



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

To: Interested Parties

Date: January 23, 2015

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

Source Name: Subaru of Indiana Automotive Inc

Permit Level: Title V SPM

Permit Number: 157-34915-00050

Source Location: 5500 SR 38 E

Type of Action Taken: Revisions to permit requirements

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 matter referenced above.

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>
To view the document, select Search option 3, then enter permit 34915.

If you would like to request a paper copy of the permit document, please contact IDEM's central file room:

Indiana Government Center North, Room 1201
100 North Senate Avenue, MC 50-07
Indianapolis, IN 46204
Phone: 1-800-451-6027 (ext. 4-0965)
Fax (317) 232-8659

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.

(continues on next page)

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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Ms. Denise Coogan
Subaru of Indiana Automotive, Inc.
P. O. Box 5689
Lafayette, Indiana 47903

January 23, 2015

Re:157-34915-00050
Significant Permit Modification to
Part 70 Operating Permit (T157-27048-00050)

Dear Ms. Coogan:

Subaru of Indiana Automotive, Inc. (SIA) was issued a Part 70 Operating Permit Renewal No. T157-27048-00050 on August 1, 2011 for an automotive and light-duty truck assembly plant, located at 5500 State Road 38 East, Lafayette, Indiana 47905. An application requesting changes to this permit was received on July 28, 2014. Pursuant to the provisions of 326 IAC 2-7-12, a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

Please find attached the entire Part 70 Operating Permit as modified. The permit references the below listed attachments. Since these attachments have been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of these attachments with this modification:

- Attachment A: 40 CFR Part 60, Subpart MM
- Attachment B: 40 CR Part 63, Subpart IIII
- Attachment C: 40 CFR Part 63, Subpart EEEE
- Attachment D: 40 CFR Part 63, Subpart DDDDD

Previously issued approvals for this source containing these attachments are available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

Federal rules under Title 40 of United States Code of Federal Regulations may also be found on the U.S. Government Printing Office's Electronic Code of Federal Regulations (eCFR) website, located on the Internet at: http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl.

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 Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

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 Aida DeGuzman, of my staff, at 317-233-4972 or 1-800-451-6027, and ask for extension 3-4972.

Sincerely,



for

Chrystal A. Wagner
Section Chief
Permits Branch
Office of Air Quality

CAW/APD

cc: File - Tippecanoe County
Tippecanoe County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch
Billing, Licensing and Training Section



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Michael R. Pence
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Commissioner

**PART 70 OPERATING PERMIT RENEWAL
OFFICE OF AIR QUALITY**

**Subaru of Indiana Automotive, Inc.
5500 State Road 38 East
Lafayette, Indiana 47905**

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

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

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

Part 70 Operating Permit Renewal No.: 157-27048-00050	
Issued by/Original Signed by: Donald F. Robin, P.E., Section Chief Permits Branch Office of Air Quality	Issuance Date: August 1, 2011 Expiration Date: August 1, 2016
Significant Permit Modification No. 157-31887-00050, issued on October 24, 2012 Significant Permit Modification No. 157-33106-00050, issued on July 16, 2013 Significant Permit Modification No. 157-33836-00050, issued on June 6, 2014	
Significant Permit Modification No. 157-34915-00050	
Issued by:  Chrystal Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: January 23, 2015 Expiration Date: August 1, 2016



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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates an automotive and sport utility vehicle assembly plant.

Source Address:	5500 State Road 38 East, Lafayette, IN 47905
General Source Phone Number:	765 449-1111
SIC Code:	3711
County Location:	Tippecanoe
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Major 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:

Paint Coating Line Systems A/B:

- (a) Electrodeposition Coating of Vehicle Bodies (ED Coating Line), identified as Unit 001, with a capacity of 71 units per hour, constructed in 1989 and modified in 2009 and 2010. Approved in 2012 for modification to increase vehicle holding/storage area to allow more vehicles to be coated hourly, in subsequent operations consisting of the following units:
 - (1) One (1) ED Body Pretreatment area;
 - (2) One (1) ED Pretreatment Drying Oven, with one (1) insignificant natural gas indirect fired burner with a heat input capacity of 6.0 MMBtu/hr;
 - (3) One (1) insignificant boiler for paint temperature control, with a heat input capacity of 4.0 MMBtu/hr;
 - (4) Six (6) insignificant pretreatment boilers for warming water surrounding the ED Body Coating Tank, with a total heat input capacity of 9.0 MMBtu/hr;
 - (5) One (1) ED Body Coating Tank, utilizing dipping as the method of application;
 - (6) One (1) ED Body Oven (pretreatment drying oven) rated at 6.0 MMBtu/hr, with five (5) natural gas-fired burners (oven zones #1 through #5) each is rated at 2.5 MMBtu/hr, using a 2.5 MMBtu/hr natural gas-fired catalytic oxidizer (B-ED) as VOC control, and exhausting to one (1) stack, identified as B-ED Inc. (emissions from the entrance to, and exit from, the ED Body Oven use no controls and exhaust to one (1) stack, identified as B-ED Hood Exhaust);
 - (7) One (1) ED Body Cool Down area; and

- (8) One (1) paint storage room.
- (b) Sealing and PVC Undercoating Line, identified as Unit 002, with a capacity of 77 units per hour, constructed in 1989 and approved for modification in 2012, consisting of the following units:
- (1) One (1) PVC Coating Booth #1, constructed in 1989, utilizing airless spray application system and pedestal robotic spray system, using a dry filter as particulate matter control, approved in 2012 for modification to add four (4) additional spray coating application systems, and exhausting to one (1) stack, identified as PVC-1-2;
 - (2) One (1) PVC Coating Booth #1 Preheat (oven zone #1), constructed in 1989, with one (1) natural gas indirect fired burner with a heat input capacity of 3.5 MMBtu/hr;
 - (3) One (1) PVC Coating Booth #2, constructed in 1999 and modified in 2006, utilizing the airless spray method of application, using a dry filter as particulate control, approved in 2012 for modification to add two (2) additional spray coating application systems and exhausting to one (1) stack, identified as PVC-Booth 2;
 - (4) One (1) PVC Coating Booth #2 Preheat (oven zone #2), constructed in 1999, with one (1) natural gas direct fired burner with a heat capacity of 16.8 MMBtu/hr;
 - (5) One (1) PVC Seal Oven, constructed in 1989, with two (2) insignificant natural gas-fired burners totaling 6.94 MMBtu/hr, using no controls, and exhausting to one (1) stack, identified as PVC-Oven Exhaust;
 - (6) One (1) PVC Cool Down area, constructed in 1989, using no controls, and exhausting to one (1) stack, identified as PVC Cooling; and
 - (7) One (1) Sound Deadener Operation approved in 2010 for construction, using no controls.
- (c) Topcoat System, identified as Unit 003, with a capacity of 77 units per hour, constructed in 1989, and modified in 2006, 2009 and 2010, consisting of the following units:
- (1) One (1) Topcoat #1 Booth, utilizing air atomized spray with robot, electrostatic air atomized spray with robot, and electrostatic bell with robot methods of application, and automatic spray applicators, using a water wash as particulate matter control, and exhausting to nine (9) stacks, identified as TC1-1 through TC1-5 and TC1-7 through TC1-10. One (1) natural gas-fired dry off oven, between the basecoat and clearcoat zones, with a heat input capacity of 5 MMBtu/hr;
 - (2) One (1) Topcoat #1 Booth Preheat, with three (3) natural gas-fired burners (oven zones #1, #2 and #3), one (1) with a heat input capacity of 3.5 MMBtu/h and two (2) each with a heat input capacity of 2.5 MMBtu/hr;
 - (3) One (1) Topcoat #1 Booth Reheat, with three (3) insignificant natural gas direct fired burners;
 - (4) One (1) Topcoat #1 Oven, approved in 2013 for modification, with four (4) insignificant natural gas direct fired burners with a total maximum heat input capacity

of 11.85 MMBtu/hr, using a 7.10 MMBtu/hr natural gas-fired regenerative thermal oxidizer (RTO-TC123) as VOC control, and exhausting to one (1) stack, identified as TC-1 Inc. (emissions from the entrance to and exit from the Topcoat #1 Oven are not controlled and exhaust to one (1) stack, identified as TC-1 Ex.). The oven is equipped with a purge exhaust stack;

- (5) One (1) Topcoat #1 Cool Down area, using no controls, and exhausting to one (1) stack, identified as TC-1 O.Cl.;
- (6) One (1) Topcoat #2 Booth, utilizing air atomized spray with robot, electrostatic air atomized spray with robot, and electrostatic bell with robot methods of application, using a water wash as particulate matter control, and exhausting to ten (10) stacks, identified as TC2-1 through TC2-10. One (1) natural gas-fired dry off oven between the base coat and clear coat zones with a heat input capacity of 2.5 MMBtu/hr;
- (7) One (1) Topcoat #2 Booth Preheat, with three (3) natural gas-fired burners (oven zones #1, #2 and #3), one (1) with a heat input capacity of 3.5 MMBtu/hr and two (2) each with a heat input capacity of 2.5 MMBtu/hr;
- (8) One (1) Topcoat #2 Booth Reheat, with three (3) insignificant natural gas direct fired burners;
- (9) One (1) Topcoat #2 Oven, approved in 2013 for modification, with four (4) insignificant natural gas direct fired burners with a total maximum heat input capacity of 11.85 MMBtu/hr, using a 7.10 MMBtu/hr natural gas-fired regenerative thermal oxidizer (RTO-TC123) as VOC control, and exhausting to one (1) stack, identified as TC-2 Inc. (emissions from the entrance to and exit from the Topcoat #1 Oven are not controlled and exhaust to one (1) stack, identified as TC-2 Ex.). The oven is equipped with a purge exhaust stack;
- (10) One (1) Topcoat #2 Cool Down area, using no controls, and exhausting to one (1) stack, identified as TC-2;
- (11) One (1) Topcoat #3 Booth, utilizing air atomized spray with robot, electrostatic air atomized spray with robot, and electrostatic bell with robot methods of application, using a water wash as particulate matter control, and exhausting to five (5) stacks, identified as TUT-1 through TUT-5;
- (12) One (1) Topcoat #3 Booth Preheat, with two (2) natural gas-fired burners (oven zones #1 and #2), one (1) with a heat input capacity of 1.5 MMBtu/hr and one (1) with a heat input capacity of 2.5 MMBtu/hr;
- (13) One (1) Topcoat #3 Booth Reheat, with one (1) insignificant 1.5 MMBtu/hr natural gas-fired burner (oven zone #3);
- (14) One (1) Topcoat #3 Booth Oven, approved in 2013 for modification, with four (4) insignificant natural gas-fired burners with a total maximum heat input capacity of 8.55 MMBtu/hr, using a 7.10 MMBtu/hr natural gas-fired regenerative thermal oxidizer (RTO-TC123) as VOC control, and exhausting to one (1) stack, identified as TUT-O-1-2. The oven is equipped with a purge exhaust stack;
- (15) One (1) Topcoat #3 Booth Cool Down area;
- (16) One (1) Wet Sand Repair direct fired Dryoff Oven, with one (1) insignificant natural gas-fired burner with a heat input capacity of 1.49 MMBtu/hr;

- (17) One (1) Topcoat #3 Booth natural gas indirect fired flash zone heater between the base coat and clear coat zones with a heat input capacity of 2.5 MMBtu/hr, permitted in 2010 for construction; and
 - (18) Main paint mix room.
- (d) Intermediate (Surfacer) Coating Line, identified as Unit 004, with a capacity of 77 units per hour, constructed in 1989 and modified in 2010. Approved in 2012 for modification to include alterations to the conveyor system that will add storage capacity to allow more vehicles to be coated hourly, in subsequent operations consisting of the following units:
- (1) One (1) Intermediate Working Stage burner (oven zone #1), with a heat input capacity of 2.5 MMBtu/hr;
 - (2) One (1) Intermediate Coating Booth, utilizing, two (2) robots, for the application of anti-chip (ACC) and stone guard (SGC), two (2) manual air assisted spray guns for the application of primer on inner doors for certain colors, followed by the exterior robot e-stat painting process, using a water wash as particulate control, and exhausting to six (6) stacks, identified as SUR-2 through SUR-7;
 - (3) One (1) Intermediate Booth Preheat (oven zones #2 and #3), with two (2) natural gas-fired burners, each with a heat input capacity of 2.5 MMBtu/hr;
 - (4) One (1) Intermediate Booth Reheat burner (oven zone #4), with two (2) insignificant natural gas-fired burners with a total heat input capacity of 2.5 MMBtu/hr;
 - (5) One (1) Intermediate Coating Oven, with five (5) insignificant natural gas direct fired burners totaling 12.42 MMBtu/hr, using a 1.0 MMBtu/hr natural gas-fired catalytic incinerator (SUR) as VOC control, and exhausting to one (1) stack, identified as SUR-1 (emissions from the entrance to and exit from the Intermediate Coating Oven use no controls and exhaust to one (1) stack, identified as Surfacer Hood Exhaust);
 - (6) One (1) Intermediate Cool Down area, using no controls, and exhausting to one (1) stack, identified as Surfacer Cooling; and
 - (7) Main paint mix room.
- (e) Plastic Bumper Coating Line (PBL), identified as Unit 005, with a capacity of 60 units per hour, constructed in 1989 and modified in 2010, consisting of the following units:
- (1) One (1) PBL Paint Booth, utilizing the air atomization and electrostatic bell methods of spraying, using a water wash as particulate matter control, and exhausting to four (4) stacks, identified as BPR-1, BPR-2, BPR-JR, and BPR-AP;
 - (2) One (1) PBL Booth Preheat (oven zone #1), with one (1) natural gas-fired burner with a heat input capacity of 1.5 MMBtu/hr;
 - (3) One (1) PBL Booth Reheat (oven zone #2), with two (2) insignificant natural gas-fired burners with a total heat input capacity of 2.5 MMBtu/hr;
 - (4) One (1) PBL Oven (ASH preheat), using a 17.1 MMBtu/hr natural gas-fired thermal incinerator as VOC control, and exhausting to one (1) stack, identified as BPR Inc.;
 - (5) One (1) PBL Cool Down area;

- (6) Two (2) PBL natural gas-fired flash zone heaters for the primer and basecoat zones, each with a heat input capacity of 2.5 MMBtu/hr and exhausting to two (2) separate stacks, permitted in 2010 for construction; and
- (7) One (1) paint mixing room.
- (f) Anticorrosion Coating, identified as Unit 006, with a capacity of 77 units per hour, constructed in 1989 and modified in 2010. Approved in 2012 for modification to add two (2) spray coating systems at the Black Coat and Wax Booth to allow more vehicles coated hourly, including the following equipment:
 - (1) One (1) Black Coat and Wax Booth, utilizing the air atomized and air-assisted airless methods of spraying, using a dry filter as particulate matter control, exhausting to BCW Stack;
 - (2) One (1) Black and Wax Coat natural gas direct fired burner, with a heat input capacity of 24.0 MMBtu/hr;
 - (3) One (1) Anticorrosion Coating Booth, utilizing the air-assisted method of spraying, using a dry filter as particulate control, exhausting to Anticorrosion Stack; and
 - (4) One (1) insignificant Anticorrosion Coating natural gas-fired burner.

Approved in 2014 for physical modification and operational change as part of the proposed "2014 Increase in Capacity Project" for the plastic bumper coating operations. This will involve the following three (3) alternative operating scenarios for coating plastic bumper parts for Subaru vehicles:

Scenario #1 - involves the use of the following facilities to coat Subaru vehicles if cessation of production of the non-Subaru vehicles occurs before construction of proposed Paint Line C is complete:

Conversion of the existing non-Subaru vehicle Plastic Fascia Paint Line System (PFPLS#2) to the production of painted plastic bumpers for 110,000 Subaru vehicles per year. The converted paint line will be renamed Unit 005B.

Use of existing Unit 005 with capacity of 250,000 units per year

Scenario #2 - involve increasing Unit 005B capacity from 110,000 to 250,000 units per year while not installing the Plastic Bumper Line, Unit 018 in Paint Line "C".

Use of existing Unit 005 with capacity of 250,000 units per year

Scenario #3 - involve installing the Paint Line "C" Plastic Bumper Line, Unit 018 with a capacity of 160,000 units per year.

Use of existing Unit 005B (110,000 units per year) without increasing its capacity.

Use of the existing Unit 005 with capacity of 250,000 units per year

- (g) One (1) plastic fascia paint line system currently identified as PFPLS#2, to be renamed as Unit 005B, once production of non-Subaru vehicle ceases, which coats front and rear bumpers, and left and right side molding panels, with a maximum capacity of 150,118 units per year, constructed in 2006, and consisting of the following units:

- (1) One (1) primer spray zone in the PFPLS#2 booth, now identified as Unit 005B, currently utilizing air atomized spray with robot method of application and automatic spray applicators with water wash system to control the particulate overspray emissions, and exhausting to one (1) stack , identified as PB2(a). Approved in 2014 to replace current applicator systems with robotic spray applicators utilizing bell application techniques once the non-Subaru vehicle production ceases.
- (2) One (1) basecoat spray zone, currently utilizing electrostatic bell with robot method of application and automatic spray applicators, with water wash system to control the particulate overspray emissions, and exhausting to one (1) stack, identified as PB2(b). Approved in 2014 to replace current applicator systems with robotic spray applicators utilizing bell application techniques once the non-Subaru vehicle production ceases.
- (3) One (1) clearcoat spray zone, currently utilizing electrostatic bell with robot method of application and automatic spray applicators, with water wash system to control the particulate overspray emissions, and exhausting to one (1) stack, identified as PB2(c). Approved in 2014 to replace current applicator systems with robotic spray applicators utilizing bell application techniques once the non-Subaru vehicle production ceases.
- (4) Two (2) paint flash off areas for the primer zone and basecoat zone, exhausting to stack PB2(d), which includes natural gas-fired dry off ovens, with a total heat input capacity of 1.1 MMBtu/hr;
- (5) Three (3) natural gas direct fired air intake units, each with a heat input capacity of 3.1 million British thermal units per hour (MMBtu/hr);
- (6) One (1) fascia paint line, now Unit 005B natural gas-fired curing oven, with a heat input capacity of 2.5 MMBtu/hr, controlled by a catalytic/thermal oxidizer with a heat input capacity of 1.1 MMBtu/hr, exhausting to one (1) stack, identified as PB2(g). Approved in 2014 to increase oven length. Upon conversion to Subaru vehicles, the catalytic/thermal oxidizer will be removed from service.
- (7) One (1) paint mix room.
- (8) One (1) Natural gas-fired burner with a heat input capacity of 3 MMBtu/hr approved in 2014 for construction.
- (9) Six (6) back-up manual spray applicators approved in 2014 for construction.
- (h) Final Repair (Touchup) painting, identified as Unit 007, constructed in 1989 and approved in 2014 to increase capacity from 10 units per hour to 15 units per hour including the following::
 - (1) One (1) Touchup IPC Booth, located in the In-Process Control area, utilizing the air atomization method of spraying;
- (i) Trim Line, identified as Unit 010, application in the Body Shop and Trim Shop of adhesives and sealers to various vehicle parts, constructed in 1989 and approved in 2012 for modification which includes increasing the line speed to allow more vehicles to be coated on an hourly basis and approved in 2014 for modification in order to accommodate a production increase from 310,000 vehicles per year to 450,000 vehicles per year:
 - (1) One (1) Wax Booth for the application of underbody wax.

- (2) One (1) startup and roll test operation.
- (j) Six (6) storage tanks, identified collectively as Unit 011, approved in 2014 to increase utilization to accommodate the increase in production capacity from 310,000 vehicles per year to 450,000 vehicles per year, which includes the following equipment:
- (1) Gasoline storage tank, with a capacity of 15,000 gallons, constructed in 1988, using a certified vapor collection and control system;
 - (2) Purge thinner storage tank, with a capacity of 5,000 gallons, constructed in 1988, using a certified vapor collection and control system;
 - (3) Waste purge thinner storage tank, with a capacity of 6,000 gallons, constructed in 1992;
 - (4) Purge thinner storage tank, with a capacity of 5,000 gallons, constructed in 2005;
 - (5) Windshield washer fluid storage tank, with a capacity of 5,000 gallons, constructed in 1988; and
 - (6) Gasoline storage tank, with a capacity of 1,500 gallons, installed in 2004.
- (k) Purge Solvent usage and capture system, identified as Unit 012, constructed in 1989 and modified in 2006 and 2010 to allow for purging and capturing of solvent and waterborne purge materials.

Paint Coating Line System "C", with a maximum capacity of 160,000 vehicles per year, approved in 2014 for construction, dedicated in coating of the increase in vehicle production, consisting of the following units:

- (a) Electrodeposition (ED) Coating Line for Vehicle Bodies, identified as Unit 013, with a capacity of 160,000 units per year, approved in 2014 for construction, venting to 9 exhaust stacks, identified as Stacks 13-1 through 13-9 consisting of the following units:
- (1) One (1) ED Body Pretreatment Area, including pretreatment boiler for warming water surrounding the ED Coating Tank, with a maximum heat input capacity of 12 million British thermal units per hour (MMBtu/hr).
 - (2) One (1) ED Body Coating Tank, utilizing dipping as the method of application.
 - (3) One (1) ED Oven (pretreatment drying oven), with a maximum heat input capacity of 9.0 MMBtu/hr, using no controls.
 - (4) One (1) ED Body Cool Down Area.
 - (5) One (1) ED Deck and ED Sand Area.
 - (6) One (1) Paint Storage Room.
 - (7) One (1) Working Stage Air House to support the Sealer, PVC, ED Sand, Wet Sand #2 Area rated at 9.5 MMBtu/hr.
 - (8) One (1) Working Stage Air House to support the Surfacer Sand, Wet Sand #1 Area rated at 2.6 MMBtu/hr.

- (b) Sealing, LASD (Liquid Applied Sound Deadener) and PVC Undercoating Line, identified as Unit 014, with a capacity of 160,000 units per year, approved in 2014 for construction, venting to 3 exhaust stacks, identified as Stacks 14-1 through 14-3, consisting of the following:
- (1) One (1) PVC Coating Booth #1, equipped with airless spray application and pedestal robotic spray system, using a dry filter to control the particulate overspray emissions.
 - (2) One (1) PVC Sealer Oven, with a maximum heat input capacity of 3.0 MMBtu/hr, using no control.
 - (3) One (1) PVC Cool Down Area, using no controls.
 - (4) One (1) Sealer Application Area, using no controls.
 - (5) One (1) LASD (Liquid Applied Sound Deadener) Application Area, using no controls.
- (c) Intermediate Surfacer Coating Line, identified as Unit 015, with a capacity of 160,000 units per year, approved in 2014 for construction, venting to 14 exhaust stacks identified as Stacks 15-1 through 15-14, consisting of the following:
- (1) One (1) Intermediate Coating Booth, equipped with manual/robotic/automated spray applicators, for the application of waterborne surfacer material, using dry filtration or a water wash system to control the particulate overspray emissions.
 - (2) One (1) Intermediate Coating Oven, with a maximum heat input capacity of 10 MMBtu/hr, with no VOC control.
 - (3) One (1) Intermediate (Surfacer) natural gas-fired flash zone heater rated at 3.0 MMBtu/hr.
 - (4) One (1) Intermediate (Surfacer) Air House rated at 21.6 MMBtu/hr.
 - (5) One (1) Intermediate Cool Down Area, using no controls.
 - (6) One (1) main paint mix room.
- (d) Topcoat System, identified as Unit 016, with a capacity of 160,000 units per year, approved in 2014 for construction, venting to 26 exhaust stacks, identified as Stacks 16-1 through 16-26, consisting of the following:
- (1) One (1) Topcoat #C1 Booth, equipped with air atomized spray with robot, electrostatic air atomized spray with robot, and electrostatic bell with robot method of applications, and automatic spray applicators, using dry filtration or a water wash system to control the particulate overspray emissions.
 - (2) One (1) Topcoat #C1 Oven, with a maximum heat input capacity of 8.0 MMBtu/hr, using a 1.0 MMBtu/hr natural gas-fired thermal oxidizer (TO-C1) as VOC control.
 - (3) One (1) Topcoat natural gas-fired flash zone heater rated at 3.0 MMBtu/hr.
 - (4) One (1) Topcoat #C1 Cool Down Area, using no controls.
 - (5) One (1) main paint mix room.

- (6) One (1) Topcoat Air House rated at 38 MMBtu/hr.
- (7) One (1) Mixing Air House located in Mix Room rated at 2.0 MMBtu/hr.
- (e) Anticorrosion Coating Operations , identified as Unit 017, with a capacity of 160,000 (if built as part of new paint Line "C") or 225,000 units per year (if built as part of existing paint lines "A/B"), approved in 2014 for construction, venting to 2 exhaust stacks, identified as Stacks 17-1 through 17-2, consisting of the following units:
 - (1) One (1) Black and Wax Coating Booth, to be part of either the new paint line "C" or existing paint lines "A/B", equipped with air atomized and air-assisted airless spray systems, using a dry filter to control the particulate overspray emissions.
 - (2) One (1) Black and Wax Coating Booth natural gas-fired burner, with a maximum heat input capacity of 15.5 MMBtu/hr.
 - (3) One (1) Wax Coating Booth, constructed in 2014 in the Trim & Final Assembly Area, utilizing air-assisted spray system, with no particulate overspray control.
- (f) Plastic Bumper Coating Line (PBL-C), identified as Unit 018, with a capacity of 160,000 units per year, approved in 2014 for construction, venting to 18 exhaust stacks, identified as Stacks 18-1 through 18-18, consisting of the following units (see operating scenarios for Unit 005B):
 - (1) One (1) PBL-C Paint Booth, equipped with air atomization and electrostatic bell spray systems, using dry filtration or water wash system to control the particulate overspray emissions.
 - (2) One (1) PBL-C Oven, with a maximum heat input capacity of 3.0 MMBtu/hr, using no VOC controls.
 - (3) One (1) PBL-C Cool Down area.
 - (4) One (1) paint mixing room.
 - (5) Three (3) Bumper Air Houses (includes Primer Air House, basecoat Air house and Clearcoat Air House), rated at a total of 17.7 MMBtu/hr.
 - (6) One (1) PBL-C natural gas-fired flash zone heater located between the primer and basecoat zones rated at 3.0 MMBtu/hr.
 - (7) One (1) PBL-C natural gas-fired flash zone heater located between the basecoat and the clearcoat zones rated at 3.0 MMBtu/hr.
 - (8) One (1) Working Stage Air House rated at 4.4 MMBtu/hr.
 - (9) One (1) Mixing Air House located in Mixing Room rated at 1.8 MMBtu/hr.
- (g) Miscellaneous combustion devices, approved in 2014 for construction:
 - (1) One (1) Working Stage Air House used to support the Inspection, Touch-up area rated at 6.5 MMBtu/hr.
 - (2) One (1) Working Stage Air House used to support Paint Coating Line "C" rated at 2.4 MMBtu/hr.

- (h) Purge solvent usage and capture system, identified as Unit 019, approved in 2014 for construction, designed to allow for purging and capturing of solvent and waterborne purge materials.
- (i) Miscellaneous support cleaning operations, identified as Unit 020, approved in 2014 for construction, which include wiping solvent and miscellaneous cleanup materials.
- (j) An additional Startup and Roll Test Line, approved in 2014 for construction.
- (k) Engine assembly - one (1) additional dynamometer gasoline engine testing, where engines are tested prior to installation in the vehicle chassis, approved in 2014 for construction.

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) Space heaters, process heaters, or boilers using the following fuels: Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
 - (1) Six (6) general hot water boilers with a combined heat input capacity of 19.6 MMBtu/hr. [40 CFR 52.21] [326 IAC 2-2] [326 IAC 6-2-4]
 - (2) Other insignificant natural gas combustion units: [326 IAC 2-2]
 - (A) Stamping Shop Steam Cleaner
 - (B) Distillation Room Heater
 - (C) Makeup Air Units (7)
 - (D) Unit Heaters (50)
 - (E) Door Heaters (14)
 - (F) Air Handling Units (48)
 - (G) Heating and Ventilation Units (6)
 - (3) Other insignificant natural gas combustion units approved in 2014 for construction: [326 IAC 2-2]

Rooftop Units - 53 Units

- Engine Assembly Expansion - 4 Units (1.6 MMBtu/hr total)
- Engine Warehouse Expansion - 2 Units (0.8 MMBtu/hr total)
- Trim Warehouse Phase 1 - 5 Units (2.0 MMBtu/hr total)
- Trim Warehouse Phase 2 - 5 Units (2.0 MMBtu/hr total)
- Trim Warehouse Phase 3 - 5 Units (2.0 MMBtu/hr total)
- Body Warehouse - 3 Units (1.2 MMBtu/hr total)
- Body Service Warehouse - 3 Units (1.2 MMBtu/hr total)
- Stamping Warehouse 1 - 4 Units (1.6 MMBtu/hr total)
- Stamping Warehouse 2 - 1 Unit (0.4 MMBtu/hr total)
- Motor Pool Bldg. - 3 Units (1.2 MMBtu/hr total)
- Paint Coating Line "C" Heating and Cooling Units - 11 units

- (8.8 MMBtu/hr total)
- Paint Coating Line "C" Makeup Air Heating Units - 5 units
(7.5 MMBtu/hr total)
- Paint Coating Line "C" Air Handling Units - 2 units (7.7 MMBtu/hr total)

Heater Units - 39 Units

- Engine Assembly Expansion - 1 Unit (0.4 MMBtu/hr total)
- Engine Warehouse Expansion - 4 Units (1.6 MMBtu/hr total)
- Trim Warehouse Phase 1 - 2 Units (0.8 MMBtu/hr total)
- Trim Warehouse Phase 2 - 2 Units (0.8 MMBtu/hr total)
- Trim Warehouse Phase 3 - 2 Units (0.8 MMBtu/hr total)
- Body Warehouse - 3 Units (1.20 MMBtu/hr total)
- Body Service Warehouse - 2 Units (0.8 MMBtu/hr total)
- Stamping Warehouse 1 - 3 Units (1.2 MMBtu/hr total)
- Stamping Warehouse 2 - 1 Unit (0.4 MMBtu/hr total)
- Motor Pool Accessory Bldg - 2 Units (0.8 MMBtu/hr total)
- Paint Coating Line "C" Heater Units - 17 units (6.8 MMBtu/hr total)

- (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 2-2]
 - (1) One (1) Stamping Shop; and
 - (2) Two (2) body lines within one (1) Body Shop with MIG and resistance welding robots, and one grinding booth, constructed in 1989 and approved for modification in 2012 and 2014 to expand the Body Shop Building to include a Parts Storage Area and Body Shop Processing Area including the following:
 - (i) One (1) natural gas-fired air supply unit, with a maximum heat input capacity of 1.73 million British thermal units per hour (MMBtu/hr).
 - (ii) MIG welding operations, with a maximum welding rod usage of 96,105 pounds per year.
 - (iii) One (1) bumper injection machine approved in 2014 for installation within the existing building, required for the capacity increase to 450,000 vehicles per year.
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (d) Deburring; buffing; polishing; abrasive blasting activities; pneumatic conveying; and woodworking operations. [326 IAC 6-3-2]
- (e) Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:
 - (1) Gasoline Fill Operations (Benzene, Naphthalene, Ethylbenzene, Styrene, Toluene, Hexane, Xylene, Methyl Tert-butyl Ether) [326 IAC 2-2]
 - (2) The following storage tanks permitted under OP 79-09-93-0454, issued on July 26, 1989:
 - (A) One (1) double-walled fixed-roof engine oil storage tank, with a capacity of 5,000 gallons; and

- (B) One (1) double-walled fixed-roof power steering fluid storage tank, with a capacity of 5,000 gallons;
- (3) The following activities permitted under E 157-14535-00050, issued on October 10, 2001: assembly and testing (including engine test stands);
- (4) Manual solvent wipedown.
- (5) One (1) power steering fluid storage tank, with a capacity of 5,000 gallons, installed in 1988.
- (6) One (1) transmission oil storage tank, with a capacity of 5,000 gallons, installed in 1988.
- (7) One (1) Antifreeze storage tank, with a capacity of 10,000 gallons, installed in 1988.
- (8) One (1) Antifreeze storage tank, with a capacity of 12,000 gallons, installed in 1988.

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, T157-27048-00050, 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 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.6 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.7 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.8 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

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

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

B.9 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:
 - (i) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and
 - (ii) the certification is 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.10 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.11 Preventive Maintenance Plan [326 IAC 2-7-5(12)] [326 IAC 1-6-3]

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1 -6 -3 if it includes, at a minimum:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (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).

- (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.12 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, not later than 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)
Facsimile Number: 317-233-6865

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

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

not later than 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.13 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, as well as the federal statutes from the Clean Air Act and federal regulations from 40 CFR, where 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.14 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 PSD/SSM No. 157-29566-00050 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 combined permit, all previous registrations and permits are superseded by this combined new source review and part 70 operating permit.

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.

- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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

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

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

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

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

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

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (c) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

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

and

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

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

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

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

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

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

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "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 not later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) 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).

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

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

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 by the "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 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 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)] [40 CFR 64][326 IAC 3-8]

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

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

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

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

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

- (b) For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
- (c) For monitoring required by CAM, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

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

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

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

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

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

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

C.13 Risk Management Plan [326 IAC 2-7-5(11)] [40 CFR 68]

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

C.14 Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8] [326 IAC 2-7-5] [326 IAC 2-7-6]

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

- (1) 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.
 - (2) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (i) initial inspection and evaluation;
 - (ii) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
 - (iii) any necessary follow-up actions to return operation to normal or usual manner of operation.
 - (3) 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:
 - (i) monitoring results;
 - (ii) review of operation and maintenance procedures and records; and/or
 - (iii) inspection of the control device, associated capture system, and the process.
 - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
 - (5) The Permittee shall record the reasonable response steps taken.
- (b)
- (1) CAM Response to excursions or exceedances.
 - (i) Upon detecting an excursion or exceedance, subject to CAM, the Permittee shall restore operation of the pollutant-specific emissions unit (including the 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 emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
 - (ii) 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, monitoring results, review

of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

- (2) If the Permittee identifies a failure to achieve compliance with an emission limitation, subject to CAM, or standard, subject to CAM, for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the IDEM, OAQ and, if necessary, submit a proposed significant permit modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.
- (3) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a QIP. The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.
- (4) Elements of a QIP:
The Permittee shall maintain a written QIP, if required, and have it available for inspection. The plan shall conform to 40 CFR 64.8 b (2).
- (5) If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the IDEM, OAQ if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.
- (6) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(a)(2) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:
 - (i) Failed to address the cause of the control device performance problems; or
 - (ii) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (7) Implementation of a QIP shall not excuse the Permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.
- (8) CAM recordkeeping requirements.
 - (i) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to paragraph (II)(a)(2) of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.
 - (ii) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for

expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.

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

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

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

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

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

Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

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

The statement must be submitted to:

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

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

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

- (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:
 - (1) All calibration and maintenance records.
 - (2) All original strip chart recordings for continuous monitoring instrumentation.
 - (3) Copies of all reports required by the Part 70 permit.
Records of required monitoring information include the following:
 - (4) The date, place, as defined in this permit, and time of sampling or measurements.

- (5) The dates analyses were performed.
- (6) The company or entity that performed the analyses.
- (7) The analytical techniques or methods used.
- (8) The results of such analyses.
- (9) 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) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A), 326 IAC 2-2-8 (b)(6)(B), 326 IAC 2-3-2 (l)(6)(A), and/or 326 IAC 2-3-2 (l)(6)(B)) that a "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:
 - (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2 -2 -1(oo) and/or 326 IAC 2 -3 -1(jj)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2 -2 -1(pp)(2)(A)(iii) and/or 326 IAC 2 -3 -1 (kk)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A) and/or 326 IAC 2-3-2 (l)(6)(A)) that a "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:

:

- (1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
- (2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.18 General Reporting Requirements [40 CFR 64][326 IAC 3-8] [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

- (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.

On and after the date by which the Permittee must use monitoring that meets the requirements of 40 CFR Part 64 and 326 IAC 3-8, the Permittee shall submit CAM reports to the IDEM, OAQ.

A report for monitoring under 40 CFR Part 64 and 326 IAC 3-8 shall include, at a minimum, the information required under paragraph (a) of this condition and the following information, as applicable:

- (1) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
- (2) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
- (3) A description of the actions taken to implement a QIP during the reporting period as specified in Section C-Response to Excursions or Exceedances. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

The Permittee may combine the Quarterly Deviation and Compliance Monitoring Report and a report pursuant to 40 CFR 64 and 326 IAC 3-8.

- (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.
- (e) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2 -2 -1 (oo) and/or 326 IAC 2 -3 -1 (jj)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
 - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C - General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2 -2 -1 (ww) and/or 326 IAC 2 -3 -1 (pp), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).
- (f) The report for project at an existing emissions unit shall be submitted no later than sixty (60) days after the end of the year and contain the following:
 - (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.
 - (3) The emissions calculated under the actual -to -projected actual test stated in 326 IAC 2 -2 -2(d)(3) and/or 326 IAC 2 -3 -2(c)(3).
 - (4) Any other information that the Permittee wishes to include in this report such as an explanation as to why the emissions differ from the preconstruction projection.

Reports required in this part 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

- (g) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C - General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

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

FACILITY OPERATION CONDITIONS

Source-Wide Operations

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

D.1.1 Prevention of Significant Deterioration (PSD) - Particulate Matter [326 IAC 2-2]

Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989; CP 157-4485-00050, issued September 13, 1995; CP 157-9619-00050, issued February 11, 1999 and PSD/SSM 157-29566-00050, issued on December 22, 2010 and PSD/SSM 157-33759-00050, the Permittee must adhere to the following conditions:

- (a) The source (including, for purposes of this paragraph (a), paint coating line systems A/B and paint coating line system "C") shall not produce greater than 450,000 vehicles per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The particulate (PM/PM10) emissions from PVC #1 Coating Booth, PVC #2 Coating Booth, Topcoat #1 Coating Booth, Topcoat #2 Coating Booth, Topcoat Booth #3, Intermediate (Surfacer) Coating Booth, Plastic Bumper Coating Booth, Black Coat and Wax Coating Booth, Anticorrosion Coating Booth, Touchup Trim Coating Booth, Touchup IPC Coating Booth, source-wide natural gas combustion, and all insignificant facilities that were permitted by the PSD (79) 1651 Revision at paint coating line systems A/B shall be limited to less than 23.1 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) The total natural gas combustion at the source (excluding, for purposes of this paragraph (c), those natural gas combustion units identified in Section D.10) shall not exceed 2,380 million standard cubic feet per 12 consecutive month period with compliance determined at the end of each month.

Compliance with Condition D.1.1(a) shall satisfy the requirements of 326 IAC 2-2, PSD rules.

Compliance with Condition D.1.1(b) and (c) shall render the requirements of 326 IAC 2-2, PSD rules not applicable.

D.1.2 Prevention of Significant Deterioration (PSD) - Carbon Monoxide and Sulfur Dioxide [326 IAC 2-2]

Compliance with the total natural gas combustion limitation contained in Condition D.1.1(c) is equivalent to CO and SO2 emissions of less than 100 tons per year, and 40 tons per year, respectively, and renders the requirements of 326 IAC 2-2 not applicable.

D.1.3 Prevention of Significant Deterioration (PSD) - Best Available Control Technology for Volatile Organic Compounds (VOC) [326 IAC 2-2][326 IAC 8-1-6]

Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989; Significant Source Modification 157-22702-00050, issued on June 9, 2006; SSM/PSD 157-29566-00050, issued on December 22, 2010; 326 IAC 2-2-3 and 326 IAC 8-1-6, the total VOC emissions from all surface coating and associated purge solvent operations, wiping/cleaning solvents, and storage at paint coating line systems A/B shall not exceed 1,084.5 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limitation, and those contained in Conditions D.2.1, D.4.1, D.5.1, D.6.1, D.7.1, and D.8.1, shall satisfy the requirements of 326 IAC 2-2 and 326 IAC 8-1-6.

Compliance with the VOC limit in this condition, and the VOC limits in Conditions D.3.1 and D.4.6, shall make 326 IAC 2-2, Prevention of Significant Deterioration (PSD) not applicable to the source modification permitted in SSM 157-22702-00050.

Compliance Determination Requirements

D.1.4 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

- (a) Compliance with the VOC emissions limit in Condition D.1.3 shall be determined by using the following equation, which calculates tons of VOC emissions per month, and adding the result to the calculated VOC emissions from the previous eleven months:

$$\text{Total VOC Emissions (ton/month)} = \text{ED Coating, Unit 001 VOC} + \text{Sealing and PVC Underbody Coating, Unit 002 VOC} + \text{Topcoat, Unit 003 VOC} + \text{Intermediate Surfacer, Unit 004 VOC} + \text{Plastic Bumper (PBL), Unit 005 VOC} + \text{Anticorrosion Coating, Unit 006 VOC} + \text{Final Repair, Unit 007 VOC} + \text{Trim Line, Unit 010 VOC} + \text{Storage Tanks, Unit 011 VOC} + \text{Purge Solvent usage and capture, Unit 012 VOC} + \text{Natural Gas Combustion VOC} + \text{Insignificant VOC Sources}$$

Where:

$$\text{VOC emissions from each coating booth, } V_b = \sum_{i=1}^n (C_i \times D_i \times W_i) \times (1-CE) \times 1 \text{ ton}/2000 \text{ lbs}$$

V_b = VOC emissions from each coating booth, ton/month

C_i = usage of coating i in gallons per month;

D_i = density of coating i in pounds per gallon;

W_i = weight percent organics from coatings i

CE = overall VOC control efficiency for each booth, when applicable.

$$\text{Natural Gas Combustion VOC Emissions, tons/month} = \text{natural gas usage (MMCF/month)} \times 1020 \text{ MMBtu}/1\text{MMCF} \times 0.0054 \text{ lb VOC/MMBtu} \times 1 \text{ ton}/2000 \text{ lbs}$$

- (b) Compliance with the particulate (PM/PM10) emission limit in Condition D.1.1(b) shall be determined by using the following equation, which calculates pounds of particulate emissions per month, and adding the result to the calculated particulate emissions from the previous eleven months:

$$\text{Total Particulate Emissions (lb/month)} = \text{PVC \#1 Coating PM/PM10} + \text{PVC \#2 Coating PM/PM10} + \text{Topcoat \#1 Coating PM/PM10} + \text{Topcoat \#2 Coating PM/PM10} + \text{Topcoat \#3 Coating PM/PM10} + \text{Intermediate (Surfacer) Coating PM/PM10} + \text{Plastic Bumper Coating PM/PM10} + \text{Black Coat and Wax Coating PM/PM10} + \text{Anticorrosion Coating PM/PM10} + \text{Touchup IPC Coating PM/PM10} + \text{Natural Gas Combustion PM/PM10} + \text{Insignificant PM/PM10 Sources}$$

Where:

$$\text{PM/PM10 emissions from each coating booth} = \sum_{i=1}^n (C_i \times D_i \times S_i) \times (1-TE) \times (1-CE);$$

Natural Gas Combustion PM/PM10 = natural gas usage (MMCF/month) * 7.6 lb PM/MMCF;

Insignificant PM/PM10 Sources = PM/PM10 emissions in lb/month from insignificant facilities that were permitted by the PSD (79) 1651 Revision;

C_i = usage of coating i in gallons per month;

D_i = density of coating i in pounds per gallon;

S_i = solids content of coating i, expressed as a decimal weight percent;

TE = solids transfer efficiency of the applicator for each booth, based on transfer efficiency determination tests; and

CE = overall particulate control efficiency for each booth, based on manufacturer data.

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

D.1.5 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.1.1, D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (11) below. Records maintained for (1) through (11) shall be taken as stated below and shall be complete and sufficient to establish the compliance status with the particulate emission limit established in Condition D.1.1(b), the natural gas combustion limit established in Conditions D.1.1(c) and D.1.2 and the VOC emission limit established in Condition D.1.3. Records necessary to demonstrate the compliance status shall be available not later than 30 days after the end of each compliance period.
- (1) The VOC content of each coating material and solvent (including purge solvents and thinners) used less water.
 - (2) The amount of coating material and solvent (including purge solvents and thinners) used on a daily or monthly basis, consistent with applicable limits in other permit conditions.
 - (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 solvent.
 - (3) The total VOC emissions from coatings and solvents (including purge solvents and thinners) for each day.
 - (4) The amount of coating material and solvent (including purge solvents and thinners) transferred off-site for disposal or recycling for each day.
 - (5) The density of each coating.
 - (6) The solids content of each coating, expressed as a decimal weight percent.
 - (7) The particulate transfer efficiency and particulate control efficiency for each surface coating booth, kept on a monthly basis, and an explanation of how these figures were determined.

- (8) The process weight rate of the insignificant robotic welding, brazing equipment, cutting torches, soldering equipment, grinding equipment, and machining equipment.
 - (9) Any process information necessary to calculate particulate (PM/PM10) emissions from other insignificant operations described in Section D.8 (e.g., deburring, buffing, polishing, abrasive blasting activities, pneumatic conveying, woodworking operations, etc.).
 - (10) A log of the dates of use.
 - (11) The plant-wide metered natural gas usage for each month.
- (b) To document the compliance status with Condition D.1.1(a), the Permittee shall maintain records of monthly vehicle production.
 - (c) To document the compliance status with the Condition D.1.3, the Permittee shall monitor and record the post-change annual VOC emissions from the existing emission units that could result in a significant emissions increase as a result of the project described in SSM 157-22702-00050.
 - (d) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.1.6 Reporting Requirements

- (a) Reports of monthly production totals to demonstrate the compliance status with Condition D.1.1(a), shall be submitted to IDEM, OAQ on a quarterly basis, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1(35).
- (b) Based on records required by Condition D.1.5(a), and to demonstrate the compliance status with Condition D.1.1(b), reports of monthly particulate (PM/PM10) emissions shall be submitted to IDEM, OAQ on a quarterly basis, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1(35).
- (c) Reports of monthly natural gas usage to demonstrate the compliance status with Conditions D.1.1(c) and D.1.2 shall be submitted to IDEM, OAQ on a quarterly basis, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1(35).
- (d) Based on records required by Condition D.1.5(a) to demonstrate the compliance status with Condition D.1.3, reports of monthly VOC emissions from surface coating operations and associated purge solvent operations and storage shall be submitted to IDEM, OAQ on a quarterly basis not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1(35).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14)]:

- (e) Plastic Bumper Coating Line (PBL), identified as Unit 005, with a capacity of 60 units per hour, constructed in 1989 and modified in 2010:
 - (1) One (1) PBL Booth, utilizing the air atomization and electrostatic bell methods of spraying, using a water wash as particulate matter control, and exhausting to four (4) stacks, identified as BPR-1, BPR-2, BPR-JR, and BPR-AP;
 - (2) One (1) PBL Booth Preheat (oven zone #1), with one (1) natural gas-fired burner with a heat input capacity of 1.5 MMBtu/hr;
 - (3) One (1) PBL Booth Reheat (oven zone #2), with two (2) insignificant natural gas-fired burners with a total heat input capacity of 2.5 MMBtu/hr;
 - (4) One (1) PBL Oven (ASH preheat), using a 17.1 MMBtu/hr natural gas-fired thermal incinerator as VOC control, and exhausting to one (1) stack, identified as BPR Inc.; and
 - (5) One (1) PBL Cool Down area.
 - (6) Two (2) PBL natural gas-fired flash zone heaters for primer and basecoat zones, each with a heat input capacity of 2.5 MMBtu/hr, and exhausting to two (2) separate stacks, permitted in 2010 for construction.
 - (7) One (1) paint mixing room.

(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 Prevention of Significant Deterioration (PSD) - Best Available Control Technology for Volatile Organic Compounds (VOC) [326 IAC 2-2][326 IAC 8-1-6]

Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, 326 IAC 2-2-3, and 326 IAC 8-1-6, BACT for the Plastic Bumper Coating Line is the following:

- (a) The daily VOC emissions from the PBL Coating Booth shall not exceed 38.2 pounds of VOC per gallon of applied solids (4.57 kilograms of VOC per liter of applied solids). This limit applies to the weighted average of all plastics bumper coatings. Compliance with this limit shall be demonstrated pursuant to Condition D.2.6.
- (b) The thermal incinerator, used to control VOC emissions from the PBL Oven, shall achieve a minimum VOC destruction efficiency of 90%.
- (c) Pretreatment Cleaning shall utilize only VOC free detergents, conditioners, and rinses in the body pre-treatment cleaning operations.
- (d) Pertaining to purge solvent use:
 - (1) Purge solvent capture systems will be utilized each time that any coating application equipment is purged. The purge solvent capture systems shall have a minimum overall capture efficiency of at least eighty percent (80%). Collected purge solvent shall be retained in closed conveyances to the

Permittee's spent purge solvent storage tank or in closed containers until such time as they are shipped offsite for disposal or recycling.

- (2) Block painting will be utilized whenever possible to minimize color changes and the resulting purge.

Compliance with these limitations, and those contained in Conditions D.1.3, D.4.1, D.5.1, D.6.1, D.7.1, and D.8.1, shall satisfy the requirements of 326 IAC 2-2 and 326 IAC 8-1-6.

D.2.2 Prevention of Significant Deterioration - Best Available Control Technology for Volatile Organic Compounds (VOC and Nitrogen Oxides (NOx) [326 IAC 2-2]

(a) Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, and 326 IAC 2-2-3, BACT for NOx for the natural gas combustion equipment described in this section is the following:

- (1) The NOx emissions from the PBL Oven shall not exceed 0.10 pounds per million Btu (lb/MMBtu) heat input;
 - (2) The NOx emissions from the PBL Booth Preheat Burner, insignificant PBL Oven thermal incinerator, and the two (2) insignificant PBL Booth Reheat burners shall not exceed 0.12 pounds per million Btu (lb/MMBtu) heat input each; and
 - (3) The PBL Preheat burner, Reheat burners, and Oven shall use low-NOx natural gas burners.
- (b) Pursuant to PSD/SSM 157-29566-00050 and 326 IAC 2-2-3, VOC BACT for the two (2) 2.5 MMBtu/hr PBL Flash Zone Heaters shall each not exceed 0.0055 pound per million British thermal units (lb/MMBtu).
- (c) The Permittee shall perform good combustion practices for the two (2) 2.5 MMBtu/hr PBL Flash Zone Heaters and utilize natural gas only for fuel.

D.2.3 Particulate Emissions [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate emissions from the PBL Paint Booth shall be controlled by a water wash and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.2.4 Particulate Emissions from Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, the particulate emissions from the two (2) PBL flash zone heaters one (1) with rated capacity of 1.5 MMBtu/hr and one (1) with rated capacity of 2.5 MMBtu/hr including a 17.1 MMBtu/hr PBL Oven/Incinerator (ASH preheat), shall not exceed 0.314 lb/MMBtu.

This limitation is based on the following equation

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

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. (Q = 120 MBtu/hr).

D.2.5 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

Compliance Determination Requirements

D.2.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Compliance with the VOC emission limit in Condition D.2.1 shall be determined with the following equation:

$$\text{VOC emissions (lb VOC/gal applied solids)} = \left[\sum_{i=1}^n (C_i)(U_i) / \sum_{i=1}^n (S_i \times TE) \right] \times [1 - (CE \times DE)]$$

Where:

C_i is the VOC content of the coating (i) in pounds of VOC per gallon of coating, as applied;
 U_i is the usage rate of the coating (i) in gallons per day;
 S_i is the usage rate of coating (i) solids in gallons per day;
TE is the transfer efficiency of the applicator;
CE is the minimum capture efficiency of the incinerator; and
DE is the minimum destruction efficiency of the incinerator required in Condition D.2.1(b).

D.2.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

- (a) Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the incinerator at all times the PBL Oven is in operation to ensure compliance with Condition D.2.1.
- (b) The incinerator on the PBL Oven shall be operated such that it achieves the minimum destruction efficiency specified in Condition D.2.1.

D.2.8 Testing Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Condition D.2.1, the Permittee shall perform VOC capture and destruction efficiency testing of the thermal incinerator utilizing methods as approved by the Commissioner at least once every two and one half (2.5) 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) for control efficiency testing. Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

D.2.9 Operator Training Program

The Permittee shall implement an operator training program.

- (a) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the water wash control system on the Plastic Bumper Coating Line. All existing operators shall be trained upon permit issuance. All new operators shall be trained upon hiring or transfer.
- (b) Training shall include proper flow of water through the water pan of the water wash system, and other factors that affect water pan capture efficiency (e.g., debris in the water pans), and troubleshooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.

- (c) All operators shall be given refresher training annually.

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

D.2.10 Thermal Incinerator Temperature [326 IAC 2-7-5(3)]

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal incinerator for measuring operating temperature whenever the PBL Oven (ASH preheat) is in operation. For the purposes of this condition, continuous monitoring shall mean no less often than once per minute. The output of this system shall be recorded as a three-hour average. If the continuous monitoring system is not in operation, the temperature will be recorded manually once in a 15-minute period. Whenever the three (3) hour average temperature is below the three (3) hour average temperature established during the latest stack test that demonstrated compliance, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
- (b) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with the limits of Condition D.2.1 as approved by IDEM.

The instruments used for determining the temperature shall comply with Section C – Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

D.2.11 Parametric Monitoring [326 IAC 2-7-5(3)]

- (a) The Permittee shall determine the appropriate duct pressure or fan amperage for the thermal incinerator on the PBL Line from the most recent valid stack test that demonstrates compliance with the permit limits on VOC destruction efficiency and control efficiency as approved by IDEM.
- (b) The duct pressure or fan amperage whichever is monitored by the Permittee under this condition, shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

D.2.12 Water Wash Monitoring [40 CFR 64]

- (a) Daily visual inspections shall be made on the water wash flood pans and water circulation associated with the PBL Booth, exhausting to four (4) stacks, identified as BPR-1, BPR-2, BPR-JR and BRP-AP to verify the control system proper operation. A warning system shall be installed and operated to ensure that the water circulation pump is operational at all times when the PBL Booth is in use. In addition, a red strobe light shall automatically be activated whenever the water circulation pump is down and once a day visual observation of the warning system shall be conducted. When a system warning is received, 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) Semi-annual inspections shall be performed of the coating emissions from the PBL Booth's 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 emission 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 Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.13 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.2.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.2.1. Records necessary to demonstrate the compliance status shall be available not later than 30 days of after the end of each compliance period.
 - (1) The VOC content of each coating material (as applied) and the VOC content of each solvent (including purge solvents and thinners) used less water.
 - (2) The solids content of each coating material used (as applied).
 - (3) The amount of coating material and solvent (including purge solvents and thinners) used on a daily basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvent.
 - (4) The volume weighted average VOC content of the coatings used (as applied) for each day.
- (b) To document the compliance status with Conditions D.2.10 and D.2.11, the Permittee shall maintain the following records:
 - (1) Continuous temperature records (on a three-hour average basis) for the thermal incinerator and the three-hour average temperature used to demonstrate compliance during the most recent compliant stack test.
 - (2) Records of the thermal incinerator shutdowns due to duct pressure or fan amperage deviations.
 - (3) Daily records of the duct pressure or fan amperage.
- (c) To document the compliance status with Condition D.2.9, the Permittee shall maintain copies of the training program, and the list of trained operators. Training records shall be maintained on site or available not later than 1 hour for inspection by IDEM.
- (d) To document the compliance status with Condition D.2.12, the Permittee shall maintain records of daily visual inspection of the water wash system, dates of any water wash warning system going off and corrective actions taken and log of semi-annual inspections of the PBL booth's stacks.

- (e) To document the compliance status with Condition D.2.2(b) and (c), the Permittee shall maintain records of the vendor design guarantees for the two (2) 2.5 MMBtu/hr PBL Flash Zone Heaters.
- (f) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.2.14 Reporting Requirements

A monthly summary of the daily VOC content of the coatings used, based on a volume weighted average from the PBL Coating Booth, including the following information to document the compliance status with Condition D.2.1, shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1(35). The reports shall contain the following data for each operation, based on actual daily coating usage:

- (1) Average coating VOC content in kg VOC/liter coating as applied;
- (2) Average coating volume % solids as applied;
- (3) Average actual solids transfer efficiency;
- (4) Overall thermal incinerator control efficiency, reflecting capture and destruction efficiency;
- (5) Average kg VOC/liter of applied solids, based on actual transfer efficiency; and
- (6) Coating usage in liters.

When more than one coating has been averaged for compliance purposes, the average shall be determined on a weighted average by volume basis. All data necessary to verify weighted averages shall be included in the report.

SECTION D.3

SOURCE OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14)]:

Approved in 2014 for physical modification and operational changes as part of the proposed "2014 Project" for the plastic bumper coating operations. This will involve the following three (3) alternative operating scenarios for coating plastic bumper parts for Subaru vehicles:

Scenario #1 - involves the use of the following facilities to coat Subaru vehicles if cessation of production of the non-Subaru vehicles occurs before construction of proposed Paint Line C is complete:

Conversion of the existing non-Subaru vehicle Plastic Fascia Paint Line System (PFPLS#2) to the production of painted plastic bumpers for 110,000 Subaru vehicles per year. The converted paint line will be renamed Unit 005B.

Use of existing Unit 005 with capacity of 250,000 units per year

Scenario #2 - involve increasing Unit 005B capacity from 110,000 to 250,000 units per year while not installing the Plastic Bumper Line in Paint Line "C".

Use of existing Unit 005 with capacity of 250,000 units per year

Scenario #3 - involve installing the Paint Line "C" Plastic Bumper Line, Unit 018 with a capacity of 160,000 units per year.

Use of existing Unit 005B (110,000 units per year) without increasing its capacity.

Use of the existing Unit 005 with capacity of 250,000 units per year

(g) One (1) plastic fascia paint line system currently identified as PFPLS#2, to be renamed as Unit 005B, once production of non-Subaru vehicle ceases, which coats front and rear bumpers, and left and right side molding panels, with a maximum capacity of 150,118 units per year, constructed in 2006, and consisting of the following units:

(1) One (1) primer spray zone in the PFPLS#2 booth, to be renamed as Unit 005B, currently utilizing air atomized spray with robot method of application and automatic spray applicators with water wash system to control the particulate overspray emissions, and exhausting to one (1) stack, identified as PB2(a). Approved in 2014 to replace current applicator systems with robotic spray applicators utilizing bell application techniques once the non-Subaru vehicle production ceases.

(2) One (1) basecoat spray zone, currently utilizing electrostatic bell with robot method of application and automatic spray applicators, with water wash system to control the particulate overspray emissions, and exhausting to one (1) stack, identified as PB2(b). Approved in 2014 to replace current applicator systems with robotic spray applicators utilizing bell application techniques once the non-Subaru vehicle production ceases.

- (3) One (1) clearcoat spray zone, currently utilizing electrostatic bell with robot method of application and automatic spray applicators, with water wash system to control the particulate overspray emissions, and exhausting to one (1) stack, identified as PB2(c). Approved in 2014 to replace current applicator systems with robotic spray applicators utilizing bell application techniques once the non-Subaru vehicle production ceases.
- (4) Two (2) paint flash off areas for the primer zone and basecoat zone, exhausting to stack PB2(d), which includes natural gas-fired dry off ovens, with a total heat input capacity of 1.1 MMBtu/hr;
- (5) Three (3) natural gas direct fired air intake units, each with a heat input capacity of 3.1 million British thermal units per hour (MMBtu/hr);
- (6) One (1) fascia paint line natural gas-fired curing oven, with a heat input capacity of 2.5 MMBtu/hr, controlled by a catalytic/thermal oxidizer with a heat input capacity of 1.1 MMBtu/hr, exhausting to one (1) stack, identified as PB2(g). Approved in 2014 to increase oven length. Upon conversion to Subaru vehicles, the catalytic/thermal oxidizer will be removed from service.
- (7) One (1) paint mix room.
- (8) One (1) Natural gas-fired burner with a heat input capacity of 3 MMBtu/hr approved in 2014 for construction.
- (9) Six (6) back-up manual spray applicators approved in 2014 for construction.

(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)]

Conditions titled Non-Subaru Bumpers shall apply until non-Subaru bumpers ceases production. After which, conditions titled Subaru Bumpers shall take effect.

Non-Subaru Bumpers:

D.3.1 Prevention of Significant Deterioration (PSD) Minor Limits [326 IAC 2-2] [326 IAC 8-1-6]

The annual VOC usage, including wiping/cleaning solvents, and solvent purging to the plastic fascia paint line (PFPLS#2), and natural gas usage from the combustion devices associated with this fascia paint line and existing Topcoat, Unit 003 modification shall be limited such that the total potential to emit does not exceed 102.6 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

- (a) The thermal oxidizer used to control VOC emissions from the curing oven for the fascia paint line system shall achieve a minimum VOC destruction efficiency of 95% and a minimum overall control efficiency (capture efficiency x destruction efficiency) of 21%.
- (b) The annual VOC usages of wiping/cleaning solvents and purge solvents minus the amount of VOC in the purge material collected shall be limited to 24.2 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This VOC limit shall

account for the capture efficiency from the purge solvent capture systems used each time that any coating applicator in either the primer or the clearcoat spray zone is purged.

- (c) The VOC emissions from the combustion devices associated with the plastic fascia paint line and the 5 MMBtu/hr natural gas-fired dry off oven added to the existing Topcoat, Unit 003 shall not exceed 5.5 pound per million cubic feet (lb/MMCF) of natural gas usage, and the total natural gas fuel usage shall not exceed 166.4 million cubic feet per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the limits in this condition and Conditions D.1.3 and D.4.6 shall render the requirements of 326 IAC 2-2, Prevention of Significant Deterioration (PSD) not applicable to the modification permitted in SSM 157-22702-00050.

Compliance with (a) and (b) of this condition shall also satisfy the requirements of 326 IAC 8-1-6.

Subaru Bumpers:

D.3.1.1 Prevention of Significant Deterioration BACT [326 IAC 2-2] [326 IAC 8-1-6]

Pursuant to 326 IAC 2-2-3 Best Available Control Technology (PSD BACT), for Unit 005B once non-Subaru bumpers ceases production shall be the following:

- (a) The VOC emissions from Unit 018 of Section D.10(f) and Unit 005B of this section, as a daily volume weighted average of all primer coatings used shall not exceed 0.71 pounds per gallon.
- (b) The VOC emissions from Unit 018 of Section D.10(f) and Unit 005B of this section, as a daily volume weighted average of all basecoat coatings shall not exceed 1.38 pounds per gallon.
- (c) The VOC emissions from Unit 018 of Section D.10(f) and Unit 005B of this section, as a daily volume weighted average of all clearcoat coatings shall not exceed 4.09 pounds per gallon.
- (d) Good work practices which includes the following:
 - (1) The use of robotic automatic spray applicators to minimize paint usage.
 - (2) The use of waterbased coatings for the primer, and basecoat applications.
 - (3) All paint mixing containers, other than day tanks equipped with continuous agitation systems, which contain organic VOC containing coatings and other materials shall have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.
 - (4) Solvent-borne purge materials sprayed during paint line cleaning and color changes shall be directed into solvent collection containers. Documentation shall be maintained on-site to demonstrate how these materials are being directed and collected for both the solvent-borne and water-borne purge materials.
 - (5) Solvent collection containers shall be kept closed when not in use.
 - (6) Clean-up rags with solvent shall be stored in closed containers.

- (7) VOC emissions shall be minimized during cleaning of storage, mixing, and conveying equipment.
- (e) The VOC emissions from Plastic Bumper Coating Line, Unit 005B burner shall not exceed 0.0054 pound per million British thermal units (lb/MMBtu) and shall only combust natural gas.

Compliance with Conditions D.3.1.1(a) through (d) and Condition D.10.2 shall satisfy the requirements of 326 IAC 2-2 and 326 IAC 8-1-6. This condition shall apply once non-Subaru bumpers cease production.

Non-Subaru Bumpers:

D.3.2 Volatile Organic Compounds (VOC) Best Available Control Technology [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, the Best Available Control Technology (BACT) for the plastic fascia paint line shall be the following:

- (a) The exhausts from the fascia paint line curing oven shall be vented to a thermal oxidizer. The thermal oxidizer shall achieve a minimum VOC destruction efficiency of 95%.
- (b) The fascia paint line shall comply with the following Best Available Control Technology limitations, for Volatile Organic Compounds (VOC):
 - (1) The daily VOC emissions, after control, as a volume weighted average of all primer coatings, shall be limited to less than 0.90 pound per gallon of coating (lbs/gal).
 - (2) The daily VOC emissions, after control, as a volume weighted average of all basecoat coatings, shall be limited to less than 1.15 lbs/gal of coating.
 - (3) The daily VOC emissions, after control, as a volume weighted average of all clearcoat coatings, shall be limited to less than 3.25 lbs/gal of coating.
- (c) Good work practices which includes the following:
 - (1) The use of robotic automatic spray applicators to minimize paint usage.
 - (2) The use of waterbased coatings for the primer, and basecoat applications.
 - (3) All paint mixing containers, other than day tanks equipped with continuous agitation systems, which contain organic VOC containing coatings and other materials shall have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.
 - (4) Solvent-borne purge materials sprayed during paint line cleaning and color changes shall be directed into solvent collection containers. Documentation shall be maintained on-site to demonstrate how these materials are being directed and collected for both the solvent-borne and water-borne purge materials.
 - (5) Solvent collection containers shall be kept closed when not in use.
 - (6) Clean-up rags with solvent shall be stored in closed containers.
 - (7) VOC emissions shall be minimized during cleaning of storage, mixing, and conveying equipment.

- (d) The purge solvent capture systems shall have a minimum purge solvent capture efficiency of 80%. Collected purge materials (paint solids and solvent) from the primer and clearcoat applicators shall be retained in closed containers until recycled on-site or shipped offsite for recycling or disposal.

Compliance with this condition shall satisfy the requirements of 326 IAC 8-1-6.

Non-Subaru Bumpers:

D.3.3 Particulate Emissions [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), the particulate overspray emissions from the fascia paint line (PFPLS#2) shall be controlled by a water wash system and the Permittee shall operate the control device in accordance with the manufacturer's specifications.

Subaru Bumpers:

D.3.3.1 Particulate Emissions [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), the particulate overspray emissions from Unit 005B shall be controlled by a water wash system and the Permittee shall operate the control device in accordance with the manufacturer's specifications. This condition shall apply once non-Subaru bumpers cease production.

Non-Subaru Bumpers and Subaru Bumpers:

D.3.4 Particulate Emissions from Sources of Indirect Heating [326 IAC 6-2-4]

- (a) Pursuant to 326 IAC 6-2-4, the particulate emissions from the two (2) paint flash off areas for the primer zone and basecoat zone, (totaling 1.1 MMBtu/hr), shall each be limited to less than 0.313 pounds per MMBtu energy input.

This limitation is based on the following equation:

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

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input; and
Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. (Q = 121.1 MMBtu/hr).

- (b) Pursuant to 326 IAC 6-2-4, the particulate emissions from the one (1) 2.5 MMBtu/hr fascia paint line natural gas-fired curing oven, shall not exceed 0.307 pounds per MMBtu energy input.

This limitation is based on the following equation:

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

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input; and
Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. (Q = 131.1 MMBtu/hr).

Non-Subaru Bumpers and Subaru Bumpers:

D.3.5 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

Compliance Determination Requirements

Non-Subaru Bumpers:

D.3.6 Volatile Organic Compounds (VOC)

- (a) Compliance with the VOC content and usage limitations contained in Conditions D.3.1 and D.3.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedure specified in 326 IAC 8-1-4.
- (b) In addition to the procedure in section (a) of this condition, compliance with the VOC limit for the solvent purging operation in Conditions D.3.1(b) and D.3.2 shall be determined through the following:
- (1) Purge solvent usage and collection shall be monitored separately for the primer coating operations and clearcoat operations. For each of the primer and clearcoat coating systems, the Permittee shall install flow meters to monitor the volume of purge solvent delivered to the spray applicators, and the volume of the purge materials collected for recycling or disposal. The purge material collection/capture, as a percentage of purge solvent usage shall be determined on a monthly basis as follows:
- $$\text{Purge Solvent Collection/Capture Efficiency} = \frac{S_c - R_{cs}}{P_u}$$
- Where:
- R_{cs} = Residual coating solids in the spray applicator;
 S_c = Purge material collected (paint solids + solvent); and
 P_u = Purge solvent usage.
- (c) Compliance with Condition D.3.1(a), the capture efficiency shall be determined using the "Protocol for Determining Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations," EPA-450/3-88-018 (Docket ID No. OAR-2002-0093 and Docket ID No. A-2001-22) or guidelines in 40 CFR § 63.3165.

Non-Subaru Bumpers:

D.3.7 Prevention of Significant Deterioration (PSD) Minor Limits and VOC BACT Limits [326 IAC 2-2] [326 IAC 8-1-6]

- (a) Compliance with the VOC limit in Condition D.3.1 shall be determined by using the following equation, which calculates the tons of VOC emissions per month, and adding the result to the calculated VOC emissions from the previous eleven months:

$$\text{Total VOC Emissions (tons/month)} = \text{natural gas combustion units (heaters, curing oven, and oxidizer) VOC} + \text{fascia paint line (wiping/cleaning solvent, and solvent purging) VOC}$$

Where:

(1) Natural Gas Combustion VOC = Natural gas usage (MMCF/month) * 5.5 lb/MMCF

$$(2) \quad \text{Fascia Paint Line VOC} = \sum_{i=1}^n (\text{Booths } C_i \times S \times C \times P) + (\text{Oven } C_i \times (1-S) \times C_i \times P \times (1-DE)) + (P_u \times P_c \times P \times (1-cw))$$

Where:

C_i is coating (i) usage in gallon per unit from each booth in the Fascia Line;
 S is the percentage booth split with oven (see spreadsheet page 2 of 12);
 C is the coating (i) VOC content in pound per gallon;
 P is the production in units per month;
 P_u is the purge solvent usage in gallon per unit;
 P_c is the purge VOC content in pound per gallon;
 DE is the destruction efficiency of the oxidizer; and
 P_{cw} is the percent purge materials collected/captured for waste recycle

- (b) Compliance with the VOC emissions rate in Condition D.3.2 which applies after controls to emissions from the fascia paint line shall be determined by using the following equation:

$$\text{VOC emissions (lb VOC/gal)} = \left[\sum_{i=1}^n (C_i)(U_i) \right] \times [1 - (\text{Overall CE})]$$

Where:

$i = 1$ to n
 C_i is the VOC content of each individual coating (i) of a coating type (Primer, Basecoat or Clearcoat) in pounds of VOC per day, as applied;
 U_i is the usage rate of each individual coating (i) of a coating type (Primer, Basecoat or Clearcoat) in gallons per day;
 n is the number of individual coatings of a particular coating type (Primer, Basecoat or Clearcoat); and
Overall CE is the overall control efficiency (capture efficiency x destruction efficiency) of the incinerator required in Condition D.3.1(a)

Subaru Bumpers:

D.3.7.1 Prevention of Significant Deterioration (PSD) VOC BACT Limits [326 IAC 2-2] [326 IAC 8-1-6]

- (a) Compliance with the VOC content and usage limitations contained in Conditions D.3.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedure specified in 326 IAC 8-1-4.
- (b) Compliance with the VOC limit in Condition D.3.1.1 shall be determined using the following equation:

$$\text{VOC emissions (lb VOC/gal)} = \left[\sum_{i=1}^n (C_i)(U_i) \right]$$

Where:

$i = 1$ to n
 C_i is the VOC content of each individual coating (i) of a coating type (Primer, Basecoat or Clearcoat) in pounds of VOC per day, as applied;
 U_i is the usage rate of each individual coating (i) of a coating type (Primer, basecoat or clearcoat) in gallons per day;

n is the number of individual coatings of a particular coating type (Primer, Basecoat or Clearcoat)

Non-Subaru Bumpers:

D.3.8 Testing Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 8-1-6]

In order to demonstrate compliance with Condition D.3.1, the Permittee shall perform VOC destruction efficiency and the control efficiency of the thermal oxidizer associated with the fascia paint line (PFPLS#2) utilizing methods as approved by the Commissioner at least once every two and one half (2.5) 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.

Non-Subaru Bumpers and Subaru Bumpers:

D.3.9 Operator Training Program

The Permittee shall implement an operator training program for the particulate control system for the fascia paint line (PFPLS#2), now Unit 005B:

- (a) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the water wash control system on the fascia paint line. All existing operators shall be trained upon permit issuance. All new operators shall be trained upon hiring or transfer.
- (b) Training shall include proper flow of water through the water pan of the water wash system, and other factors that affect water wash capture efficiency (e.g., debris in the water pan), and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available not later than 1 hour for inspection by IDEM.
- (c) All operators shall be given refresher training annually.

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

Non-Subaru Bumpers:

D.3.10 Thermal Oxidizer Temperature [326 IAC 2-7-5(3)] [40 CFR 64]

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature, whenever the fascia paint line curing oven is in operation. For the purpose of this condition, continuous means no less than once per minute. The output of this system shall be recorded as a three (3) hour average. Whenever the three (3) hour average temperature is below the three (3) hour average temperature established during the latest stack test that demonstrated compliance, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
- (b) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with the limits of Condition D.3.1(a), as approved by IDEM.

The instruments used for determining the temperature shall comply with Section C – Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

Non-Subaru Bumpers:

D.3.11 Thermal Oxidizer Parametric Monitoring [326 IAC 2-7-5(3)] [40 CFR 64]

- (a) The Permittee shall determine the appropriate range of duct pressure or fan amperage for the thermal oxidizer from the most recent valid stack test that demonstrates compliance with the limit set by Condition D.3.1(a) as approved by IDEM.
- (b) The duct pressure or fan amperage, whichever is monitored by the Permittee under this condition shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

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

Non-Subaru Bumpers:

D.3.12 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.3.1 and D.3.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limits established in Conditions D.3.1, and D.3.2. Records necessary to demonstrate the compliance status shall be available not later than 30 days after the end after each compliance period.
 - (1) The VOC content of each coating material (as applied).
 - (2) The solids content of each coating material used (as applied).
 - (3) The amount of coating material, wiping/cleaning solvent, purge solvents used on a monthly basis, and amount of purge material (paint solids + solvent) captured and recycled 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 wiping/cleaning solvents, and those used as purge.
 - (4) The volume weighted average VOC emitted per gallon of the coatings used (as applied) for each day.
 - (5) Records of the natural gas fuel usage from the combustion units associated with the fascia paint line (PFPLS#2), and from the 5 MMBtu/hr heat flash added to the existing Topcoat, Unit 003.
- (b) To document the compliance status with Condition D.3.9, the Permittee shall maintain copies of the training program, and the list of trained operators. Training records shall be maintained on site or available not later than 1 hour after a request by IDEM for inspection.

- (c) To document the compliance status with Condition D.3.10 and D.3.11, the Permittee shall maintain the following records:
 - (1) Continuous temperature records (on a three-hour average basis) for the thermal incinerator and the three-hour average temperature used to demonstrate compliance during the most recent compliant stack test.
 - (2) Records of the thermal incinerator shutdowns due to duct pressure or fan amperage deviations.
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

Subaru Bumpers:

D.3.12.1 Record Keeping Requirements

Once non-Subaru bumpers ceases production, the Permittee shall be subject to the following:

- (a) To document the compliance status with Condition D.3.1.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.3.1.1. Records necessary to demonstrate the compliance status shall be available not later than 30 days after the end after each compliance period.
 - (1) The VOC content of each coating material (as applied).
 - (2) The amount of coating materials including solvent added to coatings on a daily basis, and amount of purge material (paint solids + solvent) captured and recycled 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 wiping/cleaning solvents, and those used as purge.
 - (3) The volume weighted average VOC emitted per gallon of each type (i.e. primer, basecoat and clearcoat) of coatings used (as applied) for each day.
- (b) To document the compliance status with Condition D.3.9, the Permittee shall maintain copies of the training program, and the list of trained operators. Training records shall be maintained on site or available not later than 1 hour after a request by IDEM for inspection.

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

Non-Subaru Bumpers:

D.3.13 Reporting Requirements

A monthly summary of the VOC usage, including wiping/cleaning solvents, and solvent purging to the new plastic fascia paint line (PFPLS#2), and natural gas usage from the combustion devices associated with this fascia paint line and existing Topcoat, Unit 003 to document the compliance status with Condition D.3.1 shall be submitted to IDEM, OAQ on a quarterly basis, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains

the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1(35).

Subaru Bumpers:

D.3.13.1 Reporting Requirements

A monthly summary of the information to document compliance with Condition D.3.1.1 shall be submitted quarterly to IDEM, OAQ using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting 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.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14)]:

- (a) Electrodeposition Coating of Vehicle Bodies (ED Coating Line), identified as Unit 001, with a capacity of 71 units per hour, constructed in 1989 and modified in 2009 and 2010. Approved in 2012 for modification to increase vehicle holding/storage area to allow more vehicles to be coated hourly, in subsequent operations consisting of the following units:
- (1) One (1) ED Body Pretreatment area;
 - (2) One (1) ED Pretreatment Drying Oven, with one (1) insignificant natural gas indirect fired burner with a heat input capacity of 6.0 MMBtu/hr;
 - (3) One (1) insignificant boiler for paint temperature control, with a heat input capacity of 4.0 MMBtu/hr;
 - (4) Six (6) insignificant pretreatment boilers for warming water surrounding the ED Body Coating Tank, with a total heat input capacity of 9.0 MMBtu/hr;
 - (5) One (1) ED Body Coating Tank, utilizing dipping as the method of application;
 - (6) One (1) ED Body Oven (pretreatment drying oven) rated at 6.0 MMBtu/hr, with five (5) natural gas-fired burners (oven zones #1 through #5) each is rated at 2.5 MMBtu/hr, using a 2.5 MMBtu/hr natural gas-fired catalytic oxidizer (B-ED) as VOC control, and exhausting to one (1) stack, identified as B-ED Inc. (emissions from the entrance to, and exit from, the ED Body Oven use no controls and exhaust to one (1) stack, identified as B-ED Hood Exhaust);
 - (7) One (1) ED Body Cool Down area; and
 - (8) One (1) paint storage room.
- (c) Topcoat System, identified as Unit 003, with a capacity of 77 units per hour, constructed in 1989, and modified in 2006, 2008, 2009, and 2010, consisting of the following units:
- (1) One (1) Topcoat #1 Booth, utilizing air atomized spray with robot, electrostatic air atomized spray with robot, and electrostatic bell with robot methods of application, and automatic spray applicators, using a water wash as particulate matter control, and exhausting to nine (9) stacks, identified as TC1-1 through TC1-5 and TC1-7 through TC1-10. One (1) natural gas-fired dry off oven between the basecoat and clearcoat zones with a heat input capacity of 2.5 MMBtu/hr;
 - (2) One (1) Topcoat #1 Booth Preheat, with three (3) natural gas-fired burners (oven zones #1, #2 and #3), one (1) with a heat input capacity of 3.5 MMBtu/h and two (2) each with a heat input capacity of 2.5 MMBtu/hr;
 - (3) One (1) Topcoat #1 Booth Reheat, with three (3) insignificant natural gas direct fired burners;
 - (4) One (1) Topcoat #1 Oven, approved in 2013 for modification, with four (4) insignificant natural gas direct fired burners with a total maximum heat input capacity of 11.85 MMBtu/hr, using a 7.10 MMBtu/hr natural gas-fired regenerative thermal oxidizer (RTO-TC123) as VOC control, and exhausting to one (1) stack, identified as TC-1 Inc. (emissions from the entrance to and exit from the Topcoat #1 Oven are not controlled

SECTION D.4 FACILITY OPERATION CONDITIONS

and exhaust to one (1) stack, identified as TC-1 Ex.). The oven is equipped with a purge exhaust stack;

- (5) One (1) Topcoat #1 Cool Down area, using no controls, and exhausting to one (1) stack, identified as TC-1 O.Cl;
- (6) One (1) Topcoat #2 Booth, utilizing air atomized spray with robot, electrostatic air atomized spray with robot, and electrostatic bell with robot methods of application, using a water wash as particulate matter control, and exhausting to ten (10) stacks, identified as TC2-1 through TC2-10. One (1) natural gas-fired dry off oven between the base coat and clear coat zones with a heat input capacity of 2.5 MMBtu/hr;
- (7) One (1) Topcoat #2 Booth Preheat, with three (3) natural gas-fired burners (oven zones #1, #2 and #3), one (1) with a heat input capacity of 3.5 MMBtu/hr and two (2) each with a heat input capacity of 2.5 MMBtu/hr;
- (8) One (1) Topcoat #2 Booth Reheat, with three (3) insignificant natural gas direct fired burners;
- (9) One (1) Topcoat #2 Oven, approved in 2013 for modification, with four (4) insignificant natural gas direct fired burners with a total maximum heat input capacity of 11.85 MMBtu/hr, using a 7.10 MMBtu/hr natural gas-fired regenerative thermal oxidizer (RTO-TC123) as VOC control, and exhausting to one (1) stack, identified as TC-2 Inc. (emissions from the entrance to and exit from the Topcoat #1 Oven are not controlled and exhaust to one (1) stack, identified as TC-2 Ex.). The oven is equipped with a purge exhaust stack;
- (10) One (1) Topcoat #2 Cool Down area, using no controls, and exhausting to one (1) stack, identified as TC-2;
- (11) One (1) Topcoat #3 Booth, utilizing air atomized spray with robot, electrostatic air atomized spray with robot, and electrostatic bell with robot methods of application, using a water wash as particulate matter control, and exhausting to five (5) stacks, identified as TUT-1 through TUT-5;
- (12) One (1) Topcoat #3 Booth Preheat, with two (2) natural gas-fired burners (oven zones #1 and #2), one (1) with a heat input capacity of 1.5 MMBtu/hr and one (1) with a heat input capacity of 2.5 MMBtu/hr;
- (13) One (1) Topcoat #3 Booth Reheat, with one (1) insignificant 1.5 MMBtu/hr natural gas-fired burner (oven zone #3);
- (14) One (1) Topcoat #3 Booth Oven, approved in 2013 for modification, with four (4) insignificant natural gas-fired burners with a total maximum heat input capacity of 8.55 MMBtu/hr, using a 7.10 MMBtu/hr natural gas-fired regenerative thermal oxidizer (RTO-TC123) as VOC control, and exhausting to one (1) stack, identified as TUT-O-1-2. The oven is equipped with a purge exhaust stack;
- (15) One (1) Topcoat #3 Booth Cool Down area;
- (16) One (1) Wet Sand Repair direct fired Dryoff Oven, with one (1) insignificant natural gas-fired burner with a heat input capacity of 1.49 MMBtu/hr;
- (17) One (1) Topcoat #3 Booth natural gas indirect fired flash zone heater between the base

SECTION D.4 FACILITY OPERATION CONDITIONS

coat and clear coat zones with a heat input capacity of 2.5 MMBtu/hr, permitted in 2010 for construction; and

- (18) Main paint mix room.
- (d) Intermediate (Surfacer) Coating Line, identified as Unit 004, with a capacity of **77** units per hour, constructed in 1989 and modified in 2010. Approved in 2012 for modification to include alterations to the conveyor system that will add storage capacity to allow more vehicles to be coated hourly, in subsequent operations consisting of the following units:
- (1) One (1) Intermediate Working Stage burner (oven zone #1), with a heat input capacity of 2.5 MMBtu/hr;
 - (2) One (1) Intermediate Coating Booth, utilizing, two (2) robots, for the application of anti-chip (ACC) and stone guard (SGC), two (2) manual air assisted spray guns for the application of primer on inner doors for certain colors, followed by the exterior robot e-stat painting process, using a water wash as particulate control, and exhausting to six (6) stacks, identified as SUR-2 through SUR-7;
 - (3) One (1) Intermediate Booth Preheat (oven zones #2 and #3), with two (2) natural gas-fired burners, each with a heat input capacity of 2.5 MMBtu/hr;
 - (4) One (1) Intermediate Booth Reheat burner (oven zone #4), with two (2) insignificant natural gas-fired burners with a total heat input capacity of 2.5 MMBtu/hr;
 - (5) One (1) Intermediate Coating Oven, with five (5) insignificant natural gas direct fired burners totaling 12.42 MMBtu/hr, using a 1.0 MMBtu/hr natural gas-fired catalytic incinerator (SUR) as VOC control, and exhausting to one (1) stack, identified as SUR-1 (emissions from the entrance to and exit from the Intermediate Coating Oven use no controls and exhaust to one (1) stack, identified as Surfacer Hood Exhaust);
 - (6) One (1) Intermediate Cool Down area, using no controls, and exhausting to one (1) stack, identified as Surfacer Cooling; and
 - (7) Main paint mix room.

(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.4.1 Prevention of Significant Deterioration (PSD) - Best Available Control Technology for Volatile Organic Compounds (VOC) [326 IAC 2-2]

Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, PSD/SSM No. 157-29566-00050, 326 IAC 2-2-3, BACT for VOC for the facilities described in this section is the following:

- (a) The daily VOC emissions from each facility shall be limited to less than the corresponding limits in the following table. Compliance with these limits shall be demonstrated pursuant to Condition D.4.9:

Facility	lb VOC/gal applied solids	kg VOC/liter applied solids
ED Body Coating Line (ED Dip/Rinse Tanks and Curing Oven)	0.40 ^a	0.062 ^a
Topcoat booths (Topcoat #1 Booth, Topcoat #2 Booth)	12.3 ^b	1.47 ^b
Topcoat Booth #3	10.6 ^c	1.27 ^c
Intermediate Coating Booth	8.76 ^d	1.05 ^d

^a Coatings used at the ED Coating Line on a daily basis

^b Volume Weighted average of all Topcoat coatings used in Booths #1 and #2.

^c Volume Weighted average of all Topcoat coatings used in Booth #3.

^d Volume Weighted average of all Intermediate coatings.

- (b) The incinerator used to control VOC emissions from the Intermediate Coating Oven shall achieve a minimum VOC destruction efficiency of 90%.

The VOC emissions from the Topcoat #1, Topcoat #2 and Topcoat #3 Ovens shall be vented to the regenerative thermal oxidizer (RTO-TC123) with a minimum VOC destruction efficiency of 90 percent.

The VOC emissions from the ED Curing Oven shall be vented to the existing Catalytic Incinerator with a VOC destruction efficiency of 90 percent, and a minimum capture efficiency of 70% for the entire ED Coating Line (ED Dip/Rinse Tanks and Curing Oven).

- (c) The following good operating practices shall be observed to minimize VOC emissions from the Topcoat Booth #3:

- (1) Minimization of spillage of coating materials,
- (2) Minimization of major paint repairs,
- (3) Cleanup rags saturated with solvent shall be stored, transported and disposed in containers that are tightly closed, and
- (4) Storage containers used to store VOC- and/or HAP- containing materials shall be kept covered when not in use.

- (d) Pretreatment Cleaning shall utilize only VOC free detergents, conditioners, and rinses in the body pre-treatment cleaning operations.

- (e) Pertaining to purge solvent use:

- (1) Purge solvent capture systems will be utilized each time that any coating application equipment is purged. The purge solvent capture systems shall have a minimum overall capture efficiency of at least eighty percent (80%). Collected purge solvent shall be retained in closed conveyances to the Permittee's spent purge solvent storage tank or in closed containers until such time as they are shipped offsite for disposal or recycling.
- (2) Block painting will be utilized whenever possible to minimize color changes and the resulting purge.

- (f) The VOC emission from the one (1) 2.5 MMBtu/hr Topcoat #3 flash zone heater shall be limited to less than 0.0055 pound per million British thermal units (lb/MMBtu).

- (g) The Permittee shall perform good combustion practices for the one (1) 2.5 MMBtu/hr Topcoat #3 flash zone heater and utilize natural gas only for fuel.

Compliance with these limitations, and those contained in Conditions D.1.3, D.2.1, D.5.1, D.6.1, D.7.1, and D.8.1, shall satisfy the requirements of 326 IAC 2-2.

D.4.2 Prevention of Significant Deterioration - Best Available Control Technology for Nitrogen Oxides (NOx) [326 IAC 2-2]

Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, and 326 IAC 2-2-3, BACT for NOx for the natural gas combustion equipment described in this section is the following:

- (a) NOx emissions from the following facilities:
- (1) Shall be limited to less than 0.10 pounds per million Btu heat input for each facility listed as follows:
 - (A) the Intermediate Working Stage burner;
 - (B) the three (3) Topcoat #1 Booth Preheat burners;
 - (C) the three (3) Topcoat #2 Booth Preheat burners;
 - (D) the two (2) Topcoat #3 Booth Preheat burners;
 - (E) the insignificant ED Pretreatment Drying Oven burner;
 - (F) the insignificant ED Paint Temperature Control boiler;
 - (G) the six (6) insignificant ED Pretreatment boilers;
 - (H) the five (5) insignificant ED Body Oven burner;
 - (I) the insignificant ED Body Oven incinerator;
 - (J) the five (5) insignificant Intermediate Oven burners;
 - (K) the three (3) insignificant Topcoat #1 Booth Reheat burners;
 - (L) the four (4) insignificant Topcoat #1 Oven burners;
 - (M) the three (3) insignificant Topcoat #2 Booth Reheat burner;
 - (N) the four (4) insignificant Topcoat #2 Oven burners;
 - (O) the insignificant Topcoat #3 Booth Reheat burner;
 - (P) the four (4) insignificant Topcoat #3 Booth Oven burners;
 - (Q) the insignificant Wet Sand Repair Dryoff Oven burner.

- (2) Shall be limited to less than 0.12 pounds per million Btu heat input for each facility listed as follows:
 - (A) the two (2) Intermediate Booth Preheat burners;
 - (B) the two (2) insignificant Intermediate (Surfacer) Booth Reheat burner;
 - (C) the insignificant Intermediate (Surfacer) Oven incinerator;
- (b) All combustion operations listed above shall use low-NOx natural gas burners.

Compliance with these limitations, and those contained in Conditions D.2.2, D.5.2, D.6.2, and D.8.2, shall satisfy the requirements of 326 IAC 2-2.

D.4.3 Particulate Emissions from Sources of Indirect Heating [326 IAC 6-2-4]

- (a) Pursuant to 326 IAC 6-2-4, the particulate emissions from the six (6) insignificant - ED Pretreatment boilers (totaling 9.0 MMBtu/hr), and the one (1) insignificant 4.0 MMBtu/hr ED Paint Temperature Control boiler shall each be limited to less than 0.314 pounds per MMBtu energy input.

The limitation is based on the following equation:

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

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input; and
Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. (Q = 120 MMBtu/hr).

- (b) Pursuant to 326 IAC 6-2-4, the particulate emissions from the three (3) Topcoat #3 oven zone #1 and oven zone #3 heaters each rated at 1.5 MMBtu/hr and oven zone #2 rated at 2.5 MMBtu/hr shall each not exceed 0.314 lb/MMBtu energy input.
- (c) Pursuant to 326 IAC 6-2-4, the particulate emissions from the three (3) Topcoat #2 oven zone #1 and oven zone #3 heaters each rated at 2.5 MMBtu/hr and oven zone #2 rated at 3.5 MMBtu/hr shall each not exceed 0.314 lb/MMBtu energy input
- (d) Pursuant to 326 IAC 6-2-4, the particulate emissions from the three (3) Topcoat #1 oven zone #1 and oven zone #3 heaters each rated at 2.5 MMBtu/hr and oven zone #2 rated at 3.5 MMBtu/hr shall each not exceed 0.314 lb/MMBtu energy input
- (e) Pursuant to 326 IAC 6-2-4, the particulate emissions from the four (4) Intermediate (Surfacer) ovens with zone #1 through oven zone #3 heaters each rated at 2.5 MMBtu/hr and oven zone #4 with two (2) burners rated at total capacity of 2.5 MMBtu/hr shall each not exceed 0.314 lb/MMBtu energy input

The limitations are based on the following equation

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

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input; and
Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. (Q = 120 MBtu/hr).

- (f) Pursuant to 326 IAC 6-2-4, the particulate emissions from the Topcoat #3 flash zone heater rated at 2.5 MMBtu/hr shall not exceed 0.307 lb/MMBtu energy input.

The limitation is based on the following equation

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

- Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input; and
Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. (Q = 131.1 MMBtu/hr).

D.4.4 Volatile Organic Compound (VOC) Limitations [326 IAC 8-2-2] [326 IAC 8-1-2]

- (a) The Permittee shall not allow the discharge of VOC into the atmosphere in excess of the following limits based on an actual measured transfer efficiency higher than 30%, in lieu of the VOC emission limitations in 326 IAC 8-2-2:
- (1) The daily VOC emissions from the Topcoat booths (Topcoat #1 Booth, Topcoat #2 Booth, and Topcoat #3 Booth) shall not exceed 15.1 pounds of VOC per gallon of applied solids (1.83 kilograms of VOC per liter of applied solids). This limit applies to the weighted average of all Topcoat coatings.
 - (2) The daily VOC emissions from the Intermediate Coating Booth shall not exceed 15.1 pounds of VOC per gallon of applied solids (1.83 kilograms of VOC per liter of applied solids). This limit applies to the weighted average of all Intermediate coatings.
- (b) Pursuant to 326 IAC 8-1-2(a), the VOC emission limitations in paragraph (a) of this condition shall be achieved through one (1) or any combination of the following: use of catalytic incinerator or regenerative thermal oxidizer use of higher solids (low solvent) coatings, and/or waterborne coatings.

Compliance with the VOC emission limits in paragraph (a) of this condition shall be determined by the equation in D.4.9(a).

- (c) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the incinerators (RTO-TC123 and SUR) shall each be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{(V - E)}{V} * 100$$

Where:

- V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied;
E = Equivalent emission limit (15.1 pounds of VOC per gallon of applied solids);
O = Equivalent overall efficiency of the capture system and control device as a percentage.

D.4.5 Volatile Organic Compound (VOC) Limitations [326 IAC 8-2-2]

Pursuant to 326 IAC 8-2-2, the daily VOC emissions from the ED Body Coating Tank shall not exceed 1.17 pounds of VOC per gallon of coating less water (0.14 kilograms of VOC per liter of coating less water) (site-specific RACT limit established pursuant to 325 IAC 8-1-5 (Petition for alternate controls)).

Compliance with this limit shall be demonstrated pursuant to Condition D.4.9.

D.4.6 Prevention of Significant Deterioration (PSD) Minor Limit [326 IAC 2-2]

The annual VOC input, including cleanup solvents, to the modified Topcoat System, identified as Unit 003 shall be limited such that the VOC emissions do not exceed 393 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month.

Compliance with this VOC limit and the VOC limits in Conditions D.1.3 and D.3.5 shall render 326 IAC 2-2, Prevention of Significant Deterioration not applicable to the source modification permitted in SSM 157-22702-00050.

D.4.7 Particulate Emissions [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate emissions from the Topcoat booths (Topcoat #1 Booth, Topcoat #2 Booth, and Topcoat #3 Booth) and the Intermediate Coating Booth shall be controlled by water washes and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

D.4.8 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for this facility and their respective 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.4.9 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 2-2]

(a) Compliance with the VOC emission limits in Conditions D.4.1, D.4.4 and D.4.5 shall be determined with the following equations (as applicable):

$$\text{VOC emissions (lb VOC/gal applied solids)} = \left[\sum_{i=1}^n (C_i \times U_i) / \sum_{i=1}^n (S_i \times TE) \right] \times [1 - (CE \times DE)]$$

Where:

C_i is the VOC content of the coating (i) in pounds of VOC per gallon of coating, as applied;
 U_i is the usage rate of the coating (i) in gallons per day;
 S_i is the usage rate of coating (i) solids in gallons per day;
TE is the transfer efficiency of the applicator;
CE is the minimum capture efficiency of the incinerator; and
DE is the minimum destruction efficiency of the incinerator required in Condition D.4.1(b).

Or, if the emission limit is in units of pounds of VOC per gallon of coating less water:

$$\text{VOC emissions (lb VOC/gal coating less water)} = \left[\sum_{i=1}^n (C_i \times U_i) / \sum_{i=1}^n U \right] \times [1 - (CE \times DE)]$$

Where:

C_i is the VOC content of the coating (i) in pounds of VOC per gallon of coating less water, as applied;

U_i is the usage rate of the coating (i) in gallons per day;

U total usage rate from all coatings (from 1 to n)

CE is the minimum capture efficiency of the incinerator; and

DE is the minimum destruction efficiency of the incinerator required in Condition D.4.1(b).

- (b) Compliance with the VOC limit in Condition D.4.6 shall be determined by using the following equation, which calculates the tons of VOC emissions per month, and adding the result to the calculated VOC emissions from the previous eleven months:

$$\text{Topcoat VOC} = (U \times C) \times (1 - (CE \times DE))$$

Where:

U is the coating usage in tons/month;

C is the VOC content of the coating;

CE is the minimum capture efficiency of the incinerator; and

DE is the minimum destruction efficiency of the oxidizer required in D.4.1(b).

- (c) Compliance with Condition D.4.1(b) the capture efficiency for the ED Coating Line shall be determined using the procedure in 40 CFR Subpart MM – NSPS for Automobile and Light-Duty Truck Surface Coating Operations.

D.4.10 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

- (a) Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the incinerators at all times the respective facilities are in operation to ensure compliance with Conditions D.4.1 and D.4.4.
- (b) The incinerators shall be operated such that they achieve the minimum capture and destruction efficiencies specified in Condition D.4.1.

D.4.11 Testing Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11]

- (a) Within sixty (60) days after the start up operation of the regenerative thermal oxidizer (RTO-TC123) associated with Topcoat #1 Oven, Topcoat #2 Oven, and Topcoat #3 Oven, the Permittee shall perform VOC testing to verify its VOC destruction efficiency. Performance testing shall utilize methods as approved by the Commissioner and shall be performed at least once every two and one half (2.5) 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.
- (b) The Permittee shall perform VOC testing to verify VOC destruction efficiencies of the catalytic incinerator SUR controlling the Intermediate Coating Oven. The Permittee shall perform VOC testing to verify VOC capture efficiency of the ED Coating Line ED Dip/Rinse Tanks and Curing Oven capture system and destruction efficiency of the catalytic incinerator (B-ED) associated with the ED Body Oven. Performance testing shall utilize methods as approved by the Commissioner and shall be performed at least once every two and one half (2.5) 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.4.12 Operator Training Program

The Permittee shall implement an operator training program.

- (a) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the water wash control systems on the Topcoat #1, Topcoat #2, Topcoat #3, and Intermediate Coating lines. All existing operators shall be trained upon permit issuance. All new operators shall be trained upon hiring or transfer.
- (b) Training shall include proper flow of water through the water pan of the water wash system, and other factors that affect water pan capture efficiency (e.g., debris in the water pans), and troubleshooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available not later than 1 hour for inspection by IDEM.
- (c) All operators shall be given refresher training annually.

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

D.4.13 Regenerative Thermal Oxidizer and Catalytic Incinerators Temperature [326 IAC 2-7-5(3)] [40 CFR 64]

- a) A continuous monitoring system shall be calibrated, maintained, and operated for measuring the temperature at the inlet to the catalyst bed of the catalytic incinerator whenever any of the ED Body Oven and Intermediate Coating Oven is in operation to control the VOC emissions from the ED Body Oven and Intermediate Coating Oven. For the purpose of this condition, continuous means no less than once per minute. The output of this system shall be recorded as a three (3) hour average. Whenever the three (3) hour average inlet temperature to the catalyst bed of each catalytic incinerator is below the three (3) hour average temperature established during the latest stack test that demonstrated compliance, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
- (b) A continuous monitoring system shall be calibrated, maintained, and operated for measuring the operating temperature of the regenerative thermal oxidizer (RTO-TC123) whenever any of the Topcoat #1 Oven, Topcoat #2 Oven, or Topcoat #3 Oven, is in operation to control VOC emissions from these ovens. For the purpose of this condition, continuous means no less than once per minute. The output of this system shall be recorded as a three (3) hour average. Whenever the three (3) hour average operating temperature of this RTO is below the three (3) hour average temperature established during the latest stack test that demonstrated compliance, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
- (c) The Permittee shall determine the three (3) hour average temperature at the inlet to the catalyst beds of each catalytic incinerator (B-ED and SUR) and the three (3) hour average operating temperature of the regenerative thermal oxidizer (RTO-TC123) from the most recent valid performance test that demonstrates compliance with the limits in Conditions D.4.1, and D.4.4 as approved by IDEM.

The instruments used for determining the temperature shall comply with Section C – Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

D.4.14 Parametric Monitoring [326 IAC 2-7-5(3)] [40 CFR 64]

- (a) The Permittee shall determine the appropriate duct pressure or fan amperage for each catalytic incinerator (B-ED and SUR) and regenerative thermal oxidizer (RTO-TC123) from the most recent valid stack test that demonstrates compliance with the permit limits for VOC destruction efficiency and control efficiency as approved by IDEM.
- (b) The duct pressure or fan amperage, whichever is monitored by the Permittee under this condition, shall be observed at least once per day when the thermal or catalytic incinerator is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

D.4.15 Water Wash Monitoring [326 IAC 2-7-5(3)] [40 CFR 64]

- (a) Daily visual inspections shall be made on each water wash flood pans and water circulation associated with the Topcoat #1 Booth, exhausting to nine (9) stacks, identified as TC1-1 through TC1-10; Topcoat #2 Booth, exhausting to ten (10) stacks, identified as TC2-1 through TC2-10 and Topcoat #3 Booth, exhausting to five (5) stacks, identified as TUT-1 through TUT-5 to verify the control system proper operation. A warning system shall be installed and operated to ensure that the water circulation pump is operational at all times when any of the following emission units are in operation: Topcoat #1 Booth, Topcoat #2 Booth, and Topcoat #3 Booth. In addition, a red strobe light shall automatically be activated whenever the water circulation pump is down and once a day visual observation of the warning system shall be conducted. When a system warning is received, 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) Semi-annual inspections shall be performed of the coating emissions from the Topcoat #1 Booth stacks, identified as TC1-1 through TC1-10; Topcoat #2 Booth stacks, identified as TC2-1 through TC2-10 and Topcoat #3 Booth stacks, identified as TUT-1 through TUT-5 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 emission 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 Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.16 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.4.1, D.4.4, D.4.5, and D.4.6, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limits established in Conditions D.4.1, D.4.4, D.4.5, and D.4.6, and the compliance determination requirements established in Condition D.4.9. Records necessary to demonstrate the compliance status shall be available within not later than 30 days after the end of each compliance period.
 - (1) The VOC content of each coating material (as applied) and the VOC content of each solvent (including purge solvents and thinners) used less water.

- (2) The VOC content of each coating material used in the ED Body Coating Tank, as applied, less water.
 - (3) The solids content of each coating material used (as applied).
 - (4) The amount of coating material and solvent (including purge solvents and thinners) used on a daily basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvent.
 - (5) The volume weighted average VOC content of the coatings used (as applied) for each day.
- (b) To document the compliance status with Conditions D.4.13 and D.4.14, the Permittee shall maintain the following records:
- (1) The continuous temperature records (on a three-hour average basis) for the inlet temperature to the catalyst beds of each catalytic incinerator (B-ED and SUR), and the continuous operating temperature records (on a three-hour average basis) for the regenerative thermal oxidizer (RTO-TC123) used to demonstrate compliance during the most recent compliant stack test.
 - (2) Records of any catalytic incinerator or regenerative thermal oxidizer shutdowns due to duct pressure or fan amperage deviations.
 - (3) Daily records of the duct pressure or fan amperage for the catalytic incinerators and regenerative thermal oxidizer.
- (c) To document the compliance status with Condition D.4.12, the Permittee shall maintain copies of the training program, and the list of trained operators. Training records shall be maintained on site or available not later than 1 hour after request for inspection by IDEM.
- (d) To document the compliance status with Condition D.4.15, the Permittee shall maintain records of daily visual inspection of the water wash system, dates of any water wash warning system going off and corrective actions taken and log of semi-annual inspections of the Topcoat #1 Booth stacks, identified as TC1-1 through TC1-10; Topcoat #2 Booth stacks, identified as TC2-1 through TC2-10 and Topcoat #3 Booth stacks, identified as TUT-1 through TUT-5.
- (e) To document the compliance status with Condition D.4.1(g) and (h), the Permittee shall maintain records of the vendor design guarantees for the one (1) 2.5 MMBtu/hr Topcoat #3 flash zone heater.
- (f) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.4.17 Reporting Requirements

A monthly summary of the daily VOC content of the coatings used from the ED Coating Line, Topcoat #1 Booth, Topcoat #2 Booth, Topcoat Booth #3 and Intermediate Coating Booth, including the information to document the compliance status with Condition D.4.1 and a monthly summary of the monthly VOC usage to document the compliance status with Condition D.4.6, shall be both submitted to IDEM, OAQ not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1(35).

SECTION D.5

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14)]:

- (h) Final Repair (Touchup) painting, identified as Unit 007, constructed in 1989 and approved in 2014 to increase capacity from 10 units per hour to 15 units per hour, and including the following equipment:
- (1) One (1) Touchup IPC Booth, located in the In-Process Control area, utilizing the air atomization method of spraying.

(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.5.1 Prevention of Significant Deterioration (PSD) - Best Available Control Technology for Volatile Organic Compounds (VOC) [326 IAC 2-2]

Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, and 326 IAC 2-2-3, BACT for VOC for the Final Repair (Touchup) Operation is the following:

- (a) The daily VOC emissions from the Touchup IPC Booth shall not exceed 4.84 pounds of VOC per gallon of coating less water (0.58 kilograms of VOC per liter of coating less water). This limit applies to the weighted average of all Final Repair coatings and solvents.

Compliance with this limit shall be determined pursuant to Condition D.5.4.

- (b) Pretreatment Cleaning shall utilize only VOC free detergents, conditioners, and rinses in the body pre-treatment cleaning operations.

- (c) Pertaining to purge solvent use:

- (1) Purge solvent capture systems will be utilized each time that any coating application equipment is purged. The purge solvent capture systems shall have a minimum overall capture efficiency of at least eighty percent (80%). Collected purge solvent shall be retained in closed conveyances to the Permittee's purge solvent reclamation system for on-site reclamation and recycling or in closed containers until such time as they are shipped offsite for disposal or recycling.
- (2) Block painting will be utilized whenever possible to minimize color changes and the resulting purge.

Compliance with these limitations, and those contained in Conditions D.1.3, D.2.1, D.4.1, D.6.1, D.7.1, and D.8.1 shall satisfy the requirements of 326 IAC 2-2.

D.5.2 Volatile Organic Compound (VOC) Limitations [326 IAC 8-2-2]

Pursuant to 326 IAC 8-2-2, the daily VOC emissions from the Touchup IPC Booth shall not exceed 4.84 pounds of VOC per gallon of coating less water (0.58 kilograms of VOC per liter of coating less water). This limit applies to the weighted average of all Final Repair coatings and solvents.

Compliance with this limit shall be determined pursuant to Condition D.5.4.

D.5.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities and their respective 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.5.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Compliance with the VOC emission limits in Conditions D.5.1 and D.5.2 shall be determined with the following equation:

$$\text{VOC emissions (lb VOC/gal coating less water)} = \left[\sum_{i=1}^n (C_i \times U_i) / \sum_{i=1}^n U \right]$$

Where:

- C_i is the VOC content of the coating (i) in pounds of VOC per gallon of coating less water, as applied; and
- U_i is the usage rate of the coating (i) in gallons per day.
- U total usage rate from all coatings (from 1 to n)

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

D.5.5 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.5.1 and D.5.2 the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance the VOC emission limits established in Conditions D.5.1 and D.5.2. Records necessary to demonstrate compliance shall be available not later than 30 days after the end of each compliance period.
 - (1) The VOC content of each coating material (as applied, less water) and the VOC content of each solvent (including purge solvents and thinners) used less water.
 - (2) The amount of coating material and solvent (including purge solvents and thinners) used on a daily basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvent.
 - (3) The volume weighted average VOC content of the coatings used (as applied) for each day.
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.5.6 Reporting Requirements

A monthly summary of the daily VOC and coating usage from the Touchup IPC Booth to document the compliance status with Conditions D.5.1 and D.5.2, shall be submitted to IDEM, OAQ on a quarterly basis, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1(35). The reports shall contain the following data for each operation based on actual daily coating usage:

- (1) Average coating VOC content in kg VOC/liter coating minus water
- (2) Coating usage in liters

When more than one coating has been averaged for compliance purposes, the average shall be determined on a weighted average by volume basis. All data necessary to verify weighted averages shall be included in the report.

SECTION D.6

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14)]:

- (b) Sealing and PVC Undercoating Line, identified as Unit 002, with a capacity of 77 units per hour, constructed in 1989 and approved for modification in 2012, consisting of the following units:
 - (1) One (1) PVC Coating Booth #1, constructed in 1989, utilizing airless spray application system and pedestal robotic spray system, using a dry filter as particulate matter control, approved in 2012 for modification to add four (4) additional spray coating application systems, and exhausting to one (1) stack, identified as PVC-1-2;
 - (2) One (1) PVC Coating Booth #1 Preheat (oven zone #1), constructed in 1989, with one (1) natural gas indirect fired burner with a heat input capacity of 3.5 MMBtu/hr;
 - (3) One (1) PVC Coating Booth #2, constructed in 1999 and modified in 2006, utilizing the airless spray method of application, using a dry filter as particulate control, approved in 2012 for modification to add two (2) additional spray coating application systems and exhausting to one (1) stack, identified as PVC-Booth 2;
 - (4) One (1) PVC Coating Booth #2 Preheat (oven zone #2), constructed in 1999, with one (1) natural gas direct fired burner with a heat capacity of 3.5 MMBtu/hr;
 - (5) One (1) PVC Seal Oven, constructed in 1989, with two (2) insignificant natural gas-fired burners totaling 6.94 MMBtu/hr, using no controls, and exhausting to one (1) stack, identified as PVC-Oven Exhaust;
 - (6) One (1) PVC Cool Down area, constructed in 1989, using no controls, and exhausting to one (1) stack, identified as PVC Cooling; and
 - (7) One (1) Sound Deadener Operation approved in 2010 for construction, using no controls.

- (f) Anticorrosion Coating, identified as Unit 006, with a capacity of 77 units per hour, constructed in 1989 and modified in 2010. Approved in 2012 for modification to add two (2) spray coating systems at the Black Coat and Wax Booth to allow more vehicles coated hourly, including the following equipment:
 - (1) One (1) Black Coat and Wax Booth, utilizing the air atomized and air-assisted airless methods of spraying, using a dry filter as particulate matter control, exhausting to BCW Stack;
 - (2) One (1) Black and Wax Coat natural gas direct fired burner, with a heat input capacity of 24.0 MMBtu/hr;
 - (3) One (1) Anticorrosion Coating Booth, utilizing the air-assisted method of spraying, using a dry filter as particulate control, exhausting to Anticorrosion Stack; and
 - (4) One (1) insignificant Anticorrosion Coating natural gas-fired burner.

(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.6.1 Volatile Organic Compounds (VOC) Best Available Control Technology [326 IAC 2-2]

Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989; PSD/SSM 157-29566-00050, issued on December 22, 2010 and 326 IAC 2-2-3, BACT for VOC for the facilities described in this section is the following:

- (a) The daily VOC emissions from the Sealing and PVC Undercoating Line shall not exceed the corresponding limits in the following table. Compliance with these limits shall be determined pursuant to Condition D.6.7:

Facility	lb VOC/gal applied coating solids (lb/gacs)	kg VOC/liter applied coating solids (kg/lacs)
Sealing and PVC Undercoating Line, identified as Unit 002 (PVC Coating Booths #1 and #2)	0.30	0.036

- (b) The daily VOC emissions from the Black and Wax Booth and the Anticorrosion Coating Booth shall not exceed the corresponding limits in the following table. Compliance with these limits shall be determined pursuant to Condition D.6.7:

Facility	lb VOC/gal coating solids (lb/gcs)	kg VOC/liter coating solids (kg/lcs)
Before Vehicle Assembly		
Black and Wax Booth (black phthalic resin application)	17.9	2.14
Black and Wax Booth (inner panel wax application)	6.43	0.77
After Vehicle Assembly		
Anticorrosion Coating Booth (underfloor wax application)	3.59	0.43

- (c) The following spray application methods must be used whenever applying the following coatings:

- (1) PVC Undercoat - Airless (in PVC Coating Booths #1 and #2)
- (2) Underfloor Wax - Airless (in Anticorrosion Booth)
- (3) Inner Panel Wax - Air or Airless with minimum transfer efficiency of 80% (in Black and Wax Booth)

- (d) Pretreatment Cleaning shall utilize only VOC free detergents, conditioners, and rinses in the body pre-treatment cleaning operations.

- (e) Pertaining to purge solvent use:

- (1) Purge solvent capture systems will be utilized each time that any coating application equipment is purged. The purge solvent capture systems shall have a minimum overall capture efficiency of at least eighty percent (80%). Collected purge solvent shall be retained in closed conveyances to the Permittee's spent purge solvent storage tank or in closed containers until such time as they are shipped offsite for disposal or recycling.
- (2) Block painting will be utilized whenever possible to minimize color changes and the resulting purge.

Compliance with these limitations, and those contained in Conditions D.1.3, D.2.1, D.4.1, D.5.1, D.7.1, and D.8.1 shall satisfy the requirements of 326 IAC 2-2.

D.6.2 Prevention of Significant Deterioration - Best Available Control Technology for Nitrogen Oxides (NOx) [326 IAC 2-2]

Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, and 326 IAC 2-2-3, BACT for NOx for the natural gas combustion facilities described in this section is the following:

- (a) The NOx emissions from the PVC Coating Booths #1 and #2 Preheat Burners, the Black and Wax Coat Booth burner, the two (2) insignificant PVC Seal Oven burners, the two (2) insignificant natural gas-fired burners, and the insignificant Anticorrosion Booth burner shall not exceed 0.10 pounds per million Btu (lb/MMBtu) heat input each; and
- (b) All combustion facilities listed in this section shall use low-NOx natural gas burners.

Compliance with these limitations, and those contained in Conditions D.2.2, D.4.2, and D.8.2 shall satisfy the requirements of 326 IAC 2-2.

D.6.3 Volatile Organic Compound (VOC) Best Available Control Technology Limitations [326 IAC 2-2] [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 2-2-3 (Control Technology Review Requirements) and PSD 157-31885-00050, and 326 IAC 8-2-9, the daily VOC emissions from Anticorrosion Coating (Black and Wax Booth and Anticorrosion Coating Booth) shall not exceed 3.5 pounds of VOC per gallon of coating less water (0.42 kilograms of VOC per liter of coating less water) for materials that are air dried or forced warm air dried at temperatures up to ninety (90) degrees Celsius (one hundred ninety-four (194) degrees Fahrenheit). This limit applies to the weighted average of all Anticorrosion coatings.
- (b) Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge of VOC into the atmosphere in excess of the following limits:
 - (1) The daily VOC emissions from Sealing and PVC Coating (PVC Coating Booth #1 and PVC Coating Booth #2 and Sound deadener operation) shall not exceed 3.5 pounds of VOC per gallon of coating less water (0.42 kilograms of VOC per liter of coating less water).

Compliance with these limits shall be determined pursuant to Condition 6.7.

D.6.4 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:

- (a) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
- (b) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
- (c) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
- (d) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
- (e) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

D.6.5 Particulate Emissions [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate emissions from the Black and Wax Booth, PVC Coating Booth #1, PVC Coating Booth #2 and Anticorrosion Coating operations shall be controlled by dry filters. The Permittee shall operate the control devices in accordance with manufacturer's specifications.

D.6.6 Particulate Emissions from Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, the particulate emissions from the two (2) PVC oven zones #1 and #2 each with rated capacity of 3.5 MMBtu/hr shall each not exceed 0.314 pounds per MMBtu energy input.

The limitation is based on the following equation:

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

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input; and
Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. (Q = 120 MMBtu/hr).

D.6.7 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan, is required for these facilities and their respective 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.6.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Compliance with the VOC emission limits in Conditions D.6.1 and D.6.3 shall be determined with the following equations (as applicable):

$$\text{VOC emissions (lb VOC/gal applied coating solids)} = \left[\sum_{i=1}^n (C_i \times U_i) \right] / \sum_{i=1}^n U_i$$

Where:

C_i is the VOC content of the coating (i) in pounds of VOC per gallon of coating solids as applied; and

U_i is the usage rate of the coating (i) in gallons per day.

U total usage rate from all coatings (from 1 to n)

Or, if the emission limit is in units of pounds of VOC per gallon of coating less water:

$$\text{VOC emissions (lb VOC/gal coating less water)} = \left[\frac{\sum_{i=1}^n (C_i \times U_i)}{\sum_{i=1}^n U_i} \right]$$

Where:

C_i is the VOC content of the coating (i) in pounds of VOC per gallon of coating less water as applied; and

U_i is the usage rate of the coating (i) in gallons per day.

U total usage rate from all coatings (from 1 to n)

Or, if the emission limit is in units of pounds of VOC per gallon of applied coating solids (lb/gacs)

$$\text{DWA} = \frac{\sum_{i=1}^n (C_i)(U_i)}{\sum_{i=1}^n (S_i \times \text{TE})}$$

where:

DWA = daily calculated volume weighted average emissions in pounds per gallon coating solids;

C = VOC content of coating i, lb VOC/gal;

U = actual coating i usage, gal/day;

S = volume of solids in coating i consumed, gal/day;

TE = transfer efficiency of the applicator, determine using the Protocol for Determining Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations," EPA-450/3-88-018 (Docket ID No. OAR-2002-0093 and Docket ID No. A-2001-22); and

n = no. of coatings used during the day.

D.6.9 Operator Training Program

The Permittee shall implement an operator training program.

- (a) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the dry filters on the PVC Booth #1, PVC Booth #2, Black Coat and Wax Coating operations and Anticorrosion Coating operations. All existing operators shall be trained upon permit issuance. All new operators shall be trained upon hiring or transfer.
- (b) The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available not later than 1 hour after request for inspection by IDEM.
- (c) All operators shall be given refresher training annually.

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

D.6.10 Dry Filters Monitoring [326 IAC 2-7-5(3)] [40 CFR 64]

Dry filters shall be operated whenever the PVC Coating Booth #1 and PVC Coating Booth #2, Black and Wax coating Booth and Anticorrosion Coating Booth are in operation and shall be maintained in accordance with manufacturer's specification. Filters shall be changed on a monthly basis. Magnehelic pressure gauges shall be installed for continuous pressure monitoring and to detect whether filters need to be changed more frequently due to abnormal overspray loading. When the gauges indicate that a problem exists for a dry filter, 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.

The instruments used for determining the pressure shall comply with Section C – Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

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

D.6.11 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.6.1 and D.6.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limits established in Conditions D.6.1 and D.6.3. Records necessary to demonstrate compliance shall be available not later than 30 days after the end of each compliance period.
- (1) The VOC content of each coating material (as applied, less water) and the VOC content of each solvent (including purge solvents and thinners) used less water.
 - (2) The solids content of each coating material used (as applied).
 - (3) The amount of coating material and solvent (including purge solvents and thinners) used on a daily basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvent.
 - (4) The volume weighted average VOC content of the coatings used (as applied) for each day.
- (b) To document the compliance status with Condition D.6.9, the Permittee shall maintain copies of the training program, and the list of trained operators. Training records shall be maintained on site or available not later than 1 hour for inspection by IDEM.
- (c) To document the compliance status with Condition D.6.10, the Permittee shall maintain log containing records of dry filter replacement, and any required corrective actions taken.
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.6.12 Reporting Requirements

A monthly summary of the daily VOC content of the coatings used, based on a volume weighted average from the Sealing and Undercoating Line and Anticorrosion Coating Booth to document the compliance status with Condition D.6.1, shall be submitted to IDEM, OAQ on a quarterly basis, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1(35).

SECTION D.7

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14)]:

- (i) Trim Line, identified as Unit 010, application in the Body Shop and Trim Shop of adhesives and sealers to various vehicle parts, constructed in 1989 and approved in 2012 for modification which includes increasing the line speed to allow more vehicles to be coated on an hourly basis and approved in 2014 to construct the following in order to accommodate production increase from 310,000 vehicles per year to 450,000 vehicles per year:
 - (1) One (1) Wax Booth for the application of underbody wax.
 - (2) One (1) startup and roll test operation.
- (j) Six (6) storage tanks, identified collectively as Unit 011, approved in 2014 to increase utilization to accommodate the increase in production capacity from 310,000 vehicles per year to 450,000 vehicles per year, which includes the following equipment:
 - (1) Gasoline storage tank, with a capacity of 15,000 gallons, constructed in 1988, using a certified vapor collection and control system;
 - (2) Purge thinner storage tank, with a capacity of 5,000 gallons, constructed in 1988, using a certified vapor collection and control system;
 - (3) Waste purge thinner storage tank, with a capacity of 6,000 gallons, constructed in 1992;
 - (4) Purge thinner storage tank, with a capacity of 5,000 gallons, constructed in 2005;
 - (5) Windshield washer fluid storage tank, with a capacity of 5,000 gallons, constructed in 1988;
 - (6) Gasoline storage tank, with a capacity of 1,500 gallons, installed in 2004; and
- (k) Purge solvent usage and capture system, identified as Unit 012, constructed in 1989 and modified in 2006 and 2010 to allow for purging and capturing of solvent and waterborne purge materials.

(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.7.1 Prevention of Significant Deterioration (PSD) - Best Available Control Technology for Volatile Organic Compounds (VOC) [326 IAC 2-2]

Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, and 326 IAC 2-2-3, BACT for VOC for the facilities described in this section is the following:

- (a) Purge solvent capture system, identified as Unit 012, will be utilized each time that any coating application equipment is purged. The purge solvent capture systems shall have a minimum overall capture efficiency of at least eighty percent (80%). Collected purge solvent shall be retained in closed conveyances to the Permittee's spent purge solvent storage tank or in closed containers until such time as they are shipped offsite for disposal or recycling.

- (b) The 15,000-gallon gasoline storage tank (one of three tanks identified as 011) shall be equipped with:
- (1) a submerged fill pipe,
 - (2) pressure relief valve set to 0.7 psi or orifice of 0.5 inches in diameter, and
 - (3) a Stage I vapor balance system between the tank and transport.

Tank trucks shall not be unloaded unless they are properly equipped and connected to the vapor balance system and the system is in operation.

Compliance with these limitations, and those contained in Conditions D.1.3, D.2.1, D.4.1, D.5.1, D.6.1, and D.8.1, will satisfy the requirements of 326 IAC 2-2 and 326 IAC 8-1-6.

D.7.2 Prevention of Significant Deterioration (PSD) - Best Available Control Technology for Volatile Organic Compounds (VOC) [326 IAC 2-2]

Pursuant to 326 IAC 2-2-3, PSD 157-31885-00050 and PSD 157-33759-00050, the VOC BACT for the Trim Line, identified as Unit 010 shall be the following:

- (a) The monthly volume weighted average of the VOC content of the adhesives and other materials used in the Trim Line, Unit 010 for window installation shall not exceed 0.40 pounds of VOC per gallon of coating, as applied.
- (b) The monthly volume weighted average of the VOC content of the adhesives and sealers used in the Trim Line, Unit 010 excluding window installation materials shall not exceed 0.30 pounds of VOC per gallon of coating, as applied.

D.7.3 Prevention of Significant Deterioration (PSD) - Best Available Control Technology for Volatile Organic Compounds (VOC) [326 IAC 2-2]

Pursuant to 326 IAC 2-2-3 (Control Technology Review; Requirements) and PSD 157-33759-00050, the BACT for the existing Trim Line, Unit 010 - Fluid/Gasoline Fill to Vehicles shall be the following:

- (a) Vehicles must be equipped with on-board refueling vapor recovery system (ORVR) or the fluid/gasoline filling operation must utilize Stage II vapor recovery system.
- (b) The Permittee shall conduct daily checks of the Stage II Vapor Recovery System key operating parameters on days in which the filling of fluid/gasoline is conducted for vehicles not equipped with on-board refueling vapor recovery system (ORVR).

D.7.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their respective control devices.

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

D.7.5 Record Keeping Requirements

- (a) To document the compliance status with Condition D.7.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limit established in Condition D.7.2. Records necessary to demonstrate the compliance status shall be available not later than 30 days of the end of each compliance period.
 - (1) The VOC content of each coating/adhesive (as applied).

- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (2) The volume weighted average VOC content of the coatings/adhesives used (as applied) for each month.
- (3) The monthly coatings/adhesives usage in gallons.
- (b) To demonstrate the compliance status with Condition D.10.3, the Permittee shall maintain records in accordance with (1) and (2):
 - (1) Date and results of inspection made to the vapor recovery system.
 - (2) Dates and corrective actions made to the vapor recovery system malfunctions, defects and leaks.
- (c) Section C - General Record Keeping Requirements, contains the Permittee's obligations with regard to the records required by this condition.

D.7.6 Reporting Requirements

A quarterly report of the monthly volume weighted average of the VOC content of the adhesives used in the Trim Line, unit 010 for window installation, and all the other adhesives used and the quarterly summary of the information to document the compliance status with Condition D.7.2, shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1(35).

SECTION D.8 FACILITY OPERATION CONDITIONS

Facility Description [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) Space heaters, process heaters, or boilers using the following fuels: Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
 - (1) Six (6) general hot water boilers with a combined heat input capacity of 19.6 MMBtu/hr. [326 IAC 2-2] [326 IAC 6-2-4]
 - (2) Other insignificant natural gas combustion units: [326 IAC 2-2]
 - (A) Stamping Shop Steam Cleaner
 - (B) Distillation Room Heater
 - (C) Makeup Air Units (7)
 - (D) Unit Heaters (50)
 - (E) Door Heaters (14)
 - (F) Air Handling Units (44)
 - (G) Heating and Ventilation Units (6)
- (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 2-2]
 - (1) One (1) Stamping Shop; and
 - (2) Two (2) body lines within one (1) Body Shop with MIG and resistance welding robots, and one (1) grinding booth constructed in 1989 and approved for modification in 2012 to expand the Body Shop Building to include a Parts Storage Area and Body Shop Processing Area including the following:
 - (i) One (1) natural gas-fired air supply unit, with a maximum heat input capacity of 1.73 million British thermal units per hour (MMBtu/hr); and
 - (ii) MIG welding operations, with a maximum welding rod usage of 33,000 pounds per year
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (d) Deburring; buffing; polishing; abrasive blasting activities; pneumatic conveying; and woodworking operations.

SECTION D.8 FACILITY OPERATION CONDITIONS

- (e) Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:
 - (1) Gasoline Fill Operations (Benzene, Naphthalene, Ethylbenzene, Styrene, Toluene, Hexane, Xylene, Methyl Tert-butyl Ether) [326 IAC 2-2]
 - (2) The following storage tanks permitted under OP 79-09-93-0454, issued on July 26, 1989:
 - (A) One (1) double-walled fixed-roof engine oil storage tank, with a capacity of 5,000 gallons; and
 - (B) One (1) double-walled fixed-roof power steering fluid storage tank, with a capacity of 5,000 gallons;
 - (3) The following activities permitted under E 157-14535-00050, issued on October 10, 2001: assembly and testing (including engine test stands);
 - (4) Manual solvent wipedown;
 - (5) One (1) power steering fluid storage tank, with a capacity of 5,000 gallons, installed in 1988.
 - (6) One (1) transmission oil storage tank, with a capacity of 5,000 gallons, installed in 1988.
 - (7) One (1) Antifreeze storage tank, with a capacity of 10,000 gallons, installed in 1988.
 - (8) One (1) Antifreeze storage tank, with a capacity of 12,000 gallons, installed in 1988.

(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.8.1 Prevention of Significant Deterioration (PSD) - Best Available Control Technology for Volatile Organic Compounds (VOC) [326 IAC 2-2]

- (a) Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, and 326 IAC 2-2-3, BACT for VOC for the insignificant vehicle gasoline fueling operation is the use of a Stage II vapor balance control system. This system shall be in operation whenever vehicles are being fueled.

Compliance with this limitation, and those contained in Conditions D.1.3, D.2.1, D.4.1, D.5.1, D.6.1, and D.7.1, shall satisfy the requirements of 326 IAC 2-2.

- (b) Pursuant to PSD/SSM 157-31885-00050 and 326 IAC 2-2-3 (Control Technology Review Requirements), the Permittee shall comply with the following BACT requirements:
 - (1) The VOC BACT for the one (1) 1.73 MMBtu/hr Body Shop Air Supply Unit shall not exceed 0.0055 pound per million British thermal units (lb/MMBtu).
 - (2) The Permittee shall perform good combustion practices for the one (1) 1.73 MMBtu/hr Body Shop AHU.

- (3) The one (1) 1.73 MMBtu/hr Body Shop ASU shall burn natural gas only as fuel.

D.8.2 Prevention of Significant Deterioration - Best Available Control Technology for Nitrogen Oxides (NOx) [326 IAC 2-2]

Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, and 326 IAC 2-2-3, BACT for NOx for the insignificant natural gas combustion equipment described in this section is the following:

- (a) The NOx emissions from the following insignificant natural gas combustion facilities shall not exceed 0.10 pounds per million Btu (lb/MMBtu) heat input each:
- (1) Stamping Shop Steam Cleaner
 - (2) Hot Water Boilers (6)
 - (3) Makeup Air Units (7)
 - (4) Unit Heaters (33 - does not include 17 unit heaters in new engine manufacturing facility)
 - (5) Door Heaters (12 - does not include 2 door heaters in new engine manufacturing facility)
 - (6) Air Handling Units (38 - does not include 6 air handling units in new engine manufacturing facility)
 - (7) Heating and Ventilation Units (6)
- (b) All combustion operations at the source shall use low-NOx natural gas burners.

Compliance with these limitations, and those contained in Conditions D.2.2, D.4.2, and D.6.2, shall satisfy the requirements of 326 IAC 2-2.

D.8.3 Particulate Matter from Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, the particulate matter emissions from the six (6) insignificant natural gas-fired general hot water boilers with a combined heat input capacity of 19.6 MMBtu/hr shall each not exceed 0.314 pound per MMBtu energy input.

This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}} \quad Pt = \begin{array}{l} \text{Pounds of particulate matter emitted per million} \\ \text{Btu (lb/MMBtu) heat input; and} \end{array}$$

$Q =$ Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. ($Q = 120$ MMBtu/hr).

D.8.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan, is required for the insignificant gasoline filling operation and its Stage II vapor balance control system. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

D.8.5 Record Keeping Requirements

- (a) To document the compliance status with Condition D.8.1(b)(1), the Permittee shall maintain records of the vendor design guarantees for the one (1) 1.73 MMBtu/hr Body Shop Air Supply Unit.

- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.9 FACILITY OPERATION CONDITIONS

Entire Paint Coating Line System "C"- 2014 Project, as described in Section D.10

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

D.9.1 Prevention of Significant Deterioration (PSD) - Best Available Control Technology for Volatile Organic Compounds (VOC) [326 IAC 2-2]

Pursuant to 326 IAC 2-2-3 (Control Technology Review; Requirements) and PSD 157-33759-00050, the BACT for the Paint Coating Line System "C" shall be the following:

- (a) The total VOC emissions from the entire Paint Coating Line System "C"- 2014 project, including the PTE change from the modified existing emission units in Section D.5(h), and Section D.7(i) affected by this project shall be limited to less than 766.2 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The Paint Coating Line System "C" vehicle production shall be limited to 160,000 vehicles per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) The total natural gas combustion at the entire Paint Coating Line System "C"- 2014 project shall be limited to less than 751 million standard cubic feet (MMCF) per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limitation, and those contained in Conditions D.5.1, D.7.2, D.10.1 shall satisfy the requirements of 326 IAC 2-2. Compliance with Condition D.10.2, shall satisfy the requirements of 326 IAC 2-2 and 326 IAC 8-1-6.

Compliance with D.9.1(c) shall limit NOx emissions to less than 40 tons per year and renders 326 IAC 2-2 not applicable.

D.9.2 PSD Minor Limitations for Particulate (PM, PM10, PM2.5) Emissions

The particulate (PM, PM10 and PM2.5) emissions from ED Coating, Unit 013, Sealing, LASD (Liquid Applied Sound Deadener Coating, Unit 014, Intermediate Surfacer, Unit 015, Topcoat, Unit 016, Anticorrosion Coating (Trim and Final Assembly), Unit 017, Black and Wax Booth, Unit 017, Plastic Bumper Coating, Unit 018, Natural Gas Combustion units, at Paint Coating Line System C and PTE change from modified Plastic Bumper Booth 005B, Final Repair, Unit 007, and modified Trim Line, Unit 010 at paint Line Coating Systems A/B shall be limited to less than 25 tons of PM per twelve consecutive month period, less than 15 tons of PM10 per twelve consecutive month period and less than 10 tons of PM2.5 per twelve consecutive month period

Compliance with this condition shall render 326 IAC 2-2 not applicable.

Compliance Determination Requirements

D.9.3 Volatile Organic Compounds (VOC), Particulate (PM, PM10, PM2.5) Emissions

- (a) Compliance with the VOC emissions limit in Condition D.9.1(b) shall be determined by using the following equation, which calculates tons of VOC emissions per month, and adding the result to the calculated VOC emissions from the previous eleven months:

$$\text{Total VOC Emissions (ton/month)} = \text{ED Coating, Unit 013 VOC} + \text{Sealing, LASD (Liquid Applied Sound Deadener Coating, Unit$$

014 VOC + Intermediate Surfacer, Unit 015
VOC + Topcoat, Unit 016 VOC + Anticorrosion
Coating (Trim and Final Assembly), Unit 017
VOC + Black and Wax Booth, Unit 017 VOC +
Plastic Bumper Coating, Unit 018 VOC +
Purge Solvent and Capture, Unit 019 VOC +
Miscellaneous Cleaning Solvents, Unit 020
VOC + Natural Gas Combustion VOC +
Insignificant VOC Sources + VOC PTE change
from modified Plastic Bumper Booth 005B,
Final Repair, Unit 007, Trim Line, Unit 010,
and Storage Tanks (i.e., Gasoline, Purge
Thinner, Waste Purge, Vehicle Fluids), Unit
011

Where:

VOC emissions from each coating booth, $V_b = \sum_{i=1}^n (C_i \times D_i \times W_i) \times (1-CE) \times 1 \text{ ton}/2000 \text{ lbs}$

V_b = VOC emissions from each coating booth, ton/month

C_i = usage of coating i in gallons per month;

D_i = density of coating i in pounds per gallon;

W_i = weight percent organics from coatings i

CE = overall VOC control efficiency for each booth, when applicable.

Natural Gas Combustion VOC Emissions, tons/month = natural gas usage (MMCF/month) x
1020 MMBtu/1MMCF x 0.0054 lb VOC/MMBtu x 1 ton/2000 lbs

- (b) Compliance with the particulate (PM, PM10, PM2.5) emission limits in Condition D.9.2 shall be determined by using the following equation, which calculates pounds of particulate emissions per month, and adding the result to the calculated particulate emissions from the previous eleven months:

Total Particulate Emissions (lb/month) = ED Coating, Unit 013 PM, PM10, PM2.5, Sealing, LASD (Liquid Applied Sound Deadener Coating, Unit 014 PM, PM10, PM2.5, Intermediate Surfacer, Unit 015 PM, PM10, PM2.5, Topcoat, Unit 016 PM, PM10, PM2.5, Anticorrosion Coating (Trim and Final Assembly), Unit 017 PM, PM10, PM2.5, Black and Wax Booth, Unit 017 PM, PM10, PM2.5, Plastic Bumper Coating, Unit 018 PM, PM10, PM2.5, Natural Gas Combustion units PM, PM10, PM2.5 at Paint Coating Line System C and PTE change from modified Plastic Bumper Booth 005B, Final Repair, Unit 007, and Trim Line, Unit 010 at paint Line Coating Systems A/B

Where:

PM, PM10, PM2.5 emissions from each coating booth = $\sum_{i=1}^n (C_i \times D_i \times S_i) \times (1-TE) \times (1-CE)$;

Natural Gas Combustion PM/PM10 = natural gas usage (MMCF/month) * 7.6 lb PM/MMCF;

C_i = usage of coating i in gallons per month;
D_i = density of coating i in pounds per gallon;
S_i = solids content of coating i, expressed as a decimal weight percent;
TE = solids transfer efficiency of the applicator for each booth, based on transfer efficiency determination tests in D.10.10(b); and
CE = particulate control efficiency for each booth, based on manufacturer data.

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

D.9.4 Record Keeping Requirements

-
- (a) To document the compliance status with Conditions D.9.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish the compliance status with the VOC emission limit established in Condition D.9.1(a), the natural gas combustion limit established in Conditions D.1.1(c) and D.1.2 and the VOC emission limit established in Condition D.1.3. Records necessary to demonstrate the compliance status shall be available not later than 30 days after the end of each compliance period.
- (1) The VOC content of each coating material and solvent (including purge solvents and thinners).
 - (2) The amount of coating material and solvent (including purge solvents and thinners) 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 solvent.
 - (3) The total VOC emissions from coatings and solvents (including purge solvents and thinners) for each month.
 - (4) The amount of coating material and solvent (including purge solvents and thinners) transferred off-site for disposal or recycling for each month.
 - (5) The density of each coating.
- (b) To document the compliance status with Condition D.9.1(b), the Permittee shall maintain records of monthly vehicle production.
- (c) To document the compliance status with Condition D.9.1(c), the Permittee shall maintain records of monthly natural gas usage for each month.
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.9.5 Reporting Requirements

- (a) Reports of monthly VOC emissions from the Paint Coating Line System "C" shall be submitted to IDEM, OAQ on a quarterly basis, not later than thirty (30) days after the end of the quarter being reported, to demonstrate the compliance status with Condition D.9.1(a).
- (b) Reports of monthly vehicle production totals to demonstrate the compliance status with Condition D.9.1(b), shall be submitted to IDEM, OAQ on a quarterly basis, not later than thirty (30) days after the end of the quarter being reported.
- (c) Reports of monthly natural gas usage to demonstrate the compliance status with Conditions D.9.1(c) shall be submitted to IDEM, OAQ on a quarterly basis, not later than thirty (30) days after the end of the quarter being reported.
- (d) Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1(35).

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Facility Description [326 IAC 2-7-5(14)]:

- (a) Electrodeposition (ED) Coating Line for Vehicle Bodies, identified as Unit 013, with a capacity of 160,000 units per year, approved in 2014 for construction, venting to 9 exhaust stacks, identified as Stacks 13-1 through 13-9, consisting of the following units:
 - (1) One (1) ED Body Pretreatment Area, including a pretreatment boiler for warming water surrounding the ED Coating Tank, with a maximum heat input capacity of 12 million British thermal units per hour (MMBtu/hr).
 - (2) One (1) ED Body Coating Tank, utilizing dipping as the method of application.
 - (3) One (1) ED Oven (pretreatment drying oven), with a maximum heat input capacity of 9.0 MMBtu/hr, using no controls.
 - (4) One (1) ED Body Cool Down Area.
 - (5) One (1) ED Deck and ED Sand Area.
 - (6) One (1) Paint Storage Room.
 - (7) One (1) Working Stage Air House to support the Sealer, PVC, ED Sand, Wet Sand #2 Area rated at 9.5 MMBtu/hr.
 - (8) One (1) Working Stage Air House to support the Surfacer Sand, Wet Sand #1 Area rated at 2.6 MMBtu/hr.

- (b) Sealing, LASD (Liquid Applied Sound Deadener) and PVC Undercoating Line, identified as Unit 014, with a capacity of 160,000 units per year, approved in 2014 for construction, venting to 3 exhaust stacks, identified as Stacks 14-1 through 14-3, consisting of the following:
 - (1) One (1) PVC Coating Booth #1, equipped with airless spray application and pedestal robotic spray system, using a dry filter to control the particulate overspray emissions.
 - (2) One (1) PVC Sealer Oven, with a maximum heat input capacity of 3 MMBtu/hr, using no control.
 - (3) One (1) PVC Cool Down Area, using no controls.
 - (4) One (1) Sealer Application Area, using no controls.
 - (5) One (1) LASD (Liquid Applied Sound Deadener) Application Area, using no controls.

- (c) Intermediate Surfacer Coating Line, identified as Unit 015, with a capacity of 160,000 units per year, approved in 2014 for construction, venting to 14 exhaust stacks identified as Stacks 15-1 through 15-14, consisting of the following:
 - (1) One (1) Intermediate Coating Booth, equipped with manual/robotic/automated spray applicators, for the application of waterborne surfacer material, using dry filtration or a water wash system to control the particulate overspray emissions.
 - (2) One (1) Intermediate Coating Oven, with a maximum heat input capacity of 10 MMBtu/hr, with no VOC control.

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- (3) One (1) Intermediate (Surfacer) natural gas-fired flash zone heater rated at 3.0 MMBtu/hr.
 - (4) One (1) Intermediate (Surfacer) Air House rated at 21.6 MMBtu/hr.
 - (5) One (1) Intermediate Cool Down Area, using no controls.
 - (6) One (1) main paint mix room.
- (d) Topcoat System, identified as Unit 016, with a capacity of 160,000 units per year, approved in 2014 for construction, venting to 26 exhaust stacks, identified as Stacks 16-1 through 16-26, consisting of the following:
- (1) One (1) Topcoat #C1 Booth, equipped with air atomized spray with robot, electrostatic air atomized spray with robot, and electrostatic bell with robot method of applications, and automatic spray applicators, using dry filtration or a water wash system to control the particulate overspray emissions.
 - (2) One (1) Topcoat #C1 Oven, with a maximum heat input capacity of 8.0 MMBtu/hr, using a 1.0 MMBtu/hr natural gas-fired thermal oxidizer (TO-C1) as VOC control.
 - (3) One (1) Topcoat natural gas-fired flash zone heater rated at 3.0 MMBtu/hr.
 - (4) One (1) Topcoat #C1 Cool Down Area, using no controls.
 - (5) One (1) main paint mix room.
 - (6) One (1) Topcoat Air House rated at 38.0 MMBtu/hr.
 - (7) One (1) Mixing Air House located in Mix Room rated at 2.0 MMBtu/hr.
- (e) Anticorrosion Coating Operations, identified as Unit 017, with a capacity of 160,000 (if built as part of new paint Line "C") or 225,000 units per year (if built as part of existing paint lines "A/B"), approved in 2014 for construction, venting to 2 exhaust stacks, identified as Stacks 17-1 and 17-2, consisting of the following units:
- (1) One (1) Black and Wax Coating Booth, to be part of either the new paint line "C" or existing paint lines "A/B", equipped with air atomized and air-assisted airless spray systems, using a dry filter to control the particulate overspray emissions.
 - (2) One (1) Black and Wax Coating Booth natural gas-fired burner, with a maximum heat input capacity of 15.5 MMBtu/hr.
 - (3) One (1) Wax Coating Booth, constructed in 2014 in the Trim & Final Assembly Area, utilizing air-assisted spray system, with no particulate overspray control.
 - (4) One (1) Wax Coating Booth natural gas-fired burner, with a maximum heat input capacity 4.0 MMBtu/hr.
- (f) Plastic Bumper Coating Line (PBL-C), identified as Unit 018, with a capacity of 160,000 units per year, approved in 2014 for construction, venting to 18 exhaust stacks, identified as Stacks 18-1 through 18-18, consisting of the following units (see operating scenarios for Unit 005B):

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- (1) One (1) PBL-C Paint Booth, equipped with air atomization and electrostatic bell spray systems, using dry filtration or a water wash system to control the particulate overspray emissions.
- (2) One (1) PBL-C Oven, with a maximum heat input capacity of 3.0 MMBtu/hr, using no VOC controls.
- (3) One (1) PBL-C Cool Down area.
- (4) One (1) paint mixing room.
- (5) Three (3) Bumper Air Houses (includes Primer Air House, basecoat Air house and Clearcoat Air House), rated at a total of 17.7 MMBtu/hr.
- (6) One (1) PBL-C natural gas-fired flash zone heater located between the primer and basecoat zones rated at 3.0 MMBtu/hr.
- (7) One (1) PBL-C natural gas-fired flash zone heater located between the basecoat and the clearcoat zones rated at 3.0 MMBtu/hr.
- (8) One (1) Working Stage Air House rated at 4.4 MMBtu/hr.
- (9) One (1) Mixing Air House located in Mixing Room rated at 1.8 MMBtu/hr.
- (g) Miscellaneous combustion devices, approved in 2014 for construction:
 - (1) One (1) Working Stage Air House used to support the Inspection, Touch-up area rated at 6.5 MMBtu/hr.
 - (2) One (1) Working Stage Air House used to support Paint Coating Line "C" rated at 2.4 MMBtu/hr.
- (h) Purge solvent usage and capture system, identified as Unit 019, approved in 2014 for construction, designed to allow for purging and capturing of solvent and waterborne purge materials.
- (i) Miscellaneous support cleaning operations, identified as Unit 020, approved in 2014 for construction, which include wiping solvent and miscellaneous cleanup materials.
- (j) An additional Startup and Roll Test Line, approved in 2014 for construction.
- (k) Engine assembly C - one (1) additional dynamometer gasoline engine testing, where engines are tested prior to installation in the vehicle chassis, approved in 2014 for construction.
- (l) Other insignificant natural gas combustion units approved in 2014 for construction:
 - Rooftop Units - 53 Units
 - Engine Assy Expansion - 4 Units (1.6 MMBtu/hr total)
 - Engine W/H Expansion - 2 Units (0.8 MMBtu/hr total)
 - Trim Warehouse Phase 1 - 5 Units (2.0 MMBtu/hr total)
 - Trim Warehouse Phase 2 - 5 Units (2.0 MMBtu/hr total)
 - Trim Warehouse Phase 3 - 5 Units (2.0 MMBtu/hr total)
 - Body Warehouse - 3 Units (1.2 MMBtu/hr total)
 - Body Service Warehouse - 3 Units (1.2 MMBtu/hr total)

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- Stamping Warehouse 1 - 4 Units (1.6 MMBtu/hr total)
- Stamping Warehouse 2 - 1 Unit (0.4 MMBtu/hr total)
- Motor Pool Bldg. - 3 Units (1.2 MMBtu/hr total)
- Paint Coating Line "C" Heating and Cooling Units - 11 units (8.8 MMBtu/hr total)
- Paint Coating Line "C" Makeup Air Heating Units - 5 units (7.5 MMBtu/hr total)
- Paint Coating Line "C" Air Handling Units - 2 units (7.7 MMBtu/hr total)

Heater Units - 39 Units

- Engine Assembly Expansion - 1 Unit (0.4 MMBtu/hr total)
- Engine Warehouse Expansion - 4 Units (1.6 MMBtu/hr total)
- Trim Warehouse Phase 1 - 2 Units (0.8 MMBtu/hr total)
- Trim Warehouse Phase 2 - 2 Units (0.8 MMBtu/hr total)
- Trim Warehouse Phase 3 - 2 Units (0.8 MMBtu/hr total)
- Body Warehouse - 3 Units (1.20 MMBtu/hr total)
- Body Service Warehouse - 2 Units (0.8 MMBtu/hr total)
- Stamping Warehouse 1 - 3 Units (1.2 MMBtu/hr total)
- Stamping Warehouse 2 - 1 Unit (0.4 MMBtu/hr total)
- Motor Pool Accessory Bldg - 2 Units (0.8 MMBtu/hr total)
- Paint Coating Line "C" Heater Units - 17 units (6.8 MMBtu/hr total)

(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.10.1 Prevention of Significant Deterioration (PSD) - Best Available Control Technology for Volatile Organic Compounds (VOC) [326 IAC 2-2]

Pursuant to 326 IAC 2-2-3 (Control Technology Review; Requirements) and PSD 157-33759-00050, the BACT for VOC emissions from the following facilities in Paint Coating Line System "C" shall be the following:

- (a) The VOC emissions from the ED Coating Line, identified as Unit 013 shall be limited to less than 1.15 pounds of VOC per gallon applied coating solids (lb/gacs), based on a daily volume weighted average, without add-on control.
- (b) The VOC emissions from the Sealer, LASD and PVC Undercoating Line, identified as Unit 014 shall be limited to less than 0.38 pounds per gallon (lb/gal), based on a daily volume weighted average, without add-on control.
- (c) When using Option A, the VOC emissions from the Intermediate Surfer, identified as Unit 015, shall be limited to less than 4.8 pounds of VOC per gallon applied coating solids (lb/gacs), based on a daily volume weighted average, without add-on control.
- (d) When using Option B, the combined VOC emissions from the Intermediate Surfer, identified as Unit 015 and Topcoat, Unit 016 ("wet on wet" system), shall be limited to less than 10.41 pounds of VOC per gallon applied coating solids (lb/gacs), based on a daily volume weighted average, without add-on control.
- (e) When using Option A, the VOC emissions from the Topcoat System #C1, identified as Unit 016, shall be limited to less than 10.96 pounds per gallon applied coating solids (lb/gacs), based on a daily volume weighted average.

- (f) When using either Option A or Option B, the VOC emissions from the Topcoat System #C1 Oven, Unit 016 shall be vented to the thermal oxidizer (TO-C1) with destruction efficiency of 95% and a minimum capture efficiency of 18% (booth/oven split).
- (g) The BACT for the Black and Wax Booth, Unit 017 shall be the following:
 - (1) The VOC emissions from the phthalic black material shall be limited to less than 1.0 pounds per gallon (lb/gal) based on a daily volume weighted average.
 - (2) The VOC emissions from the inner wax material shall be limited to less than 3.5 pounds per gallon (lb/gal) based on a daily volume weighted average.
- (h) The VOC emissions from the Anticorrosion Wax Booth, Unit 017 shall be limited to less than 2.51 pounds per gallon (lbs/gal), based on a daily volume weighted average.
- (i) The annual VOC usage for paint line cleaning/purge solvents minus the amount of VOC in the purge material collected associated with the Purge Solvent Usage and Capture System, Unit 019 shall be limited to less than 83.8 tons per twelve consecutive month period with compliance determined at the end of each month.

The annual VOC usage for wiping solvents and clean up materials shall be limited to less than 15.2 tons per twelve consecutive month period with compliance determined at the end of each month.

Good work practices shall be conducted for the Purge Solvent Usage and Capture System, Unit 019 and Solvent Wiping and Cleaning, Unit 020 which includes the following:

- (1) Purge solvent capture systems shall be utilized each time that any coating application equipment is purged. The purge solvent capture systems shall have a minimum overall capture efficiency of at least eighty percent (80%). Collected purge solvent shall be retained in closed conveyances to the Permittee's spent purge solvent storage tank or in closed containers until such time as they are shipped offsite for disposal or recycling.
 - (2) Block painting will be utilized whenever possible to minimize color changes and the resulting purge.
 - (3) Clean up rags with solvent shall be stored in closed containers.
 - (4) Documentation shall be maintained on-site to demonstrate how these materials are being directed and collected for both the solvent-borne and water-borne purge material.
- (j) The BACT for the following miscellaneous natural gas combustion units shall be the following:
 - (1) The VOC emissions from the PBL-C Oven, Working Stage Air House and Mixing Air House shall each be limited to less than 0.0054 pound per million British thermal units (lb/MMBtu) and shall only combust natural gas.
 - (2) The VOC emissions from the Rooftop and Heater Units not mentioned in condition D.10.1(k) shall each be limited to less than 0.0054 pound per million British thermal units (lb/MMBtu) and shall only combust natural gas.
 - (k) The PSD BACT for the following miscellaneous natural gas combustion units shall be the following:

Combustion Emission Unit/ID	number of Units	Heat Input (MMBtu/hr)
PAINT SHOP "C" NATURAL GAS COMBUSTION UNITS		
Pretreatment Boiler – Ed Body Area	1	12
ED Oven	1	9.0
PVC Sealer Oven	1	3.0
Intermediate (Surfacer) Oven	1	10
Intermediate (Surfacer) Flash Zone Heater	1	3.0
PBL-C Flash Zone Heater – Primer & Basecoat Zones	1	3.0
Topcoat Flash Zone Heater	1	3.0
PBL-C Flash Zone Heater – Basecoat & Clearcoat Zones	1	3.0
Topcoat #C1 Oven	1	8.0
Topcoat Oven RTO	1	1.0
Intermediate (Surfacer) Air Houses	1	21.6
Topcoat Air House	1	38
Working Stage Air House - Surfacer Sand, Wet Sand #1	1	2.6
Working Stage Air House - Sealer, PVC, ED Sand, Wet Sand #2	1	9.5
Black & Wax Booth	1	15.5
Mixing Air House- Mix Room	1	2.0
Working Stage Air House - Inspection, Touch-Up Area	1	6.5
Working Stage Air House- Paint Shop "C"	1	2.4
NEW ROOFTOP UNITS		
Heating and Cooling Units		
HCU-14-1 Pretreatment Roof	1	0.77
HCU-14-2 Pretreatment Roof	1	0.77
HCU-14-3 Pretreatment Roof	1	0.77
HCU-14-4 Pretreatment Roof	1	0.77
HCU-14-5 Pretreatment Roof	1	0.77

Combustion Emission Unit/ID	number of Units	Heat Input (MMBtu/hr)
HCU-14-6 Pretreatment Roof	1	0.77
HCU-10 Oven Roof	1	0.591
HCU-11 Oven Roof	1	0.591
HCU-12 Cafeteria	1	0.692
HCU-13 Roof of Conveyor Bridge	1	1.175
HCU-14 Roof of Conveyor Bridge	1	1.175
Makeup Air heating Units		
MAU-14-1 Roof	1	1.5
MAU-14-2 Roof	1	1.5
MAU-14-3 Roof	1	1.5
MAU-14-4 Roof	1	1.5
MAU-14-5 Roof	1	1.5
AIR HANDLING UNITS		
AHU-14-1 Penthouse	1	3.834
AHU-14-2 Penthouse	1	3.834
NEW HEATER UNITS		
Unit-14-1 Oven-A4-B0	1	0.4
UH-14-2 Oven - A2 - B1.5	1	0.4
UH-14-3 Oven - A2 - B3	1	0.4
UH-14-9 Penthouse - A9 - B2	1	0.4
UH-14-10 Penthouse - A17 - B3	1	0.4
UH-14-11 Penthouse - A12.5 - B0	1	0.4
UH-14-12 Penthouse - A15 - B0	1	0.4
UH-14-13 Penthouse - A17 - B1	1	0.4
UH-14-20 North Dock - A15 - B6	1	0.4
UH-14-21 North Dock - A15 - B6	1	0.4
UH-14-22 WWT - A4.5 - B6	1	0.4
UH-14-23 WWT - A2 - B7	1	0.4
UH-14-24 Tunnel - X19.4 - Y4	1	0.4

Combustion Emission Unit/ID	number of Units	Heat Input (MMBtu/hr)
UH-14-25 Tunnel - X24 - Y5.2	1	0.4
UH-14-26 Tunnel - X18 - Y6.6	1	0.4
UH-14-27 Tunnel - X18 - Y10.8	1	0.4
UH-14-28 Tunnel - X18.5 - Y14.5	1	0.4

- (1) The VOC emissions from the combustion units in the above table shall each be limited to less than 0.005 pound per million British thermal units (lb/MMBtu).
 - (2) The combustion of only natural gas fuel; and
 - (3) Good combustion practices, which includes proper care and maintenance of the natural gas burner systems.
- (l) The Permittee shall observe good work practices when testing engines and during startup and roll test of the vehicles by minimizing excessive testing of the vehicle powertrain outside the normal testing specification ranges, (i.e. speed, duration and distance during the test).

Compliance with Condition D.10.1 shall satisfy the requirements of 326 IAC 2-2.

D.10.2 Prevention of Significant Deterioration (PSD) - Best Available Control Technology for Volatile Organic Compounds (VOC) [326 IAC 2-2] [326 IAC 8-1-6]

Pursuant to 326 IAC 2-2-3 (Control Technology Review; Requirements) and PSD 157-33759-00050, the BACT for VOC emissions from the Paint Coating Line System "C" Plastic Bumper Coating Line (PBL-C), Unit 018 shall be the following:

- (a) The VOC emissions from Unit 005B of Section D.3(g) and Unit 018 of this section, as a volume weighted average of all primer coatings used, shall be limited to less than 0.71 pounds per gallon based on a daily volume weighted average.
- (b) The VOC emissions from Unit 005B of Section D.3(g) and Unit 018 of this section, as a volume weighted average of all basecoat coatings, shall be limited to less than 1.38 pounds per gallon, based on a daily volume weighted average.
- (c) The VOC emissions from Unit 005B of Section D.3(g) and Unit 018 of this section, as a volume weighted average of all clearcoat coatings, shall be limited to less than 4.09 pounds per gallon, based on a daily volume weighted average.
- (d) Good work practices which includes the following:
 - (1) The use of robotic automatic spray applicators to minimize paint usage.
 - (2) The use of waterbased coatings for the primer, and basecoat applications.
 - (3) All paint mixing containers, other than day tanks equipped with continuous agitation systems, which contain organic VOC containing coatings and other materials shall have a cover with no visible gaps in place at all times except when material is being

added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

- (4) Solvent-borne purge materials sprayed during paint line cleaning and color changes shall be directed into solvent collection containers. Documentation shall be maintained on-site to demonstrate how these materials are being directed and collected for both the solvent-borne and water-borne purge materials.
- (5) Solvent collection containers shall be kept closed when not in use.
- (6) Clean-up rags with solvent shall be stored in closed containers.
- (7) VOC emissions shall be minimized during cleaning of storage, mixing, and conveying equipment.

Compliance with Condition D.10.2 shall satisfy the requirements of 326 IAC 2-2 and 326 IAC 8-1-6.

D.10.3 Automobile and Light Duty Truck Coating Operations [326 IAC 8-2-2] [326 IAC 8-1-2]

- (a) Pursuant to 326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations), the volatile organic compound (VOC) content of coatings applied to automobile and light duty truck bodies, hoods, doors, cargo boxes, fenders, and grill openings in the Intermediate Surfacer Coating Line, identified as Unit 015 in combination with Electrodeposition Coating of Vehicle Bodies (ED) Coating Line, identified as Unit 013 shall be limited to less than 0.23 kilograms per liter of coating (1.9 pounds per gallon), excluding water, delivered to the primer coating applicators.
- (b) Pursuant to 326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations), the volatile organic compound (VOC) content of coatings applied to automobile and light duty truck bodies, hoods, doors, cargo boxes, fenders, and grill openings in the Topcoat System, identified as Unit 016 shall be limited to less than 0.34 kilograms per liter of coating (2.8 pounds per gallon) excluding water, delivered to the applicator from topcoat application, flash-off area and oven operations.
- (c) Pursuant to 326 IAC 8-1-2(a)(5), VOC emissions for Topcoat System, identified as Unit 016 as required in 326 IAC 8-2-2 and Condition D.10.3(b) shall be limited to no greater than equivalent emission limitations based on an actual measured transfer efficiency higher than 30%. The equivalent emission limitation for the Topcoat System, identified as Unit 016 is 1.83 kilograms of VOC per liter solids deposited (15.1 pounds of VOC per gallon solids deposited).
- (d) Pursuant to 326 IAC 8-1-2(a), these emission limitations shall be achieved using control, higher solids (low solvent) coatings, waterborne coatings, and/or daily volume-weighted averaging.

D.10.4 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9, the daily VOC emissions from Sealing, LASD and PVC Undercoating Booths, Unit 014 shall be limited to less than 3.5 pounds of VOC per gallon of coating less water (0.42 kilograms of VOC per liter of coating less water), delivered to a coating applicator that applies extreme performance coatings.
- (b) Pursuant to 326 IAC 8-2-9, the daily VOC emissions from Black and Wax Booth, Unit 017 shall be limited to less than 3.0 pounds of VOC per gallon of coating less water (0.36 kilograms of VOC per liter of coating less water).

D.10.5 Particulate Emissions from Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 316 IAC 6-2-4, the particulate emissions from the Pretreatment and ED Boiler shall each not exceed 0.284 pound per million British thermal units (lb/MMBtu).

The limitation is based on the following equation:

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

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input; and
Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. (Q = 176.1 MMBtu/hr).

D.10.6 Particulate Emissions [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate emissions from the Sealing, LASD (Liquid Applied Sound Deadener) and PVC Undercoating Booth identified as Unit 014; Intermediate Coating Booth, identified as Unit 015; Topcoat #C1 Booth identified as Unit 016; Black and Wax Coating Booth identified as Unit 017 and PBL-C Paint Booth shall be controlled by dry filters or water wash system or equivalent control. The Permittee shall operate the control devices in accordance with manufacturer's specifications.

D.10.7 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan, is required for these facilities and their respective 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.10.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

(a) Compliance with the VOC emission limits in Conditions D.10.1 and D.10.2 shall be determined with the following equations (as applicable):

$$\text{VOC emissions (lb VOC/gal applied solids)} = \left[\sum_{i=1}^n (C_i \times U_i) / \sum_{i=1}^n (S_i \times TE) \right] \times [1 - (CE \times DE)]$$

Where:

C_i is the VOC content of the coating (i) in pounds of VOC per gallon of coating, as applied;
U_i is the usage rate of the coating (i) in gallons per day;
S_i is the usage rate of coating (i) solids in gallons per day;
TE is the transfer efficiency of the applicator;
CE is the minimum capture efficiency of the incinerator (as applicable); and
DE is the minimum destruction efficiency of the incinerator (as applicable).

Or, if the emission limit is in units of pounds of VOC per gallon of coating less water:

$$\text{VOC emissions (lb VOC/gal coating less water)} = \left[\sum_{i=1}^n (C_i \times U_i) / \sum_{i=1}^n U \right] \times [1 - (CE \times DE)]$$

Where:

C_i is the VOC content of the coating (i) in pounds of VOC per gallon of coating less water, as applied;
U_i is the usage rate of the coating (i) in gallons per day;
U total usage rate from all coatings (from 1 to n), gal/day
CE is the minimum capture efficiency of the incinerator (as applicable); and

DE is the minimum destruction efficiency of the incinerator (as applicable);

Or, if the emission limit is in units of pounds of VOC per gallon of coating:

$$\text{VOC emissions (lb VOC/gal coating)} = \sum_{i=1}^n (C_i \times U_i)$$

Where:

i = 1 to n

C_i is the VOC content of each individual coating (i) in pounds of VOC per day, as applied;

U_i is the usage rate of each individual coating (i) in gallons per day;

n is the number of individual coatings

- (b) Compliance with the VOC limit in Condition D.10.1(i) shall be determined by using the following equation, which calculates the tons of VOC emissions per month, and adding the result to the calculated VOC emissions from the previous eleven months:

$$\text{VOC Emission Limit} = (U \times C) \times (1 - (CE \times DE))$$

Where:

U is the coating usage in tons/month;

C is the VOC content of the coating;

CE is the minimum capture efficiency of the incinerator (as applicable); and

DE is the minimum destruction efficiency of the oxidizer (as applicable).

D.10.9 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

- (a) Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the thermal oxidizer, TO-C1 at all times the Topcoat #C1 Oven is in operation to ensure compliance with Conditions D.10.1(d) and (e).
- (b) The Topcoat #C1 Oven thermal oxidizer, TO-C1 shall be operated such that it achieve the minimum capture and destruction efficiencies specified in Condition D.10.1(f).

D.10.10 Testing Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11]

- (a) Within sixty (60) days after the start up of operation of the thermal oxidizer (TO-C1) associated with Topcoat System "C1" Oven, the Permittee shall perform VOC testing to verify its VOC destruction efficiency. Performance testing shall utilize methods as approved by the Commissioner and shall be performed at least once every two and one half (2.5) 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.
- (b) Within sixty (60) days after the start up of operation of the Paint Coating Line C, the Permittee shall perform an initial transfer efficiency test for each paint operation using methods as approved by the Commissioner. Repeat testing is required if significant material or application equipment change has occurred and must be conducted not later than 60 days after start-up and stabilization of the new material, or application equipment. Transfer efficiency testing is not necessary for the following:
- (1) Model year product change, unless there are significant changes in the size and shape of the typical vehicle.

- (2) Processing and material changes such as new model year or special order colors of the same formula type, minor changes in line rate, minor changes in processing sequence, and minor changes in equipment types.

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

D.10.11 Thermal Oxidizer Temperature [326 IAC 2-7-5(3)]

A continuous monitoring system shall be calibrated, maintained, and operated for measuring the operating temperature of the thermal oxidizer (TO-C1) whenever any of the Topcoat System "C1" Oven is in operation to control VOC emissions from this oven. For the purpose of this condition, continuous means no less than once per minute. The output of this system shall be recorded as a three (3) hour average. Whenever the three (3) hour average operating temperature of this oxidizer is below the three (3) hour average temperature established during the latest stack test that demonstrated compliance, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.10.12 Parametric Monitoring [326 IAC 2-7-5(3)]

The duct pressure or fan amperage, whichever is monitored by the Permittee under this condition, shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the approved stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

D.10.13 Water Wash Monitoring [326 IAC 2-7-5(3)]

Daily visual inspections shall be made on each water wash flood pans and water circulation associated with the Topcoat #C1 Booth, exhausting to twenty-six (26) exhaust stacks, identified as Stacks 16-1 through 16-26, the PBL-C Paint Booth exhausting to eighteen (18) exhaust stacks, identified as Stacks 18-1 through 18-18, and Intermediate Coating Booth, exhausting to fourteen (14) exhaust stacks identified as Stacks 15-1 through 15-14, to verify the control system proper operation. A warning system shall be installed and operated to ensure that the water circulation pump is operational at all times when any of the Topcoat #C1 Booth and PBL-C Paint Booth is in operation. In addition, a red strobe light shall automatically be activated whenever the water circulation pump is down and once a day visual observation of the warning system shall be conducted. When a system warning is received, 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

D.10.14 Dry Filters Monitoring [326 IAC 2-7-5(3)]

Dry filters shall be in place whenever the PVC Coating Booth #1 and Black and Wax Coating Booth, are in operation and shall be maintained in accordance with manufacturer's specification. Filters shall be changed on a monthly basis. Magnehelic pressure gauges shall be installed for continuous pressure monitoring and to detect whether filters need to be changed more frequently due to abnormal overspray loading. When the gauges indicate that a problem exists for a dry filter, 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.

The instruments used for determining the pressure shall comply with Section C – Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

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

D.10.15 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.10.1(a) through (h), D.10.2 through D.10.4, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limits established in Conditions D.10.1 through D.10.4. Records necessary to demonstrate compliance shall be available not later than 30 days after the end of each compliance period.
 - (1) The amount and VOC content of each coating material and solvent applied daily.
 - (A) Records shall include, but not limited to 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.
 - (2) The solids content of each coating material used (as applied).
 - (3) The water content of each coating material used (as applied).
 - (4) The calculated daily volume weighted average emission in pounds per gallon coating solids as applied.
 - (5) The calculated daily volume weighted average VOC content per gallon of the coatings less water as applied.
 - (6) The calculated daily volume weighted average VOC content per gallon of the coatings as applied.
- (b) To document the compliance status with Condition D.10.1(i), the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limits established in Conditions D.10.1(i). Records necessary to demonstrate compliance shall be available not later than 30 days after the end of each compliance period.
 - (1) The amount of coating material, wiping/cleaning solvent, purge solvents used on a monthly basis, and amount of purge material (paint solids + solvent) captured and recycled 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 wiping/cleaning solvent, and those used as purge.
- (c) To document the compliance status with Condition D.10.1(j), the Permittee shall maintain on file vendors guarantees and/or certifications for VOC emissions from the miscellaneous combustion sources.

- (c) To document the compliance status with Condition D.10.11, the Permittee shall maintain records of the continuous temperature records (on a three-hour average basis) for the Topcoat System "C1" Oven thermal oxidizer (TO-C1) used to demonstrate compliance during the most recent compliant stack test.
- (d) To document the compliance status with Condition D.10.14, the Permittee shall maintain log containing records of dry filter replacement, and any required corrective actions taken.
- (e) To document the compliance status with Condition D.10.13, the Permittee shall maintain a log of the dates of any water wash system warning system alarm and corrective actions taken.
- (f) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.10.16 Reporting Requirements

A monthly summary of the information to document the compliance status with Condition D.10.1 and D.10.2 shall be submitted to IDEM, OAQ using the reporting forms located at the end of this permit or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting 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).

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Facility Description [326 IAC 2-7-5(14)]:

- (a) Electrodeposition Coating of Vehicle Bodies (ED Coating Line), identified as Unit 001, with a capacity of 71 units per hour, constructed in 1989 and modified in 2009 and 2010. Approved in 2012 for modification to increase vehicle holding/storage area to allow more vehicles to be coated hourly, in subsequent operations consisting of the following units:
- (1) One (1) ED Body Pretreatment area;
 - (2) One (1) ED Pretreatment Drying Oven, with one (1) insignificant natural gas indirect fired burner with a heat input capacity of 6.0 MMBtu/hr;
 - (3) One (1) insignificant boiler for paint temperature control, with a heat input capacity of 4.0 MMBtu/hr;
 - (4) Six (6) insignificant pretreatment boilers for warming water surrounding the ED Body Coating Tank, with a total heat input capacity of 9.0 MMBtu/hr;
 - (5) One (1) ED Body Coating Tank, utilizing dipping as the method of application;
 - (6) One (1) ED Body Oven (pretreatment drying oven) rated at 6.0 MMBtu/hr, with five (5) natural gas-fired burners (oven zones #1 through #5) each is rated at 2.5 MMBtu/hr, using a 2.5 MMBtu/hr natural gas-fired catalytic oxidizer (B-ED) as VOC control, and exhausting to one (1) stack, identified as B-ED Inc. (emissions from the entrance to, and exit from, the ED Body Oven use no controls and exhaust to one (1) stack, identified as B-ED Hood Exhaust);
 - (7) One (1) ED Body Cool Down area; and
 - (8) One (1) paint storage room.
- (b) Sealing and PVC Undercoating Line, identified as Unit 002, with a capacity of 77 units per hour, constructed in 1989 and approved for modification in 2012, consisting of the following units:
- (1) One (1) PVC Coating Booth #1, constructed in 1989, utilizing airless spray application system and pedestal robotic spray system, using a dry filter as particulate matter control, approved in 2012 for modification to add four (4) additional spray coating application systems, and exhausting to one (1) stack, identified as PVC-1-2;
 - (2) One (1) PVC Coating Booth #1 Preheat (oven zone #1), constructed in 1989, with one (1) natural gas indirect fired burner with a heat input capacity of 3.5 MMBtu/hr;
 - (3) One (1) PVC Coating Booth #2, constructed in 1999 and modified in 2006, utilizing the airless spray method of application, using a dry filter as particulate control, approved in 2012 for modification to add two (2) additional spray coating application systems and exhausting to one (1) stack, identified as PVC-Booth 2;
 - (4) One (1) PVC Coating Booth #2 Preheat (oven zone #2), constructed in 1999, with one (1) natural gas direct fired burner with a heat capacity of 16.8 MMBtu/hr;
 - (5) One (1) PVC Seal Oven, constructed in 1989, with two (2) insignificant natural gas-fired burners totaling 6.94 MMBtu/hr, using no controls, and exhausting to one (1) stack,

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identified as PVC-Oven Exhaust;

- (6) One (1) PVC Cool Down area, constructed in 1989, using no controls, and exhausting to one (1) stack, identified as PVC Cooling; and
 - (7) One (1) Sound Deadener Operation approved in 2010 for construction, using no controls.
- (c) Topcoat System, identified as Unit 003, with a capacity of 77 units per hour, constructed in 1989, and modified in 2006, 2008, 2009, and 2010 consisting of the following units:
- (1) One (1) Topcoat #1 Booth, utilizing air atomized spray with robot, electrostatic air atomized spray with robot, and electrostatic bell with robot methods of application, and automatic spray applicators, using a water wash as particulate matter control, and exhausting to nine (9) stacks, identified as TC1-1 through TC1-5 and TC1-7 through TC1-10. One (1) natural gas-fired dry off oven, between the basecoat and clearcoat zones, with a heat input capacity of 5 MMBtu/hr.
 - (2) One (1) Topcoat #1 Booth Preheat, with three (3) natural gas-fired burners (oven zones #1, #2 and #3), one (1) with a heat input capacity of 3.5 MMBtu/hr and two (2) each with a heat input capacity of 2.5 MMBtu/hr;
 - (3) One (1) Topcoat #1 Booth Reheat, with three (3) insignificant natural gas direct fired burners;
 - (4) One (1) Topcoat #1 Oven, approved in 2013 for modification, with four (4) insignificant natural gas direct fired burners with a total maximum heat input capacity of 11.85 MMBtu/hr, using a 7.10 MMBtu/hr natural gas-fired regenerative thermal oxidizer (RTO-TC123) as VOC control, and exhausting to one (1) stack, identified as TC-1 Inc. (emissions from the entrance to and exit from the Topcoat #1 Oven are not controlled and exhaust to one (1) stack, identified as TC-1 Ex.). The oven is equipped with a purge exhaust stack;
 - (5) One (1) Topcoat #1 Cool Down area, using no controls, and exhausting to one (1) stack, identified as TC-1 O.Cl.;
 - (6) One (1) Topcoat #2 Booth, utilizing air atomized spray with robot, electrostatic air atomized spray with robot, and electrostatic bell with robot methods of application, using a water wash as particulate matter control, and exhausting to ten (10) stacks, identified as TC2-1 through TC2-10. One (1) natural gas-fired dry off oven between the base coat and clear coat zones with a heat input capacity of 2.5 MMBtu/hr;
 - (7) One (1) Topcoat #2 Booth Preheat, with three (3) natural gas-fired burners (oven zones #1, #2 and #3), one (1) with a heat input capacity of 3.5 MMBtu/hr and two (2) each with a heat input capacity of 2.5 MMBtu/hr;
 - (8) One (1) Topcoat #2 Booth Reheat, with three (3) insignificant natural gas direct fired burners;
 - (9) One (1) Topcoat #2 Oven, approved in 2013 for modification, with four (4) insignificant natural gas direct fired burners with a total maximum heat input capacity of 11.85 MMBtu/hr, using a 7.10 MMBtu/hr natural gas-fired regenerative thermal oxidizer (RTO-TC123) as VOC control, and exhausting to one (1) stack, identified as TC-2 Inc. (emissions from the entrance to and exit from the Topcoat #1 Oven are not controlled

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and exhaust to one (1) stack, identified as TC-2 Ex.). The oven is equipped with a purge exhaust stack;

- (10) One (1) Topcoat #2 Cool Down area, using no controls, and exhausting to one (1) stack, identified as TC-2;
 - (11) One (1) Topcoat #3 Booth, utilizing air atomized spray with robot, electrostatic air atomized spray with robot, and electrostatic bell with robot methods of application, using a water wash as particulate matter control, and exhausting to five (5) stacks, identified as TUT-1 through TUT-5;
 - (12) One (1) Topcoat #3 Booth Preheat, with two (2) natural gas-fired burners (oven zones #1 and #2), one (1) with a heat input capacity of 1.5 MMBtu/hr and one (1) with a heat input capacity of 2.5 MMBtu/hr;
 - (13) One (1) Topcoat #3 Booth Reheat, with one (1) insignificant 1.5 MMBtu/hr natural gas-fired burner (oven zone #3);
 - (14) One (1) Topcoat #3 Booth Oven, approved in 2013 for modification, with four (4) insignificant natural gas-fired burners with a total maximum heat input capacity of 8.55 MMBtu/hr, using a 7.10 MMBtu/hr natural gas-fired regenerative thermal oxidizer (RTO-TC123) as VOC control, and exhausting to one (1) stack, identified as TUT-O-1-2. The oven is equipped with a purge exhaust stack;
 - (15) One (1) Topcoat #3 Booth Cool Down area;
 - (16) One (1) Wet Sand Repair direct fired Dryoff Oven, with one (1) insignificant natural gas-fired burner with a heat input capacity of 1.49 MMBtu/hr;
 - (17) One (1) Topcoat #3 Booth natural gas indirect fired flash zone heater between the base coat and clear coat zones with a heat input capacity of 2.5 MMBtu/hr, permitted in 2010 for construction; and
 - (18) Main paint mix room.
- (d) Intermediate (Surfacer) Coating Line, identified as Unit 004, with a capacity of 77 units per hour, constructed in 1989 and modified in 2010, Approved in 2012 for modification to include alterations to the conveyor system that will add storage capacity to allow more vehicles to be coated hourly, in subsequent operations consisting of the following units:
- (1) One (1) Intermediate Working Stage burner (oven zone #1), with a heat input capacity of 2.5 MMBtu/hr;
 - (2) One (1) Intermediate Coating Booth, utilizing, two (2) robots for the application of anti-chip (ACC) and stone guard (SGC), two (2) manual air assisted spray guns for the application of primer on inner doors for certain colors, followed by the exterior robot e-stat painting process, using a water wash as particulate control, and exhausting to six (6) stacks, identified as SUR-2 through SUR-7;
 - (3) One (1) Intermediate Booth Preheat (oven zones #2 and #3), with two (2) natural gas-fired burners, each with a heat input capacity of 2.5 MMBtu/hr;
 - (4) One (1) Intermediate Booth Reheat burner (oven zone #4), with two (2) insignificant natural gas-fired burners with a total heat input capacity of 2.5 MMBtu/hr;

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- (5) One (1) Intermediate Coating Oven, with five (5) insignificant natural gas direct fired burners totaling 12.42 MMBtu/hr, using a 1.0 MMBtu/hr natural gas-fired catalytic incinerator (SUR) as VOC control, and exhausting to one (1) stack, identified as SUR-1 (emissions from the entrance to and exit from the Intermediate Coating Oven use no controls and exhaust to one (1) stack, identified as Surfacer Hood Exhaust);
- (6) One (1) Intermediate Cool Down area, using no controls, and exhausting to one (1) stack, identified as Surfacer Cooling; and
- (7) Main paint mix room
- (e) Plastic Bumper Coating Line (PBL), identified as Unit 005, with a capacity of 60 units per hour, constructed in 1989 and modified in 2010. Approved in 2012 for modification to increase the oven length to accommodate a new bumper design, consisting of the following units:
 - (1) One (1) PBL Paint Booth, utilizing the air atomization and electrostatic bell methods of spraying, using a water wash as particulate matter control, and exhausting to four (4) stacks, identified as BPR-1, BPR-2, BPR-JR, and BPR-AP;
 - (2) One (1) PBL Booth Preheat (oven zone #1), with one (1) natural gas-fired burner with a heat input capacity of 1.5 MMBtu/hr;
 - (3) One (1) PBL Booth Reheat (oven zone #2), with two (2) insignificant natural gas-fired burners with a total heat input capacity of 2.5 MMBtu/hr;
 - (4) One (1) PBL Oven (ASH preheat), using a 17.1 MMBtu/hr natural gas-fired thermal incinerator as VOC control, and exhausting to one (1) stack, identified as BPR Inc.;
 - (5) One (1) PBL Cool Down area;
 - (6) Two (2) PBL natural gas-fired flash zone heaters for the primer and basecoat zones, each with a heat input capacity of 2.5 MMBtu/hr and exhausting to two (2) separate stacks, permitted in 2010 for construction; and
 - (7) One (1) paint mixing room
- (f) Anticorrosion Coating, identified as Unit 006, with a capacity of 77 units per hour, constructed in 1989 and modified in 2010. Approved in 2012 for modification to add two (2) spray coating systems at the Black Coat and Wax Booth to allow more vehicles coated hourly, including the following equipment:
 - (1) One (1) Black Coat and Wax Booth, utilizing air atomized and air-assisted methods of spraying, using a dry filter as particulate matter control, exhausting to BCW Stack;
 - (2) One (1) Black and Wax Coat natural gas-fired burner, with a heat input capacity of 24.0 MMBtu/hr;
 - (3) One (1) Anticorrosion Coating Booth, utilizing the air-assisted method of spraying, using a dry filter as particulate control, exhausting to Anticorrosion Stack; and
 - (4) One (1) insignificant Anticorrosion Coating natural gas-fired burner.

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Approved in 2014 for physical modification and operational change as part of the proposed "2014 Increase in Capacity Project" for the plastic bumper coating operations. This will involve the following three (3) alternative operating scenarios for coating plastic bumper parts for Subaru vehicles:

Scenario #1 - involves the use of the following facilities to coat Subaru vehicles once cessation of production of the non-Subaru vehicle were to occur before construction of proposed Paint Line C is complete:

Conversion of the existing non-Subaru vehicle Plastic Fascia Paint Line System (PFPLS#2) to the production of painted plastic bumpers for 110,000 Subaru vehicles per year. The converted paint line will be renamed Unit 005B.

Use of existing Unit 005 with capacity of 250,000 units per year

Scenario #2 - involve increasing Unit 005B capacity from 110,000 to 250,000 units per year while not installing the Plastic Bumper Line, Unit 018 in Paint Line "C".

Use of existing Unit 005 with capacity of 250,000 units per year

Scenario #3 - involve installing the Paint Line "C" Plastic Bumper Line, Unit 018 with a capacity of 160,000 units per year.

Use of existing Unit 005B (110,000 units per year) without increasing its capacity.

Use of the existing Unit 005 with capacity of 250,000 units per year

(g) One (1) plastic fascia paint line system currently identified as PFPLS#2, to be renamed as Unit 005B (if non-Subaru vehicle production ceases), which coats front and rear bumpers, and left and right side molding panels with a maximum capacity of 150,118 units per year, constructed in 2006, consisting of the following units:

(1) One (1) primer spray zone in the PFPLS#2 booth, to be renamed as Unit 005B, currently utilizing air atomized spray with robot method of application and automatic spray applicators with water wash system to control the particulate overspray emissions, and exhausting to one (1) stack, identified as PB2(a). Approved in 2014 to replace current applicator systems with robotic spray applicators utilizing bell application techniques once the non-Subaru vehicle production ceases.

(2) One (1) basecoat spray zone, currently utilizing electrostatic bell with robot method of application and automatic spray applicators, with water wash system to control the particulate overspray emissions, and exhausting to one (1) stack, identified as PB2(b). Approved in 2014 to replace current applicator systems with robotic spray applicators utilizing bell application techniques once the non-Subaru vehicle production ceases.

(3) One (1) clearcoat spray zone, currently utilizing electrostatic bell with robot method of application and automatic spray applicators, with water wash system to control the particulate overspray emissions, and exhausting to one (1) stack, identified as PB2(c). Approved in 2014 to replace current applicator systems with robotic spray applicators utilizing bell application techniques once the non-Subaru vehicle production ceases.

(4) Two (2) paint flash off areas for the primer zone and basecoat zone, exhausting to stack PB2(d), which includes natural gas-fired dry off ovens, with a total heat input capacity of 1.1 MMBtu/hr;

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- (5) Three (3) natural gas direct fired air intake units, each with a heat input capacity of 3.1 million British thermal units per hour (MMBtu/hr);
 - (6) One (1) fascia paint line, now Unit 005B natural gas-fired curing oven, with a heat input capacity of 2.5 MMBtu/hr, controlled by a catalytic/thermal oxidizer with a heat input capacity of 1.1 MMBtu/hr, exhausting to one (1) stack, identified as PB2(g). Approved in 2014 to increase oven length.
 - (7) One (1) paint mix room.
 - (8) One (1) Natural gas-fired burner with a heat input capacity of 3 MMBtu/hr approved in 2014 for construction.
 - (9) Six (6) back-up manual spray applicators approved in 2014 for construction.
 - (h) Trim Line, identified as Unit 010, application in the Body Shop and Trim Shop of adhesives and sealers to various vehicle parts, constructed in 1989 and approved in 2012 for modification which includes increasing the line speed to allow more vehicles to be coated on an hourly basis.
 - (i) Six (6) storage tanks, identified collectively as Unit 011, which includes the following equipment:
 - (1) Gasoline storage tank, with a capacity of 15,000 gallons, constructed in 1988, using a certified vapor collection and control system;
 - (2) Purge thinner storage tank, with a capacity of 5,000 gallons, constructed in 1988, using a certified vapor collection and control system; and
 - (3) Waste purge thinner storage tank, with a capacity of 6,000 gallons, constructed in 1992.
 - (4) Purge thinner storage tank, with a capacity of 5,000 gallons, constructed in 2005;
 - (5) Windshield washer fluid storage tank, with a capacity of 5,000 gallons, constructed in 1988;
 - (6) Gasoline storage tank, with a capacity of 1,500 gallons, installed in 2004; and
 - (k) Purge solvent usage and capture system, identified as Unit 012, constructed in 1989 and modified in 2006 and 2010 to allow for purging and capturing of solvent and waterborne purge materials.
- Paint Coating Line System "C"
- (a) Electrodeposition (ED) Coating Line for Vehicle Bodies, identified as Unit 013, with a capacity of 160,000 units per year, approved in 2014 for construction, venting to 9 exhaust stacks, identified as Stacks 13-1 through 13-9, consisting of the following units:
 - (1) One (1) ED Body Pretreatment Area, including a pretreatment boiler for warming water surrounding the ED Coating Tank, with a maximum heat input capacity of 12.0 million British thermal units per hour (MMBtu/hr).
 - (2) One (1) ED Body Coating Tank, utilizing dipping as the method of application.
 - (3) One (1) ED Oven (pretreatment drying oven, with a maximum heat input capacity of 9.0

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MMBtu/hr, using no controls.

- (4) One (1) ED Body Cool Down Area.
 - (5) One (1) ED Deck and ED Sand Area.
 - (6) One (1) Paint Storage Room.
 - (7) One (1) Working Stage Air House to support the Sealer, PVC, ED Sand, Wet Sand #2 Area rated at 9.5 MMBtu/hr.
 - (8) One (1) Working Stage Air House to support the Surfacer Sand, Wet Sand #1 Area rated at 2.6 MMBtu/hr.
- (b) Sealing, LASD (Liquid Applied Sound Deadener) and PVC Undercoating Line, identified as Unit 014, with a capacity of 160,000 units per year, approved in 2014 for construction, venting to 3 exhaust stacks, identified as Stacks 14-1 through 14-3, consisting of the following:
- (1) One (1) PVC Coating Booth #1, equipped with airless spray application and pedestal robotic spray system, using a dry filter to control the particulate overspray emissions.
 - (2) One (1) PVC Sealer Oven, with a maximum heat input capacity of 3 MMBtu/hr, using no control.
 - (3) One (1) PVC Cool Down Area, using no controls.
 - (4) One (1) Sealer Application Area, using no controls.
 - (5) One (1) LASD (Liquid Applied Sound Deadener) Application Area, using no controls.
- (c) Intermediate Surfacer Coating Line, identified as Unit 015, with a capacity of 160,000 units per year, approved in 2014 for construction, venting to 14 exhaust stacks identified as Stacks 15-1 through 15-14, consisting of the following:
- (1) One (1) Intermediate Coating Booth, equipped with manual/robotic/automated spray applicators, for the application of waterborne surfacer material, using dry filtration or a water wash system to control the particulate overspray emissions.
 - (2) One (1) Intermediate Coating Oven, with a maximum heat input capacity of 10.0 MMBtu/hr, with no VOC control.
 - (3) One (1) Intermediate (Surfacer) natural gas-fired flash zone heater rated at 3.0 MMBtu/hr.
 - (4) One (1) Intermediate (Surfacer) Air House rated at 21.6 MMBtu/hr.
 - (5) One (1) Intermediate Cool Down Area, using no controls.
 - (6) One (1) main paint mix room.
- (d) Topcoat System, identified as Unit 016, with a capacity of 160,000 units per year, approved in 2014 for construction, venting to 26 exhaust stacks, identified as Stacks 16-1 through 16-26, consisting of the following

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- (1) One (1) Topcoat #C1 Booth, equipped with air atomized spray with robot, electrostatic air atomized spray with robot, and electrostatic bell with robot method of applications, and automatic spray applicators, using dry filtration or a water wash system to control the particulate overspray emissions.
 - (2) One (1) Topcoat #C1 Oven, with a maximum heat input capacity of 8.0 MMBtu/hr, using a 1.0 MMBtu/hr natural gas-fired thermal oxidizer (TO-C1) as VOC control.
 - (3) One (1) Topcoat natural gas-fired flash zone heater rated at 3.0 MMBtu/hr.
 - (4) One (1) Topcoat #C1 Cool Down Area, using no controls.
 - (5) One (1) main paint mix room.
 - (6) One (1) Topcoat Air House rated at 38.0 MMBtu/hr.
 - (7) One (1) Mixing Air House located in Mix Room rated at 2.0 MMBtu/hr.
- (e) Anticorrosion Coating Operations, identified as Unit 017, with a capacity of 160,000 (if built as part of new paint Line "C") or 225,000 units per year (if built as part of existing paint lines "A/B"), approved in 2014 for construction, venting to 2 exhaust stacks, identified as Stacks 17-1 and 17-2, consisting of the following units:
- (1) One (1) Black and Wax Coating Booth, to be part of either the new paint line "C" or existing paint lines "A/B", equipped with air atomized and air-assisted airless spray systems, using a dry filter to control the particulate overspray emissions.
 - (2) One (1) Black and Wax Coating Booth natural gas-fired burner, with a maximum heat input capacity of 15.5 MMBtu/hr.
 - (3) One (1) Wax Coating Booth, constructed in 2014 in the Trim & Final Assembly Area, utilizing air-assisted spray system, with no particulate overspray control.
- (f) Plastic Bumper Coating Line (PBL-C), identified as Unit 018, with a capacity of 160,000 units per year, approved in 2014 for construction, venting to 18 exhaust stacks, identified as Stacks 18-1 through 18-18, consisting of the following units:
- (1) One (1) PBL-C Paint Booth, equipped with air atomization and electrostatic bell spray systems, using dry filtration or a water wash system to control the particulate overspray emissions.
 - (2) One (1) PBL-C Oven, with a maximum heat input capacity of 3.0 MMBtu/hr, using no VOC controls.
 - (3) One (1) PBL-C Cool Down area.
 - (4) One (1) paint mixing room.
 - (5) Three (3) Bumper Air Houses (includes Primer Air House, basecoat Air house and Clearcoat Air House), rated at a total of 17.7 MMBtu/hr.
 - (6) One (1) PBL-C natural gas-fired flash zone heater located between the primer and basecoat zones rated at 3.0 MMBtu/hr.

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- (7) One PBL-C natural gas-fired flash zone heater located between the basecoat and the clearcoat zones rated at 3.0 MMBtu/hr.
 - (8) One (1) Working Stage Air House rated at 4.4 MMBtu/hr.
 - (9) One (1) Mixing Air House located in Mixing Room rated at 1.8 MMBtu/hr.
 - (g) Miscellaneous combustion devices, approved in 2014 for construction:
 - (1) One (1) Working Stage Air House used to support the Inspection, Touch-up area rated at 6.5 MMBtu/hr.
 - (2) One (1) Working Stage Air House used to support Paint Coating Line "C" rated at 2.4 MMBtu/hr.
 - (h) Purge solvent usage and capture system, identified as Unit 019, designed to allow for purging and capturing of solvent and waterborne purge materials.
 - (i) Miscellaneous support cleaning operations, identified as Unit 020, which include wiping solvent and miscellaneous cleanup materials.
 - (j) An additional Startup and Roll Test Line, approved in 2014 for construction.
 - (k) Engine assembly - one (1) additional dynamometer gasoline engine testing, where engines are tested prior to installation in the vehicle chassis, approved in 2014 for construction.
- (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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

Pursuant to 40 CFR 63.3101, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, as specified in Table 2 of 40 CFR Part 63, Subpart IIII in accordance with schedule in 40 CFR 63 Subpart IIII.

E.1.2 Surface Coating of Plastic Parts and Products NESHAP [40 CFR Part 63, Subpart PPPP]

The Permittee which engages in surface coating of plastic parts and products shall comply with the provisions of 40 CFR Part 63, Subpart IIII, in order to comply with 40 CFR Part 63, Subpart PPPP.

E.1.3 Surface Coating of Miscellaneous Metal Parts and Products NESHAP [40 CFR Part 63, Subpart MMMM]

The Permittee which engages in surface coating of miscellaneous metal parts and products shall comply with the provisions of 40 CFR Part 63, Subpart IIII, in order to demonstrate compliance with 40 CFR Part 63, Subpart MMMM.

E.1.4 Automobiles and Light-Duty Trucks NESHAP [40 CFR Part 63, Subpart IIII]

The Permittee which engages in automobiles and light duty trucks production shall comply with the provisions of 40 CFR Part 63, Subpart IIII, as follows:

- 40 CFR Part 63.3080 - (All new and existing affected units)
- 40 CFR Part 63.3081 - (All new and existing affected units)
- 40 CFR Part 63.3082 - (All new and existing affected units)
- 40 CFR Part 63.3083(b) - (Existing affected units compliance date is April 26, 2007 and new affected units is upon startup)
- 40 CFR Part 63.3090 - (Emission limits for new affected units)

- 40 CFR Part 63.3091 - (Emission limits for existing affected units)
- 40 CFR Part 63.3092 - (New and existing affected units)
- 40 CFR Part 63.3093 - (New and existing affected units)
- 40 CFR Part 63.3094 - (New and existing affected units)
- 40 CFR Part 63.3100 - (New and existing affected units)
- 40 CFR Part 63.3101 - (New and existing affected units)
- 40 CFR Part 63.3110 - (Existing affected units initial notification date is 1 year after
April 26, 2004 and new affected units 120 days after
startup)
- 40 CFR Part 63.3120 - (New and existing affected units)
- 40 CFR Part 63.3130 - (New and existing affected units)
- 40 CFR Part 63.3131 - (New and existing affected units)
- 40 CFR Part 63.3150 - (New and existing affected units)
- 40 CFR Part 63.3151 - (New and existing affected units)
- 40 CFR Part 63.3152 - (New and existing affected units)
- 40 CFR Part 63.3160 - (New and existing affected units)
- 40 CFR Part 63.3161 - (New and existing affected units)
- 40 CFR Part 63.3163 - (New and existing affected units)
- 40 CFR Part 63.3164 - (New and existing affected units)
- 40 CFR Part 63.3165 - (New and existing affected units)
- 40 CFR Part 63.3166 - (New and existing affected units)
- 40 CFR Part 63.3167 - (New and existing affected units)
- 40 CFR Part 63.3168 - (New and existing affected units)
- 40 CFR Part 63.3170 - (New and existing affected units)
- 40 CFR Part 63.3171 - (New and existing affected units)
- 40 CFR Part 63.3173 - (New and existing affected units)
- 40 CFR Part 63.3175 - (New and existing affected units)
- 40 CFR Part 63.3176 - (New and existing affected units)
- Table 1 to Subpart IIII - (New and existing affected units)
- Table 2 to Subpart IIII - (New and existing affected units)
- Table 3 to Subpart IIII - (New and existing affected units)
- Appendix A to Subpart IIII - (New and existing affected units)

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Facility Description [326 IAC 2-7-5(14)]:

- (a) Electrodeposition Coating of Vehicle Bodies (ED Coating Line), identified as Unit 001, with a capacity of 71 units per hour, constructed in 1989 and modified in 2009 and 2010. Approved in 2012 for modification to increase vehicle holding/storage area to allow more vehicles to be coated hour, in subsequent operations consisting of the following units:
- (1) One (1) ED Body Pretreatment area;
 - (2) One (1) ED Pretreatment Drying Oven, with one (1) insignificant natural gas indirect fired burner with a heat input capacity of 6.0 MMBtu/hr;
 - (3) One (1) insignificant boiler for paint temperature control, with a heat input capacity of 4.0 MMBtu/hr;
 - (4) Six (6) insignificant pretreatment boilers for warming water surrounding the ED Body Coating Tank, with a total heat input capacity of 9.0 MMBtu/hr;
 - (5) One (1) ED Body Coating Tank, utilizing dipping as the method of application;
 - (6) One (1) ED Body Oven (pretreatment drying oven) rated at 6.0 MMBtu/hr, with five (5) natural gas-fired burners (oven zones #1 through #5) each is rated at 2.5 MMBtu/hr, using a 2.5 MMBtu/hr natural gas-fired catalytic oxidizer (B-ED) as VOC control, and exhausting to one (1) stack, identified as B-ED Inc. (emissions from the entrance to, and exit from, the ED Body Oven use no controls and exhaust to one (1) stack, identified as B-ED Hood Exhaust);
 - (7) One (1) ED Body Cool Down area; and
 - (8) One (1) paint storage room
- (c) Topcoat System, identified as Unit 003, with a capacity of 77 units per hour, constructed in 1989, and modified in 2006, 2008, 2009, and 2010, consisting of the following units:
- (1) One (1) Topcoat #1 Booth, utilizing air atomized spray with robot, electrostatic air atomized spray with robot, and electrostatic bell with robot methods of application, and automatic spray applicators, using a water wash as particulate matter control, and exhausting to nine (9) stacks, identified as TC1-1 through TC1-5 and TC1-7 through TC1-10. One (1) natural gas-fired dry off oven, between the basecoat and clearcoat zones, with a heat input capacity of 5.0 MMBtu/hr.
 - (2) One (1) Topcoat #1 Booth Preheat, with three (3) natural gas-fired burners (oven zones #1, #2 and #3), one (1) with a heat input capacity of 3.5 MMBtu/h and two (2) each with a heat input capacity of 2.5 MMBtu/hr;
 - (3) One (1) Topcoat #1 Booth Reheat, with three (3) insignificant natural gas direct fired burners;
 - (4) One (1) Topcoat #1 Oven, approved in 2013 for modification, with four (4) insignificant natural gas direct fired burners with a total maximum heat input capacity of 11.85 MMBtu/hr, using a 7.10 MMBtu/hr natural gas-fired regenerative thermal oxidizer (RTO-TC123) as VOC control, and exhausting to one (1) stack, identified as TC-1 Inc. (emissions from the entrance to and exit from the Topcoat #1 Oven are not controlled

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- and exhaust to one (1) stack, identified as TC-1 Ex.). The oven is equipped with a purge exhaust stack;
- (5) One (1) Topcoat #1 Cool Down area, using no controls, and exhausting to one (1) stack, identified as TC-1 O.Cl.;
 - (6) One (1) Topcoat #2 Booth, utilizing air atomized spray with robot, electrostatic air atomized spray with robot, and electrostatic bell with robot methods of application, using a water wash as particulate matter control, and exhausting to ten (10) stacks, identified as TC2-1 through TC2-10. One (1) natural gas-fired dry off oven between the base coat and clear coat zones with a heat input capacity of 2.5 MMBtu/hr;
 - (7) One (1) Topcoat #2 Booth Preheat, with three (3) natural gas-fired burners (oven zones #1, #2 and #3), one (1) with a heat input capacity of 3.5 MMBtu/hr and two (2) each with a heat input capacity of 2.5 MMBtu/hr;
 - (8) One (1) Topcoat #2 Booth Reheat, with three (3) insignificant natural gas direct fired burners;
 - (9) One (1) Topcoat #2 Oven, approved in 2013 for modification, with four (4) insignificant natural gas direct fired burners with a total maximum heat input capacity of 11.85 MMBtu/hr, using a 7.10 MMBtu/hr natural gas-fired regenerative thermal oxidizer (RTO-TC123) as VOC control, and exhausting to one (1) stack, identified as TC-2 Inc. (emissions from the entrance to and exit from the Topcoat #1 Oven are not controlled and exhaust to one (1) stack, identified as TC-2 Ex.). The oven is equipped with a purge exhaust stack;
 - (10) One (1) Topcoat #2 Cool Down area, using no controls, and exhausting to one (1) stack, identified as TC-2;
 - (11) One (1) Topcoat #3 Booth, utilizing air atomized spray with robot, electrostatic air atomized spray with robot, and electrostatic bell with robot methods of application, using a water wash as particulate matter control, and exhausting to five (5) stacks, identified as TUT-1 through TUT-5;
 - (12) One (1) Topcoat #3 Booth Preheat, with two (2) natural gas-fired burners (oven zones #1 and #2), one (1) with a heat input capacity of 1.5 MMBtu/hr and one (1) with a heat input capacity of 2.5 MMBtu/hr;
 - (13) One (1) Topcoat #3 Booth Reheat, with one (1) insignificant 1.5 MMBtu/hr natural gas-fired burner (oven zone #3);
 - (14) One (1) Topcoat #3 Booth Oven, approved in 2013 for modification, with four (4) insignificant natural gas-fired burners with a total maximum heat input capacity of 8.55 MMBtu/hr, using a 7.10 MMBtu/hr natural gas-fired regenerative thermal oxidizer (RTO-TC123) as VOC control, and exhausting to one (1) stack, identified as TUT-O-1-2. The oven is equipped with a purge exhaust stack;
 - (15) One (1) Topcoat #3 Booth Cool Down area;
 - (16) One (1) Wet Sand Repair direct fired Dryoff Oven, with one (1) insignificant natural gas-fired burner with a heat input capacity of 1.49 MMBtu/hr;
 - (17) One (1) Topcoat #3 Booth natural gas indirect fired flash zone heater between the base

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coat and clear coat zones with a heat input capacity of 2.5 MMBtu/hr, permitted in 2010 for construction; and

- (18) Main paint mix room.
- (d) Intermediate (Surfacer) Coating Line, identified as Unit 004, with a capacity of 77 units per hour, constructed in 1989 and modified in 2010, Approved in 2012 for modification to include alterations to the conveyor system that will add storage capacity to allow more vehicles to be coated hourly, in subsequent operations consisting of the following units:
- (1) One (1) Intermediate Working Stage burner (oven zone #1), with a heat input capacity of 2.5 MMBtu/hr;
 - (2) One (1) Intermediate Coating Booth, utilizing, two (2) robots for the application of anti-chip (ACC) and stone guard (SGC), two (2) manual air assisted spray guns for the application of primer on inner doors for certain colors, followed by the exterior robot e-stat painting process, using a water wash as particulate control, and exhausting to six (6) stacks, identified as SUR-2 through SUR-7;
 - (3) One (1) Intermediate Booth Preheat (oven zones #2 and #3), with two (2) natural gas-fired burners, each with a heat input capacity of 2.5 MMBtu/hr;
 - (4) One (1) Intermediate Booth Reheat burner (oven zone #4), with two (2) insignificant natural gas-fired burners with a total heat input capacity of 2.5 MMBtu/hr;
 - (5) One (1) Intermediate Coating Oven, with five (5) insignificant natural gas direct fired burners totaling 12.42 MMBtu/hr, using a 1.0 MMBtu/hr natural gas-fired catalytic incinerator (SUR) as VOC control, and exhausting to one (1) stack, identified as SUR-1 (emissions from the entrance to and exit from the Intermediate Coating Oven use no controls and exhaust to one (1) stack, identified as Surfacer Hood Exhaust);
 - (6) One (1) Intermediate Cool Down area, using no controls, and exhausting to one (1) stack, identified as Surfacer Cooling; and
 - (7) Main paint mix room.
- Paint Coating Line System "C"
- (a) Electrodeposition (ED) Coating Line for Vehicle Bodies, identified as Unit 013, with a capacity of 160,000 units per year, approved in 2014 for construction, venting to 9 exhaust stacks, identified as Stacks 13-1 through 13-9, consisting of the following units:
- (1) One (1) ED Body Pretreatment Area, including a pretreatment boiler for warming water surrounding the ED Coating Tank, with a maximum heat input capacity of 12.0 million British thermal units per hour (MMBtu/hr).
 - (2) One (1) ED Body Coating Tank, utilizing dipping as the method of application.
 - (3) One (1) ED Oven (pretreatment drying oven, with a maximum heat input capacity of 9.0 MMBtu/hr, using no controls.
 - (4) One (1) ED Body Cool Down Area.
 - (5) One (1) ED Deck and ED Sand Area.

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- (6) One (1) Paint Storage Room.
- (7) One (1) Working Stage Air House to support the Sealer, PVC, ED Sand, Wet Sand #2 Area rated at 9.5 MMBtu/hr.
- (8) One (1) Working Stage Air House to support the Surfacer Sand, Wet Sand #1 Area rated at 2.6 MMBtu/hr.
- (d) Intermediate Surfacer Coating Line, identified as Unit 015, with a capacity of 160,000 units per year, approved in 2014 for construction, venting to 14 exhaust stacks identified as Stacks 15-1 through 15-14, consisting of the following:
 - (1) One (1) Intermediate Coating Booth, equipped with manual/robotic/automated spray applicators, for the application of waterborne surfacer material, using dry filtration or a water wash system to control the particulate overspray emissions.
 - (2) One (1) Intermediate Coating Oven, with a maximum heat input capacity of 10.0 MMBtu/hr, with no VOC control.
 - (3) One (1) Intermediate (Surfacer) natural gas-fired flash zone heater rated at 3.0 MMBtu/hr.
 - (4) One (1) Intermediate (Surfacer) Air House rated at 21.6 MMBtu/hr.
 - (5) One (1) Intermediate Cool Down Area, using no controls.
 - (6) One (1) main paint mix room.
- (d) Topcoat System, identified as Unit 016, with a capacity of 160,000 units per year, approved in 2014 for construction, venting to 26 exhaust stacks, identified as Stacks 16-1 through 16-26, consisting of the following
 - (1) One (1) Topcoat #C1 Booth, equipped with air atomized spray with robot, electrostatic air atomized spray with robot, and electrostatic bell with robot method of applications, and automatic spray applicators, using dry filtration or a water wash system to control the particulate overspray emissions.
 - (2) One (1) Topcoat #C1 Oven, with a maximum heat input capacity of 8.0 MMBtu/hr, using a 1.0 MMBtu/hr natural gas-fired thermal oxidizer (TO-C1) as VOC control.
 - (3) One (1) Topcoat natural gas-fired flash zone heater rated at 3.0 MMBtu/hr.
 - (4) One (1) Topcoat #C1 Cool Down Area, using no controls.
 - (5) One (1) main paint mix room.
 - (6) One (1) Topcoat Air House rated at 38.0 MMBtu/hr.
 - (7) One (1) Mixing Air House located in Mix Room rated at 2.0 MMBtu/hr.

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

E.2.1 General Provisions Relating to NSPS MM [326 IAC 12-1] [40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - (Attachment B) General Provisions, which are incorporated as 326 IAC 12-1, apply to the facilities described in this section except when otherwise specified in 40 CFR Part 60, Subpart MM.

E.2.2 Automobiles and Light-Duty Trucks NSPS [40 CFR Part 60, Subpart MM]

The Permittee which engages in automobiles and light duty trucks production shall comply with the provisions of 40 CFR Part 60, Subpart MM, as follows:

40 CFR Part 60.390
40 CFR Part 60.391
40 CFR Part 60.392
40 CFR Part 60.393
40 CFR Part 60.394
40 CFR Part 60.395
40 CFR Part 60.396
40 CFR Part 60.397

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FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14)]:

- (j) Six (6) storage tanks, identified collectively as Unit 011, approved in 2014 to increase utilization to accommodate the increase in production capacity from 310,000 vehicles per year to 450,000 vehicles per year, which includes the following equipment:
 - (2) Purge thinner storage tank, with a capacity of 5,000 gallons, constructed in 1988, using a certified vapor collection and control system;
 - (2) Waste purge thinner storage tank, with a capacity of 6,000 gallons, constructed in 1992;
 - (3) Purge thinner storage tank, with a capacity of 5,000 gallons, constructed in 2005;
 - (4) Windshield washer fluid storage tank, with a capacity of 5,000 gallons, constructed in 1988.
 - (5) Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:
 - (i) One (1) power steering fluid storage tank, with a capacity of 5,000 gallons, installed in 1988.
 - (ii) One (1) transmission oil storage tank, with a capacity of 5,000 gallons, installed in 1988.
 - (iii) One (1) Antifreeze storage tank, with a capacity of 10,000 gallons, installed in 1988.
 - (iv) One (1) Antifreeze storage tank, with a capacity of 12,000 gallons, installed in 1988.

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

E.3.1 General Provisions Relating to NESHAP EEEE [40 CFR Part 63, Subpart A]

The Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions which are incorporated by reference as 326 IAC 20-1-1, as specified in Table 12 to Subpart EEEE of Part 63 in accordance with schedule in 40 CFR 63 Subpart EEEE

E.3.2 National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline)

Pursuant to 40 CFR Part 63, Subpart EEEE, National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline), the Permittee shall comply with the following provisions of this NESHAP (included as Attachment C of this permit) upon startup:

40 CFR Part 63.2330
40 CFR Part 63.2334
40 CFR Part 63.2338
40 CFR Part 63.2342(a)(2), (b)(1), (d)
40 CFR Part 63.2343(b), (d)
40 CFR Part 63.2350
40 CFR Part 63.2358(c)(1)(ii)
40 CFR Part 63.2378(a)
40 CFR Part 63.2382(a),(b)(1)
40 CFR Part 63.2386
40 CFR Part 63.2390
40 CFR Part 63.2394
40 CFR Part 63.2398
40 CFR Part 63.2402
40 CFR Part 63.2406
Table 1 to Subpart EEEE - applicable sections
Table 4 to Subpart EEEE - applicable sections
Table 12 to Subpart EEEE

SECTION E.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14)]:			
Permit Section	Emission Unit Name (design and Manufacturer name)	Rated Heat Input Capacity (MMBtu/hr)	Fuels Used
New Emission Unit			
Permit Section D.10(a)(1)	Pretreatment ED Boiler	12.0 MMBtu/hr	Natural Gas
Existing Emission Units			
Permit Section D.4 (a) (3)	ED/Paint Temperature Control Boiler Cleaver Brooks (1989)	4.0 MMBtu/Hr	Natural Gas
Permit Section D. 4 (a) (4)	Pre Treatment Boiler 1 Lochinvar Sync (2009)	1.5 MMBtu/Hr	Natural Gas
Permit Section D. 4 (a) (4)	Pre Treatment Boiler 2 Lochinvar Sync (2009)	1.5 MMBtu/Hr	Natural Gas
Permit Section D. 4 (a) (4)	Pre Treatment Boiler 3 Lochinvar Sync (2009)	1.5 MMBtu/Hr	Natural Gas
Permit Section D. 4 (a) (4)	Pre Treatment Boiler 4 Lochinvar Sync (2009)	1.5 MMBtu/Hr	Natural Gas
Permit Section D. 4 (a) (4)	Pre Treatment Boiler 5 Lochinvar Sync (2009)	1.5 MMBtu/Hr	Natural Gas
Permit Section D. 4 (a) (4)	Pre Treatment Boiler 6 Lochinvar Sync (2009)	1.5 MMBtu/Hr	Natural Gas
Permit Section D.8(a)	Temperature Control Boiler B1-01 Cleaver Brooks (1989)	1.339 MMBtu/Hr	Natural Gas
Permit Section D.8(a)	Temperature Control Boiler B10-01 Cleaver Brooks (1989)	4.184 MMBtu/Hr	Natural Gas
Permit Section D.8(a)	Temperature Control Boiler B10-02 Cleaver Brooks (1989)	4.184 MMBtu/Hr	Natural Gas
Permit Section D.8(a)	Temperature Control Boiler B11-01 Cleaver Brooks (1989)	2.929 MMBtu/Hr	Natural Gas
Permit Section D.8(a)	Temperature Control Boiler B11-02 Cleaver Brooks (1989)	2.929 MMBtu/Hr	Natural Gas
Permit Section D.8(a)	Temperature Control Boiler B09-01 Cleaver Brooks (1989)	5.23 MMBtu/Hr	Natural Gas
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)			

E.4.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.7565, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1 for the above affected emission units as specified in Table 10 of 40 CFR 63, Subpart DDDDD in accordance with schedule in 40 CFR 63 Subpart DDDDD.

- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

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

E.4.2 National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters Requirements [40 CFR Part 63, Subpart DDDDD]

The provisions of 40 CFR Part 63, Subpart DDDDD (National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters) apply to the above affected emission units and shall comply with the following provisions upon startup:

40 CFR § 63.7480
40 CFR § 63.7485
40 CFR § 63.7490(a)(2)
40 CFR § 63.7491
40 CFR § 63.7495(a)
40 CFR § 63.7499
40 CFR § 63.7500(a)(1),(f)
40 CFR § 63.7505(a)
40 CFR § 63.7510(g)
40 CFR § 63.7515(d)
40 CFR § 63.7540(a)(11)
40 CFR § 63.7545(a), (c)
40 CFR § 63.7550(c)(1)(5)(i) through (iv), (xiv), (xvii)
40 CFR § 63.7555(a)(1)
40 CFR § 63.7560
40 CFR § 63.7565
40 CFR § 63.7570
40 CFR § 63.7575,
Table 3 to Subpart DDDDD of Part 63 (applicable section)
Table 9 to Subpart DDDDD of Part 63 (applicable section)
Table 10 to Subpart DDDDD of Part 63

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Subaru of Indiana Automotive, Inc.
Source Address: 5500 State Road 38 East, Lafayette, Indiana 47905
Part 70 Permit No.: T157-27048-00050

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Subaru of Indiana Automotive, Inc.
Source Address: 5500 State Road 38 East, Lafayette, Indiana 47905
Part 70 Permit No.: T157-27048-00050

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), not later than four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
The Permittee must submit notice in writing or by facsimile not later than two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO2, VOC, NOX, 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: _____

Signature: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Report

Source Name: Subaru of Indiana Automotive, Inc.
Source Address: 5500 State Road 38 East, Lafayette, Indiana 47905
Part 70 Permit No.: T157-27048-00050
Facility: Natural gas combustion units at Paint Coating Line Systems A/B
Parameter: Natural Gas Usage (for NOx, PM)
Limit: Less than 2,380 MMCF per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	Natural Gas Usage This Month (MMCF)	Natural Gas Usage for Past 11 Months (MMCF)	Total Natural Gas Usage for 12 Month Period (MMCF)
Month 1			
Month 2			
Month 3			

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: Subaru of Indiana Automotive, Inc.
Source Address: 5500 State Road 38 East, Lafayette, Indiana 47905
Part 70 Permit No.: T157-27048-00050
Facility: Source-wide (Paint Coating Line Systems A/B and C)
Parameter: # vehicles produced
Limit: Less than 450,000 vehicles per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	Vehicle Production This Month(# vehicles)	Vehicle Production for Past 11 Months (# vehicles)	Total Vehicle Production for 12 Month Period (# vehicles)
Month 1			
Month 2			
Month 3			

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: Subaru of Indiana Automotive, Inc.
Source Address: 5500 State Road 38 East, Lafayette, Indiana 47905
Part 70 Permit No.: T157-27048-00050
Facility: Surface coating operations, associated purge solvent operations and wiping/cleaning solvents, and storage at Paint Coating Line Systems A/B
Parameter: VOC Emissions
Limit: Shall not exceed 1,084.5 tons VOC per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	VOC Emissions This Month (tons)	VOC Emissions for Past 11 Months (tons)	VOC Emissions for 12 Month Period (tons)
Month 1			
Month 2			
Month 3			

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: Subaru of Indiana Automotive, Inc.
Source Address: 5500 State Road 38 East, Lafayette, Indiana 47905
Part 70 Permit No.: T157-27048-00050
Facility: Paint Coating Line Systems A/B - PVC #1 Coating Booth, PVC #2 Coating Booth, Topcoat #1 Coating Booth, Topcoat #2 Coating Booth, Topcoat #3 Coating Booth, Intermediate (Surfacer) Coating Booth, Plastic Bumper Coating Booth, Black Coat and Wax Coating Booth, Anticorrosion Coating Booth, Touchup IPC Coating Booth, source-wide natural gas combustion, and all insignificant facilities that were permitted by the PSD (79) 1651 Revision.
Parameter: PM/PM10 Emissions
Limit: Less than 23.1 tons PM/PM10 per twelve (12) consecutive month period with compliance determined at the end of each month, using the equation contained in Condition D.1.4 of this permit.

QUARTER: _____ YEAR: _____

Month	PM/PM10 Emissions This Month (tons)	PM/PM10 Emissions for Past 11 Months (tons)	PM/PM10 Emissions for 12 Month Period (tons)
Month 1			
Month 2			
Month 3			

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: Subaru of Indiana Automotive, Inc.
Source Address: 5500 State Road 38 East, Lafayette, Indiana 47905
Part 70 Permit No.: T157-27048-00050
Facility: Natural gas combustion units associated with the Fascia Paint Line and the 5 MMBtu/hr dry off oven added to the existing Topcoat, Unit 003.
Parameter: Natural Gas Usage (for VOC emissions)
Limit: Shall not exceed 166.4 million cubic feet per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

FORM 1

Month	Natural Gas Usage This Month (MMCF)	Natural Gas Usage for Past 11 Months (MMCF)	Total Natural Gas Usage for 12 Month Period (MMCF)
Month 1			
Month 2			
Month 3			

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: Subaru of Indiana Automotive, Inc.
 Source Address: 5500 State Road 38 East, Lafayette, Indiana 47905
 Part 70 Permit No.: T157-27048-00050
 Facility: Fascia Paint Line (PFPLS#2), wiping/cleaning solvents, and solvent purging
 Parameter: VOC Emissions and Solvent Usage
 Limit: VOC emissions from the fascia paint line on this report (FORM 2), combined with the VOC emissions from the natural gas combustion devices on FORM 1 shall not exceed 102.6 tons per year.
 Purge solvent and wiping/cleaning solvents shall not exceed 24.2 tons VOC per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER _____ YEAR _____

FORM 2

Month	Total VOC Emissions This Month (tons)	Total VOC Emissions for Past 11 Months (tons)	Total VOC Emissions for 12 Month Period (tons)
Month 1			
Month 2			
Month 3			

Month	Purge Solvents				Purge Solvents				Purge Solvents			
	Solvent Usage for This Month (gallons)	Captured/Collected This Month (gallons)	Wiping/Cleaning Solvent Used This Month (gallons)	Total VOC Emitted This Month	Solvent Usage for Past 11 Months (gallons)	Captured/Collected for Past 11 Months (gallons)	Wiping/Cleaning Solvent Used Past 11 Months (gallons)	Total VOC Emitted for Past 11 Months	Solvent Usage for 12 Month Period (gallons)	Captured/Collected for 12 Month Period (gallons)	Wiping/Cleaning Solvent Used Past 11 Months (gallons)	Total VOC Emitted for 12 Month Period
Month 1												
Month 2												
Month 3												

Note: VOC emissions from the fascia paint line on this report (FORM 2), combined with the VOC emissions from the natural gas combustion devices on FORM 1 (page 89 of 98 of this permit) shall not exceed 102.6 tons per year.

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: Subaru of Indiana Automotive, Inc.
Source Address: 5500 State Road 38 East, Lafayette, Indiana 47905
Part 70 Permit No.: T157-27048-00050
Facility: Topcoat System, identified as Unit 003
Parameter: VOC Usage
Limit: Shall not exceed 393 tons VOC per twelve (12) consecutive month period with compliance determined at the end of each month.

Quarter: _____ Year: _____

Month	VOC Usage This Month (tons)	VOC Usage Past 11 Months (tons)	Total VOC Usage 12 Month Period (tons)
Month 1			
Month 2			
Month 3			

- No deviation occurred in this month.
- Deviation/s occurred in this month.
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 Usage Report

Source Name: Subaru of Indiana Automotive, Inc.
Source Address: 5500 State Road 38 East, Lafayette, Indiana
Part 70 Permit No.: T 157-5906-00050
Facilities: ED Coating Line, Unit 001
Parameter: Actual VOC Content
Daily Limit: ED Coating Line - 0.4 pounds of VOC/gallon of applied coating solids (lb/gacs); on a daily basis

Month: _____ Year: _____

Day	Daily VOC Usage (lb/gacs)	Day	Daily VOC Usage (lb/gacs)
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16		no. of deviations	

- No deviation occurred in this month.
- Deviation/s occurred in this month.
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 Usage Report**

Source Name: Subaru of Indiana Automotive, Inc.
 Source Address: 5500 State Road 38 East, Lafayette, Indiana
 Part 70 Permit No.: T 157-5906-00050
 Facilities: Topcoat #1 Booth, Topcoat #2 Booth, Topcoat #3 Booth, Intermediate Coating Booth
 Parameter: Actual VOC Content
 Limits: For Combined Topcoat #1 Booth, Topcoat #2 Booth - 12.3 pounds of VOC/gallon of applied coating solids (lb/gacs); based on a daily volume weighted average.
 For Topcoat #3 Booth – 10.6 lbs/gacs, based on a daily volume weighted average.
 For Intermediate Coating Booth – 8.76 lbs/gacs, based on a daily volume weighted average.

Month: _____ Year: _____

Day	Combined Daily Volume Weighted Average VOC Usage for Topcoat #1 Booth, Topcoat #2 Booth (lbs/gacs)	Daily Volume Weighted Average VOC Usage for Topcoat #3 Booth (lbs/gacs)	Daily Volume Weighted Average VOC Usage for Intermediate Coating Booth (lbs/gacs)	Day	Combined Daily Volume Weighted Average VOC Usage for Topcoat #1 Booth, Topcoat #2 Booth (lbs/gacs)	Daily Volume Weighted Average VOC Usage for Topcoat #3 Booth (lbs/gacs)	Daily Volume Weighted Average VOC Usage for Intermediate Coating Booth (lbs/gacs)
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				no. of deviation s			

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

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

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

Part 70 Quarterly Usage Report

Source Name: Subaru of Indiana Automotive, Inc.
 Source Address: 5500 State Road 38 East, Lafayette, Indiana
 Part 70 Permit No.: T 157-5906-00050
 Facilities: Trim Line, Unit 010
 Parameter: Actual VOC Content
 Limits: For Trim Line, unit 010 window installation adhesives and other materials - 0.40 pounds of VOC per gallon of coating, as applied, based on a monthly volume weighted average

For all the other adhesives and sealers used in the Trim Line, unit 010, excluding window installation materials - 0.30 pounds of VOC per gallon of coating, as applied based on a monthly volume weighted average

Quarter: _____ Year: _____

Operation	Month 1: _____ Volume Weighted Average VOC Usage (pounds of VOC/gallon as applied)	Month 2: _____ Volume Weighted Average VOC Usage (pounds of VOC/gallon as applied)	Month 3: _____ Volume Weighted Average VOC Usage (pounds of VOC/gallon as applied)
Trim Line - Unit 010 Window Installation Adhesives			
Trim Line, unit 010- All Other Adhesives Excluding Window Installation Adhesives			

- No deviation occurred in this month.
- Deviation/s occurred in this month.
 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 Usage Report

Source Name: Subaru of Indiana Automotive, Inc.
 Source Address: 5500 State Road 38 East, Lafayette, Indiana
 Part 70 Permit No.: T 157-5906-00050
 Facilities: Sealing and PVC Undercoating Line, identified as Unit 002
 (PVC Coating Booths #1 and #2)
 Parameter: Actual VOC Content
 Limit: Sealing and PVC Undercoating Line, Unit 002 (PVC Coating Booths #1 and #2)
 – 0.30 lbs/gacs, based on a daily volume weighted average

Month: _____ Year: _____

Day	Daily Volume Weighted Average VOC Usage for Sealing and PVC Undercoating Line, Unit 002 (lbs/gacs)	Day	Daily Volume Weighted Average VOC Usage for Sealing and PVC Undercoating Line, Unit 002 (lbs/gacs)
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16		no. of deviations	

- No deviation occurred in this month.
- Deviation/s occurred in this month.
 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 Usage Report

Source Name: Subaru of Indiana Automotive, Inc.
 Source Address: 5500 State Road 38 East, Lafayette, Indiana
 Part 70 Permit No.: T 157-5906-00050
 Facilities: PBL Coating Booth
 Parameter: Actual VOC Content
 Limit: PBL Coating Booth – 38.2 lbs/gacs, based on a daily volume weighted average

Month: _____ Year: _____

Day	Daily Volume Weighted Average VOC Usage for PBL Coating Booth (lbs/gacs)	Day	Daily Volume Weighted Average VOC Usage for PBL Coating Booth (lbs/gacs)
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16		no. of deviations	

- No deviation occurred in this month.
- Deviation/s occurred in this month.
 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: Subaru of Indiana Automotive, Inc.
Source Address: 5500 State Road 38 East, Lafayette, Indiana 47905
Part 70 Permit No.: T157-27048-00050
Facility: Natural gas combustion units at Paint Coating Line System C
Parameter: Natural Gas Usage (for CO, NOx, PM10, PM 2.5)
Limit: Less than 751 MMCF per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	Natural Gas Usage This Month (MMCF)	Natural Gas Usage for Past 11 Months (MMCF)	Total Natural Gas Usage for 12 Month Period (MMCF)
Month 1			
Month 2			
Month 3			

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: Subaru of Indiana Automotive, Inc.
Source Address: 5500 State Road 38 East, Lafayette, Indiana 47905
Part 70 Permit No.: T157-27048-00050
Facility: Paint Coating Line System C
Parameter: # vehicles produced
Limit: Less than 160,000 vehicles per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	Vehicle Production This Month(# vehicles)	Vehicle Production for Past 11 Months (# vehicles)	Total Vehicle Production for 12 Month Period (# vehicles)
Month 1			
Month 2			
Month 3			

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: Subaru of Indiana Automotive, Inc.
Source Address: 5500 State Road 38 East, Lafayette, Indiana 47905
Part 70 Permit No.: T157-27048-00050
Facility: Surface coating operations, associated purge solvent operations and wiping/cleaning solvents, and storage at Paint Coating Line System C
Parameter: VOC Emissions
Limit: Shall not exceed 766.2 tons VOC per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	VOC Emissions This Month (tons)	VOC Emissions for Past 11 Months (tons)	VOC Emissions for 12 Month Period (tons)
Month 1			
Month 2			
Month 3			

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: Subaru of Indiana Automotive, Inc.
 Source Address: 5500 State Road 38 East, Lafayette, Indiana 47905
 Part 70 Permit No.: T157-27048-00050
 Facility: Paint Coating Line System C - ED Coating, Unit 013 PM, PM10, PM2.5, Sealing, LASD (Liquid Applied Sound Deadener Coating, Unit 014 PM, PM10, PM2.5, Intermediate Surfacer, Unit 015 PM, PM10, PM2.5, Topcoat, Unit 017 PM, PM10, PM2.5, Anticorrosion Coating (Trim and Final Assembly), Unit 017 PM, PM10, PM2.5, Black and Wax Booth, Unit 017 PM, PM10, PM2.5, Plastic Bumper Coating PM, PM10, PM2.5, Natural Gas Combustion units PM, PM10, PM2.5 at Paint Coating Line System C and PTE change from modified Plastic Bumper Booth 005B, Final Repair, Unit 007, and Trim Line, Unit 010 at paint Line Coating Systems A/B
 Parameter: PM, PM10, PM2.5 Emissions
 Limit: Less than 25 tons of PM per twelve consecutive month period, less than 15 tons of PM10 per twelve consecutive month period and less than 10 tons of PM2.5 per twelve consecutive month period required in D.9.2 of this permit.

QUARTER: _____ YEAR: _____

Month	PM Emissions This Month (tons)	PM10 Emissions This Month (tons)	PM2.5 Emissions This Month (tons)	PM Emissions for Past 11 Months (tons)	PM10 Emissions for Past 11 Months (tons)	PM2.5 Emissions for Past 11 Months (tons)	PM Emissions for 12 Month Period (tons)	PM10 Emissions for 12 Month Period (tons)	PM2.5 Emissions for 12 Month Period (tons)
Month 1									
Month 2									
Month 3									

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

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

Part 70 Quarterly Usage Report

Source Name: Subaru of Indiana Automotive, Inc.
 Source Address: 5500 State Road 38 East, Lafayette, Indiana
 Part 70 Permit No.: T 157-27048-00050
 Facilities: ED Coating Line, Unit 013
 Parameter: Actual VOC Content
 Daily Limit: ED Coating Line - 1.15 pounds of VOC/gallon of applied coating solids (lb/gacs); on a daily basis

Month: _____ Year: _____

Day	Daily VOC Usage (lb/gacs)	Day	Daily VOC Usage (lb/gacs)
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16		no. of deviations	

- No deviation occurred in this month.
- Deviation/s occurred in this month.
 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 Usage Report**

Source Name: Subaru of Indiana Automotive, Inc.
 Source Address: 5500 State Road 38 East, Lafayette, Indiana
 Part 70 Permit No.: T 157-27048-00050
 Facilities: Topcoat System "C1", identified as Unit 016 using Option A
 Parameter: VOC
 Limits: Less than 10.96 pounds per gallon applied coating solids (lb/gacs), based on a daily volume weighted average.

Month: _____ Year: _____

Day	Daily Volume Weighted Average VOC Usage (lbs/gacs)	Daily Volume Weighted Average VOC Usage (lbs/gacs)	Daily Volume Weighted Average VOC Usage (lbs/gacs)	Day	Daily Volume Weighted Average VOC Usage (lbs/gacs)	Daily Volume Weighted Average VOC Usage (lbs/gacs)	Daily Volume Weighted Average VOC Usage (lbs/gacs)
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				no. of deviations			

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

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE AND ENFORCEMENT BRANCH
 Part 70 Quarterly Usage Report**

Source Name: Subaru of Indiana Automotive, Inc.
 Source Address: 5500 State Road 38 East, Lafayette, Indiana
 Part 70 Permit No.: T 157-27048-00050
 Facilities: Intermediate Surfacers, identified as Unit 015 when using Option A
 Parameter: VOC
 Limits: Less than 4.8 pounds per gallon applied coating solids (lb/gacs), based on a daily volume weighted average.

Month: _____ Year: _____

Day	Daily Volume Weighted Average VOC Usage (lbs/gacs)	Daily Volume Weighted Average VOC Usage (lbs/gacs)	Daily Volume Weighted Average VOC Usage (lbs/gacs)	Day	Daily Volume Weighted Average VOC Usage (lbs/gacs)	Daily Volume Weighted Average VOC Usage (lbs/gacs)	Daily Volume Weighted Average VOC Usage (lbs/gacs)
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				no. of deviations			

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

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE AND ENFORCEMENT BRANCH
 Part 70 Quarterly Usage Report**

Source Name: Subaru of Indiana Automotive, Inc.
 Source Address: 5500 State Road 38 East, Lafayette, Indiana
 Part 70 Permit No.: T 157-27048-00050
 Facilities: Combined VOC emissions from the Intermediate Surfacers, identified as Unit 015/Topcoat, Unit 016 when using Option B ("wet on wet" system)
 Parameter: VOC
 Limits: Less than 10.41 pounds per gallon applied coating solids (lb/gacs), based on a daily volume weighted average.

Month: _____ Year: _____

Day	Daily Volume Weighted Average VOC Usage (lbs/gacs)	Daily Volume Weighted Average VOC Usage (lbs/gacs)	Daily Volume Weighted Average VOC Usage (lbs/gacs)	Day	Daily Volume Weighted Average VOC Usage (lbs/gacs)	Daily Volume Weighted Average VOC Usage (lbs/gacs)	Daily Volume Weighted Average VOC Usage (lbs/gacs)
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				no. of deviations			

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

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE AND ENFORCEMENT BRANCH
 Part 70 Quarterly Usage Report**

Source Name: Subaru of Indiana Automotive, Inc.
 Source Address: 5500 State Road 38 East, Lafayette, Indiana
 Part 70 Permit No.: T 157-27048-00050
 Facilities: Sealer, LASD and PVC Undercoating Line, identified as Unit 014
 Parameter: VOC
 Limits: Less than 0.38 pounds per gallon applied coating (lb/gal), based on a daily volume weighted average.

Month: _____ Year: _____

Day	Daily Volume Weighted Average VOC Usage (lbs/gal)	Daily Volume Weighted Average VOC Usage (lbs/gal)	Daily Volume Weighted Average VOC Usage (lbs/gal)	Day	Daily Volume Weighted Average VOC Usage (lbs/gal)	Daily Volume Weighted Average VOC Usage (lbs/gal)	Daily Volume Weighted Average VOC Usage (lbs/gal)
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				no. of deviations			

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

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE AND ENFORCEMENT BRANCH
 Part 70 Quarterly Usage Report**

Source Name: Subaru of Indiana Automotive, Inc.
 Source Address: 5500 State Road 38 East, Lafayette, Indiana
 Part 70 Permit No.: T 157-27048-00050
 Facilities: Black and Wax Booth, Unit 017
 Parameter: VOC
 Limits: Pthalic Black = 1.0 lb/gal, Inner Wax = 3.5 lb/gal based on a daily volume weighted average.

Month: _____ Year: _____

Day	Daily Volume Weighted Average VOC Usage for (lbs/gal)	Daily Volume Weighted Average VOC Usage (lbs/gal)	Daily Volume Weighted Average VOC Usage (lbs/gal)	Day	Daily Volume Weighted Average VOC Usage (lbs/gal)	Daily Volume Weighted Average VOC Usage (lbs/gal)	Daily Volume Weighted Average VOC Usage (lbs/gal)
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				no. of deviations			

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

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE AND ENFORCEMENT BRANCH
 Part 70 Quarterly Usage Report**

Source Name: Subaru of Indiana Automotive, Inc.
 Source Address: 5500 State Road 38 East, Lafayette, Indiana
 Part 70 Permit No.: T 157-27048-00050
 Facilities: Anticorrosion Wax Booth, Unit 017
 Parameter: VOC
 Limits: Less than 2.51 pounds per gallon applied coating (lb/gal), based on a daily volume weighted average.

Month: _____ Year: _____

Day	Daily Volume Weighted Average VOC Usage (lbs/gal)	Daily Volume Weighted Average VOC Usage (lbs/gal)	Daily Volume Weighted Average VOC Usage (lbs/gal)	Day	Daily Volume Weighted Average VOC Usage (lbs/gal)	Daily Volume Weighted Average VOC Usage (lbs/gal)	Daily Volume Weighted Average VOC Usage (lbs/gal)
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				no. of deviations			

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

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE AND ENFORCEMENT BRANCH
 Part 70 Quarterly Usage Report**

Source Name: Subaru of Indiana Automotive, Inc.
 Source Address: 5500 State Road 38 East, Lafayette, Indiana
 Part 70 Permit No.: T 157-27048-00050
 Facilities: Plastic Bumper Coating Line (PBL-C), Unit 018 and Unit 005B at Paint Coating Line A/B
 Parameter: VOC
 Limits: Primer coatings - limited to less than 0.71 pounds per gallon based on a daily volume weighted average.
 Basecoat coatings - limited to less than 1.38 pounds per gallon, based on a daily volume weighted average.
 Clearcoat coatings - limited to less than 4.09 pounds per gallon, based on a daily volume weighted average

Month: _____ Year: _____

Day	Daily Volume Weighted Average VOC Usage (lbs/gal)	Daily Volume Weighted Average VOC Usage (lbs/gal)	Daily Volume Weighted Average VOC Usage (lbs/gal)	Day	Daily Volume Weighted Average VOC Usage (lbs/gal)	Daily Volume Weighted Average VOC Usage (lbs/gal)	Daily Volume Weighted Average VOC Usage (lbs/gal)
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				no. of deviations			

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

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE AND ENFORCEMENT BRANCH
 Part 70 Quarterly Report**

Source Name: Subaru of Indiana Automotive, Inc.
 Source Address: 5500 State Road 38 East, Lafayette, Indiana 47905
 Part 70 Permit No.: T157-27048-00050
 Facility: Paint Coating Line System C, wiping/cleaning solvents, and solvent purging
 Parameter: VOC Usage
 Limit: VOC usage from paint line cleaning/purge solvents minus the amount of VOC in the purge material collected associated with the Purge Solvent Usage and Capture System, Unit 019 shall be limited to less than 83.8 tons per twelve consecutive month period with compliance determined at the end of each month

The annual VOC usage for wiping solvents and clean up materials shall be limited to less than 15.2 tons per twelve consecutive month period with compliance determined at the end of each month

QUARTER _____ YEAR _____

Month	Purge Solvents				Purge Solvents				Purge Solvents			
	Solvent Usage for This Month (gallons)	Captured/Collected This Month (gallons)	Wiping/Cleaning Solvent Used This Month (gallons)	Total VOC Emitted This Month	Solvent Usage for Past 11 Months (gallons)	Captured/Collected for Past 11 Months (gallons)	Wiping/Cleaning Solvent Used Past 11 Months (gallons)	Total VOC Emitted for Past 11 Months	Solvent Usage for 12 Month Period (gallons)	Captured/Collected for 12 Month Period (gallons)	Wiping/Cleaning Solvent Used Past 11 Months (gallons)	Total VOC Emitted for 12 Month Period
Month 1												
Month 2												
Month 3												

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: Subaru of Indiana Automotive, Inc.
Source Address: 5500 State Road 38 East, Lafayette, Indiana 47905
Part 70 Permit No.: T157-27048-00050

Months: _____ to _____ Year: _____

Page 1 of 2

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

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

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: _____

Submitted by: _____

Title / Position: _____

Date: _____

Phone: _____

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

**Technical Support Document (TSD) for a PSD/Significant Source
Modification and a Significant Permit Modification**

Source Description and Location

Source Name:	Subaru of Indiana Automotive, Inc.
Source Location:	5500 State Road 38 East, Lafayette, Indiana 47905
County:	Tippecanoe
SIC Code:	3711
PSD/Significant Source Modification No.:	157-34774-00050
Significant Permit Modification No.:	157-34915-00050
Permit Reviewer:	Aida DeGuzman

Existing Approvals

The source was issued its first Part 70 Operating Permit Renewal No. 157-27048-00050 on August 1, 2011. The source has since received the following approvals:

- (a) Prevention of Significant Deterioration/Significant Source Modification PSD/SSM No. 157-31885-00050, issued on October 4, 2012;
- (b) Significant Permit Modification No. 157-31887-00050, issued on October 24, 2012;
- (c) Significant Permit Modification No. 157-33106-00050, issued on July 16, 2013;
- (d) Prevention of Significant Deterioration/Significant Source Modification PSD/SSM No. 157-33759-00050, issued on May 19, 2014; and
- (e) Significant Permit Modification No. 157-33836-00050, issued on June 6, 2014.

County Attainment Status

The source is located in Tippecanoe 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 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.

¹Unclassifiable 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. Tippecanoe 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}**
 Tippecanoe County has been classified as attainment for PM_{2.5}. 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**
 Tippecanoe County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

This type of operation (automotive and light-duty trucks assembly plant) is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-7; however, there is an applicable New Source Performance Standard (Subpart MM) that was in effect on August 7, 1980. Therefore, fugitive emissions from the affected facilities to which the New Source Performance Standard 40 CFR 60, Subpart MM, applies are counted toward the determination of PSD and Part 70 Permit applicability.

Source Status - Existing Source

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 Limit for Coating Lines A/B (ton/yr)	Emissions Limit for Paint Line System C (ton/yr)	TOTAL Limited Emissions (tons/yr)
PM	23.1 (D.1.1(b))	<25	<48
PM ₁₀	23.1 (D.1.1(b)), ^(1a)	<15	<38.1
PM _{2.5}	23.1 ⁽¹⁾	<10	<33.1
SO ₂	<40 (D1.2)	0.20	<40.20
NO _x	92 ⁽²⁾	39.7 (D.9.1(c))	131.7
VOC	1,084.5 (D.1.3)	766.2 (D.9.1) ⁽⁵⁾	1,850.7
CO	99.8 ⁽²⁾	37.4 ⁽³⁾	137.2
GHGs as CO _{2e}	>100,000 ⁽⁴⁾	44,018 ⁽⁶⁾	>100,000
HAPs			
Single HAP	>10		
Combined HAPs	>25		

⁽¹⁾PM_{2.5} regulation had not been promulgated at the time of the initial PSD permit (79) 1651 issuance on July 30, 1987. Although PM_{2.5} is not limited, it is assumed equal to PM and PM₁₀.

^(1a) PM₁₀ regulation was promulgated on July 31, 1987 and took effect on August 5, 1987 which is after the issuance of the initial PSD permit (79) 1651 issuance on July 30, 1987. Therefore, PM₁₀ was not limited at that time. However, subsequent CP 157-9619-00050 was issued in 1999 that allowed for the increase in production from 240,000 to 262,000 vehicles/year. This CP 157-9619-00050 did not require a limit for PM₁₀, since the modification was naturally below 15 tons/yr. However, upon issuance of the initial TV Permit 157-5906-00050 in 2004, PM₁₀ was a regulated pollutant. During this initial TV permitting process, Subaru commented (which was documented as Comment 7 on page 10 of 137 of the ATSD of the initial TV permit) to add a source-wide general Section D.1 to include a PM₁₀ emissions limit and other emission limits to avoid repetition throughout other D sections of the permit. Therefore, PM₁₀ was limited to 23.1 tons/year, assuming PM₁₀ emissions were equivalent to PM emissions from units present and permitted in PSD permit (79) 1651 in 1987.

⁽²⁾ In the initial construction permit PSD (79) 1651, issued on July 30, 1987, the source was subject to PSD BACT requirements for NOx emissions, while the potential to emit CO was 39 tons/yr, which is less than 100 tons/year significant level. Various PSD BACT limits have been established including a natural gas usage limit of 2,752 million cubic feet per year (MMCF/yr), which corresponds to NOx emissions of 92 tons/year, using AP-42 emission factors in place in 1987. This limit was adjusted in TV 157-5906-00050 to 2,380 MMCF/yr as explained in its Technical Support Document on Page 11 of 35, due to the revisions of AP-42 emission factors upon issuance of TV 157-5906-00050.

In this permitting action (PSD/SSM 157-34774-00050), IDEM determined that the natural gas fuel usage limit of 2,380 MMCF/yr, using a current AP-42 emission factor of 84 lb/MMCF corresponds to 100 tons/year instead of less than 100 tons/yr. Therefore, this limit was adjusted to 2,375 MMCF/yr which corresponds to 99.8 tons/yr of CO.

⁽³⁾ Naturally minor and no controls employed.

⁽⁴⁾ Based on a natural gas usage limit of 2,375 MMCF/yr.

⁽⁵⁾ The VOC limit of 768.8 tons/yr in D.9.1 for the Paint Line System C was adjusted to 766.2 tons/yr to match the PSD BACT limit established in the BACT Analysis.

- (a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because a PSD regulated pollutant, excluding GHGs, is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) The source-wide GHG emissions are equal to or greater than one hundred thousand (>100,000) tons of CO₂ equivalent (CO₂e) emissions per year. GHG emissions do not affect the source PSD status.
- (c) This existing source is a major source of HAPs, as defined in 40 CFR 63.2, because HAP emissions are greater than ten (10) tons per year for a single HAP greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Subaru of Indiana Automotive, Inc. on July 28, 2014 relating to the proposed addition of new combustion emission units instead of the combustion emission units originally permitted in PSD/SSM 157- 33759-00050. The proposed changes will require re-evaluation of PSD BACT. The following are the proposed changes:

- (a) Installation of one (1) 9.5 MMBtu/hr heat input Working Stage Air House located in the Sealer, PVC, ED Sand, Wet Sand #2 area instead of originally permitted location of the ED Deck area;
- (b) Installation of one (1) 12 MMBtu/hr heat input Pretreatment boiler instead of the originally permitted 7.8 MMBtu/hr boiler;
- (c) Installation of one (1) 9 MMBtu/hr heat input ED Oven (pretreatment drying oven) instead of the originally permitted 4.4 MMBtu/hr oven;
- (d) Installation of one (1) 3 MMBtu/hr heat input PVC Sealer Oven instead of the originally permitted 1.2 MMBtu/hr oven;
- (e) Installation of one (1) 10 MMBtu/hr heat input Intermediate Surfacer Coating Oven instead of the originally permitted 3.3 MMBtu/hr oven;
- (f) Installation of one (1) 3 MMBtu/hr heat input Intermediate Surfacer flash zone heater instead of the originally permitted 1.1 MMBtu/hr heater;
- (g) Installation of one (1) 3 MMBtu/hr heat input Topcoat flash zone heater instead of the originally permitted 1.1 MMBtu/hr heater;
- (h) Installation of one (1) 3 MMBtu/hr heat input PBL-C flash zone heater instead of the originally permitted 1.2 MMBtu/hr heater, located between the primer and the basecoat zones;
- (i) Installation of one (1) 3 MMBtu/hr heat input PBL-C flash zone heater instead of the originally permitted 1.2 MMBtu/hr heater, located between the basecoat and the clearcoat zones;
- (j) Installation of one (1) 8 MMBtu/hr heat input Topcoat #C1 Oven instead of the originally permitted 3.8 MMBtu/hr oven;
- (k) Installation of one (1) 1 MMBtu/hr heat input Topcoat #C1 Oven Thermal Oxidizer (TO-C1) instead of the originally permitted 0.6 MMBtu/hr unit;
- (l) Installation of one (1) 21.6 MMBtu/hr heat input Intermediate (Surfacer) Air House instead of the originally permitted 8.4 MMBtu/hr unit;
- (m) Installation of one (1) to 38 MMBtu/hr heat input Topcoat Air House instead of the originally permitted 26.1 MMBtu/hr unit;
- (n) Installation of one (1) 2.6 MMBtu/hr heat input Working Stage Air House instead of the originally permitted 1.8 MMBtu/hr unit, located in the Surfacer Sand, Wet Sand #1 area;
- (o) Installation of one (1) 15.5 MMBtu/hr heat input Black and Wax Coating Booth natural gas-fired burner instead of the originally permitted 5.3 MMBtu/hr burner;
- (p) Installation of one (1) 2 MMBtu/hr heat input Mixing Air House instead of the originally permitted 4.5 MMBtu/hr unit, located at the Mix Room;
- (q) Installation of one (1) 6.5 MMBtu/hr heat input Working Stage Air House for the inspection, touchup area instead of the originally permitted 8.7 MMBtu/hr unit located at the Intermediate Sand area,
- (r) Installation of one (1) 2.4 MMBtu/hr heat input Working Stage Air House instead of the originally permitted 10.0 MMBtu/hr, to support Paint Line "C";

- (s) Approved in 2014 for the construction of the following new combustion emission units:
- (1) Eleven (11) Paint Line System "C" heating and cooling units, identified as HCU-14-1 through HCU-14-6, and HCU-11 through HCU-14, with a total heat input of 8.8 MMBtu/hr;
 - (2) Five (5) Paint Line System "C" makeup air heating units, identified as MAU-14-1 through MAU-14-5, each with a heat input of 1.5 MMBtu/hr;
 - (3) Two (2) Paint Line System "C" air handling units, identified as AHU-14-1 and AHU-14-2, each with a heat input of 3.834 MMBtu/hr; and
 - (4) Seventeen (17) Paint Line System "C" heaters, identified as UH-14-1 through UH-14-3, UH-14-9 through UH-14-13, and UH-14-20 through UH-14-28, each with a heat input of 0.40 MMBtu/hr.

Emission Units and Pollution Control Equipment Removed From Permit

The source has requested removal from its permit and will not install the following permitted PSD emission units:

- (a) Other insignificant natural gas combustion units approved in 2014 for construction:
[326 IAC 2-2]

Rooftop Units -

Paint Tunnel - 4 Units (1.6 MMBtu/hr total)

Paint Shop - 4 Units (1.6 MMBtu/hr total)

Paint Shop - 2 Units (2.40 MMBtu/hr total)

Heater Units

Paint Shop – 5 Units (2.00 MMBtu/hr total)

Enforcement Issues

There are no pending enforcement actions relating to this modification.

Emission Calculations

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

Permit Level Determination – Part 70 Modification to an Existing Source

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. If the control

equipment has been determined to be integral, the table reflects the PTE after consideration of the integral control device.

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

Pollutant	Total PTE of Modification (ton/yr)
PM	1.72
PM ₁₀	6.88
PM _{2.5}	6.88
SO ₂	0.54
VOC	4.98
CO	76.03
NO _x	90.52
Single HAP(Hexane)	1.63
HAPs	1.71

- (a) This source modification is subject to 326 IAC 2-7-10.5(g)(1), (4), since the modification is subject to 326 IAC 2-2, PSD. Further, NO_x PTE is equal to or greater than 25 tons per year.
- (b) 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 it does not qualify as a minor permit modification or as an administrative amendment and it involves a case-by-case determination of PSD BACT emission limitations.

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 modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

LIMITED PTE (tons/year)										
Facilities/Process ID	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO	Worst Single HAP (Hexane)	Combined HAPs	GHGs (CO _{2e})
*New Natural Gas Combustion Units + Existing Unchanged Units Permitted in PSD/SSM 157-33759	0.72	2.87	2.87	0.23	37.79	2.08	31.74	0.61	0.64	41,162
TOTAL PTE FROM MODIFICATION	0.72	2.87	2.87	0.23	37.79	2.08	31.74	0.61	0.64	41,162
PSD Significant Levels	25	15	10	40	40	40	100	--	--	75,000

- (a) The project is the addition of new combustion units that are being aggregated with the Coating Paint Line "C", which is major under PSD for VOC. Coating Paint Line "C" was permitted in PSD/SSM 157-33759. Therefore, this project is also PSD for VOC.

- (b) The NOx emissions from the Coating Paint Line "C" were limited to less than 40 tons/year, which likewise, limited the fuel usage to 751 MMCF/yr. *The project in this permitting action will not change these limits which apply for both the proposed new emission units and existing combustion emission units permitted in PSD/SSM 157-33759.

Federal Rule Applicability Determination

NSPS:

- (a) The New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) determinations made for these emissions units will not be affected by this permitting action.

NESHAP:

- (b) The National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) determinations made for these emissions units will not be affected by this permitting action.

CAM:

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each new or modified pollutant-specific emission unit that meets 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 affected natural gas combustion units in this permitting action are not subject to CAM because they are not equipped with a control device and each does not have the PTE at or above the major source threshold level.

State Rule Applicability Determination

- (a) 326 IAC 2-2 (Prevention Significant Deterioration)
PSD applicability is discussed under the Permit Level Determination – PSD section.

See Appendix C for the PSD BACT analysis.

- (b) 326 IAC 2-2-5 (Air Quality Impact; Requirements)
As part of the Paint Line System C, 2014 Project, permitted in PSD/SSM 157-33759-00050, issued on May 19, 2014, an air impact evaluation was performed to determine the potential impact of this project to the formation of ground level ozone.

The minor changes in the sizes of these natural gas combustion units will have no effect on the air quality impact evaluation performed in support of the 2014 Project.

Even though the total design heat input capacities based on the final engineering design will be higher than the "as permitted" design heat input capacities, the source will maintain the same natural gas usage limit of 751 million cubic feet per year (MMCF/year).

(c) 326 IAC 6-2-4 (Particulate Emissions from Indirect Heating Facilities)

Emission Unit Description	Total Maximum Operating Capacity - Q (MMBtu/hr)	Particulate Emissions - Pt (lbs/MMBtu)
Before 2014 Project		
Total Natural Gas Combustion	131.1	0.307
After 2014 Project		
Total Natural Gas Combustion	138.9	0.302

The particulate emission limit shall be determined using the following equation:

$$Pt = 1.09 / Q^{0.26}$$

Where

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input

Once the sourcewide heat input, Q, has been established for a specific emission unit, the value of Q does not change, i.e., if an older emission unit has been *removed from* the source (meaning physically present then removed from the source), the emission limits for other existing units at the source are not changed. However, in this case, the ED Boiler with a 7.8 MMBtu/hr heat input permitted in PSD/SSM 157-33759-00050 has not been constructed. Therefore, it is not being removed from operation or from the source. Therefore, Q will be the value before the ED Boiler 7.8 MMBtu/hr was permitted.

Based on the final engineering design, the ED Boiler will have a heat input of 12 MMBtu/hr instead of 7.8 MMBtu/hr. Therefore, Q is the following:

Emission Unit Description	Total Maximum Operating Capacity - Q (MMBtu/hr)	Particulate Emissions - Pt (lbs/MMBtu)
Before 2014 Project		
Total Natural Gas Combustion	131.1	0.307
After 2014 Project		
Total Natural Gas Combustion	138.9 176.1	0.302 0.284

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.

This modification will not affect the compliance monitoring determined for the 2014 Project.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. 157-27048-00050 to incorporate PSD/SSM no. 157-34774-00050. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

Section A.2 Changes:

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:

Paint Coating Line System "C", with a maximum capacity of 160,000 vehicles per year, approved in 2014 for construction, dedicated to coating the increase in vehicle production, consisting of the following units:

- (a) Electrodeposition (**ED**) Coating ~~Line of~~ **for Vehicle Bodies (ED) Coating Line**, identified as Unit 013, with a capacity of 160,000 units per year, approved in 2014 for construction, venting to ~~44~~ **9** exhaust stacks, identified as Stacks 13-1 through ~~13-44~~ **13-9**, consisting of the following units:
 - (1) One (1) ED Body Pretreatment Area, including an insignificant pretreatment boiler for warming water surrounding the ED Coating Tank, with a maximum heat input capacity of ~~7.8~~ **12** million British thermal units per hour (MMBtu/hr).
 - (2) One (1) ED Body Coating Tank, utilizing dipping as the method of application.
 - (3) One (1) ED Oven (pretreatment drying oven), with a maximum heat input capacity of **9.0** ~~4.4~~ MMBtu/hr, using no controls.
 - (4) One (1) ED Body Cool Down Area.
 - (5) One (1) ED Deck and ED Sand Area.
 - (6) One (1) Paint Storage Room.
 - (7) One (1) Working Stage Air House ~~in ED Deck area~~ **to support the Sealer, PVC, ED Sand, Wet Sand #2 Area** rated at 9.5 MMBtu/hr.
 - (8) One (1) Working Stage Air House ~~in ED Sand area~~ **to support the Surfacer**

Sand, Wet Sand #1 Area rated at ~~4.8~~ **2.6** MMBtu/hr.

- (b) Sealing, LASD (Liquid Applied Sound Deadener) and PVC Undercoating Line, identified as Unit 014, with a capacity of 160,000 units per year, approved in 2014 for construction, venting to ~~5~~ **3 exhaust stacks**, identified as Stacks 14-1 through ~~14-5~~ **14-3**, consisting of the following:
- (1) One (1) PVC Coating Booth #1, equipped with airless spray application and pedestal robotic spray system, using a dry filter to control the particulate overspray emissions.
 - (2) One (1) PVC Sealer Oven, with a maximum heat input capacity of ~~4.2~~ **3.0 MMBtu/hr**, using no control.
 - (3) One (1) PVC Cool Down Area, using no controls.
 - (4) One (1) Sealer Application Area, using no controls.
 - (5) One (1) LASD (Liquid Applied Sound Deadener) Application Area, using no controls.
- (c) Intermediate Surfacers Coating Line, identified as Unit 015, with a capacity of 160,000 units per year, approved in 2014 for construction, venting to 14 exhaust stacks identified as Stacks 15-1 through 15-14, consisting of the following:
- (1) One (1) Intermediate Coating Booth, equipped with manual/robotic/automated spray applicators, for the application of waterborne surfacer material, using dry filtration or a water wash system to control the particulate overspray emissions.
 - (2) One (1) Intermediate Coating Oven, with a maximum heat input capacity of ~~3.3~~ **10.0** MMBtu/hr, with no VOC control.
 - (3) One (1) Intermediate (Surfacer) natural gas-fired flash zone heater rated at ~~4.4~~ **3.0** MMBtu/hr.
 - (4) One (1) Intermediate (Surfacer) Air House rated at ~~8.4~~ **21.6** MMBtu/hr.
 - (5) One (1) Intermediate Cool Down Area, using no controls.
 - (6) One (1) main paint mix room.
 - ~~(7) One (1) Working Stage Air House located in Intermediate Sand area rated at 8.7 MMBtu/hr.~~
- (d) Topcoat System, identified as Unit 016, with a capacity of 160,000 units per year, approved in 2014 for construction, venting to ~~47~~ **26** exhaust stacks, identified as Stacks 16-1 through ~~16-26~~ **16-15, 16b-1 and 16b-2**, consisting of the following:
- (1) One (1) Topcoat #C1 Booth, equipped with air atomized spray with robot, electrostatic air atomized spray with robot, and electrostatic bell with robot method of applications, and automatic spray applicators, using dry filtration or a water wash system to control the particulate overspray emissions.
 - (2) One (1) Topcoat #C1 Oven, with a maximum heat input capacity of ~~3.8~~ **8.0** MMBtu/hr, using a ~~0.6~~ **1.0** MMBtu/hr natural gas-fired thermal oxidizer (TO-C1) as VOC control.
 - (3) One (1) Topcoat natural gas-fired flash zone heater rated at ~~4.4~~ **3.0**

MMBtu/hr.

- (4) One (1) Topcoat #C1 Cool Down Area, using no controls.
 - (5) One (1) main paint mix room.
 - (6) One (1) Topcoat Air House rated at ~~26.4~~ **38.0** MMBtu/hr.
 - (7) One (1) Mixing Air House located in Mix Room rated at ~~4.5~~ **2.0** MMBtu/hr.
- (e) Anticorrosion Coating Operations, identified as Unit 017, with a capacity of 160,000 (if built as part of new paint Line "C") or 225,000 units per year (if built as part of existing paint lines "A/B"), approved in 2014 for construction, venting to ~~3~~ **2** exhaust stacks, identified as Stacks 17-1 through ~~17-3~~ **17-2**, consisting of the following units:
- (1) One (1) Black and Wax Coating Booth, to be part of either the new paint line "C" or existing paint lines "A/B", equipped with air atomized and air-assisted airless spray systems, using a dry filter to control the particulate overspray emissions.
 - (2) One (1) Black and Wax Coating Booth natural gas-fired burner, with a maximum heat input capacity of ~~5.3~~ **15.5** MMBtu/hr.
 - (3) One (1) Wax Coating Booth, constructed in 2014 in the Trim & Final Assembly Area, utilizing air-assisted spray system, with no particulate overspray control.
 - ~~(4) One (1) Wax Coating Booth natural gas-fired burner, with a maximum heat input capacity 4.0 MMBtu/hr.~~
 - ~~(5) One (1) Working Stage Air House rated at 10.0 MMBtu/hr.~~
- (f) Plastic Bumper Coating Line (PBL-C), identified as Unit 018, with a capacity of 160,000 units per year, approved in 2014 for construction, venting to 18 exhaust stacks, identified as Stacks 18-1 through 18-18, consisting of the following units: (see operating scenarios for Unit 005B):
- (1) One (1) PBL-C Paint Booth, equipped with air atomization and electrostatic bell spray systems, using dry filtration or water wash system to control the particulate overspray emissions.
 - (2) One (1) PBL-C Oven, with a maximum heat input capacity of 3.0 MMBtu/hr, using no VOC controls.
 - (3) One (1) PBL-C Cool Down area.
 - (4) One (1) paint mixing room.
 - (5) Three (3) Bumper Air Houses (includes Primer Air House, basecoat Air house and Clearcoat Air House), rated at a total of 17.7 MMBtu/hr.
 - (6) One (1) PBL-C natural gas-fired flash zone heater located between the primer and basecoat zones rated at ~~4.2~~ **3.0** MMBtu/hr.
 - (7) One **(1)** PBL-C natural gas-fired flash zone heater located between the basecoat and the clearcoat zones rated at ~~4.2~~ **3.0** MMBtu/hr.
 - (8) One (1) Working Stage Air House rated at 4.4 MMBtu/hr.

- (9) One (1) Mixing Air House located in Mixing Room rated at 1.8 MMBtu/hr.
- (g) Miscellaneous combustion devices, approved in 2014 for construction:**
- (1) **One (1) Working Stage Air House used to support the Inspection, Touch-up area rated at 6.5 MMBtu/hr.**
- (2) **One (1) Working Stage Air House used to support Paint Coating Line "C" rated at 2.4 MMBtu/hr.**
- (g h) Purge solvent usage and capture system, identified as Unit 019, approved in 2014 for construction, designed to allow for purging and capturing of solvent and waterborne purge materials.
- (h i) Miscellaneous support cleaning operations, identified as Unit 020, approved in 2014 for construction, which include wiping solvent and miscellaneous cleanup materials.
- (i-j) An additional Startup and Roll Test Line, approved in 2014 for construction.
- (j-k) Engine assembly - one (1) additional dynamometer gasoline engine testing, where engines are tested prior to installation in the vehicle chassis, approved in 2014 for construction.

Section A.3 Changes:

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):

- (3) Other insignificant natural gas combustion units approved in 2014 for construction: [326 IAC 2-2]

Rooftop Units - ~~36~~53 Units

- Engine Assembly Expansion - 4 Units (1.6 MMBtu/hr total)
- Engine Warehouse Expansion - 2 Units (0.8 MMBtu/hr total)
- Trim Warehouse Phase 1 - 5 Units (2.0 MMBtu/hr total)
- Trim Warehouse Phase 2 - 5 Units (2.0 MMBtu/hr total)
- Trim Warehouse Phase 3 - 5 Units (2.0 MMBtu/hr total)
- Body Warehouse - 3 Units (1.2 MMBtu/hr total)
- Body Service Warehouse - 3 Units (1.2 MMBtu/hr total)
- Stamping Warehouse 1 - 4 Units (1.6 MMBtu/hr total)
- Stamping Warehouse 2 - 1 Unit (0.4 MMBtu/hr total)
- Motor Pool Bldg. - 3 Units (1.2 MMBtu/hr total)
- **Paint Coating Line "C" Heating and Cooling Units - 11 units (8.8 MMBtu/hr total)**
- **Paint Coating Line "C" Makeup Air Heating Units - 5 units (7.5 MMBtu/hr total)**
- **Paint Coating Line "C" Air Handling Units - 2 units (7.7 MMBtu/hr total)**
- ~~Paint Tunnel - 4 Units (1.6 MMBtu/hr total)~~
- ~~Paint Shop - 4 Units (1.6 MMBtu/hr total)~~
- ~~Paint Shop - 2 Units (2.40 MMBtu/hr total)~~

Heater Units - ~~47~~ **39** Units

- Engine Assembly Expansion - 1 Unit (0.4 MMBtu/hr total)
- Engine Warehouse Expansion - 4 Units (1.6 MMBtu/hr total)
- Trim Warehouse Phase 1 - 2 Units (0.8 MMBtu/hr total)
- Trim Warehouse Phase 2 - 2 Units (0.8 MMBtu/hr total)
- Trim Warehouse Phase 3 - 2 Units (0.8 MMBtu/hr total)
- Body Warehouse - 3 Units (1.20 MMBtu/hr total)
- Body Service Warehouse - 2 Units (0.8 MMBtu/hr total)
- Stamping Warehouse 1 - 3 Units (1.2 MMBtu/hr total)
- Stamping Warehouse 2 - 1 Unit (0.4 MMBtu/hr total)
- Motor Pool Accessory Bldg - 2 Units (0.8 MMBtu/hr total)
- ~~- Paint Shop - 5 Units (2.00 MMBtu/hr total)~~
- **Paint Coating Line "C" Heater Units - 17 units (6.8 MMBtu/hr total)**

Section D.9 Changes:

- (a) *The VOC BACT limit of 766.2 tons per twelve months determined in the BACT Analysis was typed incorrectly in Condition D.9.1(a). Therefore, the VOC limit was corrected from 768.8 tons per twelve months to match the BACT of 766.2 tons per twelve months:*

D.9.1 Prevention of Significant Deterioration (PSD) - Best Available Control Technology for Volatile Organic Compounds (VOC) [326 IAC 2-2]

Pursuant to 326 IAC 2-2-3 (Control Technology Review; Requirements) and PSD 157-33759-00050, the BACT for the Paint Coating Line System "C" shall be the following:

- (a) The total VOC emissions from the entire Paint Coating Line System "C"- 2014 project, including the PTE change from the modified existing emission units in Section D.5(h), and Section D.7(i) affected by this project shall be limited to less than ~~768.8~~ **766.2** tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The Paint Coating Line System "C" vehicle production shall be limited to less than 160,000 vehicles per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) The total natural gas combustion at the entire Paint Coating Line System "C"- 2014 project shall be limited to less than 751 million standard cubic feet (MMCF) per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limitation, and those contained in Conditions D.5.1, D.7.2, D.10.1 shall satisfy the requirements of 326 IAC 2-2. Compliance with Condition D.10.2 shall satisfy the requirements of 326 IAC 2-2 and 326 IAC 8-1-6.

Section D.10 Changes:

Facility Description [326 IAC 2-7-5(14)]:

Paint Coating Line System "C", with a maximum capacity of 160,000 vehicles per year, approved in 2014 for construction, dedicated in coating of the increase in vehicle production, consisting of the following units:

- (a) Electrodeposition **(ED) Coating Line** ~~of for Vehicle Bodies (ED) Coating Line~~, identified as Unit 013, with a capacity of 160,000 units per year, approved in 2014 for construction, venting to ~~44~~ **9** exhaust stacks, identified as Stacks 13-1 through ~~43-44, 13-9~~, consisting of the following units:
- (1) One (1) ED Body Pretreatment Area, including ~~a an insignificant~~ pretreatment boiler for warming water surrounding the ED Coating Tank, with a maximum heat input capacity of ~~7.8~~ **12** million British thermal units per hour (MMBtu/hr).
 - (2) One (1) ED Body Coating Tank, utilizing dipping as the method of application.
 - (3) One (1) ED Oven (pretreatment drying oven), with a maximum heat input capacity of ~~9.0~~ **4.4** MMBtu/hr, using no controls.
 - (4) One (1) ED Body Cool Down Area.
 - (5) One (1) ED Deck and ED Sand Area.
 - (6) One (1) Paint Storage Room.
 - (7) One (1) Working Stage Air House ~~in ED Deck area~~ **to support the Sealer, PVC, ED Sand, Wet Sand #2 Area** rated at 9.5 MMBtu/hr.
 - (8) One (1) Working Stage Air House ~~in ED Sand area~~ **to support the Surfacer Sand, Wet Sand #1 Area** rated at ~~4.8~~ **2.6** MMBtu/hr.
- (b) Sealing, LASD (Liquid Applied Sound Deadener) and PVC Undercoating Line, identified as Unit 014, with a capacity of 160,000 units per year, approved in 2014 for construction, venting to ~~5~~ **3** exhaust stacks, identified as Stacks 14-1 through ~~44-5~~ **14-3**, consisting of the following:
- (1) One (1) PVC Coating Booth #1, equipped with airless spray application and pedestal robotic spray system, using a dry filter to control the particulate overspray emissions.
 - (2) One (1) PVC Sealer Oven, with a maximum heat input capacity of ~~4.2~~ **3.0** MMBtu/hr, using no control.
 - (3) One (1) PVC Cool Down Area, using no controls.
 - (4) One (1) Sealer Application Area, using no controls.
 - (5) One (1) LASD (Liquid Applied Sound Deadener) Application Area, using no controls.

- (c) Intermediate Surfacers Coating Line, identified as Unit 015, with a capacity of 160,000 units per year, approved in 2014 for construction, venting to 14 exhaust stacks identified as Stacks 15-1 through 15-14, consisting of the following:
- (1) One (1) Intermediate Coating Booth, equipped with manual/robotic/automated spray applicators, for the application of waterborne surfacer material, using dry filtration or a water wash system to control the particulate overspray emissions.
 - (2) One (1) Intermediate Coating Oven, with a maximum heat input capacity of ~~3.3~~ **10** MMBtu/hr, with no VOC control.
 - (3) One (1) Intermediate (Surfacers) natural gas-fired flash zone heater rated at ~~4.4~~ **3.0** MMBtu/hr.
 - (4) One (1) Intermediate (Surfacers) Air House rated at ~~8.4~~ **21.6** MMBtu/hr.
 - (5) One (1) Intermediate Cool Down Area, using no controls.
 - (6) One (1) main paint mix room.
 - ~~(7) One (1) Working Stage Air House located in Intermediate Sand area rated at 8.7 MMBtu/hr.~~
- (d) Topcoat System, identified as Unit 016, with a capacity of 160,000 units per year, approved in 2014 for construction, venting to ~~47~~ **26** exhaust stacks, identified as Stacks 16-1 through ~~16-26~~ ~~16-15~~, ~~16b-1~~ and ~~16b-2~~, consisting of the following:
- (1) One (1) Topcoat #C1 Booth, equipped with air atomized spray with robot, electrostatic air atomized spray with robot, and electrostatic bell with robot method of applications, and automatic spray applicators, using dry filtration or a water wash system to control the particulate overspray emissions.
 - (2) One (1) Topcoat #C1 Oven, with a maximum heat input capacity of ~~3.8~~ **8.0** MMBtu/hr, using a ~~0.6~~ **1.0** MMBtu/hr natural gas-fired thermal oxidizer (TO-C1) as VOC control.
 - (3) One (1) Topcoat natural gas-fired flash zone heater rated at ~~4.4~~ **3.0** MMBtu/hr.
 - (4) One (1) Topcoat #C1 Cool Down Area, using no controls.
 - (5) One (1) main paint mix room.
 - (6) One (1) Topcoat Air House rated at ~~26.4~~ **38.0** MMBtu/hr.
 - (7) One (1) Mixing Air House located in Mix Room rated at ~~4.5~~ **2.0** MMBtu/hr.
- (e) Anticorrosion Coating Operations, identified as Unit 017, with a capacity of 160,000 (if built as part of new paint Line "C") or 225,000 units per year (if built as part of existing paint lines "A/B"), approved in 2014 for construction, venting to ~~3~~ **2** exhaust stacks, identified as Stacks 17-1 and ~~17-3~~ ~~17-2~~, consisting of the following units:
- (1) One (1) Black and Wax Coating Booth, to be part of either the new paint line "C" or existing paint lines "A/B", equipped with air atomized and air-assisted airless spray systems, using a dry filter to control the particulate overspray emissions.

- (2) One (1) Black and Wax Coating Booth natural gas-fired burner, with a maximum heat input capacity of ~~5.3~~ **15.5** MMBtu/hr.
 - (3) One (1) Wax Coating Booth, constructed in 2014 in the Trim & Final Assembly Area, utilizing air-assisted spray system, with no particulate overspray control;
 - (4) One (1) Wax Coating Booth natural gas-fired burner, with a maximum heat input capacity 4.0 MMBtu/hr.
 - ~~(5) One (1) Working Stage Air House rated at 10.0 MMBtu/hr.~~
- (f) Plastic Bumper Coating Line (PBL-C), identified as Unit 018, with a capacity of 160,000 units per year, approved in 2014 for construction, venting to 18 exhaust stacks, identified as Stacks 18-1 through 18-18, consisting of the following units (see operating scenarios for Unit 005B) ::
- (1) One (1) PBL-C Paint Booth, equipped with air atomization and electrostatic bell spray systems, using dry filtration or water wash system to control the particulate overspray emissions.
 - (2) One (1) PBL-C Oven, with a maximum heat input capacity of 3.0 MMBtu/hr, using no VOC controls.
 - (3) One (1) PBL-C Cool Down area.
 - (4) One (1) paint mixing room.
 - (5) Three (3) Bumper Air Houses (includes Primer Air House, basecoat Air house and Clearcoat Air House), rated at a total of 17.7 MMBtu/hr.
 - (6) One (1) PBL-C natural gas-fired flash zone heater located between the primer and basecoat zones rated at ~~4.2~~ **3.0** MMBtu/hr.
 - (7) One **(1)** PBL-C natural gas –fired flash zone heater located between the basecoat and the clearcoat zones rated at ~~4.2~~ **3.0** MMBtu/hr.
 - (8) One (1) Working Stage Air House rated at 4.4 MMBtu/hr.
 - (9) One (1) Mixing Air House located in Mixing Room rated at 1.8 MMBtu/hr.
- (g) Miscellaneous combustion devices, approved in 2014 for construction:**
- (1) One (1) Working Stage Air House used to support the Inspection, Touch-up area rated at 6.5 MMBtu/hr.**
 - (2) One (1) Working Stage Air House used to support Paint Coating Line "C" rated at 2.4 MMBtu/hr.**
- ~~(g)~~ **h** Purge solvent usage and capture system, identified as Unit 019, approved in 2014 for construction, designed to allow for purging and capturing of solvent and waterborne purge materials.
- ~~(h)~~ **i** Miscellaneous support cleaning operations, identified as Unit 020, approved in 2014 for construction, which include wiping solvent and miscellaneous cleanup materials.
- ~~(i)~~ **j** An additional Startup and Roll Test Line, approved in 2014 for construction.

(j- k) Engine assembly - one (1) additional dynamometer gasoline engine testing, where engines are tested prior to installation in the vehicle chassis, approved in 2014 for construction.

(k l) Other insignificant natural gas combustion units approved in 2014 for construction:

Rooftop Units - ~~36~~ 53 Units

- Engine Assembly Expansion - 4 Units (1.6 MMBtu/hr total)
- Engine Warehouse Expansion - 2 Units (0.8 MMBtu/hr total)
- Trim Warehouse Phase 1 - 5 Units (2.0 MMBtu/hr total)
- Trim Warehouse Phase 2 - 5 Units (2.0 MMBtu/hr total)
- Trim Warehouse Phase 3 - 5 Units (2.0 MMBtu/hr total)
- Body Warehouse - 3 Units (1.2 MMBtu/hr total)
- Body Service Warehouse - 3 Units (1.2 MMBtu/hr total)
- Stamping Warehouse 1 - 4 Units (1.6 MMBtu/hr total)
- Stamping Warehouse 2 - 1 Unit (0.4 MMBtu/hr total)
- Motor Pool Bldg. - 3 Units (1.2 MMBtu/hr total)
- **Paint Coating Line "C" Heating and Cooling Units - 11 units (8.8 MMBtu/hr total)**
- **Paint Coating Line "C" Makeup Air Heating Units - 5 units (7.5 MMBtu/hr total)**
- **Paint Coating Line "C" Air Handling Units - 2 units (7.7 MMBtu/hr total)**
- ~~- Paint Tunnel - 4 Units (1.6 MMBtu/hr total)~~
- ~~- Paint Shop - 4 Units (1.6 MMBtu/hr total)~~
- ~~- Paint Shop - 2 Units (2.40 MMBtu/hr total)~~

Heater Units - ~~47~~ 39 Units

- Engine Assembly Expansion - 1 Unit (0.4 MMBtu/hr total)
- Engine Warehouse Expansion - 4 Units (1.6 MMBtu/hr total)
- Trim Warehouse Phase 1 - 2 Units (0.8 MMBtu/hr total)
- Trim Warehouse Phase 2 - 2 Units (0.8 MMBtu/hr total)
- Trim Warehouse Phase 3 - 2 Units (0.8 MMBtu/hr total)
- Body Warehouse - 3 Units (1.20 MMBtu/hr total)
- Body Service Warehouse - 2 Units (0.8 MMBtu/hr total)
- Stamping Warehouse 1 - 3 Units (1.2 MMBtu/hr total)
- Stamping Warehouse 2 - 1 Unit (0.4 MMBtu/hr total)
- Motor Pool Accessory Bldg - 2 Units (0.8 MMBtu/hr total)
- ~~- Paint Shop - 5 Units (2.00 MMBtu/hr total)~~
- **Paint Coating Line "C" Units Heaters - 17 units (6.8 MMBtu/hr total)**

D.10.1 Prevention of Significant Deterioration (PSD) - Best Available Control Technology for Volatile Organic Compounds (VOC) [326 IAC 2-2]

Pursuant to 326 IAC 2-2-3 (Control Technology Review; Requirements) and PSD 157-33759-00050, the BACT for VOC emissions from for the facilities in Paint Coating Line System "C" shall be the following:

(j) The BACT for the following miscellaneous natural gas **combustion** units shall be the following:

(1) ~~The VOC emissions from the PVC Sealer Oven shall be limited to less than 0.0054 pound per million British thermal units (lb/MMBtu) and shall only combust natural gas.~~

(2) ~~The VOC emissions from the Intermediate Coating Oven shall be limited~~

~~to less than 0.0054 pound per million British thermal units (lb/MMBtu) and shall only combust natural gas.~~

- ~~(3) The VOC emissions from the Topcoat #C Oven shall be limited to less than 0.0054 pound per million British thermal units (lb/MMBtu) and shall only combust natural gas.~~
- ~~(4) The VOC emissions from the Black and Wax Coating Booth Burner shall be limited to less than 0.0054 pound per million British thermal units (lb/MMBtu) and shall only combust natural gas.~~
- ~~(5) The VOC emissions from the Wax Coating Booth Burner shall be limited to less than 0.0054 pound per million British thermal units (lb/MMBtu) and shall only combust natural gas.~~
- ~~(6) The VOC emissions from the Anticorrosion Coating Booth Working Stage Air House shall be limited to less than 0.0054 pound per million British thermal units (lb/MMBtu) and shall only combust natural gas.~~
- (7 1) The VOC emissions from the PBL-C Oven, Working Stage Air House and Mixing Air House shall each be limited to less than 0.0054 pound per million British thermal units (lb/MMBtu) and shall only combust natural gas.
- (82) The VOC emissions from the Rooftop and Heater Units **not mentioned in condition D.10.1(k)** shall each be limited to less than 0.0054 pound per million British thermal units (lb/MMBtu) and shall only combust natural gas.

(k) The PSD BACT for the following miscellaneous natural gas units shall be the following:

Combustion Emission Unit/ID	number of Units	Heat Input (MMBtu/hr)
PAINT SHOP "C" NATURAL GAS COMBUSTION UNITS		
Pretreatment Boiler – Ed Body Area	1	12
ED Oven	1	9.0
PVC Sealer Oven	1	3.0
Intermediate (Surfacer) Oven	1	10
Intermediate (Surfacer) Flash Zone Heater	1	3.0
PBL-C Flash Zone Heater – Primer & Basecoat Zones	1	3.0
Topcoat Flash Zone Heater	1	3.0
PBL-C Flash Zone Heater – Basecoat & Clearcoat Zones	1	3.0
Topcoat #C1 Oven	1	8.0
Topcoat Oven RTO	1	1.0
Intermediate (Surfacer) Air Houses	1	21.6

Combustion Emission Unit/ID	number of Units	Heat Input (MMBtu/hr)
Topcoat Air House	1	38
Working Stage Air House - Surfacers Sand, Wet Sand #1	1	2.6
Working Stage Air House - Sealer, PVC, ED Sand, Wet Sand #2	1	9.5
Black & Wax Booth	1	15.5
Mixing Air House- Mix Room	1	2.0
Working Stage Air House - Inspection, Touch-Up Area	1	6.5
Working Stage Air House- Paint Shop "C"	1	2.4
NEW ROOFTOP UNITS		
Heating and Cooling Units		
HCU-14-1 Pretreatment Roof	1	0.77
HCU-14-2 Pretreatment Roof	1	0.77
HCU-14-3 Pretreatment Roof	1	0.77
HCU-14-4 Pretreatment Roof	1	0.77
HCU-14-5 Pretreatment Roof	1	0.77
HCU-14-6 Pretreatment Roof	1	0.77
HCU-10 Oven Roof	1	0.591
HCU-11 Oven Roof	1	0.591
HCU-12 Cafeteria	1	0.692
HCU-13 Roof of Conveyor Bridge	1	1.175
HCU-14 Roof of Conveyor Bridge	1	1.175
Makeup Air heating Units		
MAU-14-1 Roof	1	1.5
MAU-14-2 Roof	1	1.5
MAU-14-3 Roof	1	1.5
MAU-14-4 Roof	1	1.5
MAU-14-5 Roof	1	1.5
AIR HANDLING UNITS		
AHU-14-1 Penthouse	1	3.834
AHU-14-2 Penthouse	1	3.834
NEW HEATER UNITS		
Unit-14-1 Oven-A4-B0	1	0.4

Combustion Emission Unit/ID	number of Units	Heat Input (MMBtu/hr)
UH-14-2 Oven - A2 - B1.5	1	0.4
UH-14-3 Oven - A2 - B3	1	0.4
UH-14-9 Penthouse - A9 - B2	1	0.4
UH-14-10 Penthouse - A17 - B3	1	0.4
UH-14-11 Penthouse - A12.5 - B0	1	0.4
UH-14-12 Penthouse - A15 - B0	1	0.4
UH-14-13 Penthouse - A17 - B1	1	0.4
UH-14-20 North Dock - A15 - B6	1	0.4
UH-14-21 North Dock - A15 - B6	1	0.4
UH-14-22 WWT - A4.5 - B6	1	0.4
UH-14-23 WWT - A2 - B7	1	0.4
UH-14-24 Tunnel - X19.4 - Y4	1	0.4
UH-14-25 Tunnel - X24 - Y5.2	1	0.4
UH-14-26 Tunnel - X18 - Y6.6	1	0.4
UH-14-27 Tunnel - X18 - Y10.8	1	0.4
UH-14-28 Tunnel - X18.5 - Y14.5	1	0.4

- (1) **The VOC emissions from the combustion units in the above table shall each be limited to less than 0.005 pound per million British thermal units (lb/MMBtu).**
- (2) **The combustion of only natural gas fuel; and**
- (3) **Good combustion practices, which includes proper care and maintenance of the natural gas burner systems.**

(k-1) The Permittee shall observe good work practices when testing engines and during startup and roll test of the vehicles by minimizing excessive testing of the vehicle powertrain outside the normal testing specification ranges, (i.e. speed, duration and distance during the test).

Compliance with Condition D.10.1 shall satisfy the requirements of 326 IAC 2-2.

D.10.5 Particulate Emissions from Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 316 IAC 6-2-4, the particulate emissions from the Pretreatment and ED

Boiler shall each not exceed ~~0.302~~ **0.284** pound per million British thermal units (lb/MMBtu).

The limitation is based on the following equation:

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

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input; and
Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. (Q = ~~146.83~~ **176.1** MMBtu/hr).

Section E.1 Changes:

Facility Description [326 IAC 2-7-5(14)]:

Paint Coating Line System "C", with a maximum capacity of 160,000 vehicles per year, approved in 2014 for construction, dedicated in coating of the increase in vehicle production, consisting of the following units:

- (a) Electrodeposition (**ED**) Coating Line of for Vehicle Bodies (~~ED~~) Coating Line, identified as Unit 013, with a capacity of 160,000 units per year, approved in 2014 for construction, venting to ~~44~~ **9** exhaust stacks, identified as Stacks 13-1 through ~~13-44~~, **13-9**, consisting of the following units:
- (1) One (1) ED Body Pretreatment Area, including ~~a an insignificant~~ pretreatment boiler for warming water surrounding the ED Coating Tank, with a maximum heat input capacity of ~~7.8~~ **12.0** million British thermal units per hour (MMBtu/hr).
 - (2) One (1) ED Body Coating Tank, utilizing dipping as the method of application.
 - (3) One (1) ED Oven (pretreatment drying oven, with a maximum heat input capacity of ~~9.0~~ **4.4** MMBtu/hr, using no controls.
 - (4) One (1) ED Body Cool Down Area.
 - (5) One (1) ED Deck and ED Sand Area.
 - (6) One (1) Paint Storage Room.
 - (7) One (1) Working Stage Air House in ~~ED Deck area~~ **to support the Sealer, PVC, ED Sand, Wet Sand #2 Area** rated at 9.5 MMBtu/hr.
 - (8) One (1) Working Stage Air House in ~~ED Sand area~~ **to support the Surfacer Sand, Wet Sand #1 Area** rated at ~~4.8~~ **2.6** MMBtu/hr.
- (b) Sealing, LASD (Liquid Applied Sound Deadener) and PVC Undercoating Line, identified as Unit 014, with a capacity of 160,000 units per year, approved in 2014 for construction, venting to ~~5~~ **3 exhaust stacks**, identified as Stacks 14-1 through ~~14-5~~ **14-3**, consisting of the following:
- (1) One (1) PVC Coating Booth #1, equipped with airless spray application and pedestal robotic spray system, using a dry filter to control the particulate overspray emissions.

- (2) One (1) PVC Sealer Oven, with a maximum heat input capacity of ~~4.2~~ **3.0 MMBtu/hr**, using no control.
 - (3) One (1) PVC Cool Down Area, using no controls.
 - (4) One (1) Sealer Application Area, using no controls.
 - (5) One (1) LASD (Liquid Applied Sound Deadener) Application Area, using no controls.
- (c) Intermediate Surfacer Coating Line, identified as Unit 015, with a capacity of 160,000 units per year, approved in 2014 for construction, venting to 14 exhaust stacks identified as Stacks 15-1 through 15-14, consisting of the following:
- (1) One (1) Intermediate Coating Booth, equipped with manual/robotic/automated spray applicators, for the application of waterborne surfacer material, using dry filtration or a water wash system to control the particulate overspray emissions.
 - (2) One (1) Intermediate Coating Oven, with a maximum heat input capacity of ~~3.3~~ **10.0** MMBtu/hr, with no VOC control.
 - (3) One (1) Intermediate (Surfacer) natural gas-fired flash zone heater rated at ~~4.4~~ **3.0** MMBtu/hr.
 - (4) One (1) Intermediate (Surfacer) Air House rated at ~~8.4~~ 21.6 MMBtu/hr.
 - (5) One (1) Intermediate Cool Down Area, using no controls.
 - (6) One (1) main paint mix room.
 - ~~(7) One (1) Working Stage Air House located in Intermediate Sand area rated at 8.7 MMBtu/hr.~~
- (d) Topcoat System, identified as Unit 016, with a capacity of 160,000 units per year, approved in 2014 for construction, venting to ~~47~~ **26** exhaust stacks, identified as Stacks 16-1 through ~~16-26~~ **16-15, 16b-1 and 16b-2**, consisting of the following:
- (1) One (1) Topcoat #C1 Booth, equipped with air atomized spray with robot, electrostatic air atomized spray with robot, and electrostatic bell with robot method of applications, and automatic spray applicators, using dry filtration or a water wash system to control the particulate overspray emissions.
 - (2) One (1) Topcoat #C1 Oven, with a maximum heat input capacity of ~~3.8~~ **8.0** MMBtu/hr, using a ~~0.6~~ **1.0** MMBtu/hr natural gas-fired thermal oxidizer (TO-C1) as VOC control.
 - (3) One (1) Topcoat natural gas-fired flash zone heater rated at ~~4.4~~ **3.0** MMBtu/hr.
 - (4) One (1) Topcoat #C1 Cool Down Area, using no controls.
 - (5) One (1) main paint mix room.
 - (6) One (1) Topcoat Air House rated at ~~26.4~~ **38.0** MMBtu/hr.
 - (7) One (1) Mixing Air House located in Mix Room rated at ~~4.5~~ **2.0** MMBtu/hr.

- (e) Anticorrosion Coating Operations, identified as Unit 017, with a capacity of 160,000 (If built as part of new paint Line "C") or 225,000 units per year (If built as part of existing paint lines "A/B"), approved in 2014 for construction, venting to ~~3~~ **2** exhaust stacks, identified as Stacks 17-1 ~~through and 47-3-17-2~~, consisting of the following units:
- (1) One (1) Black and Wax Coating Booth, to be part of either the new paint line "C" or existing paint lines "A/B", equipped with air atomized and air-assisted airless spray systems, using a dry filter to control the particulate overspray emissions.
 - (2) One (1) Black and Wax Coating Booth natural gas-fired burner, with a maximum heat input capacity of ~~5.3~~ **15.5** MMBtu/hr.
 - (3) One (1) Wax Coating Booth, constructed in 2014 in the Trim & Final Assembly Area, utilizing air-assisted spray system, with no particulate overspray control;
 - ~~(4) One (1) Wax Coating Booth natural gas-fired burner, with a maximum heat input capacity 4.0 MMBtu/hr.~~
 - ~~(5) One (1) Working Stage Air House rated at 10.0 MMBtu/hr.~~
- (f) Plastic Bumper Coating Line (PBL-C), identified as Unit 018, with a capacity of 160,000 units per year, approved in 2014 for construction, venting to 18 exhaust stacks, identified as Stacks 18-1 through 18-18, consisting of the following units:
- (1) One (1) PBL-C Paint Booth, equipped with air atomization and electrostatic bell spray systems, using dry filtration or water wash system to control the particulate overspray emissions.
 - (2) One (1) PBL-C Oven, with a maximum heat input capacity of 3.0 MMBtu/hr, using no VOC controls.
 - (3) One (1) PBL-C Cool Down area.
 - (4) One (1) paint mixing room.
 - (5) Three (3) Bumper Air Houses (includes Primer Air House, basecoat Air house and Clearcoat Air House), rated at a total of 17.7 MMBtu/hr.
 - (6) One (1) PBL-C natural gas-fired flash zone heater located between the primer and basecoat zones rated at ~~4.2~~ **3.0** MMBtu/hr.
 - (7) One PBL-C natural gas-fired flash zone heater located between the basecoat and the clearcoat zones rated at ~~4.2~~ **3.0** MMBtu/hr.
 - (8) One (1) Working Stage Air House rated at 4.4 MMBtu/hr.
 - (9) One (1) Mixing Air House located in Mixing Room rated at 1.8 MMBtu/hr.
- (g) Miscellaneous combustion devices, approved in 2014 for construction:**
- (1) One (1) Working Stage Air House used to support the Inspection, Touch-up area rated at 6.5 MMBtu/hr.**
 - (2) One (1) Working Stage Air House used to support Paint Coating Line "C" rated at 2.4 MMBtu/hr.**

- (g h) Purge solvent usage and capture system, identified as Unit 019, approved in 2014 for construction, designed to allow for purging and capturing of solvent and waterborne purge materials.
- (h i) Miscellaneous support cleaning operations, identified as Unit 020, approved in 2014 for construction, which include wiping solvent and miscellaneous cleanup materials.
- (i j) An additional Startup and Roll Test Line, approved in 2014 for construction.
- (j k) Engine assembly - one (1) additional dynamometer gasoline engine testing, where engines are tested prior to installation in the vehicle chassis, approved in 2014 for construction.

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

Section E.2 Changes

Facility Description [326 IAC 2-7-5(14)]:

Paint Coating Line System "C", with a maximum capacity of 160,000 vehicles per year, approved in 2014 for construction, dedicated in coating of the increase in vehicle production, consisting of the following units:

- (a) Electrodeposition **(ED) Coating Line** ~~of for Vehicle Bodies (ED) Coating Line~~, identified as Unit 013, with a capacity of 160,000 units per year, approved in 2014 for construction, venting to ~~44~~ **9** exhaust stacks, identified as Stacks 13-1 through ~~13-44~~, **13-9** consisting of the following units:
- (1) One (1) ED Body Pretreatment Area, including ~~a an insignificant~~ pretreatment boiler for warming water surrounding the ED Coating Tank, with a maximum heat input capacity of ~~7.8~~ **12.0** million British thermal units per hour (MMBtu/hr).
 - (2) One (1) ED Body Coating Tank, utilizing dipping as the method of application.
 - (3) One (1) ED Oven (pretreatment drying oven, with a maximum heat input capacity of ~~9.0~~ **4.4** MMBtu/hr, using no controls.
 - (4) One (1) ED Body Cool Down Area.
 - (5) One (1) ED Deck and ED Sand Area.
 - (6) One (1) Paint Storage Room.
 - (7) One (1) Working Stage Air House ~~in ED Deck area~~ **to support the Sealer, PVC, ED Sand, Wet Sand #2 Area** rated at 9.5 MMBtu/hr.
 - (8) One (1) Working Stage Air House ~~in ED Sand area~~ **to support the Surfacer Sand, Wet Sand #1 Area** rated at ~~4.8~~ **2.6** MMBtu/hr.
- (c) Intermediate Surfacer Coating Line, identified as Unit 015, with a capacity of 160,000 units per year, approved in 2014 for construction, venting to 14 exhaust stacks identified as Stacks 15-1 through 15-14, consisting of the following:
- (1) One (1) Intermediate Coating Booth, equipped with manual/robotic/automated spray applicators, for the application of waterborne surfacer material, using dry filtration or a water wash system to control the particulate overspray emissions.
 - (2) One (1) Intermediate Coating Oven, with a maximum heat input capacity of ~~3.3~~ **10.0** MMBtu/hr, with no VOC control.
 - (3) One (1) Intermediate (Surfacer) natural gas-fired flash zone heater rated at ~~4.4~~ **3.0** MMBtu/hr.
 - (4) One (1) Intermediate (Surfacer) Air House rated at ~~8.4~~ **21.6** MMBtu/hr.
 - (5) One (1) Intermediate Cool Down Area, using no controls.
 - (6) One (1) main paint mix room.

~~(7) One (1) Working Stage Air House located in Intermediate Sand area rated at 8.7 MMBtu/hr.~~

(d) Topcoat System, identified as Unit 016, with a capacity of 160,000 units per year, approved in 2014 for construction, venting to ~~47~~ **26** exhaust stacks, identified as Stacks 16-1 through ~~16-26 16-15, 16b-1 and 16b-2~~, consisting of the following:

- (1) One (1) Topcoat #C1 Booth, equipped with air atomized spray with robot, electrostatic air atomized spray with robot, and electrostatic bell with robot method of applications, and automatic spray applicators, using dry filtration or a water wash system to control the particulate overspray emissions.
- (2) One (1) Topcoat #C1 Oven, with a maximum heat input capacity of ~~3.8~~ **8.0** MMBtu/hr, using a ~~0.6~~ **1.0** MMBtu/hr natural gas-fired thermal oxidizer (TO-C1) as VOC control.
- (3) One (1) Topcoat natural gas-fired flash zone heater rated at ~~4.4~~ **3.0** MMBtu/hr.
- (4) One (1) Topcoat #C1 Cool Down Area, using no controls.
- (5) One (1) main paint mix room.
- (6) One (1) Topcoat Air House rated at ~~26.4~~ **38.0** MMBtu/hr.
- (7) One (1) Mixing Air House located in Mix Room rated at ~~4.5~~ **2.0** MMBtu/hr.

Section E. Changes

SECTION E.4 FACILITY OPERATION CONDITIONS

Permit Section	Emission Unit Name (design and Manufacturer name)	Rated Heat Input Capacity (mmbtu/hr)	Fuels Used
New Emission Unit			
Permit Section D.10(a)(1)	Pretreatment ED Boiler	7.8 12.0 MMBtu/hr	Natural Gas
Existing Emission Units			
Permit Section D.4 (a) (3)	ED/Paint Temperature Control Boiler Cleaver Brooks (1989)	4.0 MMBtu/Hr	Natural Gas
Permit Section D. 4 (a) (4)	Pre Treatment Boiler 1 Lochinvar Sync (2009)	1.5 MMBtu/Hr	Natural Gas
Permit Section D. 4 (a) (4)	Pre Treatment Boiler 2 Lochinvar Sync (2009)	1.5 MMBtu/Hr	Natural Gas
Permit Section D. 4 (a) (4)	Pre Treatment Boiler 3 Lochinvar Sync (2009)	1.5 MMBtu/Hr	Natural Gas
Permit Section D. 4 (a) (4)	Pre Treatment Boiler 4 Lochinvar Sync (2009)	1.5 MMBtu/Hr	Natural Gas
Permit Section D. 4 (a) (4)	Pre Treatment Boiler 5 Lochinvar Sync (2009)	1.5 MMBtu/Hr	Natural Gas
Permit Section D. 4 (a) (4)	Pre Treatment Boiler 6 Lochinvar Sync (2009)	1.5 MMBtu/Hr	Natural Gas
Permit Section D.8(a)	Temperature Control Boiler B1-01 Cleaver Brooks (1989)	1.339 MMBtu/Hr	Natural Gas
Permit Section D.8(a)	Temperature Control Boiler B10-01 Cleaver Brooks (1989)	4.184 MMBtu/Hr	Natural Gas
Permit Section D.8(a)	Temperature Control Boiler B10-02 Cleaver Brooks (1989)	4.184 MMBtu/Hr	Natural Gas
Permit Section D.8(a)	Temperature Control Boiler B11-01 Cleaver Brooks (1989)	2.929 MMBtu/Hr	Natural Gas
Permit Section D.8(a)	Temperature Control Boiler B11-02 Cleaver Brooks (1989)	2.929 MMBtu/Hr	Natural Gas
Permit Section D.8(a)	Temperature Control Boiler B09-01 Cleaver Brooks (1989)	5.23 MMBtu/Hr	Natural Gas
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)			

Conclusion and Recommendation

The construction of this proposed modification shall be subject to the conditions of the attached proposed PSD/Significant Source Modification No. 157-34774-00050 and Significant Permit Modification No. 157-34915-00050. The staff recommends to the Commissioner that this Part 70 PSD/Significant Source Modification and Significant Permit Modification be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Aida DeGuzman 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) 233-4972 or toll free at 1-800-451-6027 extension 3-4972.
- (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 Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

Company Name: Subaru of Indiana Automotive, Inc.
 Source Address: 5500 State Road 38 East, Lafayette, Indiana 47905
 PSD/SSM No.: 157-34774-00050
 SPM No.: 157-34915-00050
 Reviewer: Aida DeGuzman
 Date: 28-Jul-2014

For 326 IAC 2-7-10.5 Applicability

UNCONTROLLED PTE (tons/year)										
Facilities/Process ID	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO	Worst Single HAP (Hexane)	Combined HAPs	GHGs (CO _{2e})
New Natural Gas Combustion Units	1.72	6.88	6.88	0.54	90.52	4.98	76.03	1.63	1.71	109,266
TOTAL PTE FROM MODIFICATION	1.72	6.88	6.88	0.54	90.52	4.98	76.03	1.63	1.71	109266.39

For 326 IAC 2-2, PSD Applicability

*UNLIMITED PTE (tons/year)										
Facilities/Process ID	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO	Worst Single HAP (Hexane)	Combined HAPs	GHGs (CO _{2e})
New Natural Gas Combustion Units	1.72	6.88	6.88	0.54	90.52	4.98	76.03	1.63	1.71	109,266
**Units Unchanged Permitted in PSD 157-33759	0.19	0.74	0.74	0.06	9.79	0.54	8.22	0.18	0.18	11,819
TOTAL PTE FROM MODIFICATION	1.91	6.88	6.88	0.54	90.52	4.98	76.03	1.81	1.89	109,266

*LIMITED PTE (tons/year)										
Facilities/Process ID	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO	Single HAP (Hexane)	Combined HAPs	GHGs (CO _{2e})
New Natural Gas Combustion Units + Existing Unchanged Units Permitted in PSD/SSM 157-33759	0.72	2.87	2.87	0.23	37.79	2.08	31.74	0.68	0.71	45,614
TOTAL PTE FROM MODIFICATION	0.72	2.87	2.87	0.23	37.79	2.08	31.74	0.68	0.71	45,614
PSD Significant Levels	25	15	10	40	40	40	100	--	--	75,000

The project is the addition of new combustion units that are being aggregated with the Coating Paint Line "C", which is major under PSD for VOC. Coating Paint Line "C" was permitted in PSD/SSM 157-33759. Therefore, this project is also PSD for VOC.

The NOx emissions from the Coating Paint Line "C" were limited to less than 40 tons/year, which likewise limited the fuel usage to 751 MMCF/yr. The natural gas usage limit will not be affected by this permitting action. Limits were calculated based on 3300 hrs/year of operation.

* - these natural gas combustion units are not controlled.

Company Name: Subaru of Indiana Automotive, Inc.
Source Address: 5500 State Road 38 East, Lafayette, Indiana 47905
PSD/SSM No.: 157-34774-00050
SPM No.: 157-34915-00050
Reviewer: Aida DeGuzman
Date: 28-Jul-2014

Emission factor (lb/MMCF)						
PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
1.9	7.6	7.6	0.6	100	5.5	84
**see below						

New Natural Gas Units at Paint Shop

Natural Gas Combustion Device/ID	Proposed New Units Heat Input (MMBtu/hr)	Potential Throughput (MMCF/yr)	PTE (TONS/YR)						
			PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Pretreatment & ED Boiler	12.0	103.1	0.10	0.39	0.39	0.03	5.15	0.28	4.33
ED Oven	9.0	77.3	0.07	0.29	0.29	0.02	3.86	0.21	3.25
Bumber (Unit 018 or 005B) Ovens	3.0	25.8	0.02	0.10	0.10	0.01	1.29	0.07	1.08
Sealer Oven	3.0	25.8	0.02	0.10	0.10	0.01	1.29	0.07	1.08
Surfacer Oven	10.0	85.9	0.08	0.33	0.33	0.03	4.29	0.24	3.61
Primer Heated Flash - Body	3.0	25.8	0.02	0.10	0.10	0.01	1.29	0.07	1.08
Primer Heated Flash - Bumper	3.0	25.8	0.02	0.10	0.10	0.01	1.29	0.07	1.08
Basecoat Heated Flash - Body	3.0	25.8	0.02	0.10	0.10	0.01	1.29	0.07	1.08
Basecoat Heated Flash - Bumper	3.0	25.8	0.02	0.10	0.10	0.01	1.29	0.07	1.08
Topcoat Oven	8.0	68.7	0.07	0.26	0.26	0.02	3.44	0.19	2.89
Topcoat Oven RTO	1.0	8.6	0.01	0.03	0.03	0.00	0.43	0.02	0.36
Surfacer Air Houses	21.6	185.5	0.18	0.70	0.70	0.06	9.28	0.51	7.79
Bumper Air Houses	17.7	152.0	0.14	0.58	0.58	0.05	7.60	0.42	6.38
Topcoat Air House	38	326.4	0.31	1.24	1.24	0.10	16.32	0.90	13.71
Working Stage Air Houses - Bumper	4.4	37.8	0.04	0.14	0.14	0.01	1.89	0.10	1.59
Working Stage Air House - Sealer, PVC, ED Sand, Wet Sand #1	9.5	81.6	0.08	0.31	0.31	0.02	4.08	0.22	3.43
Working Stage Air House - Surfacer Sand, Wet Sand #1	2.6	22.3	0.02	0.08	0.08	0.01	1.12	0.06	0.94
Working Stage Air House - Inspection, Touch-Up	6.5	55.8	0.05	0.21	0.21	0.02	2.79	0.15	2.34
Mixing Air Houses - Body	2.0	17.2	0.02	0.07	0.07	0.01	0.86	0.05	0.72
Mixing Air Houses - Bumper	1.8	15.5	0.01	0.06	0.06	0.00	0.77	0.04	0.65
Working Stage Air House - Other	2.4	20.6	0.02	0.08	0.08	0.01	1.03	0.06	0.87
Black & Wax Booth	15.5	133.1	0.13	0.51	0.51	0.04	6.66	0.37	5.59
Wax Application Booth	--	--	--	--	--	--	--	--	--
Total NG Units for Paint Shop	180.0	1545.9	1.47	5.87	5.87	0.46	77.29	4.25	64.93

Company Name: Subaru of Indiana Automotive, Inc.
 Source Address: 5500 State Road 38 East, Lafayette, Indiana 47905
 PSD/SSM No.: 157-34774-00050
 SPM No.: 157-34915-00050
 Reviewer: Aida DeGuzman
 Date: 7-Oct-2013

New Combustion Emission Units

Natural Gas Combustion Device/ID	Number of Units	Heat Input (MMBtu/hr)	Potential Throughput (MMCF/yr)	PTE (TONS/YR)						
				PM*	PM10*	direct PM2.5	SO2	NOx	VOC	CO
Rooftop Units - Heating and										
HCU-14-1 Pretreatment Roof	1	0.767	6.6	0.01	0.03	0.03	0.00	0.33	0.02	0.28
HCU-14-2 Pretreatment Roof	1	0.767	6.6	0.01	0.03	0.03	0.00	0.33	0.02	0.28
HCU-14-3 Pretreatment Roof	1	0.767	6.6	0.01	0.03	0.03	0.00	0.33	0.02	0.28
HCU-14-4 Pretreatment Roof	1	0.767	6.6	0.01	0.03	0.03	0.00	0.33	0.02	0.28
HCU-14-5 Pretreatment Roof	1	0.767	6.6	0.01	0.03	0.03	0.00	0.33	0.02	0.28
HCU-14-6 Pretreatment Roof	1	0.767	6.6	0.01	0.03	0.03	0.00	0.33	0.02	0.28
HCU-10 Oven Roof	1	0.591	5.1	0.00	0.02	0.02	0.00	0.25	0.01	0.21
HCU-11 Oven Roof	1	0.591	5.1	0.00	0.02	0.02	0.00	0.25	0.01	0.21
HCU-12 Cafeteria	1	0.692	5.9	0.01	0.02	0.02	0.00	0.30	0.02	0.25
HCU-13 Roof of Conveyor Bridge	1	1.175	10.1	0.01	0.04	0.04	0.00	0.50	0.03	0.42
HCU-14 Roof of Conveyor Bridge	1	1.175	10.1	0.01	0.04	0.04	0.00	0.50	0.03	0.42
Makeup Air Heating Units										
						--				
MAU-14-1 Roof	1	1.5	12.9	0.01	0.05	0.05	0.00	0.64	0.04	0.54
MAU-14-2 Roof	1	1.5	12.9	0.01	0.05	0.05	0.00	0.64	0.04	0.54
MAU-14-3 Roof	1	1.5	12.9	0.01	0.05	0.05	0.00	0.64	0.04	0.54
MAU-14-4 Roof	1	1.5	12.9	0.01	0.05	0.05	0.00	0.64	0.04	0.54
MAU-14-5 Roof	1	1.5	12.9	0.01	0.05	0.05	0.00	0.64	0.04	0.54
Air Handling Units										
AHU-14-1 Penthouse	1	3.834	32.9	0.03	0.13	0.13	0.01	1.65	0.09	1.38
AHU-14-2 Penthouse	1	3.834	32.9	0.03	0.13	0.13	0.01	1.65	0.09	1.38
Total PTE from New Rooftop Units	18	23.99	206.07	0.20	0.78	0.78	0.06	10.30	0.57	8.65

Company Name: Subaru of Indiana Automotive, Inc.
 Source Address: 5500 State Road 38 East, Lafayette, Indiana 47905
 PSD/SSM No.: 157-34774-00050
 SPM No.: 157-34915-00050
 Reviewer: Aida DeGuzman
 Date: 7-Oct-2013

New Combustion Emission Units

Natural Gas Combustion Device/ID	Number of Units	Heat Input (MMBtu/hr)	Potential Throughput (MMCF/yr)	PTE (TONS/YR)						
				PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Unit-14-1 Oven-A4-B0	1	0.4	3.4	0.00	0.01	0.01	0.00	0.17	0.01	0.14
UH-14-2 Oven - A2 - B1.5	1	0.4	3.4	0.00	0.01	0.01	0.00	0.17	0.01	0.14
UH-14-3 Oven - A2 - B3	1	0.4	3.4	0.00	0.01	0.01	0.00	0.17	0.01	0.14
UH-14-9 Penthouse - A9 - B2	1	0.4	3.4	0.00	0.01	0.01	0.00	0.17	0.01	0.14
UH-14-10 Penthouse - A17 - B3	1	0.4	3.4	0.00	0.01	0.01	0.00	0.17	0.01	0.14
UH-14-11 Penthouse - A12.5 - B0	1	0.4	3.4	0.00	0.01	0.01	0.00	0.17	0.01	0.14
UH-14-12 Penthouse - A15 - B0	1	0.4	3.4	0.00	0.01	0.01	0.00	0.17	0.01	0.14
UH-14-13 Penthouse - A17 - B1	1	0.4	3.4	0.00	0.01	0.01	0.00	0.17	0.01	0.14
UH-14-20 North Dock - A15 - B6	1	0.4	3.4	0.00	0.01	0.01	0.00	0.17	0.01	0.14
UH-14-21 North Dock - A15 - B6	1	0.4	3.4	0.00	0.01	0.01	0.00	0.17	0.01	0.14
UH-14-22 WWT - A4.5 - B6	1	0.4	3.4	0.00	0.01	0.01	0.00	0.17	0.01	0.14
UH-14-23 WWT - A2 - B7	1	0.4	3.4	0.00	0.01	0.01	0.00	0.17	0.01	0.14
UH-14-24 Tunnel - X19.4 - Y4	1	0.4	3.4	0.00	0.01	0.01	0.00	0.17	0.01	0.14
UH-14-25 Tunnel - X24 - Y5.2	1	0.4	3.4	0.00	0.01	0.01	0.00	0.17	0.01	0.14
UH-14-26 Tunnel - X18 - Y6.6	1	0.4	3.4	0.00	0.01	0.01	0.00	0.17	0.01	0.14
UH-14-27 Tunnel - X18 - Y10.8	1	0.4	3.4	0.00	0.01	0.01	0.00	0.17	0.01	0.14
UH-14-28 Tunnel - X18.5 - Y14.5	1	0.4	3.4	0.00	0.01	0.01	0.00	0.17	0.01	0.14
Total PTE From New Heater Units	17.0	6.8	58.4	0.06	0.22	0.22	0.02	2.92	0.16	2.45

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

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

Company Name: Subaru of Indiana Automotive, Inc.
 Address City IN Zip: 5500 State Road 38 East, Lafayette, Indiana 47905
 PSD/SSM No.: 157-34774-00050
 SPM No.: 157-34915-00050
 Reviewer: Aida DeGuzman
 Date: 28-Jul-2014

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr	
210.8	1020	1810.3	New Combustion Units

Methodology

All emission factors are based on normal firing.
 MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

HAPS Calculations

Unlimited HAPs - Organics						
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03	Total - Organics
PTE in tons/yr	1.901E-03	1.086E-03	6.789E-02	1.629E+00	3.078E-03	1.703E+00

HAPs - Metals						
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total - Metals
PTE in tons/yr	4.526E-04	9.957E-04	1.267E-03	3.440E-04	1.901E-03	4.960E-03
Total HAPs						1.708E+00
Worst HAP						1.629E+00

Methodology is the same as above.

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

Greenhouse Gas Calculations

Unlimited Greenhouse Gas			
Emission Factor in lb/MMcf	CO2 120,000	CH4 2.3	N2O 2.2
PTE in tons/yr	108,621	2.1	2.0
Summed PTE Before Modification tons/yr	108,625		
CO2e Total in tons/yr	109,266		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
 Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
 Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
 CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (25) + N2O Potential Emission ton/yr x N2O GWP (298).

Company Name: Subaru of Indiana Automotive, Inc.
 Source Address: 5500 State Road 38 East, Lafayette, Indiana 47905
 PSD/SSM No.: 157-34774-00050
 SPM No.: 157-34915-00050
 Reviewer: Aida DeGuzman
 Date: 28-Jul-2014

Emission factor (lb/MMCF)						
PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
1.9	7.6	7.6	0.6	100	5.5	84
				**see below		

Existing Combustion Units Permitted in the original PSD 157-33759 that are included in the NOx Emissions Limit and Natural Gas Fuel Usage Limit.

Natural Gas Combustion Device/ID	Number of Units	Heat Input (MMBtu/hr)	Total Heat Input (MMBtu/hr)	Potential Throughput (MMCF/yr)	PTE (tons/year)						
					PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Existing Rooftop Units (No Change)											
Engine Assembly Expansion	4	0.4	1.6	13.7	0.01	0.05	0.05	0.00	0.69	0.04	0.58
Engine W/H Expansion	2	0.4	0.8	6.9	0.01	0.03	0.03	0.00	0.34	0.02	0.29
Trim Warehouse Phase 1	5	0.4	2	17.2	0.02	0.07	0.07	0.01	0.86	0.05	0.72
Trim Warehouse Phase 2	5	0.4	2	17.2	0.02	0.07	0.07	0.01	0.86	0.05	0.72
Trim Warehouse Phase 3	5	0.4	2	17.2	0.02	0.07	0.07	0.01	0.86	0.05	0.72
Body Warehouse	3	0.4	1.2	10.3	0.01	0.04	0.04	0.00	0.52	0.03	0.43
Body Service Warehouse	3	0.4	1.2	10.3	0.01	0.04	0.04	0.00	0.52	0.03	0.43
Stamping Warehouse 1	4	0.4	1.6	13.7	0.01	0.05	0.05	0.00	0.69	0.04	0.58
Stamping Warehouse 2	1	0.4	0.4	3.4	0.00	0.01	0.01	0.00	0.17	0.01	0.14
Motor Pool Bldg	3	0.4	1.2	10.3	0.01	0.04	0.04	0.00	0.52	0.03	0.43
TOTAL PTE from Existing Rooftop Units	35	4.00	14	120.24	0.11	0.46	0.46	0.04	6.01	0.33	5.05
Existing Heaters (No Change)											
Engine Assembly Expansion	1	0.4	0.4	3.4	0.00	0.01	0.01	0.00	0.17	0.01	0.14
Engine W/H Expansion	4	0.4	1.6	13.7	0.01	0.05	0.05	0.00	0.69	0.04	0.58
Trim Warehouse Phase 1	2	0.4	0.8	6.9	0.01	0.03	0.03	0.00	0.34	0.02	0.29
Trim Warehouse Phase 2	2	0.4	0.8	6.9	0.01	0.03	0.03	0.00	0.34	0.02	0.29
Trim Warehouse Phase 3	2	0.4	0.8	6.9	0.01	0.03	0.03	0.00	0.34	0.02	0.29
Body Warehouse	3	0.4	1.2	10.3	0.01	0.04	0.04	0.00	0.52	0.03	0.43
Body Service Warehouse	2	0.4	0.8	6.9	0.01	0.03	0.03	0.00	0.34	0.02	0.29
Stamping Warehouse 1	3	0.4	1.2	10.3	0.01	0.04	0.04	0.00	0.52	0.03	0.43
Stamping Warehouse 2	1	0.4	0.4	3.4	0.00	0.01	0.01	0.00	0.17	0.01	0.14
Motor Pool Accessory Bldg	2	0.4	0.8	6.9	0.01	0.03	0.03	0.00	0.34	0.02	0.29
Total PTE From Existing Heater Units	22	4	8.8	75.58	0.07	0.29	0.29	0.02	3.78	0.21	3.17

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

Appendix A: Emissions Calculations
Natural Gas Combustion Only from
Existing Combustion Units Permitted in PSD/SSM 157-33759-00050
MM BTU/HR <100

Company Name: Subaru of Indiana Automotive, Inc.
 Address City IN Zip: 5500 State Road 38 East, Lafayette, Indiana 47905
 PSD/SSM No.: 157-34774-00050
 SPM No.: 157-34915-00050
 Reviewer: Aida DeGuzman
 Date: 28-Jul-2014

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr	
22.8	1020	195.8	New Combustion Units

Methodology

All emission factors are based on normal firing.
 MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

HAPS Calculations

Unlimited HAPs - Organics						
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03	Total - Organics
PTE in tons/yr	2.056E-04	1.175E-04	7.343E-03	1.762E-01	3.329E-04	1.842E-01

HAPs - Metals						
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total - Metals
PTE in tons/yr	4.895E-05	1.077E-04	1.371E-04	3.720E-05	2.056E-04	5.365E-04
					Total HAPs	1.848E-01
					Worst HAP	1.762E-01

Methodology is the same as above.

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

Greenhouse Gas Calculations

Unlimited Greenhouse Gas			
Emission Factor in lb/MMcf	CO2 120,000	CH4 2.3	N2O 2.2
PTE in tons/yr	11,749	0.2	0.2
Summed PTE Before Modification tons/yr	11,749		
CO2e Total in tons/yr	11,819		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.
 Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.
 Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
 CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (25) + N2O Potential Emission ton/yr x N2O GWP (298).

APPENDIX C

CONTROL TECHNOLOGY / PSD BACT ANALYSIS

Source Name: Subaru of Indiana Automotive, Inc.
 Source Location: 5500 State Road 38 East, Lafayette, Indiana 47905
 County: Tippecanoe
 SIC Code: 3711
 Operation Permit No.: T 157-27048-00050
 Operation Permit Issuance Date: August 1, 2011
 PSD/Significant Source Modification No.: 157-34774-00050
 Significant Permit Modification No.: 157-34915-00050
 Permit Reviewer: Aida De Guzman

Subaru of Indiana Automotive, Inc. (SIA) was issued PSD/SSM 157-33759-00050 on May 19, 2014 for the construction of a new Paint Line System C along with various natural gas combustion units that will support this new paint coating line. However, Subaru has subsequently proposed to add new combustion emission units instead of the combustion emission units originally permitted in PSD/SSM 157-33759-00050. Therefore, these combustion units are subject to re-evaluation of the PSD BACT for VOC.

The following BACT Analysis is a re-evaluation of the PSD BACT for Volatile Organic Compounds (VOC) that was established in PSD/SSM 157-33759-00050, issued on May 19, 2014 for the natural gas combustion units that support the Paint Line System C. The affected natural gas combustion units are the following:

Combustion Emission Unit/ID	number of Units	Heat Input as Permitted in PSD/SSM 157-33759-00050 (MMBtu/hr)	Heat Input Based on Final Engineering Design (MMBtu/hr)
PAINT SHOP "C" NATURAL GAS COMBUSTION UNITS			
Pretreatment Boiler –Ed Body Area	1	7.8	12.0
ED Oven	1	4.4	9.0
PVC Sealer Oven	1	1.2	3.0
Intermediate (Surfacer) Oven	1	3.3	10.0
Intermediate (Surfacer) Flash Zone Heater	1	1.1	3.0
PBL-C Flash Zone Heater – Primer & Basecoat Zones	1	1.2	3.0
Topcoat Flash Zone Heater	1	1.1	3.0

Combustion Emission Unit/ID	number of Units	Heat Input as Permitted in PSD/SSM 157-33759-00050 (MMBtu/hr)	Heat Input Based on Final Engineering Design (MMBtu/hr)
PBL-C Flash Zone Heater – Basecoat & Clearcoat Zones	1	1.2	3.0
Topcoat #C1 Oven	1	3.8	8.0
Topcoat Oven RTO	1	0.60	1.0
Intermediate (Surfacer) Air Houses	1	8.4	21.6
Topcoat Air House	1	26.1	38.0
Working Stage Air House - Surfacer Sand, Wet Sand #1	1	1.8	2.6
Working Stage Air House - Sealer, PVC, ED Sand, Wet Sand #2	1	9.5	9.5
Black & Wax Booth	1	5.3	15.5
Mixing Air House- Mix Room	1	4.5	2.0
Working Stage Air House - Inspection, Touch-Up Area	1	8.7	6.5
Working Stage Air House- Paint Shop “C”	1	10.0	2.4
NEW ROOFTOP UNITS			
Heating and Cooling Units			
HCU-14-1 Pretreatment Roof	1	--	0.77
HCU-14-2 Pretreatment Roof	1	--	0.77
HCU-14-3 Pretreatment Roof	1	--	0.77
HCU-14-4 Pretreatment Roof	1	--	0.77
HCU-14-5 Pretreatment Roof	1	--	0.77
HCU-14-6 Pretreatment Roof	1	--	0.77

Combustion Emission Unit/ID	number of Units	Heat Input as Permitted in PSD/SSM 157-33759-00050 (MMBtu/hr)	Heat Input Based on Final Engineering Design (MMBtu/hr)
HCU-10 Oven Roof	1	--	0.591
HCU-11 Oven Roof	1	--	0.591
HCU-12 Cafeteria	1	--	0.692
HCU-13 Roof of Conveyor Bridge	1	--	1.175
HCU-14 Roof of Conveyor Bridge	1	--	1.175
Makeup Air heating Units			
MAU-14-1 Roof	1	--	1.5
MAU-14-2 Roof	1	--	1.5
MAU-14-3 Roof	1	--	1.5
MAU-14-4 Roof	1	--	1.5
MAU-14-5 Roof	1	--	1.5
AIR HANDLING UNITS			
AHU-14-1 Penthouse	1	--	3.834
AHU-14-2 Penthouse	1	--	3.834
NEW HEATER UNITS			
Unit-14-1 Oven-A4-B0	1	--	0.4
UH-14-2 Oven - A2 - B1.5	1	--	0.4
UH-14-3 Oven - A2 - B3	1	--	0.4
UH-14-9 Penthouse - A9 - B2	1	--	0.4
UH-14-10 Penthouse - A17 - B3	1	--	0.4
UH-14-11 Penthouse - A12.5 - B0	1	--	0.4
UH-14-12 Penthouse - A15 - B0	1	--	0.4
UH-14-13 Penthouse - A17 - B1	1	--	0.4
UH-14-20 North Dock - A15 - B6	1	--	0.4
UH-14-21 North Dock - A15 - B6	1	--	0.4

Combustion Emission Unit/ID	number of Units	Heat Input as Permitted in PSD/SSM 157-33759-00050 (MMBtu/hr)	Heat Input Based on Final Engineering Design (MMBtu/hr)
UH-14-22 WWT - A4.5 - B6	1	--	0.4
UH-14-23 WWT - A2 - B7	1	--	0.4
UH-14-24 Tunnel - X19.4 - Y4	1	--	0.4
UH-14-25 Tunnel - X24 - Y5.2	1	--	0.4
UH-14-26 Tunnel - X18 - Y6.6	1	--	0.4
UH-14-27 Tunnel - X18 - Y10.8	1	--	0.4
UH-14-28 Tunnel - X18.5 - Y14.5	1	--	0.4

The BACT analysis was based on the draft "Top-Down Approach: BACT Guidance" published by USEPA, Office of Air Quality Planning Standards, March 15, 1990 and based on the following sources of information which were reviewed or contacted:

- (1) RACT/BACT/LAER Information System; USEPA, BACT/LAER Clearinghouse;
- (2) Compilation of Control Technology; USEPA, BACT/LAER Clearinghouse
- (3) EPA, State, and Local Air Quality permits and applications where related;
- (4) Control equipment and material vendors; and,
- (5) OAQPS Control Cost Manual.

The five basic steps of a top-down BACT analysis are listed below:

Step 1: Identify Potential Control Technologies

For the source, emissions unit, activity, or process requiring BACT, identify and list all "available" emissions control options for emissions of VOC. Available control options are those VOC control technologies and techniques with a practical potential for application to the source, emissions unit, activity, or process. In general, any control option in commercial use in the United States at the time the analysis is performed should be included on the list of available control options. As stated above, available VOC control technologies are limited to those that are associated with surface coating operations.

Step 2: Eliminate Technically Infeasible Options

The second step is to eliminate technically infeasible options from further consideration. To be considered feasible, a technology must be both available and applicable. It is important in this step that any presentation of a technical argument for eliminating a technology from further consideration be clearly documented based on physical, chemical, engineering and source-specific factors related to safe and successful use of the controls.

Step 3: Rank the Remaining Control Technologies by Control Effectiveness

The third step is to rank the technologies not eliminated in Step 2 in order of descending control effectiveness for each pollutant of concern. If the highest ranked technology is proposed as BACT, it is not necessary to perform any further technical or economic evaluation, except for the environmental analyses.

Step 4: Evaluate the Most Effective Controls and Document the Results

The fourth step entails an evaluation of energy, environmental and economic impacts for determining a final level of control. The evaluation begins with the most stringent control option and continues until a technology under consideration cannot be eliminated based on adverse energy, environmental, or economic impacts.

Energy and Environmental Impacts of VOC Control Alternatives

There are no toxic impacts from the control options but there is an energy impact and emissions of GHG will result from the thermal oxidation control option as compared to no control.

Step 5: Select BACT

The fifth and final step is to select as BACT the most effective of the remaining technologies under consideration for each pollutant of concern. BACT must, at a minimum, be no less stringent than the level of control required by any applicable New Source Performance Standard (NSPS) and National Emissions Standard for Hazardous Air Pollutants (NESHAP) or state regulatory standards applicable to the emission units included in the permits.

BACT for Volatile Organic Compounds (VOC)
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PROPOSED NEW PAINT LINE SYSTEM "C" - MISCELLANEOUS NATURAL GAS COMBUSTION PROCESS HEATERS, BOILER, THERMAL OXIDIZER and HVAC/AIR SUPPLY UNITS

SIA has been permitted in PSD/SSM 157-33759-00050, issued on May 19, 2014 to install miscellaneous natural gas combustion process heaters, a boiler, thermal oxidizer, heating and cooling units throughout the Paint Line System "C" and warehouses 1 and 2 with mostly heat input capacities less than 10 million British thermal units (MMBtu/hr) each, four units at less than 20 MMBtu/hr each, one at 21.6 MBtu/hr and one at 38 MMBtu/hr. The total VOC emissions from all these combustion units are 5.73 tons/year.

Step 1 Identification of Control Technologies

VOC emissions from the combustion facilities primarily result as a by-product of incomplete and inefficient combustion of the fuel. These VOCs may comprise a wide spectrum of volatile and semi-volatile organic compounds. They are emitted to the atmosphere when some of the fuel remains unburned or partially burned during combustion. In the case of natural gas fuel, some of the organics are carryover, unreacted, trace constituents of the gas while others may be pyrolysis products of heavier hydrocarbon constituents. From the previously identified sources of information, the technologies available to potentially control VOC emissions are the following:

- (a) Good Combustion
- (b) Oxidation Catalyst

- (c) Condensation System
- (d) Flares
- (e) Membrane Separation Technology

Step 2 – Elimination of Infeasible Control Options

- (a) **Good Combustion** - VOC emissions from combustion facilities primarily result from combustion by-products of the fuel. The RACT/BACT/LAER Clearinghouse database does not show any non-utility boiler, process heater or comfort heating unit smaller than 100 MMBtu/hr with an add-on control device to control VOC emissions. It identified "good combustion" as the only control technology that has been applied for the control of VOC emissions. This technology will be evaluated for further consideration in this BACT analysis.
- (b) **Oxidation Catalysts** – Oxidation catalysts can be used to control VOC emissions from natural gas combustion devices. The catalyst promotes the oxidation of VOC to carbon dioxide and water as the emission stream passes through the catalyst bed. The catalyst is usually made of a precious metal such as platinum, palladium, or rhodium. Other formulations, such as metal oxides for emission streams containing chlorinated compounds, are also used. The oxidation process takes place spontaneously, without the requirement for introducing reactants. The performance of these oxidation catalyst systems depends on several variables including temperature, pressure drop, incoming VOC concentration and the presence in the flue gas of certain elements that may foul or deactivate (poison) the catalyst.

In a catalytic oxidizer, a catalyst is used to lower the activation energy for oxidation. When a preheated gas stream is passed through a catalytic oxidizer, the catalyst bed initiates and promotes the oxidation of VOCs without being permanently altered itself. In catalytic oxidization, combustion occurs at significantly lower temperatures than that of direct flame units and can also achieve a destruction efficiency of 95%. However, steps must be taken to ensure complete combustion. The types of catalysts used include platinum, platinum alloys, copper chromate, copper oxide, chromium, manganese and nickel. These catalysts are deposited in thin layers on an inert substrate, usually honeycomb-shaped ceramic.

The optimal working temperature range for VOC oxidation catalysts is approximately 850°F - 1,100°F with a minimum exhaust gas stream temperature of 500°F for minimally acceptable VOC control. The temperature of the natural gas combustion devices in this BACT analysis will be far below the minimum 500°F threshold for effective operation of an oxidation catalyst system.

Based upon a review of the previously listed information resources, there is no known application of oxidation catalysts to control VOC emissions from natural gas combustion devices with heat inputs less than 50 MMBtu/hr. VOC oxidation catalysts are usually

installed on engines used to support the oil and gas industry. These engines have different exhaust characteristics and vary dramatically from the proposed natural gas combustion devices. The State of the Art (SOTA) Manual for Boilers and Process Heaters, written by the State of New Jersey's Department of Environmental Protection (NJDEP) – Air Quality Permitting Element, has also concluded that BACT for small boilers and process heaters greater than or equal 10 MMBtu/hr and less than 50 MMBtu/hr is good combustion practices and combustion controls. Boilers and process heaters in this size category are not required to install post-combustion controls to minimize emissions of VOC. As such, the NJDEP has concluded that the State of the Art controls for VOC emissions from natural gas combustion is good combustion practices.

Consequently, this control alternative is considered technically infeasible for this application to control VOC emissions from small natural gas combustion devices and will not be considered further in this BACT analysis.

- (c) **Condensation System** – These systems utilize a refrigerant to cool the exhaust stream, effect a phase change from gas to liquid for a target volatile constituent with ascertainable phase-change conditions, collect the liquid and thereby, lower the concentration in the gas-phase. However, the technology is only effective under high concentration gradients in excess of 100 ppmv which offers the motive force for the phase change. The exhaust streams associated with the proposed small natural gas combustion devices are very dilute with a multitude of volatile constituents which would preclude any effective technical applicability of a condensation system. In conclusion, condensation technology is not considered technically feasible to reduce VOC emissions from natural gas combustion equipment, and will be precluded from further consideration in this BACT analysis.

- (d) **Flares** - A VOC combustion control process in which the VOCs are piped to a remote, usually elevated, location and burned in an open flame in the open air using a specially designed burner tip, auxiliary fuel, and steam or air to promote mixing for destruction. Completeness of combustion in a flare is governed by flame temperature, residence time in the combustion zone, turbulent mixing of the gas stream components to complete the oxidation reaction, and available oxygen for free radical formation. Combustion is complete if all VOC emissions are converted to carbon dioxide and water. Incomplete combustion results in some of the VOCs being unaltered or converted to other organic compounds such as aldehydes or acids. This technology has been determined to be inappropriate for small natural gas combustion devices (in the range of less than 1.0 MMBtu/hr to approximately 40 MMBtu/hr) because of the low VOC concentration levels. Consequently, this control alternative is not considered technically feasible to reduce VOC emissions from the natural gas combustion equipment, and will be precluded from further consideration in this BACT analysis.

- (e) **Membrane Separation Technology** – This organic vapor/air separation technology involves the preferential transport of organic vapors through a non-porous gas separation

membrane via a diffusion process analogous to pumping saline water through a reverse osmosis membrane. In this system, the feedstream is compressed to approximately 150 psig and sent to a condenser where the liquid solvent is recovered. The condenser bleed stream is sent to the membrane module comprised of spirally-wound modules of thin film membranes separated by plastic mesh spacers. The concentrated stream from the membrane module is returned to the compressor for further recovery in the condenser.

This technology has been proposed for offgas treatment from Soil Vapor Extraction (SVE) and other groundwater remediation systems. Based upon a review of the previously listed information resources including the RBLC database, there is no known application of membrane separation technology for small natural gas combustion equipment.

In conclusion, on account of the above operational limitations, the technology is not considered technically feasible to reduce VOC emissions from natural gas.

Step 3 – Rank Remaining Control Technologies

As shown in Steps 1 and 2, the only remaining viable control technologies for VOC emissions from small natural gas fired combustion equipment (in the range of less than 1.0 MMBtu/hr to approximately 50 MMBtu/hr) are combustion of natural gas and good combustion practices. These types of technologies are effective at reducing VOC emissions from small natural gas fired combustion equipment. Review of the RBLC database did not identify any small natural gas combustion devices with add-on controls as BACT. Review of the RBLC database indicates the BACT is good combustion control and VOC emission limits for small natural gas fired equipment.

Step 4 – Evaluate Most Effective Control

As shown in the previous steps, all add-on control options have been eliminated due to technical infeasibility to SIA's natural gas-fired combustion equipment, except for good combustion practices.

Step 5 – Select BACT

A review of USEPA's RACT/BACT/LAER Clearinghouse, including Indiana air permits and sources permitted by other states agencies, identified the following BACTs with respect to natural gas fired combustion equipment with sizes 1 MMBtu/hr to approximately 40 MMBtu/hr.

Facility/ RBLC ID	State	Permit Date	Basis	Heat Input (MMBtu/hr)	VOC BACT Limit	Controls
<u>Existing:</u> Subaru of Indiana Automotive, Inc	IN	5/19/2014	BACT PSD	Natural gas fired combustion equipment: 1-20 MMBtu/hr	0.0054 lb/MMBtu	Combustion of natural gas
<u>Proposed:</u> Subaru of Indiana Automotive, Inc	IN	Proposed	BACT PSD	Natural gas fired combustion equipment: 1-40 MMBtu/hr	0.005 lb/MMBtu	Combustion of natural gas. Good combustion practices, which includes proper care and maintenance of the natural gas burner system.
MGM Mirage NV-0050	NV	11/30/2009	Case-by- case	Natural gas fired water heater: 2 MMBtu/hr	0.0054 lb/MMBtu	Combustion of natural gas only and good combustion practices
Competitive Power Ventures, Inc MD-0040	MD	11/12/2009	LAER	Natural gas fired heater: 1.7 MMBtu/hr	0.005 lb/MMBtu	No controls feasible
Progress Energy Florida (PEF) FL-0285	FL	1/26/2007	BACT PSD	Natural gas fueled process heaters: 3.0 MMBtu/hr	2 gr S/100 scf gas	Combustion of natural gas
Competitive Power Ventures, Inc/CPV Maryland, LLC MD-0040	MD	11/12/2008	LAER for VOC	Natural gas Heater: 1.70 MMBtu/hr	0.0050 lb/MMBtu	Exclusive combustion of natural gas with sulfur content < 2.0 gr/100 SCF No add-on controls
Dominion Cove Point, LNG, L.P. MD-0035	MD	8/12/2005	BACT PSD	Natural gas fired emergency vent heater: 1.3 MMBtu/hr	0.0054 lb/MMBtu	Combustion of natural gas only and good combustion practices
Wisconsin Public Service – Weston Plant WI-0228	WI	10/19/2004	BACT PSD	Natural gas fired heater: 0.75 MMBtu/hr	0.0040 lb/hr	Combustion of natural gas

Facility/ RBLC ID	State	Permit Date	Basis	Heat Input (MMBtu/hr)	VOC BACT Limit	Controls
Duke Energy Vermillion, LLC	IN	3/13/2003	BACT PSD	Natural gas fired boiler: 46 MMBtu/hr	0.0054 lb/MMBtu	Combustion of natural gas
Tenaska, IN	IN	11/12/2002	BACT PSD	Natural gas fired boiler: 40 MMBtu/hr	0.0054 lb/MMBtu	Combustion of natural gas
Interstate Power	IA	12/20/2002	BACT PSD	Natural gas fired boiler: 68 MMBtu/hr	0.0054 lb/MMBtu	Combustion of natural gas
Mustang Power	Ok	02/12/2002	BACT PSD	Natural gas fired boiler: 31 MMBtu/hr	0.0055 lb/MMBtu	Combustion of natural gas

BACT Conclusion:

Based on the outcome of Steps 1 through 5, there is no alternative fuel that can be substituted for natural gas or air pollution control device/technique that is feasible to further reduce this air pollutant (VOC) during the combustion of natural gas for the following new natural gas combustion equipment associated with the proposed 2014 project:

Combustion Emission Unit/ID	number of Units	Heat Input (MMBtu/hr)
PAINT SHOP "C" NATURAL GAS COMBUSTION UNITS		
Pretreatment Boiler – Ed Body Area	1	12
ED Oven	1	9.0
PVC Sealer Oven	1	3.0
Intermediate (Surfacer) Oven	1	10
Intermediate (Surfacer) Flash Zone Heater	1	3.0
PBL-C Flash Zone Heater – Primer & Basecoat Zones	1	3.0
Topcoat Flash Zone Heater	1	3.0
PBL-C Flash Zone Heater – Basecoat & Clearcoat Zones	1	3.0
Topcoat #C1 Oven	1	8.0
Topcoat Oven RTO	1	1.0

Combustion Emission Unit/ID	number of Units	Heat Input (MMBtu/hr)
Intermediate (Surfacer) Air Houses	1	21.6
Topcoat Air House	1	38
Working Stage Air House - Surfacer Sand, Wet Sand #1	1	2.6
Working Stage Air House - Sealer, PVC, ED Sand, Wet Sand #2	1	9.5
Black & Wax Booth	1	15.5
Mixing Air House- Mix Room	1	2.0
Working Stage Air House - Inspection, Touch-Up Area	1	6.5
Working Stage Air House- Paint Shop "C"	1	2.4
NEW ROOFTOP UNITS		
Heating and Cooling Units		
HCU-14-1 Pretreatment Roof	1	0.77
HCU-14-2 Pretreatment Roof	1	0.77
HCU-14-3 Pretreatment Roof	1	0.77
HCU-14-4 Pretreatment Roof	1	0.77
HCU-14-5 Pretreatment Roof	1	0.77
HCU-14-6 Pretreatment Roof	1	0.77
HCU-10 Oven Roof	1	0.591
HCU-11 Oven Roof	1	0.591
HCU-12 Cafeteria	1	0.692

Combustion Emission Unit/ID	number of Units	Heat Input (MMBtu/hr)
HCU-13 Roof of Conveyor Bridge	1	1.175
HCU-14 Roof of Conveyor Bridge	1	1.175
Makeup Air heating Units		
MAU-14-1 Roof	1	1.5
MAU-14-2 Roof	1	1.5
MAU-14-3 Roof	1	1.5
MAU-14-4 Roof	1	1.5
MAU-14-5 Roof	1	1.5
AIR HANDLING UNITS		
AHU-14-1 Penthouse	1	3.834
AHU-14-2 Penthouse	1	3.834
NEW HEATER UNITS		
Unit-14-1 Oven-A4-B0	1	0.4
UH-14-2 Oven - A2 - B1.5	1	0.4
UH-14-3 Oven - A2 - B3	1	0.4
UH-14-9 Penthouse - A9 - B2	1	0.4
UH-14-10 Penthouse - A17 - B3	1	0.4
UH-14-11 Penthouse - A12.5 - B0	1	0.4
UH-14-12 Penthouse - A15 - B0	1	0.4
UH-14-13 Penthouse - A17 - B1	1	0.4
UH-14-20 North Dock - A15 - B6	1	0.4
UH-14-21 North Dock - A15 - B6	1	0.4
UH-14-22 WWT - A4.5 - B6	1	0.4
UH-14-23 WWT - A2 - B7	1	0.4
UH-14-24 Tunnel - X19.4 - Y4	1	0.4

Combustion Emission Unit/ID	number of Units	Heat Input (MMBtu/hr)
UH-14-25 Tunnel - X24 - Y5.2	1	0.4
UH-14-26 Tunnel - X18 - Y6.6	1	0.4
UH-14-27 Tunnel - X18 - Y10.8	1	0.4
UH-14-28 Tunnel - X18.5 - Y14.5	1	0.4

The PSD BACT for VOC for the above combustion emission units is the following:

- (a) The VOC emissions shall be limited to 0.005 lb/MMBtu;
- (b) The combustion of only natural gas fuel; and
- (c) Good combustion practices, which includes proper care and maintenance of the natural gas burner systems.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Denise Coogan
Subaru of Indiana Automotive, Inc. (SIA)
PO Box 5689
Lafayette, IN 47903

DATE: January 23, 2015

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

SUBJECT: Final Decision
Title V
157-34915-00050

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

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

A copy of the final decision and supporting materials has also been sent via standard mail to:
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 6/13/2013



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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

January 23, 2015

TO: Tippecanoe Public Library

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

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

Applicant Name: Subaru of Indiana Automotive
Permit Number: 157-34915-00050

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

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

Enclosures
Final Library.dot 6/13/2013

Mail Code 61-53

IDEM Staff	CDENNY 01/23/2015 Subaru of Indiana Automotive, Inc. (SIA) 157-34915-00050 (final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Denise Coogan Subaru of Indiana Automotive, Inc. (SIA) PO Box 5689 Lafayette IN 47903 (Source CAATS) VIA USPS CERTIFIED MAIL										
2		Thomas V Easterday Executive VP, Sec and Chief Legal Officer Subaru of Indiana Automotive, Inc. (SIA) 5500 SR 38 E Lafayette IN 47903 (RO CAATS)										
3		Tippecanoe County Commissioners 20 N 3rd St, County Office Building Lafayette IN 47901 (Local Official)										
4		Tippecanoe County Health Department 20 N. 3rd St Lafayette IN 47901-1211 (Health Department)										
5		Lafayette City Council and Mayors Office 20 North 6th Street Lafayette IN 47901-1411 (Local Official)										
6		Tippecanoe County Public Library 627 South Street Lafayette IN 47901-1470 (Library)										
7		Ms. Geneva Werner 3212 Longlois Drive Lafayette IN 47904-1718 (Affected Party)										
8		Mrs. Phyllis Owens 3600 Cypress Lane Lafayette IN 47905 (Affected Party)										
9		Mr. Jerry White 4317 Amesbury Drive West Lafayette IN 47906 (Affected Party)										
10		Ms. Rose Filley 5839 Lookout Drive West Lafayette IN 47906 (Affected Party)										
11		Mr. William Cramer 128 Seminole Drive West Lafayette IN 47906 (Affected Party)										
12		West Lafayette City Council and Mayors Office 609 W. Navajo West Lafayette IN 47906 (Local Official)										
13		Mr. Allen Hoffman 4740 Masons Ridge Rd. Lafayette IN 47909 (Affected Party)										
14												
15												

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12			