. (Particulate emissions from chemical metal treatment are calculated based on 5% of the solids contained in the product material used being dispersed to the atmosphere as particulate matter).
- d PTE for VOC assumes that 100% of the VOC contained in the product is emitted to the atmosphere and is calculated according to the following:

$$\text{VOC(lb/hr)} = (\text{Potential annual usage, gallons/yr}) * (\text{Density, lb mat'l/gal}) * (\% \text{ w/w of VOC, lb VOC/lb mat'l}) / 100$$

$$= (\text{gallons/yr}) * (\text{lb mat'l/gal}) * (\text{lb VOC/lb mat'l}) / 100$$
- e PTE for particulate matter (PM) assumes that all PM is PM10 and is calculated according to the following:

$$\text{PM/PM10 (lb/yr)} = (\text{Potential annual usage, gallons/yr}) * (\text{Density, lb mat'l/gal}) * (\% \text{ Solids in Mat'l, lb solids/lb mat'l}) / 100 * (\% \text{ Solids Emitted}) / 100$$

$$= (\text{gallons/yr}) * (\text{lb mat'l/gal}) * (\text{lb solids/lb mat'l}) / 100 * (5\% \text{ or } 5/100)$$

Potential Usage

Emission Unit ID (Stack ID)	Emission Unit Description	Product Material Used	2005 Annual Usage (gallons)	Prorated Potential Usage (gallons)	Tank Capacity (gallons)			Fraction of Total Tank Volume			Potential Tank Usage (gallons)			
					I011	I012	#7 Frame	I011	I012	#7 Frame	I011	I012	#7 Frame	Total
I011	Stage 1	Nalco Texolite 1391SL	5,264	23,056	990	1285	1200	0.285	0.370	0.345	6568.6	8525.9	7961.9	23,056
I012	Stage 3	Nalco Globrite 704DS	4,606	20,174	880	1285	1200	0.262	0.382	0.357	5275.9	7704.0	7194.4	20,174
#7 Frame Washer	Stage 5	Nalco Sealtex 8800NCS	275	1,205	550	770	0	0.417	0.583	0.000	501.88	702.6	0.0	1,205

Totals: 12,346 16,932 15,156 44,435

Appendix A: Emission Calculations
Potential to Emit from Small Natural Gas-Fired Boilers (< 100 MMBtu/hr Each)

Company Name: Toyota Industrial Equipment Manufacturing, Inc.
Address City IN Zip: 5555 Inwood Drive, Columbus, IN 47202
Permit Number T005-32849-00040
Reviewer: Anh Nguyen
Date: 02/26/13

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

149.20

1307

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10/2.5*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100 **see below	5.50	84.0
Potential Emission in tons/yr	1.24	4.97	0.392	65.3	3.59	54.9

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

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

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichloroben	Formaldehyde	Hexane	Toluene
	0.00210	0.00120	0.07500	1.80000	0.00340
Potential Emission in tons/yr	0.001372	0.000784	0.049012	1.176293	0.002222

Emission Factor in lb/MMcf	HAPs - Metals					Total
	Lead	Cadmium	Chromium	Manganese	Nickel	
	0.0005	0.0011	0.0014	0.0004	0.0021	
Potential Emission in tons/yr	0.00033	0.00072	0.00091	0.00025	0.00137	1.23

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

Company Name: Toyota Industrial Equipment Manufacturing, Inc.
Address City IN Zip: 5555 Inwood Drive, Columbus, IN 47202
Permit Number: T005-32849-00040
Reviewer: Anh Nguyen
Date: 02/26/13

Greenhouse Gas Emissions

Heat Input Capacity	149.20 MMBtu/hr	
Heat Input Capacity	1,306,992 MMBtu/yr	
One Metric Ton (MT) =	2,200 pounds	Conversion Factor
CO2 Emission Factor	53.02 kg CO2/MMBtu	40 CFR 98, Subpart C
CH4 Emission Factor	1.00E-03 kg CH4/MMBtu	40 CFR 98, Subpart C
N2O Emission Factor	1.00E-04 kg N2O /MMBtu	40 CFR 98, Subpart C
CO2 Global Warming Potential	1 (unitless)	40 CFR 98, Subpart A
CH4 Global Warming Potential	21 (unitless)	40 CFR 98, Subpart A
N2O Global Warming Potential	310 (unitless)	40 CFR 98, Subpart A

Pollutant (metric ton) = 0.001 (metric ton/kg) x Energy Input (MMBtu/yr) x EF (kg/MMBtu)
 [40 CFR 98, Subpart A, equation C-1]

PTE of CO2 =	69297 metric tons/yr	76,227 TPY (US)
PTE of CH4 =	1.31 metric tons/yr	1.45 TPY (US)
PTE of N2O =	0.14 metric tons/yr	0.16 TPY (US)

Global Warming Potential

$CO_2e \text{ (metric tons/yr)} = \sum \text{Green House Gas}_i \text{ (metric tons/yr)} \times \text{Global Warming Potential}$
 [40 CFR 98, Subpart A, Equation A-1]

Greenhouse	PTE	GWP	CO ₂ e
CO2	69,297	1	69,297
CH4	1.31	21	27.51
N2O	0.14	310	43
PTE CO₂e			69,368
			76,305

metric tons/yr
TPY (US)

Methodology:

- 1) All emission factors are based on normal firing.
- 2) MMBtu = 1,000,000 Btu
- 3) MMCF = 1,000,000 Cubic Feet of Gas
- 4) Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
- 5) Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
- 6) 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 (SUPPLEMENT D 3/98)

Appendix A: Emission Calculations
Potential to Emit from Natural Gas-Fired Internal Combustion Engines

Company Name: Toyota Industrial Equipment Manufacturing, Inc.
Address City IN Zip: 5555 Inwood Drive, Columbus, IN 47202
Permit Number: T005-32849-00040
Reviewer: Anh Nguyen
Date: 02/26/13

Worst case fuel usage

Fuel consumption (g/kW h)* 258
 Shaft Output (kW)* 43
 Fuel consumption (g/h) 11094
 Fuel consumption (lb/hr) 24.5
 Energy content CNG 21,300 Btu/lb CNG
 Heat input capacity (MMBtu/hr) 0.52

* From charts provided by the applicant

Four stroke Lean Burn Engines
 Heat Input Capacity
 MM Btu/yr

521.0

Lean Burn Engines

	Pollutant					
	PM	PM10/2.5	SO2	NOx	VOC	CO
Emission Factor in lb/MMBtu	7.71E-05	9.99E-03	5.88E-04	4.08	0.12	3.17E-01
Potential Emission in tons/yr	0.00002	0.003	0.0002	1.06	0.031	0.083

Four stroke Rich Burn Engines
 Heat Input Capacity
 MM Btu/yr

521.0

Rich Burn Engines

	Pollutant					
	PM	PM10/2.5	SO2	NOx	VOC	CO
Emission Factor in lb/MMBtu	9.50E-03	1.94E-02	5.88E-04	2.21	0.03	3.72E+00
Potential Emission in tons/yr	0.002	0.005	0.000	0.576	0.008	0.969

Worst Case Emissions

	PM	PM10/2.5	SO2	NOx	VOC	CO
Worst case emissions for project	0.002	0.005	0.0002	0.576	0.008	0.969

**Appendix A: Emission Calculations
Potential to Emit from Natural Gas-Fired Internal Combustion Engines**

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HAP	Emission Factor Four stroke Lean burn (lb/MMBtu)	Emission Factor Four stroke Rich burn (lb/MMBtu)	Potential to Emit (tons/yr)
1,1,2,2-Tetrachloroethane	4.00E-05	2.53E-05	1.04E-05
1,1,2-Trichloroethane	3.18E-05	1.53E-05	8.28E-06
1,1-Dichloroethane	2.36E-05	1.13E-05	6.15E-06
1,2-Dichloroethane	2.36E-05	1.13E-05	6.15E-06
1,2-Dichloropropane	2.69E-05	1.30E-05	7.01E-06
1,3-Butadiene	2.67E-04	6.63E-04	1.73E-04
1,3-Dichloropropene	2.64E-05	1.27E-05	6.88E-06
2,2,4-Trimethylpentane	2.50E-04	0.00E+00	6.51E-05
Acetaldehyde	8.36E-03	2.79E-03	2.18E-03
Acrolein	5.14E-03	2.63E-03	1.34E-03
Benzene	4.40E-04	1.58E-03	4.12E-04
Biphenyl	2.12E-04	0.00E+00	5.52E-05
Carbon Tetrachloride	3.67E-05	1.77E-05	9.56E-06
Chlorobenzene	3.04E-05	1.29E-05	7.92E-06
Chloroethane	1.87E-06	0.00E+00	4.87E-07
Chloroform	2.85E-05	1.37E-05	7.42E-06
Ethylbenzene	3.97E-05	2.48E-05	1.03E-05
Ethylene Dibromide	4.43E-05	2.13E-05	1.15E-05
Formaldehyde	5.28E-02	2.05E-02	1.38E-02
Methanol	2.50E-03	3.06E-03	7.97E-04
Methylene Chloride	2.00E-05	4.12E-05	1.07E-05
n-Hexane	1.11E-03	0.00E+00	2.89E-04
Naphthalene	7.44E-05	9.71E-05	2.53E-05
Phenol	2.40E-05	0.00E+00	6.25E-06
Styrene	2.36E-05	1.19E-05	6.15E-06
Toluene	4.08E-04	5.58E-04	1.45E-04
Vinyl Chloride	1.49E-05	7.18E-06	3.88E-06
Xylene	1.84E-04	1.95E-04	5.08E-05
Total HAPs:			0.019

Appendix A: Emission Calculations
Potential to Emit from Natural Gas-Fired Internal Combustion Engines

Company Name: Toyota Industrial Equipment Manufacturing, Inc.
Address City IN Zip: 5555 Inwood Drive, Columbus, IN 47202
Permit Number: T005-32849-00040
Reviewer: Anh Nguyen
Date: 02/26/13

Greenhouse Gas Emissions			
Heat Input Capacity	0.52	MMBtu/hr	vided by Applicant
Heat Input Capacity	4,555	MMBtu/yr	culated by IDEM
One Metric Ton (MT) =	2,200	pounds	inversion Factor
CO2 Emission Factor	53.02	kg CO2/MMBtu	:FR 98, Subpart C
CH4 Emission Factor	1.00E-03	kg CH4/MMBtu	:FR 98, Subpart C
N2O Emission Factor	1.00E-04	kg N2O /MMBtu	:FR 98, Subpart C
CO2 Global Warming Pot.	1	(unitless)	:FR 98, Subpart A
CH4 Global Warming Pot.	21	(unitless)	:FR 98, Subpart A
N2O Global Warming Pot.	310	(unitless)	:FR 98, Subpart A

Pollutant (metric ton) = 0.001 (metric ton/kg) x Energy Input (MMBtu/yr) x EF (kg/MMBtu)
 [40 CFR 98, Subpart A, equation C-1]

			TPY (US)
PTE of CO2 =	242 metric tons/yr		266 TPY (US)
PTE of CH4 =	0.01 metric tons/yr		0.02 TPY (US)
PTE of N2O =	0.01 metric tons/yr		0.02

Global Warming Potential

CO_2e (metric tons/yr) = \sum Green House Gas_i (metric tons/yr) x Global Warming Potential
 [40 CFR 98, Subpart A, Equation A-1]

Greenhouse Gas	PTE (metric tons/yr)	GWP (unitless)	CO ₂ e	
CO2	242	1	242.00	
CH4	0.01	21	0.21	
N2O	0.01	310	3.10	metric tons/yr
		PTE CO₂e	245.31	TPY (US)
			269.84	

Methodology

Emission Factors for PM/PM10/PM2.5, SO₂, NO_x, VOC HAPs and CO are from AP 42 Tables 3.2-1, 3.2-2 and 3.2-3, revised July 2000
 Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 8760 hr/yr / (2,000 lb/ton)

**Appendix A: Emission Calculations
Potential to Emit from Laser Cutting Units**

Company Name: Toyota Industrial Equipment Manufacturing, Inc.
Address City IN Zip: 5555 Inwood Drive, Columbus, IN 47202
Permit Number T005-32849-00040
Reviewer: Anh Nguyen
Date: 02/26/13

Potential to Emit Calculations		
Pollutant	Uncontrolled PTE (TPY)	Source
PM	2.40	Provided by Applicant
PM10	2.40	Provided by Applicant
PM2.5	2.40	Provided by Applicant
SO2	0.00	None Anticipated
NOx	0.00	None Anticipated
VOC	0.00	None Anticipated
CO	0.00	None Anticipated

Potential to Emit Calculations - HAPs			
Pollutant	Uncontrolled PTE for PM (TPY)	*Emission Factor (lb/lb PM)	PTE (TPY)
Mn	2.40	0.0120	0.029
Cr	2.40	0.0025	0.006
Ni	2.40	0.0020	0.005
Total HAPs			0.040

* Emission Factors are from an analysis of the composition of the steel. HAP content of the air emissions is assumed to be same composition of the steel.

326 IAC 6-3-2 Emission Limitations

In accordance with 326 IAC 6-3-2-1(b)(14), manufacturing processes with potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour are exempt from 326 IAC 6-3-2 emission limitations. Therefore, the laser cutting operation is exempt from 326 IAC 6-3-2.

Appendix A: Emission Calculations
Particulate and HAP Emissions from Shot Blast Operations

Company Name: Toyota Industrial Equipment Manufacturing, Inc.
Address City IN Zip: 5555 Inwood Drive, Columbus, IN 47202
Permit Number: T005-32849-00040
Reviewer: Anh Nguyen
Date: 02/26/13

Table 1 - Emission Factors for Abrasives

Abrasive	Emission Factor	
	lb PM / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	

HAP Emission Factors for Steel Shot	
lb Manganese/lb PM	0.0120
lb Chromium/lb PM	0.0025
lb Nickel/lb PM	0.0020

1) PM / PM₁₀ / PM_{2.5} Emissions

Shot blaster	Potential Shot Usage (lb/hr)	PTE PM Emissions (TPY)	PTE PM10/2.5 Emissions (TPY)	PSD Minor Limit PM Emissions (lbs/hr)	PSD Minor Limit PM10 / PM2.5 (lbs/hr)	PSD Minor Limit PM Emissions (TPY)	PSD Minor Limit PM10 / PM2.5 (TPY)
U009	132,000	2,313	1,989	5.28	4.54	23.13	19.89
U011	115,500	2,024	1,741	4.62	3.97	20.24	17.39
U015	38,400	673	579	0.23	0.23	1.00	1.00

2) HAP Emissions

Potential to Emit (TPY)					
Shot blaster	PTE PM Emissions (ton/yr)	PTE Mn Emissions (ton/yr)	PTE Cr Emissions (ton/yr)	PTE Ni Emissions (ton/yr)	PTE Total HAP Each Unit (ton/yr)
U009	2,313	27.76	5.78	4.63	38.17
U011	2,024	24.29	5.06	4.05	33.40
U015	673	8.08	1.68	1.35	11.11
	Total Single HAP	60.13	12.52	10.03	
	Total HAP		82.68		

Shot blaster	HAP Minor limits			
	Single HAP (lb/hr)	Single HAP (TPY)	Total HAP (lb/hr)	Total HAP (TPY)
U009	0.106	0.46	0.212	0.929
U011	0.092	0.40	0.184	0.806
U015	0.002	0.01	0.0027	0.012
	Total	0.87		1.75

Methodology:

Emission Factors are from Stappa Alapco, Section 3 "Abrasive Blasting"
HAP emission factors assume same HAP composition in steel shot as in steel
Uncontrolled Emissions = shot usage * emission factor
PSD Limit PM / PM10 / PM2.5 = PTE * (1 - control efficiency)
PTE HAP = PM emissions * Emission Factor
PTE (TPY) = PTE (lb/hr) * 4.38

**Appendix A - Emission Calculations
Insignificant Activities other than Combustion**

Company Name: Toyota Industrial Equipment Manufacturing, Inc.
Address City IN Zip: 5555 Inwood Drive, Columbus, IN 47202
Permit Number T005-32849-00040
Reviewer: Anh Nguyen
Date: 02/26/13

Gasoline Dispensing

Material	Usage 1997 (gallons/yr)	Truck Production 1997	Potential Annual Truck Production	Potential Gasoline Usage (gallons/yr)	Displacement Loss Emission Factor (lb VOC/gallon)	Spill Loss Emission Factor (lb VOC/gallon)	Displacement Loss (tons VOC/yr)	Spill Loss (tons VOC/yr)	Total VOC Emissions (tons/yr)
Gasoline	8500	14601	74460	43347	0.011	0.001	0.238	0.015	0.254

Storage Tanks

Material	Potential Breathing Losses (lbs/yr)	Potential Working Losses (lbs/yr)	Total Potential Tank Emissions (lbs/yr)	Total Potential Tank Emissions (ton/yr)
Gasoline	307	535	842	0.421
Various	15.0	34.0	49.0	0.025
Total:				0.446

Total Potential VOC Emissions: 0.699 tons/yr

METHODOLOGY**Gasoline Dispensing**

Emissions = gasoline usage (scaled to maximum production) * (displacement loss emission factor + spill loss emission factor)

Storage Tanks

Provided by the applicant. Based on capacity, throughput, product stored, and type of tank.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

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

TO: Ron Allen
Toyota Industrial Equipment Manufacturing, Inc.
5555 Inwood Drive
Columbus, IN 47201

DATE: March 19, 2013

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

SUBJECT: Final Decision
Administrative Amendment
005-32849-00040

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:
Tim Baker – Vice President
Andrea Swanson – Cornerstone Environmental
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07

Mail Code 61-53

IDEM Staff	GHOTOPP 3/19/2013 Toyota Industrial Equipment Manufacturing, Inc 005-32849-00040 Final		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
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1		Ron Allen Toyota Industrial Equipment Manufacturing, Inc 5555 Inwood Dr Columbus IN 47201 (Source CAATS) via confirmed delivery										
2		Tim Barker VP Toyota Industrial Equipment Manufacturing, Inc 5555 Inwood Dr Columbus IN 47201 (RO CAATS)										
3		Columbus City Council and Mayors Office 123 Washington St Columbus IN 47201 (Local Official)										
4		Mr. Elbert Held 734 Hutchins Columbus IN 47201 (Affected Party)										
5		Mr. Lcnfc 1039 Sycamore St Columbus IN 47201 (Affected Party)										
6		Bartholomew County Commissioners 440 Third Street Columbus IN 47202 (Local Official)										
7		Mr. Jean Terpstra 3210 Grove Pkwy Columbus IN 47203 (Affected Party)										
8		August Tindell 31 Reo Street Columbus IN 47201 (Affected Party)										
9		Terry Lowe 1039 W Jeffersons St Apt 3 Franklin IN 46131 (Affected Party)										
10		Mr. Charles Mitch 3210 Grove Parkway Columbus IN 47203 (Affected Party)										
11		Mr. Roy Keowen 1800 Monore Ave Evansville IN 47714 (Affected Party)										
12		Ms. Carole Underhill 508 Martins Ln Evansville IN 47715 (Affected Party)										
13		Bartholomew County Health Department 440 3rd Street, Suite 303 Columbus IN 47201 (Health Department)										
14		Ms. Andrea Swanson Cornerstone Environmental 880 Lennox Ct Zionsville IN 46077 (Consultant)										
15												

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