



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

TO: Interested Parties / Applicant

DATE: March 11, 2014

RE: Valeo Lighting Systems North America, LLC / 071-34124-00006

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

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

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

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

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



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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

Ms. Molly Harden
Valeo Lighting Systems North America, LLC
1231 Avenue A North
Seymour, IN, 47274

March 11, 2014

Re: 071-34124-00006
Minor Source Modification

Dear Ms. Harden:

Valeo Lighting Systems North America, LLC was issued Part 70 Operating Permit Renewal No. T071-31066-00006 on February 1, 2012 for a stationary automotive light assembly manufacturing plant located at 1231 Avenue A North, Seymour, IN, 47274. An application to modify the source was received on January 29, 2014. Pursuant to the provisions of 326 IAC 2-7-10.5, a Minor Source Modification is hereby approved as described in the attached Technical Support Document.

Pursuant to 326 IAC 2-7-10.5, the following emission unit is approved for construction at the source:

- (a) One (1) Thermal Cure Spray Coating Booth, approved in 2014 for construction, identified as Unit #26, using HVLP guns, dry filters as control, and exhausting to stack AF4.

The following construction conditions are applicable to the proposed modification:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

3. Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

Commenced Construction

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(j), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Approval to Construct

6. Pursuant to 326 IAC 2-7-10.5(f)(3), this Minor Source Modification authorizes the construction of the new emission unit(s) when the Minor Source Modification has been issued.

Pursuant to 326 IAC 2-7-10.5(m), the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

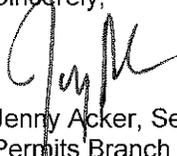
Pursuant to 326 IAC 2-7-12, operation of the new emission unit(s) is not approved until the Significant Permit Modification has been issued. Operating conditions shall be incorporated into the Part 70 Operating Permit as a Significant Permit Modification in accordance with 326 IAC 2-7-10.5(m)(2) and 326 IAC 2-7-12 (Permit Modification).

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. 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, refer to the IDEM's Permit Guide on the Internet at: www.idem.in.gov

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 Julie Alexander of my staff, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for Julie Alexander or extension 3-1782 or dial (317) 233-1782.

Sincerely,



Jenny Acker, Section Chief
Permits Branch
Office of Air Quality

Attachments: Minor Source Modification and Technical Support Document

cc: File - Jackson County
Jackson County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch
IDEM Southeast Regional Office



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
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100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
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Minor Source Modification to a Part 70 Source OFFICE OF AIR QUALITY

Valeo Lighting System North America, LLC
1231 Avenue A North
Seymour, Indiana 47274

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

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. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.

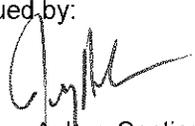
Minor Source Modification No.: 071-34124-00006	
Issued by:  Jenny Acker, Section Chief Permits Branch Office of Air Quality	Issuance Date: March 11, 2014

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SECTION A SOURCE SUMMARY

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

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

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

Source Address:	1231 Avenue A North, Seymour, Indiana 47274
General Source Phone Number:	812-574-5744
SIC Code:	3647
County Location:	Jackson
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

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

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

- (g) Two (2) Thermal Cure Spray Coating Booths, permitted in 2011, identified as Units #14 and #25, using HVLP guns and dry filters as control, and exhausting to stacks TC1 and TC2.
- (h) One (1) Thermal Cure Spray Coating Booth, approved in 2014 for construction, identified as Unit #26, using HVLP guns, dry filters as control, and exhausting to stack AF4.
- (i) Five (5) Lean Lens Coaters, permitted in 2011, identified as Units #20 through #24, using dry filters and overspray collection baffles as control, and exhausting to stack LL1 through LL5.

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

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

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

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

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

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

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

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

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

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

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

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

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

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]**Error! Bookmark not defined.**

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

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

- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:
- (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(35).

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than 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]Error! Bookmark not defined.

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance

causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

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

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

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ or 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 T071-31066-00006 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(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(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

- (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

- (a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (c) without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

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

(4) The Permittee notifies the:

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

and

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

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

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

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

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(37)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

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

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

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

- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

C.6 Stack Height [326 IAC 1-7] **Error! Bookmark not defined.**

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

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of

326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

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

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

- (a) For new units:
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.
- (b) For existing units:
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 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, 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).

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. The analog instrument shall be capable of measuring values outside of the normal range.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

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

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

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

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

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

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

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

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

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

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

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

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

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]Error! Bookmark not defined.

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(33) ("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, where applicable:

- (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, where applicable:

- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
- (BB) The dates analyses were performed.
- (CC) The company or entity that performed the analyses.
- (DD) The analytical techniques or methods used.
- (EE) The results of such analyses.
- (FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

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

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

- (b) The address for report submittal is:
- Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) spray paint booth, South wing Manual Spray Paint Booth, installed in 1996, using conventional spray application, identified as emission unit #3, for coating plastic automotive lighting assembly components with a maximum capacity of 100 units per hour, using dry filters for overspray control, and exhausting to stack PP-E-40.
- (b) One (1) paint booth, Hard Coat #2, installed in 1996, using conventional spray application, identified as emission unit # 9, for coating plastic automotive lighting assembly components with a maximum capacity of 720 units per hour, using an Oscar VIII Overspray Collection and Recovery System for overspray control and exhausting to stack PP-E-84.
- (c) One (1) robotic spray booth, installed in 2003, using high volume low pressure spray application, identified as emission unit #10, for coating plastic automotive lighting assembly components, with a maximum capacity of 200 units per hour, using dry filters for overspray control exhausting to one (1) stack, identified as PP-E-03-101.
- (e) One (1) flow coating line, identified as emission unit #6, installed in 1994, for coating plastic automotive lighting assembly components. The flowcoater has a maximum capacity of 1,440 units per hour, and uses a regenerative thermal oxidizer to reduce volatile organic compound emissions and exhausts to stacks PP-E-10, 11 and 7.
- (f) One (1) lens surface coating booth, installed in 2006, using flowcoating application method, with a maximum throughput of 144 lenses per hour, identified as emission unit #13, with VOC controlled by one (1) regenerative thermal oxidizer, which exhausts to one (1) stack, identified as HC-05-01.
- (g) Two (2) Thermal Cure Spray Coating Booths, permitted in 2011, identified as Unit #14 and #25, using HVLP guns and dry filters as control, and exhausting to stacks TC1 and TC2.
- (h) One (1) Thermal Cure Spray Coating Booth, approved in 2014 for construction, identified as Unit #26, using HVLP guns, dry filters as control, and exhausting to stack AF4.
- (i) Five (5) Lean Lens Coaters, permitted in 2011, identified as Units #20 through #24, using dry filters and overspray collection baffles as control, and exhausting to stack LL1 through LL5.

Insignificant Activities:

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

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

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

D.1.1 Volatile Organic Compounds (VOC) BACT [326 IAC 8-1-6]

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

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

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

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

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

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

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

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

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

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

Pursuant 326 IAC 6-3-2(d), particulate from the spray booths (identified as units #3, #9, #10, #14 - #26 and base coat surface coating process) shall be controlled by dry filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications and control emissions from the spray booths (identified as units #3, #9, #10, #14 - #26, and base coat surface coating process) at all times when the spray booths are in operation.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(12)] [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC) Emissions

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

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

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

In order to demonstrate compliance with D.1.1 and D.1.2, the Permittee shall perform a test to verify the overall control efficiency of the thermal oxidizers, fan amperage and operating temperatures utilizing methods as approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

D.1.8 Thermal Oxidizer Temperature [40 CFR 64]

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizers for measuring operating temperature. For purposes of this condition, continuous mean no less often than once per fifteen (15) minutes. The output of this system shall be recorded as 3-hour averages.
- (b) The Permittee shall determine the 3-hour average temperature from the latest valid stack test that demonstrates compliance with limits in Condition D.1.7
- (c) On and after the date the stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature as observed during the compliant stack test.
- (d) If the 3-hour average temperature falls below the above mentioned 3-hour average temperature, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

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

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

D.1.10 Parametric Monitoring [40 CFR 64]

- (a) The Permittee shall determine the appropriate duct pressure or fan amperage from the latest valid stack test that demonstrates compliance with limits in Condition D.1.7.
- (b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in latest compliant stack test.
- (c) When, for any one reading, the duct pressure or fan amperage is outside the above mentioned range, the Permittee shall take a reasonable response. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A 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.

D.1.11 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks and from surface coating booths #14 - #26 while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.12 Record Keeping Requirements

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

D.1.13 Reporting Requirements

Quarterly summaries of the information to document the compliance status with Condition D.1.2 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting Requirements contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
 - (1) Six (6) natural gas fired boilers, listed as follows: [326 IAC 6-2-4]
 - (A) Three (3) 0.75 MMBtu/hr boilers, identified as 70926, 70877 and 70935, each constructed in 1994.
 - (B) Two (2) 3.21 MMBtu/hr boilers, identified as 23997 and 23914, each constructed in 1996.
 - (C) One (1) 0.63 MMBtu/hr boiler, identified as 507, constructed in 2005.
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations [326 IAC 6-3-2].
- (c) Manufacturing activities such as brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-3-2].
- (d) One baghouse controlling dust from the BMC press area [326 IAC 6-3-2].

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

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

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

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

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

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

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

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

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

Error! Bookmark not defined.**INDIANA DEPARTMENT OF ENVIRONMENTAL
MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
Fax: (317) 233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

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

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Error! Bookmark not defined. **INDIANA DEPARTMENT OF ENVIRONMENTAL
MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

Part 70 Quarterly Report

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

QUARTER :

YEAR:

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

No deviation occurred in this quarter.

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

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

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

Part 70 Quarterly Report

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

QUARTER :

YEAR:

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

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

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

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

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

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

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

Page 1 of 2

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

Page 2 of 2

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 Minor Source and Minor
Permit Modification**

Source Description and Location

Source Name:	Valeo Lighting System North America, LLC
Source Location:	1231 Avenue A North, Seymour, IN 47274
County:	Jackson
SIC Code:	3647
Operation Permit No.:	T071-31066-00006
Operation Permit Issuance Date:	February 01, 2012
Minor Source Modification No.:	071-34124-00006
Significant Permit Modification No.:	071-34173-00006
Permit Reviewer:	Julie Alexander

Existing Approvals

The source was issued Part 70 Operating Permit No. T071-31066-00006 on February 01, 2012. The source has since received the following approvals:

- (a) Minor Source Modification No. 071-34124-00006, issued on February 13, 2014.

County Attainment Status

The source is located in Jackson County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹
PM _{2.5}	Unclassifiable or attainment effective April 5, 2005, for the annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	

- (a) **Ozone Standards**
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Jackson County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
Jackson County has been classified as attainment for PM_{2.5}. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5}

emissions. These rules became effective on July 15, 2008. On May 4, 2011, the air pollution control board issued an emergency rule establishing the direct PM_{2.5} significant level at ten (10) tons per year. This rule became effective June 28, 2011. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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

Fugitive Emissions

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

Source Status

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	Emissions (ton/yr)
PM	Less than 100
PM10	Less than 100
PM2.5	Less than 100
SO2	Less than 100
VOC	Greater than 100, Less than 250
CO	Less than 100
NOX	Less than 100
GHGs as CO ₂ e	Less than 100,000
Single HAP	Less than 10
Total HAP	Less than 25

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated pollutant, excluding GHGs, is emitted at a rate of two hundred fifty (250) tons per year or more, emissions of GHGs are less than one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (d) This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).
- (c) These emissions are based upon Part 70 Operating Permit No. T071-31066-00006.

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Valeo Lighting System North America, LLC (formerly known as Valeo Sylvania) on January 29, 2014, relating to the addition of an additional thermal cure spray coating booth. The following is the proposed emission unit and pollution control device:

- (a) One (1) Thermal Cure Spray Coating Booth, approved in 2014 for construction, identified as Unit #26, using HVLP guns and dry filters as control, and exhausting to stack AF4.

Additionally, the source has requested a name change from Valeo Sylvania to Valeo Lighting System North America, LLC.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
AF4	Thermal Cure Spray Coating Booth	40.00	24.00	6000.00	72.0

Emission Calculations

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

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.

Increase in PTE Before Controls of the Modification	
Pollutant	Potential To Emit (ton/yr)
PM	0.66
PM ₁₀	0.66
PM _{2.5}	0.66
SO ₂	0.00
VOC	18.41
CO	0.00
NO _x	0.00
Xylene	0.00
Styrene	0.00
Methanol	1.02
Toluene	0.00
Total HAPs	1.02

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

Pursuant to 326 IAC 2-7-10.5(e)(1)(B)(iii), this modification requires a Minor Source Modification because the PTE for the project is "less than twenty-five (25) tons per year and equal to or great than ten (10) tons per year of" VOC. Additionally, the modification will be incorporated into the

Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d)(1), because there will be a "significant change to the existing monitoring Part 70 permit terms".

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 source and permit modification, 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 (ton/yr)							
	PM	PM ₁₀	PM _{2.5} *	SO ₂	VOC	CO	NO _x	GHGs
Thermal Cure Spray Coat (Unit 26)	0.07	0.07	0.07	-	18.41	-	-	-
Total for Modification	0.07	0.07	0.07	-	18.41	-	-	-
Significant Level	25	15	10	40	40	100	40	75,000 CO ₂ e

*PM_{2.5} listed is direct PM_{2.5}.

This modification to an existing minor stationary source is not major because the emissions increase is less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Potential to Emit After Issuance

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance (tons/year)										
	PM	PM ₁₀	PM _{2.5} *	SO ₂	NO _x	VOC	CO	GHGs 11/29/2013	GHGs 10/30/2009	Toluene	Total HAPs
Unit 3	11.21	11.21	11.21	-	-	10.60	-	-	-	5.38	5.57
Unit 6	-	-	-	-	-	47.43	-	-	-	-	-
Unit 9	54.39	54.39	54.39	-	-	6.34	-	-	-	-	-
Unit 10	0.07	0.07	0.07	-	-	18.41	-	-	-	-	1.02
Unit 13	-	-	-	-	-	3.02	-	-	-	-	-
Unit 14	0.07	0.07	0.07	-	-	18.41	-	-	-	-	1.02
Unit 25	0.07	0.07	0.07	-	-	18.41	-	-	-	-	1.02
Unit 26	0.07	0.07	0.07	-	-	18.41	-	-	-	-	1.02
Lean Reflector Booths (5 Units)	0.16	0.16	0.16	-	-	1.11	-	-	-	-	-
Lean Lens (5 Units)	2.25	2.25	2.25	-	-	24.31	-	-	-	-	-

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance (tons/year)										
	PM	PM ₁₀	PM _{2.5} *	SO ₂	NO _x	VOC	CO	GHGs 11/29/2013	GHGs 10/30/2009	Toluene	Total HAPs
Closed Molding Ops.	-	-	-	-	-	1.75	-	-	-	-	1.75
Natural gas combustion	0.76	3.02	3.02	0.24	39.78	2.19	33.41	48,015	48,022	1.35E-03	0.75
Total PTE of Entire Source	69.03	71.30	71.30	0.24	39.78	170.36	33.41	48,015	48,022	5.39	12.15
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000 CO ₂ e	100,000 CO ₂ e	10	25
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000 CO ₂ e	100,000 CO ₂ e	NA	NA
*PM _{2.5} listed is direct PM _{2.5} .											

Federal Rule Applicability Determination

The following federal rules are applicable to the source due to this modification:

NSPS:

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

NESHAP:

- (b) This source is not subject to the requirements of National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks (40 CFR Part 63.3080, Subpart IIII) because it does not coat automobiles, light-duty trucks or their body parts.
- (c) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63.3880, Subpart MMMM) because the potential to emit of any single HAP at this source is less than ten (10) tons per year and the potential to emit the combination of all HAPs is less than twenty-five (25) tons per year. 40 CFR Part 63, Subpart MMMM only applies to Major Sources of HAPs.
- (d) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products (40 CFR Part 63, Subpart PPPP) because the potential to emit of any single HAP at this source is less than ten (10) tons per year and the potential to emit the combination of all HAPs is less than twenty-five (25) tons per year. 40 CFR Part 63, Subpart PPPP only applies to Major Sources of HAPs.
- (e) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40 CFR 63, Subpart HHHHHH) because the source does not have any paint stripping operations or autobody refinishing operations, and does not use coating containing chromium, lead, manganese, nickel or cadmium. This subpart is only subject to these activities.
- (f) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) applicable to this proposed modification.

CAM

(g) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:

- (1) has a potential to emit before controls equal to or greater than the Part 70 major source threshold for the pollutant involved;
- (2) is subject to an emission limitation or standard for that pollutant; and
- (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

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

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)
Thermal Cure Spray Coat - Unit 26	Dry Filters	Y	< 100	< 100	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the new units as part of this modification.

State Rule Applicability Determination

The following state rules are applicable to the source due to the modification:

326 IAC 2-2 (PSD)

PSD applicability is discussed under the Permit Level Determination – PSD section.

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

The operation of all new and modified units 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 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2(d), particulate from the Thermal Cure Spray Coat - Unit 26 shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer’s specifications.

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

The Thermal Cure Spray Coat - Unit 26 is not regulated by any article 8 rules, but the potential emissions of VOCs is less than 25 tons/year, therefore 326 IAC 8-1-6 does not apply.

326 IAC 8-2-2 (Automobile and light duty truck coating operations)

The Thermal Cure Spray Coat - Unit 26 will emit more than 15 pounds of VOC per day before add-on controls, but it will be coating plastic parts for automobiles, not the whole automobile. Therefore 326 IAC 8-2-2 does not apply.

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

The source is located in Jackson County; therefore 326 IAC 8-2-9 applies to any operation that involves coating metal parts. Since Unit 26 is coating only plastic parts and not metal, the requirements of 326 IAC 8-2-9 are not applicable.

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 Determination Requirements because of this modification. The new compliance monitoring requirements applicable due to this modification are as follows:

Particulate Monitoring

- (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks and from surface coating booths #26 while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps to correct the condition.
- (2) 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.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T071-31066-00006. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

Changes Affecting Conditions Throughout the Permit

- (a) *Multiple Conditions - Responsible Official*
On November 3, 2011, the Indiana Air Pollution Control Board issued a revision to 326 IAC 2. The revision resulted in a change to the rule cite of the "responsible official" definition.
- (b) *Multiple Conditions - Rule Cite*
On October 27, 2010, the Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These revisions resulted in changes to the rule citations listed in the permit. These changes are not changes to the underlining provisions. The change is only to cite of these rules in Section A - General Information, Section A - Emission Units and Pollution Control Equipment Summary, Section A - Specifically Regulated Insignificant Activities,

Section B - Preventative Maintenance Plan, Section B - Emergency Provisions, Section B - Operational Flexibility, Section C - Risk Management Plan, the Facility Descriptions, and Section D - Preventative Maintenance Plan.

- (c) *Multiple Conditions - Company Name Change*
The company name has been changed from Valeo Sylvania to Valeo Lighting System North America, LLC.

Pervious Source Name: ~~Valeo Sylvania~~
New Source Name: **Valeo Lighting System North America, LLC**

- (d) *Multiple Conditions - Typographical Errors, Language Clarification*
Throughout the permit, typographical and grammatical errors have been corrected. Additionally, changes to language for clarification or to align with the current preferred permit language conventions have been made.

Changes Specific to Section A of the Permit

- (a) Condition A.2 has been updated to include the new emission unit, Unit #26.

SECTION A SOURCE SUMMARY

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

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

A.2 Emission Units and Pollution Control Equipment Summary

[326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(~~14~~14)]

- (h) **One (1) Thermal Cure Spray Coating Booth, approved in 2014 for construction, identified as Unit #26, using HVLP guns, dry filters as control, and exhausting to stack AF4.**

- (hi) Five (5) Lean Lens Coaters, permitted in 2011, identified as Units #20 through #24, using dry filters and overspray collection baffles as control, and exhausting to stack LL1 through LL5.

A.3 Specifically Regulated Insignificant Activities

[326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(~~14~~14)]

Changes Specific to Section B and C of the Permit

- (a) *Section C - Compliance Monitoring*
IDEM is changing the Section C - Compliance Monitoring Condition to clearly describe when new monitoring for new and existing units must begin.
- (b) *Section C - Instrument Specifications*
IDEM has clarified Section C - Instrument Specifications to indicate that the analog instrument must be capable of measuring the parameters outside the normal range.
- (c) *Section C - General Record Keeping Requirements*
IDEM, OAQ has decided to clarify the Permittee's responsibility under CAM
- (d) *Section C - General Reporting Requirements*
IDEM, OAQ has decided to clarify the Permittee's responsibility in this condition.

SECTION B GENERAL CONDITIONS

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(~~3435~~), and

(b) ***

(c) A "responsible official" is defined at 326 IAC 2-7-1(~~3435~~).

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

(c) ***

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(~~3435~~).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (612)][326 IAC 1-6-3]

(b) ****

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(~~3435~~).

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(~~3435~~).

(d) ***

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

(b) ***

(5) ***

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(~~3435~~).

(c) ***

(d) ***

(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)(98) be revised in response to an emergency.

(f) ***

(g) ***

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(3435).

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(4042). 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(3435).

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

(b) ***
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(3435).

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

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

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

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2c)(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(~~3637~~)) 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:

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(~~3435~~).

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

- (b) ***

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(~~3435~~).

SECTION C SOURCE OPERATION CONDITIONS

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

- (d) ***

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(~~3435~~).

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

- (a) ***

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(~~3435~~).

- (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(~~3435~~).

- (c) ***

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

(a) **For new units:**
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

(b) **For existing units:**
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 start-up, whichever is later~~, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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(3435).

~~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. **The analog instrument shall be capable of measuring values outside of the normal range.**

(b) ***

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

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34-35).

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]

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(3233) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

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(3435).

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, where applicable:**

- (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, where applicable:

- (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.

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(3435). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

Changes Specific to Section D of the Permit

- (a) Section D.1 has been updated to include the Unit #26.
- (b) IDEM, OAQ has decided to clarify Section D - Parametric Monitoring, Section D - Testing Requirements, and Section D - Thermal Oxidizer Temperature.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(h) **One (1) Thermal Cure Spray Coating Booth, approved in 2014 for construction, identified as Unit #26, using HVLP guns, dry filters as control, and exhausting to stack AF4.**

(hi) Five (5) Lean Lens Coaters, permitted in 2011, identified as Units #20 through #24, using dry filters and overspray collection baffles as control, and exhausting to stack LL1 through LL5.

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

Pursuant 326 IAC 6-3-2(d), particulate from the spray booths (identified as units #3, #9, #10, #14 - ~~#2526~~ and base coat surface coating process) shall be controlled by dry filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications and control emissions from the spray booths (identified as units #3, #9, #10, **#14 - #26**, and base coat surface coating process) at all times when the spray booths are in operation.

D.1.5 Preventive Maintenance Plan [~~326 IAC 2-7-5(13)]~~**[326 IAC 2-7-5(12)] [326 IAC 1-6-3]**

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

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

In order to demonstrate ~~the compliance status~~ with D.1.1 and D.1.2, the Permittee shall **perform** ~~conduct a performance~~ a test to verify the overall control efficiency of the thermal oxidizers, fan amperage and operating temperatures utilizing methods as approved by the Commissioner at least once every five **(5)** years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

D.1.8 Thermal Oxidizer Temperature [40 CFR 64]

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizers for measuring operating temperature. For purposes of this condition, continuous ~~shall mean~~ **no less often than once per fifteen (15) minutes.** ~~temperature measurement no less than once every fifteen (15) minutes.~~ The output of this system shall be recorded as 3-hour ~~block~~ averages.
- (b) The Permittee shall **determine the 3-hour average temperature from the latest valid stack test that demonstrates compliance with limits in Condition D.1.7** ~~operate the thermal oxidizers at or above the 3-hour average temperature established during the most recent valid stack test. When a temperature is outside the normal ranges listed above or ranges established during the latest stack test, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.~~
- (~~b~~c) On and after the date the ~~approved~~ stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature as observed during the compliant stack test.
- (d) **If the 3-hour average temperature falls below the above mentioned 3-hour average temperature, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.**

D.1.10 Parametric Monitoring [40 CFR 64]

- (a) **The Permittee shall determine the appropriate duct pressure or fan amperage from the latest valid stack test that demonstrates compliance with limits in Condition D.1.7.**
- (b) **The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in latest compliant stack test.**

- (c) **When, for any one reading, the duct pressure or fan amperage is outside the above mentioned range, the Permittee shall take a reasonable response. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A 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.**

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

D.1.11 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks and from surface coating booths #14 - #2526 while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
- (b) ***

D.1.13 Reporting Requirements

Quarterly summaries of the information to document the compliance status with Conditions D.1.2 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting Requirements contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(345).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Emission Unit Description: Insignificant Activities
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QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B -Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C-General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".
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Conclusion and Recommendation

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 071-34124-00006 and Significant Permit Modification No. 071-34173-00006. The staff recommend to the Commissioner that this Part 70 Minor Source and Significant Permit Modification be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Julie Alexander 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) 233-1782 or toll free at 1-800-451-6027 extension 3-1782.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

**Appendix A: Emission Calculations
PTE Summary**

Company Name: Valeo Lighting System North America, LLC
Address City IN Zip: 1231 A Avenue North, Seymour, IN 47274
Minor Source Modification: 071-34124-00006
Significant Permit Modification: 071-34173-00006
Reviewer: Julie Alexander
Date: February 3, 2014

Uncontrolled Potential to Emit (tons/yr)									
Emission Unit	PM	PM10	PM2.5 *	SO ₂	NOx	VOC	CO	CO ₂ e 11/29/2013	CO ₂ e 10/30/2009
Unit 3	11.21	11.21	11.21	-	-	10.60	-	-	-
Unit 6	-	-	-	-	-	948.54	-	-	-
Unit 9	54.39	54.39	54.39	-	-	6.34	-	-	-
Unit 10	0.66	0.66	0.66	-	-	18.41	-	-	-
Unit 13	-	-	-	-	-	60.41	-	-	-
Unit 14	0.66	0.66	0.66	-	-	18.41	-	-	-
Unit 25	0.66	0.66	0.66	-	-	18.41	-	-	-
Unit 26	0.66	0.66	0.66	-	-	18.41	-	-	-
Lean Reflector Booths (5 Units)	1.56	1.56	1.56	-	-	1.11	-	-	-
Lean Lens (5 Units)	22.55	22.55	22.55	-	-	24.31	-	-	-
Closed Molding Ops.	-	-	-	-	-	1.75	-	-	-
Natural gas combustion	0.76	3.02	3.02	0.24	39.78	2.19	33.41	48,015	48,022
Total	93.11	95.38	95.38	0.24	39.78	1,110.45	33.41	48,015	48,022

* PM2.5 listed is direct PM2.5

Potential to Emit after Control (tons/yr)									
Emission Unit	PM	PM10	PM2.5 *	SO ₂	NOx	VOC	CO	CO ₂ e 11/29/2013	CO ₂ e 10/30/2009
Unit 3	11.21	11.21	11.21	-	-	10.60	-	-	-
Unit 6	-	-	-	-	-	47.43	-	-	-
Unit 9	54.39	54.39	54.39	-	-	6.34	-	-	-
Unit 10	0.07	0.07	0.07	-	-	18.41	-	-	-
Unit 13	-	-	-	-	-	3.02	-	-	-
Unit 14	0.07	0.07	0.07	-	-	18.41	-	-	-
Unit 25	0.07	0.07	0.07	-	-	18.41	-	-	-
Unit 26	0.07	0.07	0.07	-	-	18.41	-	-	-
Lean Reflector Booths (5 Units)	0.16	0.16	0.16	-	-	1.11	-	-	-
Lean Lens (5 Units)	2.25	2.25	2.25	-	-	24.31	-	-	-
Closed Molding Ops.	-	-	-	-	-	1.75	-	-	-
Natural gas combustion	0.76	3.02	3.02	0.24	39.78	2.19	33.41	48,015	48,022
Total	69.03	71.30	71.30	0.24	39.78	170.36	33.41	48,015	48,022

* PM2.5 listed is direct PM2.5

Potential to Emit after Issuance (tons/yr)									
Emission Unit	PM	PM10	PM2.5 *	SO ₂	NOx	VOC	CO	CO ₂ e 11/29/2013	CO ₂ e 10/30/2009
Unit 3	11.21	11.21	11.21	-	-	10.60	-	-	-
Unit 6	-	-	-	-	-	47.43	-	-	-
Unit 9	54.39	54.39	54.39	-	-	6.34	-	-	-
Unit 10	0.07	0.07	0.07	-	-	18.41	-	-	-
Unit 13	-	-	-	-	-	3.02	-	-	-
Unit 14	0.07	0.07	0.07	-	-	18.41	-	-	-
Unit 25	0.07	0.07	0.07	-	-	18.41	-	-	-
Unit 26	0.07	0.07	0.07	-	-	18.41	-	-	-
Lean Reflector Booths (5 Units)	0.16	0.16	0.16	-	-	1.11	-	-	-
Lean Lens (5 Units)	2.25	2.25	2.25	-	-	24.31	-	-	-
Closed Molding Ops.	-	-	-	-	-	1.75	-	-	-
Natural gas combustion	0.76	3.02	3.02	0.24	39.78	2.19	33.41	48,015	48,022
Total	69.03	71.30	71.30	0.24	39.78	170.36	33.41	48,015	48,022

* PM2.5 listed is direct PM2.5

**Appendix A: Emission Calculations
HAPs Summary**

Company Name: Valeo Lighting System North America, LLC
Address City IN Zip: 1231 A Avenue North, Seymour, IN 47274
Minor Source Modification: 071-34124-00006
Significant Permit Modification: 071-34173-00006
Reviewer: Julie Alexander
Date: February 3, 2014

Uncontrolled Potential to Emit (tons/yr)														
Emission Unit	Xylene	Toluene	Styrene	Methanol	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Lead	Cadmium	Chromium	Manganese	Nickel	Total HAPs
Unit 3	0.19	5.38	-	-	-	-	-	-	-	-	-	-	-	5.57
Unit 10	-	-	-	1.02	-	-	-	-	-	-	-	-	-	1.02
Unit 14	-	-	-	1.02	-	-	-	-	-	-	-	-	-	1.02
Unit 25	-	-	-	1.02	-	-	-	-	-	-	-	-	-	1.02
Unit 26	-	-	-	1.02	-	-	-	-	-	-	-	-	-	1.02
Closed Molding Ops.	-	-	1.75	-	-	-	-	-	-	-	-	-	-	1.75
Natural gas combustion	-	1.35E-03	-	-	8.35E-04	4.77E-04	2.98E-02	7.16E-01	1.99E-04	4.38E-04	5.57E-04	1.51E-04	8.35E-04	0.75
Total	1.88E-01	5.39	1.75	4.08	8.35E-04	4.77E-04	2.98E-02	7.16E-01	1.99E-04	4.38E-04	5.57E-04	1.51E-04	8.35E-04	12.15

Potential to Emit after Issuance (tons/yr)														
Emission Unit	Xylene	Toluene	Styrene	Methanol	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Lead	Cadmium	Chromium	Manganese	Nickel	Total HAPs
Unit 3	0.19	5.38	-	-	-	-	-	-	-	-	-	-	-	5.57
Unit 10	-	-	-	1.02	-	-	-	-	-	-	-	-	-	1.02
Unit 14	-	-	-	1.02	-	-	-	-	-	-	-	-	-	1.02
Unit 25	-	-	-	1.02	-	-	-	-	-	-	-	-	-	1.02
Unit 26	-	-	-	1.02	-	-	-	-	-	-	-	-	-	1.02
Closed Molding Ops.	-	-	1.75	-	-	-	-	-	-	-	-	-	-	1.75
Natural gas combustion	-	1.35E-03	-	-	8.35E-04	4.77E-04	2.98E-02	7.16E-01	1.99E-04	4.38E-04	5.57E-04	1.51E-04	8.35E-04	0.75
Total	1.88E-01	5.39	1.75	4.08	8.35E-04	4.77E-04	2.98E-02	7.16E-01	1.99E-04	4.38E-04	5.57E-04	1.51E-04	8.35E-04	12.15

Appendix A: Emissions Calculations
Emissions from Unit 26

Company Name: Valeo Lighting System North America, LLC
Address City IN Zip: 1231 A Avenue North, Seymour, IN 47274
Minor Source Modification: 071-34124-00006
Significant Permit Modification: 071-34173-00006
Reviewer: Julie Alexander
Date: February 3, 2014

Process	Emission Unit	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	CO ₂ e	CO ₂ e	Toluene	Methanol	HAPs
		(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	11/29/2013 (ton/yr)	10/30/2009 (ton/yr)	(ton/yr)	(ton/yr)
Thermal Cure Spray Coat	Unit 26	0.66	0.66	0.66	-	-	18.41	-	-	-	-	1.02	1.02
Total		0.66	0.66	0.66	0.00	0.00	18.41	0.00	0	0	0.00	1.02	1.02

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

Company Name: Valeo Lighting System North America, LLC
Address City IN Zip: 1231 A Avenue North, Seymour, IN 47274
Minor Source Modification: 071-34124-00006
Significant Permit Modification: 071-34173-00006
Reviewer: Julie Alexander
Date: February 3, 2014

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Unit 3														
Wabash Black	8.45	58.90%	0.0%	58.9%	0.0%	41.10%	1.30E-03	100	4.98	4.98	2.83	1.78	12.11	10%
Argent Paint 303LE21326H	8.54	59.04%	0.0%	59.0%	0.0%	30.62%	4.80E-03	100	5.04	5.04	10.60	11.21	16.46	10%
Hardener LE9425B	8.05	59.01%	0.0%	59.0%	0.0%	35.00%	3.80E-04	100	4.75	4.75	0.79	0.49	13.57	10%
Acetone	6.60	0.00%	0.0%	0.0%	0.0%	0.00%	4.80E-03	100	0.00	0.00	0.00	N/A	N/A	N/A
Total											10.60	11.21		
Unit 6														
UVB63R2VS	8.79	35.03%	0.0%	35.0%	0.0%	57.93%	2.20E-02	1440	3.08	3.08	427.14	0.00	5.31	100%
butyl acetate	7.52	100.00%	0.0%	100.0%	0.0%	0.00%	1.10E-02	1440	7.52	7.52	521.40	0.00	N/A	100%
Total											948.54	0.00		
326 IAC 8-1-6 Limit											47.43	-		
Unit 9														
UVT2000V1	7.70	9.50%	0.0%	9.5%	0.0%	32.09%	2.75E-03	720	0.73	0.73	6.34	54.39	2.28	10%
acetone	6.60	0.00%	0.0%	0.0%	0.0%	0.00%	2.75E-03	720	0.00	0.00	0.00	N/A	N/A	N/A
Total											6.34	54.39		
Unit 13														
UV SRC Topcoat	7.35	68.73%	0.0%	68.7%	0.0%	23.86%	2.00E-03	144	5.05	5.05	6.37	0.00	21.17	100%
Isopropyl Alcohol	6.59	100.00%	0.0%	100.0%	0.0%	0.00%	1.30E-02	144	6.59	6.59	54.03	N/A	N/A	N/A
Total											60.41	0.00		
326 IAC 8-1-6 Limit											3.02	-		

METHODOLOGY

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

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

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

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

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

Total = Worst Coating + Sum of all solvents used

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

Company Name: Valeo Lighting System North America, LLC
Address City IN Zip: 1231 A Avenue North, Seymour, IN 47274
Minor Source Modification: 071-34124-00006
Significant Permit Modification: 071-34173-00006
Reviewer: Julie Alexander
Date: February 3, 2014

Material	Density (lbs/gal)	Max. Coated Surface (in ²)	Dry Film Thickness (microns)	Dry Vol. on part (gal)	% volatile by volume	Weight % Solids	Wet volume on part (gal)	Transfer Efficiency (%)	Gallons Sprayed per part	Cycle Time (sec/part)	Production Rate (part/hr)	gal. sprayed per hr.	*VOC lb / gal	Potential VOC (ton/yr)	PTE of PM/PM ₁₀ /PM _{2.5} (tons/yr)	Control Efficiency (%)	Controlled PM/PM ₁₀ /PM _{2.5} (tons/yr)	
Lean Reflector Coaters - Red Spot UVB325 UV Basecoating Material																		
Unit 15	9.41	223	35.00	1.33E-03	0%	7%	1.33E-03	65%	2.05E-03	25.00	144.00	0.30	0.02	0.03	0.31	90%	0.03	
Unit 16	9.41	223	35.00	1.33E-03	0%	7%	1.33E-03	65%	2.05E-03	25.00	144.00	0.30	0.02	0.03	0.31	90%	0.03	
Unit 17	9.41	223	35.00	1.33E-03	0%	7%	1.33E-03	65%	2.05E-03	25.00	144.00	0.30	0.02	0.03	0.31	90%	0.03	
Unit 18	9.41	223	35.00	1.33E-03	0%	7%	1.33E-03	65%	2.05E-03	25.00	144.00	0.30	0.02	0.03	0.31	90%	0.03	
Unit 19	9.41	223	35.00	1.33E-03	0%	7%	1.33E-03	65%	2.05E-03	25.00	144.00	0.30	0.02	0.03	0.31	90%	0.03	
Total														0.14	1.56		0.16	
Lean Reflector Coaters - BASF QN11-0117 UVGloss Primer for BMC																		
Unit 15	9.41	223	25.00	9.50E-04	2%	7%	9.70E-04	65%	1.49E-03	25.00	144.00	0.21	0.24	0.22	0.23	90%	0.02	
Unit 16	9.41	223	25.00	9.50E-04	2%	7%	9.70E-04	65%	1.49E-03	25.00	144.00	0.21	0.24	0.22	0.23	90%	0.02	
Unit 17	9.41	223	25.00	9.50E-04	2%	7%	9.70E-04	65%	1.49E-03	25.00	144.00	0.21	0.24	0.22	0.23	90%	0.02	
Unit 18	9.41	223	25.00	9.50E-04	2%	7%	9.70E-04	65%	1.49E-03	25.00	144.00	0.21	0.24	0.22	0.23	90%	0.02	
Unit 19	9.41	223	25.00	9.50E-04	2%	7%	9.70E-04	65%	1.49E-03	25.00	144.00	0.21	0.24	0.22	0.23	90%	0.02	
Total														1.11	1.13		0.11	
Total for Units 15-19:														1.11	1.56		0.16	
Lean Lens Coaters																		
Unit 20	7.66	450	10.00	7.67E-04	64%	44%	2.11E-03	50%	4.21E-03	25.00	144.00	0.61	1.83	4.86	4.51	90%	0.45	
Unit 21	7.66	450	10.00	7.67E-04	64%	44%	2.11E-03	50%	4.21E-03	25.00	144.00	0.61	1.83	4.86	4.51	90%	0.45	
Unit 22	7.66	450	10.00	7.67E-04	64%	44%	2.11E-03	50%	4.21E-03	25.00	144.00	0.61	1.83	4.86	4.51	90%	0.45	
Unit 23	7.66	450	10.00	7.67E-04	64%	44%	2.11E-03	50%	4.21E-03	25.00	144.00	0.61	1.83	4.86	4.51	90%	0.45	
Unit 24	7.66	450	10.00	7.67E-04	64%	44%	2.11E-03	50%	4.21E-03	25.00	144.00	0.61	1.83	4.86	4.51	90%	0.45	
Total for Units 20-24:														24.31	22.55		2.25	

METHODOLOGY

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

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

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

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

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

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

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

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

Company Name: Valeo Lighting System North America, LLC
Address City IN Zip: 1231 A Avenue North, Seymour, IN 47274
Minor Source Modification: 071-34124-00006
Significant Permit Modification: 071-34173-00006
Reviewer: Julie Alexander
Date: February 3, 2014

Emission unit	Density (lbs/gal)	Max. Coated Surface (in ²)	Dry Film Thickness (microns)	Dry Vol. on part (gal)	% volatile by volume	Weight % Solids	Wet volume on part (gal)	Transfer Efficiency (%)	Gallons Sprayed per part	Cycle Time (sec/part)	Production Rate (part/hr)	gal. sprayed per hr.	*VOC lb / gal	Potential VOC (ton/yr)	PTE of PM/PM ₁₀ /PM _{2.5} (tons/yr)	Control Efficiency (%)	Controlled PM/PM ₁₀ /PM _{2.5} (tons/yr)
Unit 14	7.15	350	3.25	1.94E-04	93%	9%	2.94E-03	65%	4.52E-03	25.00	144.00	0.65	6.46	18.41	0.66	90%	0.07
Unit 25	7.15	350	3.25	1.94E-04	93%	9%	2.94E-03	65%	4.52E-03	25.00	144.00	0.65	6.46	18.41	0.66	90%	0.07
Unit 26	7.15	350	3.25	1.94E-04	93%	9%	2.94E-03	65%	4.52E-03	25.00	144.00	0.65	6.46	18.41	0.66	90%	0.07
Unit 10	7.15	350	3.25	1.94E-04	93%	9%	2.94E-03	65%	4.52E-03	25.00	144.00	0.65	6.46	18.41	0.66	90%	0.07

METHODOLOGY

Dry Volume on part (gal) = Max coated surface area (sq. in) * dry film thickness (micron) * 1in/25400 micron * 1 gal / 231 cubic inch
Wet Volume on part (gal) = dry volume on part (gal) / (1-% volatile by volume)
Gallons sprayed per part (gal/part) = wet volume per part (gal) / transfer efficiency
*Maximum, from product data sheet, UVB325 Series, 3/23/2009
*VOC EF (lb/gal) = coating QN11-0117 density 9.405 lb/gal * solvent n-butyl acetate 2.5 wt%
Potential VOC (ton/yr) = VOC (lb/gal) * gal sprayed per hr * 8760/2000
Potential PM (ton/yr) = Density (lb/gal) * Weight % Solid * Gallons sprayed per part (gal/part) * Production Rate (part/hr) * (1-Transfer Eff.) * 8760/2000

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

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

Company Name: Valeo Lighting System North America, LLC
Address City IN Zip: 1231 A Avenue North, Seymour, IN 47274
Minor Source Modification: 071-34124-00006
Significant Permit Modification: 071-34173-00006
Reviewer: Julie Alexander
Date: February 3, 2014

Material	Density (lb/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Styrene	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Styrene Emissions (ton/yr)	Methanol Emissions (ton/yr)	Total HAPs (ton/yr)
Unit 3												
Wabash Black	8.45	1.30E-03	100	0%	15%	0%	0%	0.00	0.72	0.00	0.00	0.72
Argent Paint 303LE21326H	8.54	4.80E-03	200	0%	15%	0%	0%	0.00	5.38	0.00	0.00	5.38
Hardener LE9425B	8.05	3.80E-04	200	7%	0%	0%	0%	0.19	0.00	0.00	0.00	0.19
Total								0.19	5.38	0.00	0.00	5.38
Unit 10												
Thermal Cure Spray Coat	7.15	4.52E-03	144	0%	0%	0%	5%	0.00	0.00	0.00	1.02	1.02
Unit 14												
Thermal Cure Spray Coat	7.15	4.52E-03	144	0%	0%	0%	5%	0.00	0.00	0.00	1.02	1.02
Unit 25												
Thermal Cure Spray Coat	7.15	4.52E-03	144	0%	0%	0%	5%	0.00	0.00	0.00	1.02	1.02
Unit 26												
Thermal Cure Spray Coat	7.15	4.52E-03	144	0%	0%	0%	5%	0.00	0.00	0.00	1.02	1.02

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
 Coating used in Unit 6, 9, 13, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24 contains no HAPs.

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

Company Name: Valeo Lighting System North America, LLC
Address City IN Zip: 1231 A Avenue North, Seymour, IN 47274
Minor Source Modification: 071-34124-00006
Significant Permit Modification: 071-34173-00006
Reviewer: Julie Alexander
Date: February 3, 2014

BMC Press #	PRODUCT	TYPE	V [cm ³]	sg [g/cm ³]	BOM [lb]	BOM as of 4/8/03	Cycle Time [sec]	Refl per year	lbs molded per year		% Styrene in BMC	Max tons of Styrene Input	Max tons of Styrene Emitted
27	2003 CLIO	H/L	156.00	1.84	0.63	0.68	53.00	1,190,037.74	812,795.77	BMC1	11%	45.52	0.46
28	GMX 320	H/L	248.00	1.90	1.04	1.00	81.00	778,666.67	774,773.33	BMC1	11%	43.39	0.43
29	03 ST22 Chrysler	H/L	327.00	1.90	1.37	1.30	65.00	970,338.46	1,256,588.31	REC T70	4%	23.25	0.23
39	05 WK	H/L (BUX-RHD)	265.96	1.84	1.08	1.08	60.00	1,051,200.00	1,132,878.24	REC T70	4%	20.96	0.21
40	05 WK	H/L (BUX-LHD)	265.96	1.84	1.08	1.08	60.00	1,051,200.00	1,132,878.24	REC T70	4%	20.96	0.21
44	05 WK	H/L (DOM.)	265.96	1.84	1.08	1.08	60.00	1,051,200.00	1,132,878.24	REC T70	4%	20.96	0.21
									6242792.13			Total:	1.75
									712.65 tons/yr				

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

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

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

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

500 ton presses

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MMBTU/HR >100**

Company Name: Valeo Lighting System North America, LLC
Address City IN Zip: 1231 A Avenue North, Seymour, IN 47274
Minor Source Modification: 071-34124-00006
Significant Permit Modification: 071-34173-00006
Reviewer: Julie Alexander
Date: February 3, 2014

Unit	Number of Units	Total MMBtu/hr		
70926, 70877 & 70935	3	2.25		
23997 & 23914	2	6.42		
507	1	0.63		
HVAC units	17	3.20		
AMU units	18	50.00		
miscellaneous heaters	17	29.79	HHV mmBtu	Potential Throughput
Thermal Oxidizer	2	0.34	mmscf	MMCF/yr
Total Heat Input Capacity		92.63	1020	795.53

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	0.76	3.02	3.02	0.24	39.78	2.19	33.41

*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					Total - Organics
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	8.353E-04	4.773E-04	2.983E-02	7.160E-01	1.352E-03	7.485E-01

Emission Factor in lb/MMcf	HAPs - Metals					Total - Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	1.989E-04	4.375E-04	5.569E-04	1.512E-04	8.353E-04	2.180E-03

Total HAPs	7.507E-01
Worst HAP	7.160E-01

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	47,732	0.9	0.9
Summed Potential Emissions in tons/yr	47,733		
CO2e Total in tons/yr based on 11/29/2013 federal GWPs	48,015		
CO2e Total in tons/yr based on 10/30/2009 federal GWPs	48,022		

Methodology

All emission factors are based on normal firing.

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

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

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

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

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

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

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Molly Harden
Valeo Lighting Systems North America, LLC
1231 Avenue A North
Seymour, IN 47274

DATE: March 11, 2014

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

SUBJECT: Final Decision
Minor Source Modification to a Part 70 Operating Permit
071-34124-00006

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

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

A copy of the final decision and supporting materials has also been sent via standard mail to:
Stephanie Prince, General Manager
Lynn Vo, Bruce Carter and Associations
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 6/13/2013

Mail Code 61-53

IDEM Staff	VHAUN 3/11/2014 Valeo Lighting Systems North America LLC 071-34124-00006 FINAL		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

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1		Molly Harden Valeo Lighting Systems North America LLC 1231 Avenue A North Seymour IN 47274 (Source CAATS) Confirmed Delivery										
2		Stephanie Prince General Manager Valeo Lighting Systems North America LLC 1231 Avenue A North Seymour IN 47274 (RO CAATS)										
3		Jackson County Commissioner Jackson County Courthouse Brownstown IN 47220 (Local Official)										
4		Mr. Tome Earnhart 3960 N. CR 300 W. North Vernon IN 47265 (Affected Party)										
5		Seymour City Council and Mayors Office 301 North Chestnut Street Seymour IN 47274 (Local Official)										
6		Jackson County Health Department 801 West 2nd Street Seymour IN 47274-2711 (Health Department)										
7		Lynn Vo Bruce Carter And Associates 616 South 4th Street Elkhart IN 46514 (Consultant)										
8												
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