

#### INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue . Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence Governor Thomas W. Easterly

Commissioner

### NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a Signficant Modification to a Part 70 Operating Permit

for General Motors, LLC - Fort Wayne Assembly in Allen County

Significant Permit Modification No.: 003-35825-00036

The Indiana Department of Environmental Management (IDEM) has received an application from General Motors, LLC - Fort Wayne Assembly, located at 12200 Lafayette Center Road, Roanoke, IN 46783, for a significant modification of its Part 70 Operating Permit issued on November 13, 2014. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow General Motors, LLC - Fort Wayne Assembly to make certain changes at its existing source. General Motors, LLC - Fort Wayne Assembly has applied to make changes to the compliance requirements for permitted surface coating operations at its facility.

This draft Significant Permit Modification does not contain any new equipment that would emit air pollutants; however, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). This notice fulfills the public notice procedures to which those conditions are subject. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow for these changes.

A copy of the permit application and IDEM's preliminary findings are available at:

Allen County Public Library 900 Library Plaza Fort Wayne, Indiana 46802

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

#### How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30<sup>th</sup> day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.



Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SPM 003-35825-00036 in all correspondence.

#### Comments should be sent to:

Madhurima Moulik IDEM. Office of Air Quality 100 North Senate Avenue MC 61-53 IGCN 1003 Indianapolis, Indiana 46204-2251 (800) 451-6027, ask for extension 3-0868 Or dial directly: (317) 233-0868 Fax: (317) 232-6749 attn: Madhurima Moulik

E-mail: mmoulik@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

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.

#### What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, and the IDEM public file room on the 12<sup>th</sup> floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Madhurima Moulik of my staff at the above address.

Chrystal A. Wagner, Section Chief

Permits Branch Office of Air Quality



#### INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence

Thomas W. Easterly

Commissioner

#### DRAFT

Mr. Matt Arbuckle, Sr. Environmental Engineer General Motors, LLC - Fort Wayne Assembly 12200 Lafayette Center Road Roanoke, IN 46783

Re: 003-35825-00036

Significant Permit Modification to

Part 70 Renewal No.: T003-33417-00036

Dear Mr. Arbuckle:

General Motors, LLC - Fort Wayne Assembly was issued Part 70 Operating Permit Renewal No. T003-33417-00036 on November 13, 2014 for a stationary automobile and light duty truck assembly plant located at 12200 Lafayette Center Road, Roanoke, Indiana 46783. An application requesting changes to this permit was received on May 13, 2015. 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 attachment(s). 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 60, Subpart Db

Attachment B - 40 CFR 60, Subpart MM

Attachment C - 40 CFR 63, Subpart IIII

Attachment D - 40 CFR 63, Subpart ZZZZ

Attachment E - 40 CFR 60, Subpart JJJJ

Attachment F - 40 CFR 63, Subpart DDDDD

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

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: <a href="http://www.in.gov/ai/appfiles/idem-caats/">http://www.in.gov/ai/appfiles/idem-caats/</a>. 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: <a href="http://www.in.gov/idem/5881.htm">http://www.in.gov/idem/5881.htm</a>; and the Citizens' Guide to IDEM on the Internet at: <a href="http://www.in.gov/idem/6900.htm">http://www.in.gov/idem/6900.htm</a>.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.



General Motors, LLC - Fort Wayne Assemb Roanoke, Indiana

Permit Reviewer: Madhurima Moulik

Page 2 of 2 SPM No. 003-35825-00036

#### **DRAFT**

If you have any questions on this matter, please contact Madhurima Moulik, of my staff, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251 at 317-233-0868 or 1-800-451-6027, and ask for extension 3-0868.

Sincerely,

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

Attachments: Modified Permit and Technical Support Document

cc: File - Allen County

Allen County Health Department

U.S. EPA, Region 5

Compliance and Enforcement Branch

# IDEM

#### INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence Governor Thomas W. Easterly

Commissioner

## Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY DRAFT

#### General Motors, LLC - Fort Wayne Assembly 12200 Lafayette Center Road Roanoke, Indiana 46783

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

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

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

ssuance Date: November 13, 2014
Expiration Date: November 13, 2019

Significant Permit Modification No. 003-34985-00036 issued on February 23, 2015 Administrative Amendment No. 003-35772-00036 issued on May 12, 2015

Significant Permit Modification No.: 003-35825-00036		
Issued by:	Issuance Date:	
Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Expiration Date: November 13, 2019	





#### **TABLE OF CONTENTS**

A. SOUR	CE SUMMARY	7
A.1	General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]	
	[326 IAC 2-7-5(14)]	
A.3	Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)]	
	[326 IAC 2-7-5(14)]	
A.4	Part 70 Permit Applicability [326 IAC 2-7-2]	
B. GENE	RAL CONDITIONS	13
B.1	Definitions [326 IAC 2-7-1]	
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)]	
B.3	Term of Conditions [326 IAC 2-1.1-9.5]	
B.4	Enforceability [326 IAC 2-7-7] [IC 13-17-12]	
B.5	Severability [326 IAC 2-7-5(5)]	
B.6	Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]	
B.7	Duty to Provide Information [326 IAC 2-7-5(6)(E)]	
B.8	Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]	
B.9	Annual Compliance Certification [326 IAC 2-7-6(5)]	
B.10	• • • • • • • • • • • • • • • • • • • •	
B.11	. , , , , , , , , , , , , , , , , , , ,	
B.12		
B.13	• • • • • • • • • • • • • • • • • • • •	
B.14		
B.15		
	[326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]	
B.16	Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]	
B.17		
B.18		
	[326 IAC 2-7-12(b)(2)]	
B.19		
B.20		
B.21	·	
	Transfer of Ownership or Operational Control [326 IAC 2-7-11]	
	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]	
	Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]	
C. SOUR	CE OPERATION CONDITIONS	24
Emissi	on 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]	
C.2	Opacity [326 IAC 5-1]	
C.3	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.5	Fugitive Dust Emissions [326 IAC 6-4]	
C.6	Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]	
C.7	Stack Height [326 IAC 1-7]	
C.8	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	

Compliance Requirements [326 IAC 2-1.1-11]   C.10   Compliance Requirements [326 IAC 2-1.1-11]   C.11   Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]   C.11   Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64]   326 IAC 3-8    C.12   Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)]   [326 IAC 2-7-6(1)]   Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]   C.13   Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]   C.14   Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]   C.15   Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5]   [326 IAC 2-7-6]   C.16   Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]   [326 IAC 2-7-6]   Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]   C.17   Emission Statement [326 IAC 2-7-5(3)(C)(iii))[326 IAC 2-7-5(7)][326 IAC 2-7-19]   C.18   General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-3]   [326 IAC 2-3] [40 CFR 64][326 IAC 3-8]  Stratospheric Ozone Protection   C.20   Compliance with 40 CFR 82 and 326 IAC 22-7-5(1)]   D.1.1   Prevention of Significant Deterioration (PSD) [326 IAC 2-2]   D.1.2   Particulate Emission Limitations for Indirect Heating [326 IAC 6-2-4]   D.1.3   Nitrogen Oxides (NOx) [326 IAC 2-2]   D.1.4   Preventive Maintenance [326 IAC 2-7-5(1)]   Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 6-2-4]   D.1.1   Preventive Maintenance [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]   D.1.2   Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]   D.1.5   Continuous Emission Monitoring   Record Keeping and Reporting Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]   D.1.6   Record Keeping Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-19]   D.1.7   Reporting Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-19]   D.1.8   Record Keeping and Reporting Requirements [326 IAC 2-7-5(1)]   D.1.8   Record Keeping and Reporting Requirements [326 IAC 2-7-5(1)]		equirements [326 IAC 2-7-6(1)] Performance Testing [326 IAC 3-6]
C.11 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64] [326 IAC 3-8] C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]  Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3] C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68] C.15 Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5] [326 IAC 2-7-6] C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]  Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19] C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-6(7)][326 IAC 2-7-19(c)] [326 IAC 2-6] C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3] C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1-11] [326 IAC 2-2] [326 IAC 2-3] [40 CFR 64][326 IAC 3-8]  Stratospheric Ozone Protection C.20 Compliance with 40 CFR 82 and 326 IAC 2-2-1 D.1. EMISSIONS UNIT OPERATION CONDITIONS	-	
C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]  Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]  C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]  C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]  C.15 Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5]  [326 IAC 2-7-6]  C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  [326 IAC 2-7-6]  Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]  C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19]  C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]  [326 IAC 2-3]  C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-7-6] [326 IAC 2-2]  [326 IAC 2-3] [40 CFR 64][326 IAC 3-8]  Stratospheric Ozone Protection  C.20 Compliance with 40 CFR 82 and 326 IAC 22-1  D.1. EMISSIONS UNIT OPERATION CONDITIONS		Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64]
C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3] C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68] Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5] [326 IAC 2-7-6] C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]  Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19] C.17 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] C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3] C.19 General Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3] [40 CFR 64][326 IAC 3-8]  Stratospheric Ozone Protection C.20 Compliance with 40 CFR 82 and 326 IAC 22-1  D.1. EMISSIONS UNIT OPERATION CONDITIONS	C.12	Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)]
C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68] C.15 Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5] [326 IAC 2-7-6] C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]  Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19] C.17 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] C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3] C.19 General Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3] [40 CFR 64][326 IAC 3-8]  Stratospheric Ozone Protection C.20 Compliance with 40 CFR 82 and 326 IAC 22-1  D.1. EMISSIONS UNIT OPERATION CONDITIONS		
C.15 Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5] [326 IAC 2-7-6] C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6] Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19] C.17 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] C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3] C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3] [40 CFR 64][326 IAC 3-8]  Stratospheric Ozone Protection C.20 Compliance with 40 CFR 82 and 326 IAC 2-1  D.1. EMISSIONS UNIT OPERATION CONDITIONS		
C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]  Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19] C.17 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] C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3] C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3] [40 CFR 64][326 IAC 3-8]  Stratospheric Ozone Protection C.20 Compliance with 40 CFR 82 and 326 IAC 22-1  D.1. EMISSIONS UNIT OPERATION CONDITIONS		Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5]
C.17 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] C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3] C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3] [40 CFR 64][326 IAC 3-8]  Stratospheric Ozone Protection C.20 Compliance with 40 CFR 82 and 326 IAC 22-1  D.1. EMISSIONS UNIT OPERATION CONDITIONS	C.16	Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-6] C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-3] C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3] [40 CFR 64][326 IAC 3-8]  Stratospheric Ozone Protection C.20 Compliance with 40 CFR 82 and 326 IAC 22-1  D.1. EMISSIONS UNIT OPERATION CONDITIONS		
C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3] C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3] [40 CFR 64][326 IAC 3-8]  Stratospheric Ozone Protection C.20 Compliance with 40 CFR 82 and 326 IAC 22-1  D.1. EMISSIONS UNIT OPERATION CONDITIONS	C.17	
C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3] [40 CFR 64][326 IAC 3-8]  Stratospheric Ozone Protection C.20 Compliance with 40 CFR 82 and 326 IAC 22-1  D.1. EMISSIONS UNIT OPERATION CONDITIONS	C.18	General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]
D.1. EMISSIONS UNIT OPERATION CONDITIONS	C.19	General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]
Emission Limitations and Standards [326 IAC 2-7-5(1)]  D.1.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2] D.1.2 Particulate Emission Limitations for Indirect Heating [326 IAC 6-2-4] D.1.3 Nitrogen Oxides (NOx) [326 IAC 2-2] D.1.4 Preventive Maintenance [326 IAC 2-17-5(12)]  Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)] D.1.5 Continuous Emission Monitoring  Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19] D.1.6 Record Keeping Requirements D.1.7 Reporting Requirements D.1.7 Reporting Requirements  D.2. EMISSIONS UNIT OPERATION CONDITIONS	•	
D.1.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2] D.1.2 Particulate Emission Limitations for Indirect Heating [326 IAC 6-2-4] D.1.3 Nitrogen Oxides (NOx) [326 IAC 2-2] D.1.4 Preventive Maintenance [326 IAC 2-17-5(12)]  Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)] D.1.5 Continuous Emission Monitoring  Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19] D.1.6 Record Keeping Requirements D.1.7 Reporting Requirements D.1.8 Record Keeping Requirements D.1.9 Reporting Requirements D.10 Remission Limitations and Standards [326 IAC 2-7-5(1)]	D.1. EMISSI	ONS UNIT OPERATION CONDITIONS35
D.1.2 Particulate Emission Limitations for Indirect Heating [326 IAC 6-2-4] D.1.3 Nitrogen Oxides (NOx) [326 IAC 2-2] D.1.4 Preventive Maintenance [326 IAC 2-17-5(12)]  Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)] D.1.5 Continuous Emission Monitoring  Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19] D.1.6 Record Keeping Requirements D.1.7 Reporting Requirements D.1.7 Reporting Requirements  D.2. EMISSIONS UNIT OPERATION CONDITIONS	Emission	Limitations and Standards [326 IAC 2-7-5(1)]
D.1.3 Nitrogen Oxides (NOx) [326 IAC 2-2] D.1.4 Preventive Maintenance [326 IAC 2-17-5(12)]  Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)] D.1.5 Continuous Emission Monitoring  Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19] D.1.6 Record Keeping Requirements D.1.7 Reporting Requirements D.1.7 Reporting Requirements  D.2. EMISSIONS UNIT OPERATION CONDITIONS		
D.1.4 Preventive Maintenance [326 IAC 2-17-5(12)]  Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]  D.1.5 Continuous Emission Monitoring  Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]  D.1.6 Record Keeping Requirements  D.1.7 Reporting Requirements  D.2. EMISSIONS UNIT OPERATION CONDITIONS		
D.1.5 Continuous Emission Monitoring  Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]  D.1.6 Record Keeping Requirements  D.1.7 Reporting Requirements  D.2. EMISSIONS UNIT OPERATION CONDITIONS		
D.1.6 Record Keeping Requirements D.1.7 Reporting Requirements  D.2. EMISSIONS UNIT OPERATION CONDITIONS	-	
D.1.7 Reporting Requirements  D.2. EMISSIONS UNIT OPERATION CONDITIONS		
Emission Limitations and Standards [326 IAC 2-7-5(1)]		
	D.2. EMISSI	ONS UNIT OPERATION CONDITIONS39
	Emission	Limitations and Standards [326 IAC 2-7-5/1)]
D.2.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]	D.2.1	Prevention of Significant Deterioration (PSD) [326 IAC 2-2]
D.2.2 Automobile and Light Truck Coating Operations [326 IAC 8-2-2][326 IAC 8-1-2]	D.2.2	Automobile and Light Truck Coating Operations [326 IAC 8-2-2][326 IAC 8-1-2]
D.2.3 Miscellaneous Metal Coating Operations [326 IAC 8-2-9]		
D.2.4 Particulate [326 IAC 6-3-2(d)] D.2.5 Preventive Maintenance [326 IAC 2-17-5(12)]		

Complian	ce Determination Requirements
D.2.6	PSD VOC BACT Limit [326 IAC 2-2]
D.2.7	Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]
D.2.8	PM and VOC Controls [326 IAC 6-3-2] [326 IAC 8-1-2] [326 IAC 2-2]
D.2.9	Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11] [326 IAC 2-2]
0	Manifestian Banatian anta 1990 IAO 0 7 5/4/1/2000 IAO 0 7 0/4/1
-	ce Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]
D.2.10	Thermal Oxidizer Temperature [40 CFR 64 CAM]
D.2.11	Parametric Monitoring [40 CFR 64 CAM]
Record K	eeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
D.2.12	Record Keeping Requirements
D.2.13	Reporting Requirements
D 3 EMISSI	ONS UNIT OPERATION CONDITIONS46
D.S. EIVIISSI	ONS UNIT OPERATION CONDITIONS40
	Limitations and Standards [326 IAC 2-7-5(1)]
D.3.1	Prevention of Significant Deterioration (PSD) (BACT Limits) [326 IAC 2-2]
D.3.2	Automobile and Light Truck Coating Operations [326 IAC 8-2-2][326 IAC 8-1-2]
D.3.3	Particulate [326 IAC 6-3-2(d)]
D.3.4	Preventive Maintenance [326 IAC 2-17-5(12)]
Complian	ce Determination Requirements
D.3.5	PSD VOC BACT Limit [326 IAC 2-2]
D.3.6	Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]
D.3.7	PM and VOC Controls [326 IAC 6-3-2] [326 IAC 8-1-2]
D.3.8	Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11] [326 IAC 2-2]
Complian	00 Manifering Dequirements, [226 IAC 2.7 E/4][226 IAC 2.7 E/4]]
-	ce Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]
	Thermal Oxidizer Temperature [40 CFR 64 CAM]
D.3.10	
D.3.11	Monitoring [40 CFR 64 CAM]
Record K	eeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
D.3.12	
D.3.13	Reporting Requirements
D.4. EMISSI	ONS UNIT OPERATION CONDITIONS51
	Limitations and Standards [326 IAC 2-7-5(1)]
D.4.1	Prevention of Significant Deterioration (PSD) (BACT Limits) [326 IAC 2-2]
D.4.2	Automobile and Light Truck Coating Operations [326 IAC 8-2-2][326 IAC 8-1-2]
D.4.3	Particulate [326 IAC 6-3-2(d)]
D.4.4	Preventive Maintenance [326 IAC 2-17-5(12)]
Complian	ce Determination Requirements
D.4.5	PSD VOC BACT Limit [326 IAC 2-2]
D.4.6	Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]
D.4.7	PM and VOC Controls [326 IAC 6-3-2] [326 IAC 8-1-2]
D.4.8	Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11] [326 IAC 2-2]
Complian	ce Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]
-	· · · · · · · · · · · · · · · · · · ·
D.4.9 D.4.10	Catalytic Oxidizer Temperature [40 CFR 64 CAM]
D.4.10 D.4.11	Parametric Monitoring [40 CFR 64 CAM]  Monitoring [40 CFR 64 CAM]
D.4.11	

D.4	ord Ke 4.12 4.13	Reping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]  Record Keeping Requirements  Reporting Requirements	
D.5. EN	/IISSIC	ONS UNIT OPERATION CONDITIONS	56
Emis D.		Limitations and Standards [326 IAC 2-7-5(1)] Particulate Matter Limitaiotns for Process Operations [326 IAC 6-3-2]	
D.6. EN	/IISSIC	ONS UNIT OPERATION CONDITIONS	57
Emis D.6 D.6	6.1 6.2	Limitations and Standards [326 IAC 2-7-5(1)] Prevention of Significant Deterioration (PSD) (BACT Limits) [326 IAC 2-2][326 IAC 8-1-6] Opacity Limitations [326 IAC 5-1] Preventive Maintenance [326 IAC 2-17-5(12)]	
Com	pliand	ce Determination Requirements	
D.6	6.4	Testing Requirements [326 IAC 2-7-6(1)] [326 IAC 2-1.1-11] [326 IAC 2-2]	
		eeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19] Record Keeping Requirements	
D.7 EM	IISSIO	NS UNIT OPERATION CONDITIONS	60
Emissi D.7.1 D.7.2 D.7.3 D.7.4 D.7.5 D.7.6	PM2. PSD Autor Misce Partic	mitations and Standards [326 IAC 2-7-5(1)] 5 PSD Credit Limitations[326 IAC 2-2] Minor VOC Limitations [326 IAC 2-2] mobile and Light Duty Truck Coating Operations [326 IAC 8-2-2] ellaneous Metal Coating Operations [326 IAC 8-2-9] culate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4] entive Maintenance Plan [326 IAC 2-7-5(12)]	
D.7.7 D.7.8	Volat PM2.	Determination Requirements ile Organic Compounds (VOC) 5 and VOC Controls ng Requirements	
Compli	iance	Monitoring Requirements	
		mal Oxidizer Temperature [40 CFR 64] metric Monitoring [326 IAC 2-7-5(3)] [40 CFR 64]	
D.7.12	Reco	bing and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19] ord Keeping Requirements rting Requirements	
E.1. SC	URCI	E OPERATING CONDITIONS	68
<b>Emis</b> E.1 E.1	1.1	Limitations and Standards [326 IAC 2-7-5(1)] General Provisions Relating to NSPS Db [326 IAC 12][40 CFR 60, Subpart A] Standards of Performance for Steam Generating Units [40 CFR 60, Subpart MM]	

E.2. SOUR	CE OPERATING CONDITIONS	69
Emission E.2.1 E.2.2	Limitations and Standards [326 IAC 2-7-5(1)] General Provisions Relating to NSPS MM [326 IAC 12][40 CFR 60, Subpart A] Standards of Performance for Automobile and Light Truck Surface Coating [40 CFR 60, Subpart MM]	
E.3. SOUR	CE OPERATING CONDITIONS	70
Emission E.3.1 E.3.2 E.3.3	Limitations and Standards [326 IAC 2-7-5(1)] General Provisions Relating to NESHAP IIII [326 IAC 20][40 CFR 63, Subpart A] Surface Coating of Automobile and Light Truck Surface Coating [40 CFR 63, Subpart III Surface Coating of Miscellaneous Metal Part and Products [40 CFR 63, Subpart MMMM	
E.4. SOUR	CE OPERATING CONDITIONS	72
Emission E.4.1 E.4.2	Limitations and Standards [326 IAC 2-7-5(1)] General Provisions Relating to NSPS JJJJ [326 IAC 12][40 CFR 60, Subpart A] Standards of Performance for Spark Ignition Internal Combustion Engines [40 CFR 60, Subpart JJJJ]	
E.5. SOUR	CE OPERATING CONDITIONS	73
Emission E.5.1 E.5.2	Limitations and Standards [326 IAC 2-7-5(1)] General Provisions Relating to NESHAP ZZZZ [326 IAC 20][40 CFR 63, Subpart A] National Emissions Standards for Reciprocating Internal Combustion Engines [40 CFR Subpart ZZZZ]	63,
E.6. SOUR	CE OPERATING CONDITIONS	74
Emission E.6.1 E.6.2	Limitations and Standards [326 IAC 2-7-5(1)] General Provisions Relating to NESHAP DDDDD [326 IAC 20][40 CFR 63, Subpart A] National Emissions Standards for Industrial, Commercial, and Institutional Boilers [40 C 63, Subpart DDDDD]	FR
Certificatio	n	76
Part 70 Usa	/ Occurrence Report7 age Report7 Deviation and Compliance Monitoring Report8	<b>79-82</b>
Attachment	A - 40 CFR 60, Subpart Db	
Attachment	B - 40 CFR 60, Subpart MM	
Attachment	C - 40 CFR 63, Subpart IIII	
Attachment	D - 40 CFR 63, Subpart ZZZZ	
Attachment	E - 40 CFR 60, Subpart JJJJ	
Attachment	F - 40 CFR 63, Subpart DDDDD	

Permit Reviewer: Jack Harmon

Significant Permit Modification No. 003-35825-00036 Modified by: Madhurima Moulik DRAFT Page 7 of 84 T003-33417-00036

#### **SECTION A**

#### **SOURCE SUMMARY**

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

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

The Permittee owns and operates a stationary automobile and light duty truck assembly plant.

Source Address: 12200 Lafayette Center Road, Roanoke, Indiana 46783

General Source Phone Number: 260-673-2345

SIC Code: 3711 County Location: Allen

Source Location Status:

Source Status:

Attainment for all criteria pollutants
Part 70 Operating 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:

- (a) Facility-wide natural gas usage, including combustion units described as follows:
  - (1) One (1) natural gas/landfill gas fired boiler, identified as 004, constructed in 1992 and modified in 2011 to combust landfill gas, with a maximum heat input capacity of 228 MMBtu/hr for natural gas and landfill gas, using low NO<sub>X</sub> burners and flue gas recirculation as control, and exhausting to stack 01;
    - Under 40 CFR 60, Subpart Db, this boiler is considered an affected facility.
    - Under 40 CFR 63, Subpart DDDDD, this boiler is considered an affected facility.
  - One (1) natural gas-fired boiler, identified as 005, constructed in 1993, with a maximum heat input capacity of 228 MMBtu/hr, using low NO<sub>X</sub> burners and flue gas recirculation as control, and exhausting to stack 01;
    - Under 40 CFR 60, Subpart Db, this boiler is considered an affected facility.
    - Under 40 CFR 63, Subpart DDDDD, this boiler is considered an affected facility.
  - (3) Fifty-six (56) space heaters and process heaters using natural gas, identified as 007, with a total heat input capacity of 50.6 MMBtu/hr, using no control, and exhausting to various stacks denoted as stack 13; and
  - (4) Twenty (20) natural gas fired air supply house burners, constructed in 2001, identified as MOD 1 through MOD 10 (each mod air supply house contains two burners), with emissions exhausted through their respective booth stacks denoted as SO4, and each burner heat input rated at 12.6 MMBtu per hour.

- (b) One (1) ELPO Dipping System, identified as 006, constructed in 1985, using natural gas thermal incinerators identified as #1 through #3 on the drying ovens as VOC control, and exhausting to stack 02;
  - Under 40 CFR 60, Subpart MM, this is considered an affected facility.
  - Under 40 CFR 63, Subpart IIII, this is considered an affected facility.
- (c) One (1) Underbody Robotic Sealer Operation, identified as Stone Guard Sealer, approved in 2012 for operation, using no controls, and exhausting indoors;
  - Under 40 CFR 63, Subpart IIII, this unit is considered an affected facility.
- (d) One (1) Primer Surfacer System, identified as 010, constructed in 1994 and modified in 2010, using a natural gas fired regenerative thermal oxidizer with a maximum heat input capacity of 16 MMBtu/hr as VOC control, and water wash as PM control, and exhausting to stack 03. The Primer Surfacer System also includes applicators that purge internally through valves located inside the robot into a gun box. Additionally, the robotic bells purge into a gun box within the booth. The booth is an enclosed manufacturing unit, which is directed to the control device described above;
  - Under 40 CFR 60, Subpart MM, this is considered an affected facility.
  - Under 40 CFR 63, Subpart IIII, this is considered an affected facility.
- (e) One (1) Topcoat System, identified as 008, constructed in 1985, approved in 2015 for modification, using ten (10) natural gas fired catalytic oxidizers identified as #1 #10 on the drying ovens as VOC control, with the maximum heat input capacity of oxidizers #1 #7 being 7.5 MMBtu/hr each, and the maximum heat input capacity of oxidizers #8 #10 being 9.5 MMBtu/hr each, using waterwash as PM control, and exhausting to stack 04;
  - Under 40 CFR 60, Subpart MM, this is considered an affected facility.
  - Under 40 CFR 63, Subpart IIII, this is considered an affected facility.
- (f) Miscellaneous sealers/adhesives/additives/solvents, identified as 009, constructed in 1985, using no controls, and exhausting to stacks 07 and 08;
  - Under 40 CFR 63, Subpart IIII, this is considered an affected facility.
- (g) One (1) Final Repair Operation, identified as 012, constructed in 1985, using dry filters for particulate control, and exhausting to stack 06 and spot repair stalls;
  - Under 40 CFR 63, Subpart IIII, this is considered an affected facility.
- (h) One (1) Maintenance Paint Operation, identified as 013, constructed in 1985, using no control, and exhausting to stack 10;
  - Under 40 CFR 63, Subpart IIII, this is considered an affected facility.
- (i) One (1) Gasoline Fill Operation, identified as 014, constructed in 1985, including tanks 8 and 9, each with a capacity of 20,000 gallons. The vehicles being fueled is equipped with an Onboard Refueling Vapor Recovery (ORVR) System as VOC control; and

- (j) Four (4) identical landfill gas-fired generators, identified as Gen 1 through Gen 4, approved in 2013 for construction, each with a maximum output rating of 2,242 horsepower, using no controls, and each exhausting through Stack S01.
  - Under 40 CFR 60, Subpart JJJJ, these four (4) generators are considered affected facilities.
  - Under 40 CFR 63, Subpart ZZZZ, these four (4) generators are considered affected facilities.
- (k) The following equipment approved in 2015 for construction to accommodate the T1 Full Size Truck Project:
  - (1) One (1) Electrodeposition (ELPO Dipping) System, identified as 20, approved in 2015 for construction, using three (3) natural gas-fired regenerative thermal oxidizers (RTOs), each with a maximum heat input capacity of 3.0 million British thermal units per hour (MMBtu/hr) as VOC control for the tank and oven, and exhausting through stack 020. The ELPO oven has 14 zones with a combined maximum heat input capacity of 79.5 MMBtu/hr.
  - (2) Miscellaneous Sealers and Adhesives application, identified as 022, approved in 2015 for construction, using no controls, and exhausting to stacks 07 and 08.
  - (3) Miscellaneous natural gas-fired equipment, identified as 021, with no controls.
    - (i) Five (5) ASH Paint Heaters, each with a maximum heat input capacity of 6.0 MMBtu/hr, all venting inside the building.
    - (ii) One (1) ASH Paint Heater with a maximum heat input capacity of 8.0 MMBtu/hr, venting inside the building.
    - (iii) Three (3) Hot Water Generators, located at the paint area, each with a maximum heat input capacity of 8.0 MMBtu/hr, all venting through stack ID 21a.
    - (iv) One (1) Locker Room Heater, located at the paint area, with a maximum heat input capacity of 0.875 MMBtu/hr, venting inside the building.
    - (v) Four (4) Door Heaters, located at the paint area, each with a maximum heat input capacity of 0.48 MMBtu/hr, all venting inside the building.
    - (vi) Eight (8) Unit Heaters, located at the paint area, each with a maximum heat input capacity of 0.058 MMBtu/hr, all venting inside the building.
    - (vii) Fourteen (14) ELPO Oven Convection Zones, each with a maximum heat input capacity of 3.0 MMBtu/hr, all venting through stack 020.
    - (viii) Twelve (12) ELPO Oven Radiant Zones, each with a maximum heat input capacity of 3.0 MMBtu/hr, all venting through stack 020.
    - (ix) One (1) ELPO Oven Radiant Zone 13, with a maximum heat input capacity of 3.0 MMBtu/hr, venting through stack 020.
    - (x) Fifty-nine (59) Dock Door Heaters, located at the Body Shop and Material Room, each with a maximum heat input capacity of 0.40 MMBtu/hr, all venting inside the building.

Page 10 of 84 T003-33417-00036

(xi) Thirty-nine (39) ASH Heaters, located at the Body Shop and Material Room, each with a maximum heat input capacity of 0.972 MMBtu/hr, all venting inside the building.

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

This stationary source has the following insignificant activities, as defined in 326 IAC 2-7-1(21).

- (a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations [326 IAC 6-3-2].
- (b) One (1) Body Shop Grinding and Machining, associated with the T1 Full Size Truck Project, approved in 2015 for construction.
- (c) One (1) Pre-Treatment System, associated with the T1 Full Size Truck Project, approved in 2015 for construction.
- (d) Storage tanks, identified as 1 (solvent/thinner), 2 (solvent/thinner), 7 (automatic transmission fluid), and two (2) 18,900 gallon waste purge solvent tanks, all constructed after July 23, 1984.
  - Under 40 CFR 63, Subpart IIII, tanks 1, 2, and the two waste purge solvent tank are considered affected facilities. Tank 7 is not subject to 40 CFR 63, Subpart IIII.
- (e) Space heaters, process heaters, or boilers using natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (f) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (g) The following VOC and HAP storage containers:
  - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
  - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (h) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-3-2].
- (i) Closed loop heating and cooling systems.
- (j) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (k) Any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs.
- Noncontact cooling tower systems with natural draft cooling towers not regulated under a NESHAP.

- (m) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (n) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone [326 IAC 6-3-2].
- (o) Paved and unpaved roads and parking lots with public access.
- (p) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (q) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (r) On-site fire and emergency response training approved by the department.
- (s) Diesel generator not exceeding 1600 horsepower.
- (t) Other emergency equipment as follows: Stationary fire pumps.
- (u) A laboratory as defined in 326 IAC 2-7(21)(G).
- (v) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (w) Other activities or categories with emissions less than insignificant thresholds:
  - (1) Fluorocarbon R-134A Storage Tanks (Main Plant);
  - (2) Sulfuric Acid Storage Tank (Wastewater Treatment Plant);
  - (3) Grinding Operations (Light Duty Truck Body Shop) [326 IAC 6-3-2];
  - (4) Pre-phosphate Washers (Light Duty Truck Assembly Line);
  - (5) Multi-stage Phosphate Systems (Light Duty Truck Assembly Line);
  - (6) Feather Dusters (Light Duty Truck Assembly Line);
  - (7) Vehicle washers prior to shipping (Light Duty Truck Assembly Line);
  - (8) Spot sanding and painting (Light Duty Truck Assembly Line);
  - (9) Bulk Storage Material Transferring Equipment; i.e. pumps, valves, pipes, flanges, etc. (Light Duty Truck Assembly Line);
  - (10) Vehicle Fluid Fill Operations; i.e. engine oil, windshield, transmission, engine coolant, power steering fluid, brake fluid, and air conditioning refrigerant (Light Duty Truck Assembly Line):
  - (11) Engine Subassembly Lines (Light Duty Truck Assembly Line);
  - (12) Radiator Subassembly Lines (Light Duty Truck Assembly Line);

- (13) Trim Assembly Lines (Light Duty Truck Assembly Line);
- (14) Maintenance Shops (Light Duty Truck Assembly Line);
- (15) Gasoline/Diesel Tank Assembly Areas (Light Duty Truck Assembly Line);
- (16) Mechanical Repair Stalls (Light Duty Truck Assembly Line);
- (17) Final Vehicle Inspection (Care Building);
- (18) Wastewater Treatment Plant;
- (19) Storage Tanks;
- (20) Body Washers;
- (21) Mig Welding [326 IAC 6-3-2]; and
- (22) Diesel Pumps.
- (x) Twelve (12) parts washers that use water-based material containing no VOC or HAPs.

#### 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).

Page 13 of 84 T003-33417-00036

#### **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, T003-33417-00036, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Page 15 of 84 T003-33417-00036

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

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

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

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

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,

Compliance and Enforcement Branch), or

Telephone Number: 317-233-0178 (ask for Office of Air Quality,

Compliance and Enforcement Branch) Facsimile Number: 317-233-6865

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

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

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

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

(A) A description of the emergency;

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

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

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

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

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

- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

- (a) All terms and conditions of permits established prior to T003-33417-00036 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.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

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

Page 19 of 84 T003-33417-00036

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit.
  [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
  - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the

Page 20 of 84 T003-33417-00036

document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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

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

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

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

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

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

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

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

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

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

and

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

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

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

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

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(37)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
  - (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.

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

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

Page 22 of 84 T003-33417-00036

- (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

Page 23 of 84 T003-33417-00036

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

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

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

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

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

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

Page 24 of 84 T003-33417-00036

#### **SECTION C**

#### **SOURCE OPERATION CONDITIONS**

#### **Entire Source**

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

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

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

#### C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

#### C.6 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

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

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

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

Permit Reviewer: Jack Harmon

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

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

All required notifications shall be submitted to:

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

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

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

Page 26 of 84 T003-33417-00036

(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.9 Performance Testing [326 IAC 3-6]

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

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

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

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

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

#### C.10 Compliance Requirements [326 IAC 2-1.1-11]

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

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

#### C.11 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64][326 IAC 3-8]

- (a) For new units:
  - Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented within 90 days of the date of initial start-up.
- (b) For existing units: Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of

permit issuance to begin such monitoring. If, due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

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

- (c) 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.
- (d) 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.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

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

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Page 28 of 84 T003-33417-00036

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

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

- C.15 Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5] [326 IAC 2-7-6]
  - (I) Upon detecting an excursion where a response step is required by the D Section, or an exceedance of a limitation, not subject to CAM, in this permit:
    - (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
    - (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
      - (1) initial inspection and evaluation;
      - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
      - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
    - (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
      - (1) monitoring results;
      - (2) review of operation and maintenance procedures and records; and/or
      - inspection of the control device, associated capture system, and the process.
    - (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
    - (e) The Permittee shall record the reasonable response steps taken.

(II)

- (a) CAM Response to excursions or exceedances.
  - (1) 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.

- (2) 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.
- (b) 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.
- (c) 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.
- (d) 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).
- (e) 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.
- (f) 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:
  - Failed to address the cause of the control device performance problems;
     or
  - (2) 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.

- (g) 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.
- (h) CAM recordkeeping requirements.
  - 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.
  - (2) 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.16 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.17 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(33) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Permit Reviewer: Jack Harmon

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.18 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, where applicable:
    - (AA) All calibration and maintenance records.
    - (BB) All original strip chart recordings for continuous monitoring instrumentation.
    - (CC) Copies of all reports required by the Part 70 permit.

Records of required monitoring information include the following, where applicable:

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

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

- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.
- (c) 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.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2][326 IAC 2-3] [40 CFR 64][326 IAC 3-8]
  - (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.20 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**

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

- (a) Facility-wide natural gas usage, including combustion units described as follows:
  - (1) One (1) natural gas/landfill gas fired boiler, identified as 004, constructed in 1992 and modified in 2011 to combust landfill gas, with a maximum heat input capacity of 228 MMBtu/hr for natural gas and landfill gas, using low NO<sub>X</sub> burners and flue gas recirculation as control, and exhausting to stack 01:
    - Under 40 CFR 60, Subpart Db, this boiler is considered an affected facility.
    - Under 40 CFR 63, Subpart DDDDD, this boiler is considered an affected facility.
  - One (1) natural gas-fired boiler, identified as 005, constructed in 1993, with a maximum heat input capacity of 228 MMBtu/hr, using low NO<sub>X</sub> burners and flue gas recirculation as control, and exhausting to stack 01;
    - Under 40 CFR 60, Subpart Db, this boiler is considered an affected facility.
    - Under 40 CFR 63, Subpart DDDDD, this boiler is considered an affected facility.
  - (3) Fifty-six (56) space heaters and process heaters using natural gas, identified as 007, with a total heat input capacity of 50.6 MMBtu/hr, using no control, and exhausting to various stacks denoted as stack 13; and
  - (4) Twenty (20) natural gas fired air supply house burners, constructed in 2001, identified as MOD 1 through MOD 10 (each mod air supply house contains two burners), with emissions exhausted through their respective booth stacks denoted as SO4, and each burner heat input rated at 12.6 MMBtu per hour.

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

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

D.1.1 Prevention of Significant Deterioration (PSD) Best Available Control Technology (BACT) [326 IAC 2-2]

Pursuant to Permit PSD (02) No. 1575, issued on November 30, 1984; CP (003) No. 2000, issued on September 9, 1991; CP No. 003-2524, issued on October 13, 1992; and 326 IAC 2-2 PSD BACT:

- (a) For Boiler 004:
  - $NO_X$  emissions shall not exceed 0.098 lb/MMBtu input from the combustion of natural gas. Flue gas recirculation and low  $NO_X$  burners are considered PSD BACT for this emission unit.
- (b) For Boiler 005:NO<sub>X</sub> emissions shall not exceed 0.098 lb/MMBtu from the combustion of natural gas.

Page 36 of 84 T003-33417-00036

#### D.1.2 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from the 228 and 228 million BTU/hour boilers, identified as Boilers 004 and 005, shall be limited as follows:

- (a) Boiler 004 shall be limited to 0.22 pound per million BTU heat input.
- (b) Boiler 005 shall be limited to 0.20 pound per million BTU heat input.

# D.1.3 Nitrogen Oxides (NO<sub>x</sub>) [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 not applicable, and pursuant to SSM No. 003-12830-00036, issued March 5, 2001, the Permittee shall comply with the following:

- (a) NO<sub>x</sub> emissions from the twenty (20) natural gas-fired burners (MOD 1 MOD 10) shall not exceed 100 pounds of NO<sub>x</sub> per million standard cubic feet of natural gas.
- (b) The natural gas usage for the twenty (20) natural gas-fired burners (MOD 1 MOD 10) shall not exceed six hundred ten (610) million cubic feet of natural gas per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits shall limit the  $NO_x$  emissions from the twenty (20) natural gas-fired burners (MOD 1 - MOD 10) to less than forty (40) tons per year and render 326 IAC 2-2 not applicable.

# D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for Boilers 004 and 005. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

#### D.1.5 Continuous Emission Monitoring [326 IAC 2-2] [326 IAC 3-5] [40 CFR 60, Subpart Db]

- (a) Pursuant to 326 IAC 2-2, 326 IAC 3-5, and 326 IAC 12, the Permittee shall install, calibrate, maintain, and operate all necessary continuous emission monitoring systems (CEMS) and related equipment and shall continuously monitor and record the following parameters to demonstrate compliance with Condition D.1.1 and D.1.2:
  - (1) Nitrogen oxide concentration for Boilers 004 and 005, and
  - (2) Opacity for Boilers 004 and 005, unless the Permittee uses one of the following to meet compliance monitoring requirements:
    - (A) Boiler 004 and Boiler 005 use a PM CEMS to monitor PM emissions; or
    - (B) Boiler 004 and Boiler 005 burn only liquid (excluding residual oil) or gaseous fuels with potential SO<sub>2</sub> emissions of 0.060 lb/MMBtu or less and do not use a post-combustion technology to reduce SO<sub>2</sub> or PM emissions.
    - (C) Boiler 004 and Boiler 005 do not use post-combustion technology (except a wet scrubber) for reducing PM, SO<sub>2</sub>, or carbon monoxide (CO) emissions, burns only gaseous fuels or fuel oils that contain less than or equal to 0.30 weight percent sulfur, and is operated such that emissions of CO to the atmosphere from Boiler 004 and Boiler 005 are maintained at levels less than or equal to 0.15 lb/MMBtu on a steam generating unit

Permit Reviewer: Jack Harmon

operating day average basis. The Permittee shall demonstrate compliance by the following:

- (i) A CO CEM shall be installed, certified, maintained, and operated in accordance with Condition D.1.6(c) and (d).
- (ii) The Permittee shall calculate the one (1) hour average CO emissions levels for each steam generating unit operating day by multiplying the average hourly CO output concentration measured by the CO CEMS times the corresponding average hourly flue gas flow rate and divided by the corresponding average hourly heat input to the boiler. The twenty-four (24) hour average CO emission level is determined by calculating the arithmetic average of the hourly CO emission levels computed for each steam generating unit operating day.
- (iii) The Permittee shall evaluate the preceding twenty-four (24) hour average CO emission level each steam generating unit operating day excluding periods of boiler startup, shutdown, or malfunction. If the twenty-four (24) hour average CO emission level is greater than 0.15 lb/MMBtu, the Permittee shall initiate an investigation of the relevant equipment and control systems within twenty-four (24) hours of the first discovery of the high emission incident and, take the appropriate corrective action as soon as practicable to adjust control settings or repair equipment to reduce the twenty-four (24) hour average CO emission level to 0.15 lb/MMBtu or less.
- (iv) The Permittee shall record the CO measurements and calculations performed and any corrective actions taken. The record of corrective action taken must include the date and time during which the twenty-four (24) hour average CO emission level was greater than 0.15 lb/MMBtu, and the date, time, and description of the corrective action.
- (b) The continuous monitoring systems have been installed and operational prior to conducting the performance tests. A monitoring protocol has been performed in accordance with the applicable procedures under 40 CFR 60, Appendix B, Performance Specification 1 and 326 IAC 3-5.
- (c) The Permittee shall record the output of the system and shall perform the required record keeping, pursuant to 326 IAC 3-5-6, and reporting, pursuant to 326 IAC 3-5-7.
- (d) In instances of CEM downtime, compliance with the  $NO_X$  emission limits established in Condition D.1.1 and D.1.2 shall be determined by the use of the appropriate AP-42 emission factors. Compliance with the particulate emission limits contained in Conditions D.1.1 and D.1.2 shall be determined by burning clean fuels such as natural gas or landfill gas.
- (e) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous emission monitoring system pursuant to 326 IAC 3-5 and 40 CFR 60, Subpart Db.

Page 38 of 84 T003-33417-00036

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

#### D.1.6 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.1.1, D.1.2, D.1.3 and D.1.6, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the NO<sub>X</sub> and opacity emission limits established in Conditions D.1.1, D.1.2, and D.1.3.
  - (1) Calendar dates covered in the compliance determination period;
  - (2) Heat input for Boilers 004 and 005;
  - (3) Amount of natural gas usage for Boilers 004 and 005 and amount of landfill gas usage for Boiler 004;
  - (4) Output of the NO<sub>x</sub> continuous emissions monitoring systems on Boilers 004 and 005 and record keeping required pursuant to 326 IAC 3-5-6;
- (b) To document the compliance status with Condition D.1.3, the Permittee shall maintain records of the natural gas usage to the twenty (20) natural gas fired burners (MOD 1 -MOD 10) monthly.
- (c) In the event that a breakdown of a continuous emission monitoring equipment system occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.
- (d) Section C General Record Keeping Requirements, of this permit, contains the Permittee's obligation with regard to the records required by this condition.

#### D.1.7 Reporting Requirements

- (a) A semi-annual summary of the information to document the compliance status with Conditions D.1.3 shall be submitted, using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the semi-annual period 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) The Permittee shall submit NOx CEM performance audit reports pursuant to 326 IAC 3-5-5(e).

Page 39 of 84 T003-33417-00036

#### SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (b) One (1) ELPO Dipping System, identified as 006, constructed in August 1985, using natural gas thermal incinerators identified as #1 through #3 on the drying ovens as VOC control, and exhausting to stack 02;
- (c) One (1) Underbody Robotic Sealer Operation, identified as Stone Guard Sealer, approved in 2012 for operation, using no controls, and exhausting indoors;
- (f) Miscellaneous sealers/adhesives/additives/solvents, identified as 009, constructed in August 1985, using no controls, and exhausting to stacks 07 and 08;
- (g) One (1) Final Repair Operation, identified as 012, constructed in August 1985, using dry filters for particulate control, and exhausting to stack 06 and spot repair stalls; and
- (h) One (1) Maintenance Paint Operation, identified as 013, constructed in August 1985, using no control, and exhausting to stack 10.

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

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

#### D.2.1 PSD BACT Limits [326 IAC 2-2]

Pursuant to PSD (02) 1575, issued on November 30, 1984 and 326 IAC 2-2 (Prevention of Significant Deterioration) and in conjunction with Conditions D.3.1 and D.4.1, the total VOC usage shall be limited such that the source's VOC potential to emit from the surface coating operations and cleaning operations, including ELPO Dipping System (006), Underbody Robotic Sealer, identified as Stone Guard Sealer, Primer Surfacer System (010), Topcoat System (008), Miscellaneous Sealers/Adhesives/Additives/Solvents (009), Final Repair Operation (012), and Maintenance Paint Operation (013), does not exceed 3,204 tons per twelve consecutive month period, with compliance determined at the end of each month.

#### D.2.2 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) delivered to the applicator from ELPO Dipping System (006) and Final Repair Operation (012) application, flash-off and curing of coatings applied to automobile and light duty truck bodies, hoods, doors, cargo boxes, fenders, and grill openings shall not exceed:
  - (1) 0.23 kilograms per liter of coating (1.9 pounds per gallon), excluding water, for the ELPO Dipping System (006).
  - (2) 0.58 kilograms per liter of coating (4.8 pounds per gallon), excluding water, for the Final Repair Operation (012).
- (b) Pursuant to 326 IAC 8-1-2(a), the emission limitations specified in D.2.2(a), shall be achieved through one or any combination of thermal incineration, higher solids (low solvent) coatings, water borne coatings and/or daily averaging.
- (c) Pursuant to 326 IAC 8-1-2(a)(5), when using an equivalent emission limitation to comply with Condition D.2.2(a)(1), the VOC emissions from the ELPO Dipping System (006) thermal oxidizers shall be limited to no greater than 2.6 pounds per gallon solids

deposited. Compliance with the equivalent emission limitation shall be determined according to the following equation:

$$\mathsf{E} = \frac{\mathsf{L}}{[(\mathsf{1} - (\mathsf{L} \, / \, \mathsf{D})) \bullet \mathsf{T}]}$$

Where:

E = Actual emissions in pounds of VOC per gallon of coating solids deposited

L = Actual VOC content in pounds of VOC per gallon of coating, as applied, excluding water and nonphotochemically reactive hydrocarbons

D = Actual density of the VOC in the coating in pounds per gallon of VOC

(d) Pursuant to 326 IAC 8-1-2(c), when used to comply with the emission limitation in D.2.2(a)(1), the overall efficiency of the ELPO Dipping System (006) thermal oxidizers shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = 100 \times (V - E)/V$$

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 in pounds of VOC per gallon of coating solids, as applied, where E = L / [1 - (L/D)], and

L = Applicable emission limit in pounds of VOC per gallon of coating.

D = Density of VOC in coating in pounds per gallon of VOC.

E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

A solvent density of seven and thirty-six hundredths (7.36) pounds of VOC per gallon of solvent shall be used to determine equivalent pounds of VOC per gallon of solids for the applicable emission limit. Actual solvent density shall be used to determine compliance; and

O = Equivalent overall efficiency of the capture system and control device as a percentage.

# D.2.3 Miscellaneous Metal Coating Operations [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the Permittee shall not allow the discharge into the atmosphere of VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator for the Miscellaneous Sealers and Adhesives (009) and Underbody Robotic Sealer Operation (Stone Guard Sealer).

- (b) Pursuant to 326 IAC 8-1-2(a) the emission limitations specified in D.2.3(a), shall be achieved through one or any combination of higher solids (low solvent) coatings, water borne coatings and/or an equivalent emission limitation.
- (c) Pursuant to 326 IAC 8-1-2(a)(5), when using an equivalent emission limitation to comply with Condition D.2.3(a), the VOC emissions from the Miscellaneous Sealers and Adhesives (009) and the Underbody Robotic Sealer Operation (Stone Guard Sealer) shall be limited to no greater than 1.34 kilograms of VOC per liter solids deposited (11.2 pounds per gallon solids deposited) based on an actual measured transfer efficiency greater than 60%. Compliance with the equivalent emission limitation shall be determined according to the following equation:

$$\mathsf{E} = \frac{\mathsf{L}}{[(\mathsf{1} - (\mathsf{L} \, / \, \mathsf{D})) \bullet \mathsf{T}]}$$

Where:

- E = Actual emissions in pounds of VOC per gallon of coating solids deposited
- L = Actual VOC content in pounds of VOC per gallon of coating, as applied, excluding water and nonphotochemically reactive hydrocarbons
- D = Actual density of the VOC in the coating in pounds per gallon of VOC
- T = Actual measured transfer efficiency
- (d) Pursuant to 326 IAC 8-2-9(f), the Permittee shall use the following work practices to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, clean materials, and waste materials, including, but not limited to, the following:
  - (1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
  - (2) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
  - (3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
  - (4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
  - (5) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

# D.2.4 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the Final Repair Operation (012) shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

A Preventive Maintenance Plan is required for the ELPO Dipping System (006) and its control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

# **Compliance Determination Requirements**

#### D.2.6 PSD VOC BACT Limit [326 IAC 2-2]

Compliance with the VOC PSD BACT limit in Condition D.2.1 shall be determined within 30 days of the end of each month based on the following:

For ELPO Dipping System (006), Primer Surfacer System (010), Underbody Robotic Sealer, identified as Stone Guard Sealer, Topcoat System (008), Miscellaneous Sealers/Adhesives/Additives/Solvents (009), Final Repair Operation (012), and Maintenance Paint Operation (013):

VOC emissions (tons, 12 consecutive months) = VOC emissions in previous eleven (11) months, tons + monthly VOC usage (uncontrolled), tons + monthly VOC emissions (after controls), tons

#### where:

monthly VOC emissions (after controls), tons = monthly VOC input (tons) x (1- overall control efficiency/100);

#### where:

overall control efficiency (%) = capture efficiency (%) x destruction efficiency (%)

#### D.2.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

- (a) Compliance with the VOC contents contained in Conditions D.2.2 and D.2.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) When daily averaging is used to comply with the emission limitations in Condition D.2.2(a), one of the following equations shall be used to determine the volume weighted average of coatings on a daily basis:
  - (1) When a thermal oxidizer is used to demonstrate compliance with an emission limitation, the daily volume weighted average shall be determined as follows:

$$A = \frac{\sum_{i=1}^{n} C_{i}U_{i}(1 - (CE \bullet DRE))}{\sum_{i=1}^{n} U_{i}(1 - D_{i})}$$

Where:

A = daily volume weighted average, lb VOC/gal, less water

C = VOC content of coating i, lb VOC/gal, less water

U = actual coating i usage, gal/day

D = coating i volume % water

n = no. of coatings used during the day

CE = capture efficiency of the emission system vented to the thermal oxidizer

General Motors, LLC - Fort Wayne Assembly Roanoke, Indiana
Permit Reviewer: Jack Harmon

Significant Permit Modification No. 003-35825-00036 Modified by: Madhurima Moulik DRAFT Page 43 of 84 T003-33417-00036

DRE = destruction/removal efficiency of thermal oxidizer

(2) When a thermal oxidizer is not used to demonstrate compliance with an emission limitation, the daily volume weighted average shall be determined as follows:

$$A = \frac{\sum_{i=1}^{n} C_i U_i}{\sum_{i=1}^{n} U_i}$$

Where:

A = daily volume weighted average, lb VOC/gal, less water

C = VOC content of coating i, lb VOC/gal, less water

U = actual coating i usage, gal/day

n = no. of coatings used during the day

# D.2.8 PM and VOC Controls [326 IAC 6-3-2] [326 IAC 8-1-2] [326 IAC 2-2]

- (a) Pursuant to 326 IAC 6-3-2(d), the Permittee shall operate the dry filters at all times the Final Repair Operation (012) is in operation.
- (b) Pursuant to 326 IAC 8-1-2(a) and in order to ensure compliance with Conditions D.2.1 and/or D.2.2, the Permittee shall operate the thermal incinerators #1 #3 for the ELPO Dipping System (006) at all times the processes that they are controlling are in operation, if the abatement credit is used to show compliance with Conditions D.2.1 and/or D.2.2.

#### D.2.9 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [326 IAC 2-2]

The following facilities are required to stack test, when used to show compliance with Conditions D.2.1 and/or D.2.2, as follows:

- (a) Not later than two and one-half (2.5) years from the date of the most recent valid compliance demonstration, the Permittee shall conduct testing for VOC capture and destruction efficiency for one (1) of the thermal incinerators, #1 #3, controlling the ELPO Dipping System (006) emissions. This test shall be repeated every two and one-half (2.5) years from the date of the most recent valid compliance demonstration. Testing on an incinerator shall not be repeated until each one has been tested.
- (b) The Permittee shall use the determined capture and destruction efficiencies from the most recent performance test for determining compliance when the control devices are used to show compliance with Conditions D.2.1 and/or D.2.2. 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.

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

#### D.2.10 Thermal Oxidizer Temperature [40 CFR 64]

The following requirements shall apply only if the VOC reduction credit for the incinerators is used to show compliance with Conditions D.2.1 and/or D.2.2:

- (a) A continuous monitoring system shall be calibrated and maintained on each thermal and catalytic oxidizer for measuring operating temperature. For the purpose of this condition, continuous means no less often than once per fifteen (15) minutes. The output of this system shall be recorded as a 3-hour average.
- (b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.2.1 and/or D.2.2.
- (c) The Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature as observed during the most recent compliant stack test. If the 3-hour average temperature falls below the level observed during the most recent valid compliant stack test, the Permittee shall take reasonable response steps. Section C Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A 3-hour average temperature reading that is below the level observed during the most recent valid compliant stack test is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

#### D.2.11 Parametric Monitoring [40 CFR 64]

The following requirements shall apply only if the VOC reduction credit for the thermal incinerators is used to show compliance with Conditions D.2.1 and/or D.2.2:

The system that continuously monitors proper operation of the thermal incinerators shall be equipped with system alarms, which shall immediately notify plant personnel that a malfunction of the emission control equipment has occurred. 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.2.12 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.2.1, D.2.2, D.2.3, D.2.6, D.2.7, D.2.10, and D.2.11, the Permittee shall maintain records in accordance with (1) through (8) below. Records maintained for (1) through (8) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.1, D.2.2, and D.2.3.
  - (1) The VOC content of each coating material and solvent used, less water.
  - (2) The amount of coating material and solvent used on a monthly basis.
    - (A) Records shall include documents necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) A log of the dates of use of each coating.
  - (4) A log of when the thermal incinerators are used to demonstrate compliance with an emission limitation.
  - (5) The calculated daily volume weighted average in pounds of VOC per gallon, less water, if applicable.

- (6) The monthly cleanup solvent usage.
- (7) The total VOC usage and emissions for each month.
- (8) During periods when the thermal incinerators are used to demonstrate compliance with an emission limitation:
  - (A) The continuous temperature records (on a 3-hour average basis) for the thermal oxidizers and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.
  - (B) Records of the dates of any thermal incinerator system alarms and corrective actions taken.
- (b) Section C General Record Keeping Requirements, of this permit, contains the Permittee's obligation with regard to the records required by this condition.

# D.2.13 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.2.1 shall be submitted, using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting 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.3**

#### **FACILITY OPERATION CONDITIONS**

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

(d) One (1) Primer Surfacer System, identified as 010, constructed in March 1994, approved in 2010 for modification, using a natural gas fired regenerative thermal oxidizer with a maximum heat input capacity of 16 MMBtu/hr as VOC control, and water wash as PM control, and exhausting to stack 03. The Primer Surfacer System also includes applicators that purge internally through valves located inside the robot into a gun box. Additionally, the robotic bells purge into a gun box within the booth. The booth is an enclosed manufacturing unit, which is directed to the control device described above.

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

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

#### D.3.1 PSD BACT Limits [326 IAC 2-2]

Pursuant to PSD (02) 1575, issued on November 30, 1984 and 326 IAC 2-2 (Prevention of Significant Deterioration) and in conjunction with Conditions D.2.1 and D.4.1, the total VOC usage shall be limited such that the source's VOC potential to emit from the surface coating and cleaning operations, including ELPO Dipping System (006), Primer Surfacer System (010), Underbody Robotic Sealer, identified as Stone Guard Sealer, Topcoat System (008), Miscellaneous Sealers/Adhesives/Additives/Solvents (009), Final Repair Operation (012), and Maintenance Paint Operation (013), does not exceed 3,204 tons per twelve consecutive month period, with compliance determined at the end of each month.

#### D.3.2 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(b)(2) (Automobile and Light Duty Truck Coating Operations), the volatile organic compound (VOC) delivered to the applicator from Primer Surfacer System (010) application, flash-off and curing of coatings applied to automobile and light duty truck bodies, hoods, doors, cargo boxes, fenders, and grill openings shall not exceed 0.34 kilograms per liter of coating (2.8 pounds per gallon), excluding water.
- (b) Pursuant to 326 IAC 8-1-2(a), the emission limitation specified in D.3.2(a), shall be achieved through one or any combination of thermal incineration, higher solids (low solvent) coatings, water borne coatings, and/or an equivalent emission limitation.
- (c) Pursuant to 326 IAC 8-1-2(a)(5), VOC emissions as allowed in D.3.2(a)(2) from the Primer Surfacer System (010) shall be limited to no greater than an equivalent emission limitation based on an actual measured transfer efficiency higher than 30%. The equivalent emission limitation is 1.83 kilograms of VOC per liter solids deposited (15.1 pounds per gallon solids deposited). Compliance with the above equivalent emission limitation shall be determined by use of procedures found in "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations", EPA-450/3-88-018, December 1988, or by an alternative method approved by the Commissioner.
- (d) Pursuant to 326 IAC 8-1-2(c), when used to comply with the emission limitation in D.3.2(a), the overall efficiency of the Primer Surfacer System (010) thermal oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:

 $O = 100 \times (V - E)/V$ 

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 in pounds of VOC per gallon of coating solids, as applied; and
- O =Equivalent overall efficiency of the capture system and control device as a percentage.

$$O = (6.50 - 5.1) / 6.5 \times 100 = 21.5\%$$

The overall efficiency of the thermal oxidizer shall be no less than 21.5%.

#### Particulate Matter (PM) [326 IAC 6-3-2(d)] D.3.3

Pursuant to 326 IAC 6-3-2(d), particulate from Primer Surfacer System (010) shall be controlled by a dry particulate filter, water wash, or an equivalent control device at all times that the process is operating. The Permittee shall operate the control device in accordance with manufacturer's specifications.

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

A Preventive Maintenance Plan is required for the Primer Surfacer System (010), and its control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

#### **Compliance Determination Requirements**

#### D.3.5 VOC PSD BACT Limit [326 IAC 2-2]

Compliance with the VOC PSD BACT limit in Condition D.3.1 shall be determined within 30 days of the end of each month based on the following:

For ELPO Dipping System (006), Primer Surfacer System (010), Underbody Robotic Sealer, identified as Stone Guard Sealer, Topcoat System (008), Miscellaneous Sealers/ Adhesives/Additives/Solvents (009), Final Repair Operation (012), and Maintenance Paint Operation (013):

VOC emissions (tons, 12 consecutive months) = VOC emissions in previous eleven (11) months, tons + monthly VOC usage (uncontrolled), tons + monthly VOC emissions (after controls), tons

# where:

VOC emissions (after controls), tons = VOC input (tons) x (1- overall control efficiency/100);

overall control efficiency (%) = capture efficiency (%) x destruction efficiency (%)

#### D.3.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC contents contained in Condition D.3.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

#### D.3.7 PM and VOC Controls [326 IAC 2-2] [326 IAC 6-3-2] [326 IAC 8-1-2]

Pursuant to 326 IAC 6-3-2(d), the Permittee shall operate the water wash system at all (a) times the Primer Surfacer System (010) is in operation.

(b) Pursuant to 326 IAC 8-1-2(a) and in order to ensure compliance with Conditions D.3.1 and D.3.2, the Permittee shall operate the regenerative thermal oxidizer for the Primer Surfacer System (010) at all times the processes that it controls are in operation, if the abatement credit is used to show compliance with Conditions D.3.1 and/or D.3.2.

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

The following facilities are required to stack test when used to show compliance with Conditions D.3.1 and/or D.3.2 as follows:

- (a) Not later than two and one-half (2.5) years from the date of the most recent valid compliance demonstration, the Permittee shall conduct testing for VOC capture and destruction efficiency for the regenerative thermal oxidizer controlling the Primer Surfacer System (010) emissions. This test shall be repeated every two and one-half (2.5) years from the date of the most recent valid compliance demonstration.
- (b) The Permittee shall use the determined capture and destruction efficiencies from the most recent performance test for determining compliance when the control device is used to show compliance with Conditions D.3.1 and/or D.3.2. 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.

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

#### D.3.9 Thermal Oxidizer Temperature [40 CFR 64]

The following requirements shall apply only if the regenerative thermal oxidizer is used to show compliance with Conditions D.3.1 and/or D.3.2:

- (a) A continuous monitoring system shall be calibrated and maintained on the regenerative thermal oxidizer for measuring operating temperature. For the purpose of this condition, continuous means no less often than once per fifteen (15) minutes. The output of this system shall be recorded as a 3-hour average.
- (b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.3.1 and/or D.3.2.
- (c) The Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature as observed during the most recent compliant stack test. If the 3-hour average temperature falls below the level observed during the most recent valid compliant stack test, the Permittee shall take reasonable response steps. Section C Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A 3-hour average temperature reading that is below the level observed during the most recent valid compliant stack test is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

#### D.3.10 Parametric Monitoring [40 CFR 64]

The following requirements shall apply only if the VOC reduction credit for the thermal oxidizer is used to show compliance with Conditions D.3.1 and/or D.3.2:

The system that continuously monitors proper operation of the thermal oxidizer shall be equipped with system alarms, which shall immediately notify plant personnel that a malfunction of the emission control equipment has occurred. 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.3.11 Monitoring [40 CFR 64]

- (a) The condition of the Primer Surfacer System (010) waterwash system shall be monitored through the use of alarms on the water pumps that feed the systems. 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 stack 03 and the presence of overspray on the rooftops and 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.3.12 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.3.1, D.3.2, D.3.5, D.3.6, D.3.9, and D.3.10, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.3.1 and D.3.2.
  - (1) The VOC content of each coating material and solvent used, less water.
  - (2) The amount of coating material and solvent used on a monthly basis.
    - (A) Records shall include documents necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) A log of the dates of use of each coating.
  - (4) A log of when the regenerative thermal oxidizer is used to demonstrate compliance with an emission limitation.
  - (5) The monthly cleanup solvent usage.
  - (6) The total VOC usage and emissions for each month.
  - (7) During periods when the regenerative thermal oxidizer is used to demonstrate compliance with an emission limitation:
    - (A) The continuous temperature records (on a 3-hour average basis) for the thermal oxidizer and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.
    - (B) Records of the dates of any thermal oxidizer system alarms and corrective actions taken.

General Motors, LLC - Fort Wayne Assembly Roanoke, Indiana
Permit Reviewer: Jack Harmon

Significant Permit Modification No. 003-35825-00036 Modified by: Madhurima Moulik DRAFT

Page 50 of 84 T003-33417-00036

- (b) To document the compliance status with Conditions D.3.3 and D.3.11, the Permittee shall maintain records of the dates of any water wash alarms and corrective actions taken and shall maintain a log of semi-annual inspections.
- (c) Section C General Record Keeping Requirements, of this permit, contains the Permittee's obligation with regard to the record required by this condition.

# D.3.13 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.3.1 shall be submitted, using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting 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).

Page 51 of 84 T003-33417-00036

#### **SECTION D.4**

#### **FACILITY OPERATION CONDITIONS**

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

(e) One (1) Topcoat System, identified as 008, constructed in August 1985, approved in 2015 for modification, using ten (10) natural gas fired catalytic oxidizers identified as #1 - #10 on the drying ovens as VOC control, with the maximum heat input capacity of oxidizers #1 - #7 being 7.5 MMBtu/hr each, and the maximum heat input capacity of oxidizers #8 - #10 being 9.5 MMBtu/hr each, using waterwash as PM control, and exhausting to stack 04.

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

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

#### D.4.1 PSD BACT Limits [326 IAC 2-2]

Pursuant to PSD (02) 1575, issued on November 30, 1984 and 326 IAC 2-2 (Prevention of Significant Deterioration) and in conjunction with Conditions D.2.1 and D.3.1, the total VOC usage shall be limited such that the source's VOC potential to emit from the surface coating and cleaning operations, including ELPO Dipping System (006), Primer Surfacer System (010), Underbody Robotic Sealer, identified as Stone Guard Sealer, Topcoat System (008), Miscellaneous Sealers/Adhesives/Additives/Solvents (009), Final Repair Operation (012), and Maintenance Paint Operation (013), does not exceed 3,204 tons per twelve consecutive month period, with compliance determined at the end of each month.

#### D.4.2 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) delivered to the applicator from Topcoat System (008) application, flash-off and curing of coatings applied to automobile and light duty truck bodies, hoods, doors, cargo boxes, fenders, and grill openings shall not exceed 0.34 kilograms per liter of coating (2.8 pounds per gallon), excluding water.
- (b) Pursuant to 326 IAC 8-1-2(a), the emission limitation specified in D.4.2(a), shall be achieved through one or any combination of catalytic incineration, higher solids (low solvent) coatings, water borne coatings, and/or an equivalent emission limitation.
- (c) Pursuant to 326 IAC 8-1-2(a)(5), VOC emissions as allowed in D.4.2(a) from the Topcoat System (008) shall be limited to no greater than an equivalent emission limitation based on an actual measured transfer efficiency higher than 30%. The equivalent emission limitation is 1.83 kilograms of VOC per liter solids deposited (15.1 pounds per gallon solids deposited). Compliance with the above equivalent emission limitation shall be determined by use of procedures found in "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations", EPA-450/3-88-018, December 1988, or by an alternative method approved by the Commissioner.
- (d) Pursuant to 326 IAC 8-1-2(c), when used to comply with the emission limitation in D.4.2(a), the overall efficiency of the Topcoat System (008) catalytic oxidizers shall be no less than the equivalent overall efficiency calculated by the following equation:

#### 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 in pounds of VOC per gallon of coating solids, as applied; and
- O = Equivalent overall efficiency of the capture system and control device as a percentage.

#### D.4.3 Particulate Matter (PM) [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the Topcoat System (008) shall be controlled by a dry particulate filter, water wash, or an equivalent control device at all times that the process is operating. The Permittee shall operate the control device in accordance with manufacturer's specifications.

# D.4.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for the Topcoat System (008), and its control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

#### **Compliance Determination Requirements**

#### D.4.5 PSD VOC BACT Limit [326 IAC 2-2]

Compliance with Condition D.4.1 shall be determined within 30 days of the end of each month based on the total volatile organic compound emissions for coating and cleaning operations per month, and adding the result to the calculated VOC emissions from the previous eleven (11) months.

#### D.4.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC contents contained in Condition D.4.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

#### D.4.7 PM and VOC Controls [326 IAC 2-2] [326 IAC 6-3-2] [326 IAC 8-1-2]

- (a) Pursuant to 326 IAC 6-3-2(d), the Permittee shall operate the water wash at all times the Topcoat System (008) is in operation.
- (b) Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the catalytic oxidizers #1 #10 for the Topcoat System (008) at all times the processes that they are controlling are in operation, if the abatement credit is used to show compliance with Conditions D.4.1 and/or D.4.2.

#### D.4.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [326 IAC 2-2]

The following facilities are required to stack test, when the oxidizer abatement credit is used to show compliance with Conditions D.4.1 and/or D.4.2, as follows:

(a) Not later than two and one-half (2.5) years from the date of the most recent valid compliance demonstration, the Permittee shall conduct testing for VOC destruction

efficiency for two (2) of the 7.5 MMBtu/hr catalytic oxidizers and one (1) of the 9.5 MMBtu/hr catalytic oxidizers controlling the Topcoat System (008) emissions. This test shall be repeated every two and one-half (2.5) years from the date of the most recent valid compliance demonstration. Testing on a catalytic oxidizer shall not be repeated until each one has been tested.

(b) The Permittee shall use the determined destruction efficiencies from the most recent performance test for determining compliance when the control devices are used to show compliance with Conditions D.4.1 and/or D.4.2. 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.

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

#### D.4.9 Catalytic Oxidizer Temperature [40 CFR 64]

The following requirements shall apply only if the VOC reduction credit from the catalytic oxidizers is used to show compliance with Conditions D.4.1 and/or D.4.2:

- (a) A temperature measurement device shall be installed in the gas stream immediately before and after the catalyst bed. A continuous monitoring system shall be calibrated and maintained on each catalytic oxidizer for measuring operating temperature. For the purpose of this condition, continuous means no less often than once per fifteen (15) minutes. The output of this system shall be recorded as a 3-hour average.
- (b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.4.1 and/or D.4.2.
- (c) The Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature as observed during the most recent compliant stack test. If the 3-hour average temperature falls below the level observed during the most recent valid compliant stack test, the Permittee shall take reasonable response steps. Section C Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A 3-hour average temperature reading that is below the level observed during the most recent valid compliant stack test is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

#### D.4.10 Parametric Monitoring [40 CFR 64]

The following requirements shall apply only if the VOC reduction credit for the catalytic oxidizers is used to show compliance with Conditions D.4.1 and/or D.4.2:

The system that continuously monitors proper operation of the catalytic oxidizers shall be equipped with system alarms, which shall immediately notify plant personnel that a malfunction of the emission control equipment has occurred. 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.4.11 Monitoring [40 CFR 64]

(a) The condition of the Topcoat System (008) waterwash system shall be monitored through the use of alarms on the water pumps that feed the systems. 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 stack 04 and the presence of overspray on the rooftops and 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.4.12 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.4.1, D.4.2, D.4.5, D.4.6, D.4.9, and D.4.10, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.4.1 and D.4.2.
  - (1) The VOC content of each coating material and solvent used, less water.
  - (2) The amount of coating material and solvent used on a monthly basis.
    - (A) Records shall include documents necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) A log of the dates of use of each coating.
  - (4) A log of when the catalytic oxidizers are used to demonstrate compliance with an emission limitation.
  - (5) The monthly cleanup solvent usage.
  - (6) The total VOC usage and emissions for each month.
  - (7) During periods when the catalytic oxidizers are used to demonstrate compliance with an emission limitation:
    - (A) The continuous temperature records (on a 3-hour average basis) for the catalytic oxidizers and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.
    - (B) Records of the dates of any catalytic oxidizer system alarms and corrective actions taken.
- (b) To document the compliance status with Conditions D.4.3 and D.4.11, the Permittee shall maintain records of the dates of any water wash alarms and corrective actions taken and shall maintain a log of semi-annual inspections.
- (c) The Permittee shall monitor and record the annual VOC emissions from the Topcoat that could result in a significant VOC emissions increase as a result of the project described in SECTION D.7, permitted in SSM003-34856-00036.

General Motors, LLC - Fort Wayne Assembly Roanoke, Indiana Permit Reviewer: Jack Harmon Significant Permit Modification No. 003-35825-00036 Modified by: Madhurima Moulik DRAFT Page 55 of 84 T003-33417-00036

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

# D.4.13 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.4.1 shall be submitted, using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting 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).

Page 56 of 84 T003-33417-00036

#### **SECTION D.5**

#### **FACILITY OPERATION CONDITIONS**

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

Insignificant Activities:

- (a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (b) One (1) Body Shop Grinding and Machining, associated with the T1 Full Size Truck Project, approved in 2015 for construction.
- (f) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (I) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (u)(3) Grinding Operations (Light Duty Truck Body Shop).
- (u)(21) Mig Welding.

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

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

#### D.5.1 Particulate Matter Limitations for Process Operations [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2(e)(2) (Process Operations), the allowable PM emission rate from a manufacturing process shall not exceed 0.551 pounds per hour when operating at a process weight rate of less than 100 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e), the allowable PM emission rate from a manufacturing process shall not exceed E, the pounds per hour allowable emission rate, when processing a process weight up to sixty thousand (60,000) pounds per hour as determined by the following equation:

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

#### SECTION D.6 FACILITY OPERATION CONDITIONS

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

(j) Four (4) identical landfill gas-fired generators, identified as Gen 1 through Gen 4, approved in 2013 for construction, each with a maximum output rating of 2,242 horsepower, using no controls, and each exhausting through Stack S01.

Under New Source Performance Standards for Stationary Spark Ignition Internal Combustion Engines (40 CFR 60, Subpart JJJJ), these four (4) generators are considered affected facilities.

Under National Emission Standards for Hazardous Air Pollutants for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ), these four (4) generators are considered affected facilities.

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

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

D.6.1 Prevention of Significant Deterioration (PSD) Best Available Control Technology (BACT) [326 IAC 2-2-3] [326 IAC 8-1-6]

Pursuant to PSD/Significant Permit Modification No. 003-33317-00038, issued December 6, 2013, and 326 IAC 2-2-3 (Prevention of Significant Deterioration (PSD)), the Best Available Control Technology (BACT) for the four (4) landfill gas-fired generators, identified as Gen 1 through Gen 4, shall be as follows:

- (a) The VOC emissions from each of the Caterpillar G3520C generators, identified as Gen 1 though Gen 4, shall not exceed 0.56 g/bhp-hr VOC.
- (b) The NOx emissions from each of the Caterpillar G3520C generators, identified as Gen 1 though Gen 4, shall not exceed 0.6 g/bhp-hr NOx.
- (c) The CO emissions from each of the Caterpillar G3520C generators, identified as Gen 1 though Gen 4, shall not exceed 4.22 g/bhp-hr CO.
- (d) The PM<sub>2.5</sub> emissions from each of the Caterpillar G3520C generators, identified as Gen 1 though Gen 4, shall not exceed 0.13 g/bhp-hr PM<sub>2.5</sub> (0.044 lb/MMBtu).
- (e) The landfill gas-fired generators, Gen 1 through Gen 4, shall each be equipped with leanburn control technology with air-to-fuel ratio adjustment control and ignition timing to ensure good combustion practices, and shall be maintained in accordance with manufacturer's recommendations.

#### D.6.2 Opacity Limits [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity for generators Gen 1 through Gen 4 shall meet the following:

(a) When operating alone, the opacity from any one generator shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period. 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) in a six (6) hour period. The opacity standards apply except during periods of startup, shutdown, or malfunction.

Page 58 of 84 T003-33417-00036

#### D.6.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)

A Preventive Maintenance Plan is required for each of the four (4) generators, identified as Gen 1 through Gen 4. 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.6.4 Testing Requirements [326 IAC 2-1.1-11]

In order to demonstrate compliance with Condition D.6.1 (PSD BACT), within sixty (60) days of reaching maximum capacity but no later than one hundred eighty (180) days after initial startup, the Permittee shall conduct emissions testing utilizing methods as approved by the commissioner as follows:

- (a) In order to demonstrate compliance with Condition D.6.1(a), the Permittee shall conduct emissions testing of VOC emissions from one of the Caterpillar G3520C generators, identified as Gen 1 though Gen 4. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be alternated between Gen 1, Gen 2, Gen 3, and Gen 4 on a rotating schedule such that no generator shall be tested again until each of the four (4) generators has been tested.
- (b) In order to demonstrate compliance with Condition D.6.1(b), the Permittee shall conduct emissions testing of NOx emissions from one of the Caterpillar G3520C generators, identified as Gen 1 though Gen 4. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be alternated between Gen 1, Gen 2, Gen 3, and Gen 4 on a rotating schedule such that no generator shall be tested again until each of the four (4) generators has been tested.
- (c) In order to demonstrate compliance with Condition D.6.1(c), the Permittee shall conduct emissions testing of CO emissions from one of the Caterpillar G3520C generators, identified as Gen 1 though Gen 4. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be alternated between Gen 1, Gen 2, Gen 3, and Gen 4 on a rotating schedule such that no generator shall be tested again until each of the four (4) generators has been tested.
- (d) In order to demonstrate compliance with Condition D.6.1(d), the Permittee shall conduct emissions testing of PM<sub>2.5</sub> emissions from one of the Caterpillar G3520C generators, identified as Gen 1 though Gen 4. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be alternated between Gen 1, Gen 2, Gen 3, and Gen 4 on a rotating schedule such that no generator shall be tested again until each of the four (4) generators has been tested. PM<sub>2.5</sub> includes filterable and condensable PM.

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.

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

# D.6.5 Record Keeping Requirements

(a) In order to document the compliance status with Condition D.6.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC BACT, NO<sub>X</sub> BACT, CO BACT, and PM<sub>2.5</sub> BACT, established in Condition D.6.1.

Page 59 of 84 T003-33417-00036

- (1) Records maintained shall include for each generator, Gen 1 through Gen 4, a complete list of maintenance specifications from the manufacturer, including specific parts and functions, maintenance items needed, specific intervals for maintenance of those parts, and the minimum specification required of those parts; and
- (2) Records maintained shall include for each generator, Gen 1 through Gen 4, a complete list of actual maintenance performed, and shall include specific parts and functions, maintenance items performed, date and time of maintenance, and the specification achieved as the result of the maintenance activity.
- (3) Section C Record Keeping Requirements contains the Permittee's obligation with regard to the record keeping requirements required by this condition.

#### SECTION D.7 FACILITY OPERATION CONDITIONS

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

- (k) The following equipment approved in 2015 for construction to accommodate the T1 Full Size Truck Project:
  - (1) One (1) Electrodeposition (ELPO Dipping) System, identified 20, approved in 2015 for construction, using three (3) natural gas-fired regenerative thermal oxidizers (RTOs), each with a maximum heat input capacity of 3.0 million British thermal units per hour (MMBtu/hr) as VOC control for the tank and oven, and exhausting through stack 020. The ELPO oven has 14 zones with a combined maximum heat input capacity of 79.5 MMBtu/hr.
  - (2) Miscellaneous Sealers and Adhesives application, identified as 022, approved in 2015 for construction, using no controls, and exhausting to stacks 07 and 08.
  - (3) Miscellaneous natural gas-fired equipment, identified as 021, with no controls.
    - (i) Five (5) ASH Paint Heaters, each with a maximum heat input capacity of 6.0 MMBtu/hr, all venting inside the building.
    - (ii) One (1) ASH Paint Heater with a maximum heat input capacity of 8.0 MMBtu/hr, venting inside the building.
    - (iii) Three (3) Hot Water Generators, located at the paint area, each with a maximum heat input capacity of 8.0 MMBtu/hr, all venting through stack ID 21a.
    - (iv) One (1) Locker Room Heater, located at the paint area, with a maximum heat input capacity of 0.875 MMBtu/hr, venting inside the building.
    - (v) Four (4) Door Heaters, located at the paint area, each with a maximum heat input capacity of 0.48 MMBtu/hr, all venting inside the building.
    - (vi) Eight (8) Unit Heaters, located at the paint area, each with a maximum heat input capacity of 0.058 MMBtu/hr, all venting inside the building.
    - (vii) Fourteen (14) ELPO Oven Convection Zones, each with a maximum heat input capacity of 3.0 MMBtu/hr, all venting through stack 020.
    - (viii) Twelve (12) ELPO Oven Radiant Zones, each with a maximum heat input capacity of 3.0 MMBtu/hr, all venting through stack 020.
    - (ix) One (1) ELPO Oven Radiant Zone 13, with a maximum heat input capacity of 3.0 MMBtu/hr, all venting through stack 020.

Page 61 of 84 T003-33417-00036

(x)	Fifty-nine (59) Dock Door Heaters, located at the Body Shop and Material Room, each with a maximum heat input capacity of 0.40 MMBtu/hr, all venting inside the building.
(xi)	Thirty-nine (39) ASH Heaters, located at the Body Shop and Material Room, each with a maximum heat input capacity of 0.972 MMBtu/hr, all venting inside the building.

(The information describing the process contained in this emissions unit description box

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

is descriptive information and does not constitute enforceable conditions.)

# D.7.1 PM2.5 PSD Credit Limitations [326 IAC 2-2]

The Permittee shall comply with the following limitations:

- (a) The combined natural gas usage at the one hundred fifty (150) combustion units associated with the T1 Full Size Truck Project permitted in SSM 003-34856-00036 shall be limited to 600 million cubic feet (MMCF) per twelve consecutive month period, with compliance determined at the end of each month.
- (b) Boiler, identified as 003, shall be shut down permanently and removed from operation prior to the operation of any of the emission units associated with the T1 Full Size Truck Project permitted in SSM 003-34856-00036.
- (c) PM2.5 emissions from overspray at the Primer Surfacer, identified as 010, shall not exceed 0.07 pound per hour.

Compliance with this condition shall render the requirements of 326 IAC 2-2, PSD, not applicable to this modification for PM2.5.

#### D.7.2 PSD Minor VOC Limitations [326 IAC 2-2]

- (a) The VOC input/usage at the Miscellaneous Sealers and Adhesives operation, identified as 022, shall be limited to less than 20 tons per twelve consecutive month period, with compliance determined at the end of each month. Compliance with this condition shall render PSD not applicable to this modification.
- (b) The VOC emissions from the ELPO, identified as 020, controlled by three RTOs, exhausting to Stack 020, shall be limited to 4.07 pounds per hour.

Compliance with this condition shall render the requirements of 326 IAC 2-2, PSD, not applicable to this modification for VOC.

# D.7.3 Automobile and Light Duty Truck Coating Operations [326 IAC 8-2-2]

- (a) Pursuant to 326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations), the combined VOC delivered to the applicators from prime application, involving the Electrodeposition (ELPO Dipping) System, identified as 020, in this SECTION D.7 and the Primer Surfacer Coating System, identified as 010, in SECTION D.3, including the flash-off area, and drying oven shall not exceed 0.23 kilogram per liter of coating (1.9 pounds per gallon), excluding water.
- (b) Pursuant to 326 IAC 8-1-2(a), the combined VOC emission limitations under 326 IAC 8-2-2 in Condition D.7.2, for the Electrodeposition (ELPO Dipping) System, identified as 020, and the Primer Surfacer Coating System, identified as 010,

shall be achieved through one (1) or any combination of the following: thermal incineration, use of higher solids (low solvent) coatings, and/or waterborne coatings.

(c) Pursuant to 326 IAC 8-1-2(b), VOC emissions from the Electrodeposition (ELPO Dipping) System, identified as 020, and the Primer Surfacer Coating System, identified as 010, shall be limited to no greater than the equivalent emissions of 2.6 pounds of VOC per gallon of coating solids, allowed in paragraph (a) of this condition. This equivalency was determined by the following equation:

$$E = L / [1 - (L / D)]$$

#### Where:

L = Applicable emission limit in pounds of VOC per gallon of coating.

D= Density of VOC in coating in pounds per gallon of VOC.

E= Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

A solvent density of seven and thirty-six hundredths (7.36) pounds of VOC per gallon of coating shall be used to determine equivalent pounds of VOC per gallon of solids for the applicable emission limit. Actual solvent density shall be used to determine compliance of surface coating operations using the compliance methods contained in 326 IAC 8-1-2(a).

# D.7.4 Miscellaneous Metal Coating Operations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the Permittee shall not allow the discharge into the atmosphere of VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicators for the Miscellaneous Sealers and Adhesives, identified as 022.

D.7.5 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from the three (3) Hot Water Generators, shall each not exceed 0.22 pound/MMBtu.

#### D.7.6 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for the ELPO Dipping System, identified as 20 and its control devices and the Miscellaneous Sealers and Adhesives application, identified as 022 in this Section D.7. 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.7.7 Volatile Organic Compounds (VOC)

- (a) Compliance with the VOC content and usage limitations contained in Conditions D.7.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8.
- (b) Pursuant to 326 IAC 8-1-2(a), the combined VOC emission limitations under 326 IAC 8-2-2 in Condition D.7.3, for the Electrodeposition (ELPO Dipping) System, identified as 020, and the Primer Surfacer Coating System, identified as 010, shall be achieved through one (1) or any combination of the following: thermal

incineration, use of higher solids (low solvent) coatings, and/or waterborne coatings.

When daily averaging is used to comply with the emission limitations in Condition D.7.3, one of the following equations shall be used to determine the volume weighted average of coatings on a daily basis:

(1) When a thermal oxidizer is used to demonstrate compliance with an emission limitation, the daily volume weighted average shall be determined as follows:

$$A = \frac{\sum_{i=1}^{n} C_i U_i (1 - (CE \bullet DRE))}{\sum_{i=1}^{n} U_i (1 - D_i)}$$

Where:

A = daily volume weighted average, lb VOC/gal, less water

C = VOC content of coating i, lb VOC/gal, less water

U = actual coating i usage, gal/day

D = coating i volume % water

n = no. of coatings used during the day

CE = capture efficiency of the emission system vented to the thermal oxidizer

DRE = destruction/removal efficiency of thermal oxidizer

(2) When a thermal oxidizer is not used to demonstrate compliance with the emission limitation in Condition D.7.3, the daily volume weighted average shall be determined as follows:

$$A = \frac{\sum_{i=1}^{n} C_i U_i}{\sum_{i=1}^{n} U_i}$$

Where:

A = daily volume weighted average, lb VOC/gal, less water

C = VOC content of coating i, lb VOC/gal, less water

U = actual coating i usage, gal/day

n = no. of coatings used during the day

(3) Using VOC Control:

The source may comply using VOC control equipment. In this case, the source must comply with the equivalent VOC emission limit expressed in terms of pound of VOC per gallon of coating solids. Equivalent emission limit is calculated using the following equation:

$$E = L / (1 - (L/D))$$

$$= \frac{1.9}{1 - \frac{1.9}{7.36}}$$

2.6 lbs/gallon of coating solids

#### Where

L= Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating (1.9 lb/gal);

D= Density of VOC in coating in pounds per gallon of VOC (7.36 lb/gal);E= Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

A solvent density of 7.36 pounds of VOC per gallon of coating shall be used to determine equivalent pounds of VOC per gallon of solids for the applicable emission limit contained in this article.

(4) To meet the equivalent emission limit in pounds per gallon of applied coating solids (lb/gacs) of the pound per gallon less water VOC limit in Condition D.7.3(a), the overall control efficiency shall not be less than the equivalent overall efficiency calculated as follows:

$$O = (V - E) \times 100$$

#### 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 in pounds of VOC per gallon of coating solids, as applied; and
- O = Equivalent overall efficiency of the capture system and control device as a percentage.

#### D.7.8 PM2.5 and VOC Controls

(a) In order to ensure compliance with Condition D.7.1(c), the water wash associated with the Primer Surfacer, identified as 010, in SECTION D.3, shall be in operation at all times the Primer Surfacer, identified as 010, is in operation. The Permittee shall continue monitoring the water wash operation as required in Condition D.3.11.

(b) In order to ensure compliance with Conditions D.7.2(b) and D.7.3(a), the Permittee shall operate the three (3) RTOs at the same time and at all times the ELPO, identified as 020, is in operation whenever noncompliant coatings are utilized at the ELPO Dipping System, identified as 020.

#### D.7.9 Testing Requirements

Within sixty (60) days after achieving maximum capacity but no later than one hundred eighty (180) days after initial startup of the ELPO, identified as 020, the Permittee shall conduct initial performance tests to determine the overall control efficiency (capture and destruction) of the three (3) RTOs while all are operating at the same time and shall determine compliance with the VOC limit in Condition D.7.2(b), utilizing methods as approved by the Commissioner. This testing shall be repeated 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.

# **Compliance Monitoring Requirements**

# D.7.10 Thermal Oxidizer Temperature [40 CFR 64]

- (a) A continuous monitoring system shall be calibrated and maintained on each thermal oxidizer for measuring operating temperature. For the purpose of this condition, continuous means no less often than once per fifteen (15) minutes. The output of this system shall be recorded as a 3-hour average.
- (b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with the VOC limit in Conditions D.7.2(b).
- (c) The Permittee shall operate the all the thermal oxidizers at or above the 3-hour average temperature as observed during the most recent compliant stack test. If the 3-hour average temperature falls below the level observed during the most recent valid compliant stack test, the Permittee shall take reasonable response steps. Section C Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A 3-hour average temperature reading that is below the level observed during the most recent valid compliant stack test is not a deviation from this permit. Failure to take response steps-shall be considered a deviation from this permit.

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

- (a) The Permittee shall determine the appropriate duct pressure or fan amperage for the three RTOs associated with the ELPO, identified as 020, 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

Permit Reviewer: Jack Harmon

Page 66 of 84 T003-33417-00036

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 the most recent compliant stack test. If the duct pressure or fan amperage reading is outside the normal range, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A duct pressure or fan amperage reading that is outside the normal range observed during the most recent valid compliant stack test is not a deviation from this permit. 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.7.12 Record Keeping Requirements

- (a) To document the compliance status with Condition D.7.1(a), the Permittee shall maintain records of the natural gas usage from the one hundred fifty (150) combustion units associated with the T1 Full Size Truck Project, including the RTO controls in this SECTION D.7.
- (b) To document the compliance status with Conditions D.7.2(a) and D.7.3(a), the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit in D.7.2(a) and the VOC emission limit in Condition D.7.3(a):
  - (1) The VOC content of each coating material and solvent used, less water.
  - (2) The amount of coating material and solvent used on a monthly basis.
    - (A) Records shall include documents necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) A log of the dates of use of each coating.
  - (4) A log of when the regenerative thermal oxidizers are used to demonstrate compliance with an emission limitation.
  - (5) The monthly cleanup solvent usage.
  - (6) The total VOC usage for each month.
  - (7) During periods when the ELPO regenerative thermal oxidizers (RTOs) are used to demonstrate compliance with an emission limitation:
    - (A) The continuous temperature records (on a 3-hour average basis) for the RTOs and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.
    - (B) The Permittee shall maintain records of RTO shutdowns.
    - (C) Records of the dates of any RTO's system alarms and corrective

General Motors, LLC - Fort Wayne Assembly Roanoke, Indiana Permit Reviewer: Jack Harmon Significant Permit Modification No. 003-35825-00036 Modified by: Madhurima Moulik DRAFT Page 67 of 84 T003-33417-00036

#### actions taken.

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

# D.7.13 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.7.1(a) and Condition D.7.2(a) shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting 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 E.1 SOURCE OPERATING CONDITIONS - NSPS, Subpart Db

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

- (a) Facility-wide natural gas usage, including combustion units described as follows:
  - (1) One (1) natural gas/landfill gas fired boiler, identified as 004, constructed in 1992 and modified in 2011 to combust landfill gas, with a maximum heat input capacity of 228 MMBtu/hr for natural gas and landfill gas, using low NO<sub>X</sub> burners and flue gas recirculation as control, and exhausting to stack 01;
    - Under 40 CFR 60, Subpart Db, this boiler is considered an affected facility.
    - Under 40 CFR 63, Subpart DDDDD, this boiler is considered an affected facility.
  - One (1) natural gas-fired boiler, identified as 005, constructed in 1993, with a maximum heat input capacity of 228 MMBtu/hr, using low NO<sub>X</sub> burners and flue gas recirculation as control, and exhausting to stack 01;
    - Under 40 CFR 60, Subpart Db, this boiler is considered an affected facility.
    - Under 40 CFR 63, Subpart DDDDD, this boiler is considered an affected facility.

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

#### E.1.1 General Provisions Relating to NSPS Db [326 IAC 12] [40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - 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 Db.

E.1.2 Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units [40 CFR Part 60, Subpart Db]

Pursuant to 40 CFR Part 60, Subpart Db, the Permittee shall comply with the following provisions of 40 CFR Part 60, Subpart Db (included as Attachment A of this permit):

- (A) 40 CFR 60.40b(a),(f),(g),(j);
- (B) 40 CFR 60.41b;
- (C) 40 CFR 60.42b(k)(2);
- (D) 40 CFR 60.44b(a)(1),(h), (i);
- (E) 40 CFR 60.46b(a),(c), (e);
- (F) 40 CFR 60.48b(b)(1) or (b)(2), (c), (d), (f);
- (G) 40 CFR 60.49b(a),(b), (d), (g), (o), (v), (w).

#### SECTION E.2 SOURCE OPERATING CONDITIONS - NSPS, Subpart MM

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

- (b) One (1) ELPO Dipping System, identified as 006, constructed in August 1985, using natural gas thermal incinerators identified as #1 through #3 on the drying ovens as VOC control, and exhausting to stack 02;
- (d) One (1) Primer Surfacer System, identified as 010, constructed in March 1994, approved in 2010 for modification, using a natural gas fired regenerative thermal oxidizer with a maximum heat input capacity of 16 MMBtu/hr as VOC control, and water wash as PM control, and exhausting to stack 03. The Primer Surfacer System also includes applicators that purge internally through valves located inside the robot into a gun box. Additionally, the robotic bells purge into a gun box within the booth. The booth is an enclosed manufacturing unit, which is directed to the control device described above; and
- (e) One (1) Topcoat System, identified as 008, constructed in August 1985, approved in 2015 for modification, using ten (10) natural gas fired catalytic oxidizers identified as #1 #10 on the drying ovens as VOC control, with the maximum heat input capacity of oxidizers #1 #7 being 7.5 MMBtu/hr each, and the maximum heat input capacity of oxidizers #8 #10 being 9.5 MMBtu/hr each, using water wash as PM control, and exhausting to stack 04.
- (k)(2) One (1) Electrodeposition (ELPO Dipping) System, identified as 20, approved in 2015 for construction, using three (3) natural gas-fired regenerative thermal oxidizers (RTOs), each with a maximum heat input capacity of 3.0 million British thermal units per hour (MMBtu/hr) as VOC control for the tank and oven, and exhausting through stack 020. The ELPO oven has 14 zones with a combined maximum heat input capacity of 79.5 MMBtu/hr.

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

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

The provisions of 40 CFR Part 60, Subpart A - 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 Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations [40 CFR Part 60, Subpart MM]

Pursuant to 40 CFR Part 60, Subpart MM, the Permittee shall comply with the following provisions of 40 CFR Part 60, Subpart MM (included as Attachment B of this permit):

- (1) 40 CFR 60.390;
- (2) 40 CFR 60.391;
- (3) 40 CFR 60.392(a)(1), (b), (c);
- (4) 40 CFR 60.393;
- (5) 40 CFR 60.394;
- (6) 40 CFR 60.395;
- (7) 40 CFR 60.396;
- (8) 40 CFR 60.397.

Page 70 of 84 T003-33417-00036

#### SECTION E.3 SOURCE OPERATING CONDITIONS - NESHAP, Subpart IIII

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

- (b) One (1) ELPO Dipping System, identified as 006, constructed in August 1985, using natural gas thermal incinerators identified as #1 through #3 on the drying ovens as VOC control, and exhausting to stack 02;
- (c) One (1) Underbody Robotic Sealer Operation, identified as Stone Guard Sealer, approved in 2012 for operation, using no controls, and exhausting indoors;
- (d) One (1) Primer Surfacer System, identified as 010, constructed in March 1994, approved in 2010 for modification, using a natural gas fired regenerative thermal oxidizer with a maximum heat input capacity of 16 MMBtu/hr as VOC control, and water wash as PM control, and exhausting to stack 03. The Primer Surfacer System also includes applicators that purge internally through valves located inside the robot into a gun box. Additionally, the robotic bells purge into a gun box within the booth. The booth is an enclosed manufacturing unit, which is directed to the control device described above;
- (e) One (1) Topcoat System, identified as 008, constructed in August 1985, approved in 2015 for modification, using ten (10) natural gas fired catalytic oxidizers identified as #1 #10 on the drying ovens as VOC control, with the maximum heat input capacity of oxidizers #1 #7 being 7.5 MMBtu/hr each, and the maximum heat input capacity of oxidizers #8 #10 being 9.5 MMBtu/hr each, using water wash as PM control, and exhausting to stack 04;
- (f) Miscellaneous solvents, identified as part of 009, constructed in August 1985, using no controls, and exhausting to stacks 07 and 08;
- (g) One (1) Final Repair Operation, identified as 012, constructed in August 1985, using dry filters for particulate control, and exhausting to stack 06 and spot repair stalls;
- (h) One (1) Maintenance Paint Operation, identified as 013, constructed in August 1985, using no control, and exhausting to stack 10;
- (k)(2) One (1) Electrodeposition (ELPO Dipping) System, identified as 20, approved in 2015 for construction, using three (3) natural gas-fired regenerative thermal oxidizers (RTOs), each with a maximum heat input capacity of 3.0 million British thermal units per hour (MMBtu/hr) as VOC control for the tank and oven, and exhausting through stack 020. The ELPO oven has 14 zones with a combined maximum heat input capacity of 79.5 MMBtu/hr; and

#### Insignificant Activities:

(b) Storage tanks, identified as 1 (solvent/thinner), 2 (solvent/thinner), and two (2) 18,900 gallon waste purge solvent tanks, all constructed after July 23, 1984.

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

#### E.3.1 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.3.2 Surface Coating of Automobiles and Light-Duty Trucks NESHAP [40 CFR Part 63, Subpart IIII]

The Permittee which engages in surface coating of automobiles and light-duty trucks shall comply with the following provisions of 40 CFR Part 63, Subpart IIII (included as Attachment C of this

```
(1)
       40 CFR 63.3080;
(2)
       40 CFR 63.3081;
(3)
       40 CFR 63.3082(a)-(d), (g);
(4)
       40 CFR 63.3083(b), (d);
(5)
       40 CFR 63.3091(a)-(f);
(6)
       40 CFR 63.3092;
(7)
       40 CFR 63.3093;
(8)
       40 CFR 63.3094;
(9)
       40 CFR 63.3100;
(10)
       40 CFR 63.3101;
(11)
       40 CFR 63.3110;
(12)
       40 CFR 63.3120;
(13)
       40 CFR 63.3130;
(14)
       40 CFR 63.3131;
(15)
       40 CFR 63.3150;
(16)
       40 CFR 63.3151;
(17)
       40 CFR 63.3152;
       40 CFR 63.3160(b), (c);
(18)
(19)
       40 CFR 63.3161;
(20)
       40 CFR 63.3163;
(21)
       40 CFR 63.3164;
(22)
       40 CFR 63.3165;
(23)
       40 CFR 63.3166;
(24)
       40 CFR 63.3167(a), (b), (f);
       40 CFR 63.3168(a), (b), (c), (g);
(25)
(26)
       40 CFR 63.3169;
(27)
       40 CFR 63.3170(b);
(28)
       40 CFR 63.3171;
(29)
       40 CFR 63.3173;
(30)
       40 CFR 63.3174;
(31)
       40 CFR 63.3175;
(32)
       40 CFR 63.3176;
       Table 1 to 40 CFR 63, Subpart IIII;
(33)
       Table 2 to 40 CFR 63, Subpart IIII;
(34)
(35)
       Table 3 to 40 CFR 63, Subpart IIII;
(36)
       Appendix A to Subpart IIII of Part 63.
```

permit), with a compliance date of April 26, 2007:

### E.3.3 Surface Coating of Miscellaneous Metal Parts and Products NESHAP [40 CFR 63, Subpart MMMM]

Pursuant to 40 CFR 63.3881(d), the Permittee which engages in the surface coating of miscellaneous metal parts and products that meets the applicability criteria in 40 CFR 63.3081(b) for the surface coating of automobiles and light-duty trucks, shall comply with the provisions of 40 CFR 63, Subpart IIII, in order to demonstrate compliance with 40 CFR 63, Subpart MMMM.

Page 72 of 84 T003-33417-00036

#### SECTION E.4 SOURCE OPERATING CONDITIONS - NSPS, Subpart JJJJ

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

(j) Four (4) identical landfill gas-fired generators, identified as Gen 1 through Gen 4, approved in 2013 for construction, each with a maximum output rating of 2,242 horsepower, using no controls, and each exhausting through Stack S01.

Under New Source Performance Standards for Stationary Spark Ignition Internal Combustion Engines (40 CFR 60, Subpart JJJJ), these are considered affected facilities.

Under National Emission Standards for Hazardous Air Pollutants for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ), these are considered affected facilities.

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

#### E.4.1 General Provisions Relating to NSPS, Subpart JJJJ [40 CFR 60, Subpart A]

The provisions of 40 CFR 60, Subpart A - General Provisions, which are incorporated by as 326 IAC 12-1, apply to the facilities described in this section, except where otherwise specified in 40 CFR 60, Subpart JJJJ.

E.4.2 New Standards of Performance for Spark Ignition Internal Combustion Engines [40 CFR 60, Subpart JJJJ]

Pursuant to 40 CFR 60, Subpart JJJJ, the Permittee shall comply with the following provisions of 40 CFR 60, Subpart JJJ (included as Attachment E of this permit):

- (1) 40 CFR 60.4230(a)(4)(i), (6)
- (2) 40 CFR 60.4233(e)
- (3) 40 CFR 60.4234
- (4) 40 CFR 60.4243(b)(2)(ii), (g),
- (5) 40 CFR 60.4244
- (6) 40 CFR 60.4245(a), (c), (d)
- (7) 40 CFR 60.4246
- (8) 40 CFR 60.4248
- (9) Tables 1 3 (applicable portions)

Permit Reviewer: Jack Harmon

#### SECTION E.5 SOURCE OPERATING CONDITIONS - NESHAP, Subpart ZZZZ

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

(j) Four (4) identical landfill gas-fired generators, identified as Gen 1 through Gen 4, approved in 2013 for construction, each with a maximum output rating of 2.242 horsepower, using no controls, and each exhausting through Stack S01.

Under New Source Performance Standards for Stationary Spark Ignition Internal Combustion Engines (40 CFR 60, Subpart JJJJ), these are considered affected facilities.

Under National Emission Standards for Hazardous Air Pollutants for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ), these are considered affected facilities.

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

#### E.5.1 General Provisions Relating to NESHAP ZZZZ [40 CFR 63, Subpart A]

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

E.5.2 National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines [40 CFR 63, Subpart ZZZZ]

The Permittee which owns and/or operates stationary reciprocating internal combustion engines shall comply with the following provisions of 40 CFR 63, Subpart ZZZZ (included as Attachment D of this permit):

- (1) 63.6580
- (2)63.6585 (a), (b)
- 63.6590 (a)(2)(i), (b)(2) (3)
- 63.6595 (a)(3) (4)
- (5)63.6600 (c)
- (6)63.6605
- (7) 63.6625 (c)
- (8) 63.6640 (e)
- (9)
- 63.6645 (c)
- (10) 63.6650 (g)
- (11) 63.6655 (c)
- (12) 63.6660
- (13) 63.6665 (14) 63.6670
- (15) 63.6675
- (16) Table 7 (item 2)
- (17) Table 8

Permit Reviewer: Jack Harmon

#### SECTION E.6 SOURCE OPERATING CONDITIONS - NESHAP, Subpart DDDDD

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

One (1) natural gas/landfill gas fired boiler, identified as 004, constructed in 1992 and (a) modified in 2011 to combust landfill gas, with a maximum heat input capacity of 228 MMBtu/hr for natural gas and landfill gas, using low NO<sub>x</sub> burners and flue gas recirculation as control, and exhausting to stack 01;

Under 40 CFR 60, Subpart Db, this boiler is considered an affected facility.

Under 40 CFR 63, Subpart DDDDD, this boiler is considered an affected facility.

(b) One (1) natural gas-fired boiler, identified as 005, constructed in 1993, with a maximum heat input capacity of 228 MMBtu/hr, using low NO<sub>x</sub> burners and flue gas recirculation as control, and exhausting to stack 01;

Under 40 CFR 60, Subpart Db, this boiler is considered an affected facility.

Under 40 CFR 63, Subpart DDDDD, this boiler is considered an affected facility.

(k)(4)(iii)Three (3) Hot Water Generators, located at the paint area, each with a maximum heat input capacity of 8.0 MMBtu/hr.

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

#### E.6.1 General Provisions Relating to NESHAP DDDDD [40 CFR 63, Subpart A]

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

National Emissions Standards for Hazardous Air Pollutants for Industrial, Commercial, and E.6.2 Institutional Boilers [40 CFR 63, Subpart DDDDD]

The Permittee which owns and/or operates stationary industrial boilers shall comply with the following provisions of 40 CFR 63, Subpart DDDDD:

- 40 CFR 63.7480; (a)
- 40 CFR 63.7485; (b)
- (c) 40 CFR 63.7490;
- (d) 40 CFR 63.7495:
- 40 CFR 63.7500:
- (e) 40 CFR 63.7505:
- (f) (g) 40 CFR 63.7510;
- (h) 40 CFR 63.7515;
- (i) 40 CFR 63.7520; 40 CFR 63.7525;
- (j) 40 CFR 63.7530; (k)
- 40 CFR 63.7535; (I)
- 40 CFR 63.7540; (m)
- (n) 40 CFR 63.7541:
- 40 CFR 63.7545; (o)
- 40 CFR 63.7550; (p)

Page 75 of 84 T003-33417-00036

(q) 40 CFR 63.7555;	
(r) 40 CFR 63.7560;	
(s) 40 CFR 63.7565;	
(t) 40 CFR 63.7570;	
(u) 40 CFR 63 Table 2 to NESHAP Subpart DDD	DD;
(v) 40 CFR 63 Table 3 to NESHAP Subpart DDD	DD;
(w) 40 CFR 63 Table 4 to NESHAP Subpart DDD	DD;
(x) 40 CFR 63 Table 5 to NESHAP Subpart DDD	DD;
(y) 40 CFR 63 Table 6 to NESHAP Subpart DDD	DD;
(z) 40 CFR 63 Table 8 to NESHAP Subpart DDD	DD;
(aa) 40 CFR 63 Table 9 to NESHAP Subpart DDD	DD;
(bb) 40 CFR 63 Table 10 to NESHAP Subpart DDI	DDD; and
(cc) 40 CFR 63 Table 11 to NESHAP Subpart DDI	DDD.

General Motors, LLC - Fort Wayne Assembly Roanoke, Indiana Permit Reviewer: Jack Harmon Significant Permit Modification No. 003-35825-00036 Modified by: Madhurima Moulik DRAFT Page 76 of 84 T003-33417-00036

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

Source Name: General Motors, LLC - Fort Wayne Assembly

Source Address: 12200 Lafayette Center Road, Roanoke, Indiana 46783

Part 70 Permit No.: T003-33417-00036

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:

General Motors, LLC - Fort Wayne Assembly Roanoke, Indiana

Permit Reviewer: Jack Harmon

Significant Permit Modification No. 003-35825-00036 Modified by: Madhurima Moulik DRAFT

Page 77 of 84 T003-33417-00036

### 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: General Motors, LLC - Fort Wayne Assembly

Source Address: 12200 Lafayette Center Road, Roanoke, Indiana 46783

Part 70 Permit No.: T003-33417-00036

#### This form consists of 2 pages

Page 1 of 2

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

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

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

General Motors, LLC - Fort Wayne Assembly Roanoke, Indiana Permit Reviewer: Jack Harmon

#### Significant Permit Modification No. 003-35825-00036 Modified by: Madhurima Moulik DRAFT

Page 78 of 84 T003-33417-00036

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? Ν Type of Pollutants Emitted: TSP, PM-10, SO<sub>2</sub>, VOC, NO<sub>X</sub>, CO, Pb, other: Estimated amount of pollutant(s) emitted during emergency: Describe the steps taken to mitigate the problem: Describe the corrective actions/response steps taken: Describe the measures taken to minimize emissions: If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: Form Completed by: Title / Position: Date:\_\_\_

Phone:

Page 79 of 84 T003-33417-00036

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

Source Name: General Motors LLC Fort Wayne Assembly

Source Address: 12200 Lafayette Center Road, Roanoke, Indiana 46783

Part 70 Permit No.: T 003-33417-00036

Facility: Surface Coating and Cleaning Operations, including ELPO Dipping System

(006), Primer Surfacer System (010), Topcoat System (008), Miscellaneous Sealers/Adhesives/Additives/Solvents (009), Final Repair Operation (012), and

Maintenance Paint Operation (013)

Parameter: VOC emissions

Limit: Shall not exceed 3,204 tons per twelve (12) consecutive month period, with

compliance determined at the end of each month.

	QUARTER:	YEAR:	
Month	VOC Emissions (tons)	VOC Emissions (tons)	VOC Emissions (tons)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			
	□ No deviation occurred in □ Deviation/s occurred in the Deviation has been recorded.	nis quarter.	
	·	rted on:	
	Title / Position:		
	Signature:		
	Date:		
	Phone:		

General Motors, LLC - Fort Wayne Assembly Roanoke, Indiana

Permit Reviewer: Jack Harmon

Significant Permit Modification No. 003-35825-00036 Modified by: Madhurima Moulik DRAFT Page 80 of 84 T003-33417-00036

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

#### **Part 70 Quarterly Report**

Source Name. Seneral Motors LLC For Wayne Assemb	Source Name:	General Motors LLC Fort Wayne Assemb
--	--------------	--------------------------------------

Source Address: 12200 Lafayette Center Road, Roanoke, Indiana 46783

Part 70 Permit No.: T 003-33417-00036

Facility: Twenty (20) natural gas-fired burners, known as MOD 1 through MOD 10 (each

mod contains two burners)

Parameter: Natural gas usage

Limit: Shall not exceed six hundred ten (610) million cubic feet per twelve (12)

consecutive month period, with compliance determined at the end of each month.

	QUARTER :	YEAR:	
Month	Natural Gas Usage (MMCF)	Natural Gas Usage (MMCF)	Natural Gas Usage (MMCF)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			
	□ No deviation occurred in	·	
	<ul> <li>Deviation/s occurred in the Deviation has been reported.</li> </ul>	nis quarter. orted on:	<u></u>
	Submitted by:		
	Title / Position:		
	Signature:		
	Date:		
	Phone:		

Significant Permit Modification No. 003-35825-00036 Modified by: Madhurima Moulik DRAFT Page 81 of 84 T003-33417-00036

(tons)

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

#### **Part 70 Quarterly Report**

Source Name: General Motors LLC Fort Wayne Assembly

Source Address: 12200 Lafayette Center Road, Roanoke, Indiana 46783

Part 70 Permit No.: T 003-33417-00036

Facility: T1 Full Size Truck Project - Miscellaneous Sealers and Adhesives, ID 022

Parameter: VOC usage

Limit: Shall not exceed 20 tons per twelve (12) consecutive month period, with

compliance determined at the end of each month.

	QUARTER :	YEAR:	
	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (to
Month	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			
	Submitted by:  Title / Position:  Signature:	•	

Permit Reviewer: Jack Harmon

Page 82 of 84 T003-33417-00036

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

#### Part 70 Quarterly Report

Source Name. General Motors LLC Fort Wayne Assemb	Source Name:	General Motors LLC Fort Wayne Assembly
---	--------------	--

Source Address: 12200 Lafayette Center Road, Roanoke, Indiana 46783

Part 70 Permit No.: T 003-33417-00036

T1 Full Size Truck Project - One hundred fifty (150) natural gas-fired heaters, and Facility:

**RTOs** 

Parameter: Natural gas usage

Limit: Shall not exceed six hundred (600) million cubic feet per twelve (12) consecutive

month period, with compliance determined at the end of each month.

	QUARTER:	YEAR:	
Month	Natural Gas Usage (MMCF)	Natural Gas Usage (MMCF)	Natural Gas Usage (MMCF)
WOTH	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			
	Submitted by:  Title / Position:  Signature:	·	

General Motors, LLC - Fort Wayne Assembly Roanoke, Indiana

Permit Reviewer: Jack Harmon

Significant Permit Modification No. 003-35825-00036 Modified by: Madhurima Moulik DRAFT Page 83 of 84 T003-33417-00036

# 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: General Motors, LLC - Fort Wayne Assembly

Source Address: 12200 Lafayette Center Road, Roanoke, Indiana 46783

Part 70 Permit No.: T003-33417-00036

Months: to	Year:
	Page 1 of 2
This report shall be submitted quarterly based on a Section B –Emergency Provisions satisfies the rep General Reporting. Any deviation from the requirer the probable cause of the deviation, and the response required to be reported pursuant to an applicable reshall be reported according to the schedule stated be included in this report. Additional pages may be please specify in the box marked "No deviations of	orting requirements of paragraph (a) of Section C- ments of this permit, the date(s) of each deviation, nse steps taken must be reported. A deviation equirement that exists independent of the permit, in the applicable requirement and does not need to e attached if necessary. If no deviations occurred,
☐ NO DEVIATIONS OCCURRED THIS REPORTI	NG 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:	

General Motors, LLC - Fort Wayne Assembly Roanoke, Indiana Permit Reviewer: Jack Harmon

#### Significant Permit Modification No. 003-35825-00036 Modified by: Madhurima Moulik DRAFT

Page 84 of 84 T003-33417-00036

Page 2 of 2

	ŭ
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Form Completed by:	
Title / Position:	
Date:	
Phone:	

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

#### Technical Support Document (TSD) for a Part 70 Significant Permit Modification

#### **Source Description and Location**

General Motors, LLC - Fort Wayne Assembly Source Name: Source Location:

12200 Lafayette Center Road, Roanoke, IN

46783

County: Allen SIC Code: 3711

Operation Permit No.: T 003-33417-00036 Operation Permit Issuance Date: November 13, 2014 Significant Permit Modification No.: 003-35825-00036 Permit Reviewer: Madhurima Moulik

#### **Existing Approvals**

The source was issued Part 70 Operating Permit No. T 003-334317-00036 on November 13, 2014. The source has since received the following approvals:

- Significant Source Modification No. 003-34856-00036 issued on February 3, 2015; (a)
- Significant Permit Modification No. 003-34985-00036 issued on February 23, 2015; and (b)
- Administrative Amendment No. 003-35772-00036 issued on May 12, 2015. (c)

#### **County Attainment Status**

The source is located in Allen County.

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

#### Ozone Standards (a)

Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) 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<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Allen County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

TSD for Significant Permit Modification No.: 003-35825-00036

Permit Reviewer: Madhurima Moulik

- (b) PM<sub>2.5</sub>
  Allen County has been classified as attainment for PM<sub>2.5</sub>. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Other Criteria Pollutants
  Allen County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

#### **Fugitive Emissions**

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

#### **Enforcement Issues**

There are no pending enforcement actions related to this modification.

#### Permit Level Determination – Part 70 Modification to an Existing Source

This modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d), because the modification requires significant changes to existing Part 70 monitoring and recordkeeping requirements in the permit.

#### **Federal Rule Applicability Determination**

The federal rule applicabilities shall remain unchanged as a result of this modification.

#### **State Rule Applicability Determination**

#### 326 IAC 2-2 (Prevention of Significant Deterioration)

Pursuant to Permit PSD (02) 1575, issued on November 30, 1984 (as referenced in Part 70 Operating Permit No. 003-5959-00036), the source-wide potential to emit VOC is limited to 3,204 tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month. This limit is based on total VOC usage from all surface coating and cleaning operations, including ELPO Dipping System (006), Underbody Robotic Sealer, identified as Stone Guard Sealer, Primer Surfacer System (010), Topcoat System (008), Miscellaneous Sealers/Adhesives/Additives/Solvents (009), Final Repair Operation (012), and Maintenance Paint Operation (013) with abatement credit given for using the oxidizer.

Compliance with the VOC PSD BACT limit shall be determined within 30 days of the end of each month based on the following:

For ELPO Dipping System (006), Primer Surfacer System (010), Underbody Robotic Sealer, identified as Stone Guard Sealer, Topcoat System (008), Miscellaneous Sealers/Adhesives/Additives/Solvents (009), Final Repair Operation (012), and Maintenance Paint Operation (013):

VOC emissions (tons, 12 consecutive months) = VOC emissions in previous eleven (11) months, tons + monthly VOC usage (uncontrolled), tons + monthly VOC emissions (after controls), tons

#### where:

VOC emissions (after controls), tons = VOC input (tons) x (1- overall control efficiency/100);

Permit Reviewer: Madhurima Moulik

TSD for Significant Permit Modification No.: 003-35825-00036

where:

overall control efficiency (%) = capture efficiency (%) x destruction efficiency (%)

#### 326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations)

Pursuant to 326 IAC 8-2-2(b)(2) (Automobile and Light Duty Truck Coating Operations), the volatile organic compound (VOC) delivered to the applicator from Primer Surfacer System (010) application, flash-off and curing of coatings applied to automobile and light duty truck bodies, hoods, doors, cargo boxes, fenders, and grill openings shall not exceed 0.34 kilograms per liter of coating (2.8 pounds per gallon), excluding water.

#### **Compliance Determination and Monitoring Requirements**

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

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

The Compliance Requirements for the thermal oxidizer used for the Primer Surfacer System (010) have been modified as follows:

Pursuant to 326 IAC 8-1-2(a), and in order to ensure compliance with Condition D.3.2, which includes the VOC limitation of 2.8 pounds of VOC per gallon of coating, the Permittee shall operate the regenerative thermal oxidizer for the Primer Surfacer System (010) at all times the processes that it controls are in operation only when non-compliant coatings are being used. In the current permit, the thermal oxidizer is required to be operating continuously at all times. The use of the thermal oxidizer will no longer be necessary when the Permittee is using compliant coatings. In addition, the Permittee shall have the option of demonstrating compliance with Condition 326 IAC 2-2 (PSD) BACT VOC limitation included in D.2.1, D.3.1 and D.4.1 by using a combination of controlled and uncontrolled emissions.

#### **Proposed Changes**

The changes listed below have been made to Part 70 Operating Permit (Renewal) No. T 003-33417-000236. Deleted language appears as strikethroughs and new language appears in **bold**:

- (a) Conditions D.2.6, D.3.5 and D.4.5 VOC PSD BACT Limit [326 IAC 2-2] have been modified to clarify that the VOC PSD BACT limitation for ELPO Dipping System (006), Primer Surfacer System (010), Underbody Robotic Sealer, identified as Stone Guard Sealer, Topcoat System (008), Miscellaneous Sealers/Adhesives/Additives/Solvents (009), Final Repair Operation (012), and Maintenance Paint Operation (013) is a VOC emissions limitation and not a VOC usage limitation. The corresponding Quarterly Report form has been modified.
- (b) Condition D.3.7 PM and VOC controls has been modified. The operation of the thermal oxidizer for the Primer Surfacer System (010) is optional for demonstrating compliance with the VOC emission limitation in Condition D.3.1, as described above. In addition, the

Permit Reviewer: Madhurima Moulik

TSD for Significant Permit Modification No.: 003-35825-00036

use of the thermal oxidizer is necessary to demonstrate compliance with Condition D.3.2 only when non-compliant coatings or solvents are being used.

(c) Recordkeeping Requirements in Conditions D.2.12, D.3.12, and D.4.12 have been modified to include the recordkeeping for VOC emissions from ELPO Dipping System (006), Primer Surfacer System (010), Underbody Robotic Sealer, identified as Stone Guard Sealer, Topcoat System (008), Miscellaneous Sealers/Adhesives/ Additives/Solvents (009), Final Repair Operation (012), and Maintenance Paint Operation (013).

#### D.2.6 PSD VOC BACT Limit [326 IAC 2-2]

Compliance with the VOC PSD BACT limit in Condition D.2.1 shall be determined within 30 days of the end of each month based on the **following** total volatile organic compound usage for coating and cleaning operations per month, and adding the result to the calculated VOC usage from the previous eleven (11) months.:

For ELPO Dipping System (006), Primer Surfacer System (010), Underbody Robotic Sealer, identified as Stone Guard Sealer, Topcoat System (008), Miscellaneous Sealers/Adhesives/Additives/Solvents (009), Final Repair Operation (012), and Maintenance Paint Operation (013):

VOC emissions (tons, 12 consecutive months) = VOC emissions in previous eleven (11) months, tons + monthly VOC usage (uncontrolled), tons + monthly VOC emissions (after controls), tons

#### where:

monthly VOC emissions (after controls), tons = monthly VOC input (tons) x (1- overall control efficiency/100);

#### where:

overall control efficiency (%) = capture efficiency (%) x destruction efficiency (%)

#### D.2.12 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.2.1, D.2.2, D.2.3, D.2.6, D.2.7, D.2.10, and D.2.11, the Permittee shall maintain records in accordance with (1) through (8) below. Records maintained for (1) through (8) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.1, D.2.2, and D.2.3.
  - (1) The VOC content of each coating material and solvent used, less water.
  - (2) The amount of coating material and solvent used on a monthly basis.
    - (A) Records shall include documents necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) A log of the dates of use of each coating.
  - (4) A log of when the thermal incinerators are used to demonstrate compliance with an emission limitation.
  - (5) The calculated daily volume weighted average in pounds of VOC per gallon, less water, if applicable.
  - (6) The monthly cleanup solvent usage.

Permit Reviewer: Madhurima Moulik

TSD for Significant Permit Modification No.: 003-35825-00036

(7) The total VOC usage **and emissions** for each month.

#### D.3.5 VOC PSD BACT Limit [326 IAC 2-2]

Compliance with the VOC PSD BACT limit in Condition D.3.1 shall be determined within 30 days of the end of each month based on the **following** total volatile organic compound usage for coating and cleaning operations per month, and adding the result to the calculated VOC usage from the previous eleven (11) months.:

For ELPO Dipping System (006), Primer Surfacer System (010), Underbody Robotic Sealer, identified as Stone Guard Sealer, Topcoat System (008), Miscellaneous Sealers/Adhesives/Additives/Solvents (009), Final Repair Operation (012), and Maintenance Paint Operation (013):

VOC emissions (tons, 12 consecutive months) = VOC emissions in previous eleven (11) months, tons + monthly VOC usage (uncontrolled), tons + monthly VOC emissions (after controls), tons

#### where:

monthly VOC emissions (after controls), tons = monthly VOC input (tons) x (1- overall control efficiency/100);

#### where:

overall control efficiency (%) = capture efficiency (%) x destruction efficiency (%)

#### D.3.7 PM and VOC Controls [326 IAC 2-2] [326 IAC 6-3-2] [326 IAC 8-1-2]

- (a) Pursuant to 326 IAC 6-3-2(d), the Permittee shall operate the water wash system at all times the Primer Surfacer System (010) is in operation.
- (b) Pursuant to 326 IAC 8-1-2(a) and in order to ensure compliance with Conditions D.3.1 and D.3.2, the Permittee shall operate the regenerative thermal oxidizer for the Primer Surfacer System (010) at all times the processes that it controls are in operation, if the abatement credit is used to show compliance with Conditions D.3.1 and/or D.3.2.

#### D.3.12 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.3.1, D.3.2, D.3.5, D.3.6, D.3.9, and D.3.10, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.3.1 and D.3.2.
  - (1) The VOC content of each coating material and solvent used, less water.
  - (2) The amount of coating material and solvent used on a monthly basis.
    - (A) Records shall include documents necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) A log of the dates of use of each coating.
  - (4) A log of when the regenerative thermal oxidizer is used to demonstrate compliance with an emission limitation.
  - (5) The monthly cleanup solvent usage.
  - (6) The total VOC usage **and emissions** for each month.

TSD for Significant Permit Modification No.: 003-35825-00036

- (7) During periods when the regenerative thermal oxidizer is used to demonstrate compliance with an emission limitation:
  - (A) The continuous temperature records (on a 3-hour average basis) for the thermal oxidizer and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.
  - (B) Records of the dates of any thermal oxidizer system alarms and corrective actions taken.

#### D.4.5 PSD VOC BACT Limit [326 IAC 2-2]

Compliance with Condition D.4.1 shall be determined within 30 days of the end of each month based on the total volatile organic compound usage emissions for coating and cleaning operations per month, and adding the result to the calculated VOC usage emissions from the previous eleven (11) months.

#### D.4.12 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.4.1, D.4.2, D.4.5, D.4.6, D.4.9, and D.4.10, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.4.1 and D.4.2.
  - (1) The VOC content of each coating material and solvent used, less water.
  - (2) The amount of coating material and solvent used on a monthly basis.
    - (A) Records shall include documents necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) A log of the dates of use of each coating.
  - (4) A log of when the catalytic oxidizers are used to demonstrate compliance with an emission limitation.
  - (5) The monthly cleanup solvent usage.
  - (6) The total VOC usage **and emissions** for each month.

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

#### Part 70 Quarterly Report

Source Name: General Motors LLC Fort Wayne Assembly

Source Address: 12200 Lafayette Center Road, Roanoke, Indiana 46783

Part 70 Permit No.: T 003-33417-00036

Facility: Surface Coating and Cleaning Operations, including ELPO Dipping System

(006), Primer Surfacer System (010), Topcoat System (008), Miscellaneous

General Motors, LLC - Fort Wayne Assembly

Page 7 of 8

Roanoke, Indiana

Permit Reviewer: Madhurima Moulik

TSD for Significant Permit Modification No.: 003-35825-00036

Sealers/Adhesives/Additives/Solvents (009), Final Repair Operation (012), and

Maintenance Paint Operation (013)

Parameter:

VOC usage emissions

Limit: Shall not exceed 3,204 tons per twelve (12) consecutive month period, with

compliance determined at the end of each month.

QUARTER:	YEAR:	

This Month  Mont	Month	VOC <del>Usage</del> <b>Emissions</b> (tons)	VOC <del>Usage</del> <b>Emissions</b> (tons)	VOC <del>Usage</del> <b>Emissions</b> (tons)			
Month 2  Month		This Month	12 Month Total				
2 Month							
		<ul> <li>Deviation/s occurred in this quarter.</li> <li>Deviation has been reported on:</li> </ul>					
		Submitted by:					
Deviation has been reported on:		Title / Position:					

#### **Conclusion and Recommendation**

Signature:

This proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 003-35825-00036. The staff recommends to the Commissioner that this Part 70 Significant Permit Modification be approved.

#### **IDEM Contact**

- (a) Questions regarding this proposed permit can be directed to Madhurima Moulik 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) 233-0868 or toll free at 1-800-451-6027 extension 3-0868.
- (b) A copy of the findings is available on the Internet at: <a href="http://www.in.gov/ai/appfiles/idem-caats/">http://www.in.gov/ai/appfiles/idem-caats/</a>

TSD for Significant Permit Modification No.: 003-35825-00036

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



We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204 (800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence Governor Thomas W. Easterly

Commissioner

July 22, 2015

Mr. Matt Arbuckle Sr. Environmental Engineer General Motors, LLC – Fort Wayne Assembly 12200 Lafayette Center Road Roanoke, Indiana 46783

Re: Public Notice

General Motors, LLC – Fort Wayne Assembly Permit Level: Title V– Significant Permit

Modification

Permit Number: 003-35825-00036

Dear Mr. Arbuckle:

Enclosed is a copy of your draft Title V-Significant Permit Modification, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Fort Wayne Journal Gazette in Fort Wayne, Indiana will publish the abbreviated version of the public notice no later than July 24, 2015. You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper.

OAQ has submitted the draft permit package to the Allen County Public Library, 900 Library Plaza in Fort Wayne, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Madhurima Moulik, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-0868 or dial (317) 233-0868.

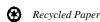
Sincerely,

Víckí Bíddle

Vicki Biddle Permits Branch Office of Air Quality

Enclosures PN Applicant Cover lette-2014. Dot4/10/14







We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204 (800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence Governor Thomas W. Easterly

Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

July 22, 2015

Fort Wayne Journal Gazette P.O. Box 100 600 W. Main Street Fort Wayne, Indiana 46801

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for General Motors, LLC – Fort Wayne Assembly, Allen County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than July 24, 2015.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

#### To ensure proper payment, please reference account # 100174737.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Vicki Biddle at 800-451-6027 and ask for extension 3-6867 or dial 317-233-6867.

Sincerely,

Víckí Bíddle

Vicki Biddle Permit Branch Office of Air Quality

Permit Level: Title V – Significant Permit Modification

Permit Number: 003-35825-00036

Enclosure PN Newspaper.dot 6/13/2013







We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204 (800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly

Commissioner

July 22, 2015

To: Allen County Public Library

From: Matthew Stuckey, Branch Chief

Permits Branch
Office of Air Quality

Subject: Important Information to Display Regarding a Public Notice for an Air

Permit

Applicant Name: General Motors, LLC –

**Fort Wayne Assembly** 

Permit Number: 003-35825-00036

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. Please make this information readily available until you receive a copy of the final package.

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. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures PN Library.dot 6/13/2013







We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204 (800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence Governor

Thomas W. Easterly

Commissioner

#### **Notice of Public Comment**

July 22, 2015 Title V – Significant Permit Modification 003-35825-00036

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

**Please Note:** If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.

Enclosure PN AAA Cover.dot 6/13/13







We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence Governor Thomas W. Easterly

Commissioner

## AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD DRAFT INDIANA AIR PERMIT

July 22, 2015

A 30-day public comment period has been initiated for:

Permit Number: 003-35825-00036

Applicant Name: General Motors, LLC – Fort Wayne Assembly

Location: Fort Wayne, Allen County, Indiana

The public notice, draft permit and technical support documents can be accessed via the **IDEM Air Permits Online** site at: http://www.in.gov/ai/appfiles/idem-caats/

Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

Indiana Department of Environmental Management Office of Air Quality, Permits Branch 100 North Senate Avenue Indianapolis, IN 46204

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at <a href="mailto:chammack@idem.IN.gov">chammack@idem.IN.gov</a> or (317) 233-2414.

Affected States Notification.dot 3/13/2013





## Mail Code 61-53

IDEM Staff	VBIDDLE 7/22/2	015		
	General Motors L	LC Fort Wayne Assembly 003- 35825-000	AFFIX STAMP	
Name and		Indiana Department of Environmental	Type of Mail:	HERE IF
address of		Management		USED AS
Sender		Office of Air Quality – Permits Branch	CERTIFICATE OF	CERTIFICATE
		100 N. Senate	MAILING ONLY	OF MAILING
		Indianapolis, IN 46204	MAIEMO GILE	

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		Matt Arbuckle General Motors LLC Fort Wayne Assembly 12200 Lafayette Center Roa	d Roanoke II	N 46783-9628	(Source CAATS)						
2		Michael A Glinski Plant Manager General Motors LLC Fort Wayne Assembly 12200 Lafayette Center Road Roanoke IN 46783-9628 (RO CAATS)									
3		Daniel & Sandy Trimmer 15021 Yellow River Road Columbia City IN 46725 (Affected Party)									
4		Duane & Deborah Clark Clark Farms 6973 E. 500 S. Columbia City IN 46725 (Affected Party)									
5		Allen County Public Library 900 Library Plaza, P.O. Box 2270 Fort Wayne IN 46802 (Library)									
6		Mr. Jeff Coburn Plumbers & Steamfitters, Local 166 2930 W Ludwig Rd Fort Wayne IN 46818-1328 (Affected Party)									
7		Roanoke Town Council P.O. Box 328 Roanoke IN 46783 (Local Official)									
8		Allen Co. Board of Commissioners 200 E Berry Street Ste 410 Fort Wayne IN 46802 (Local Official)									
9		Fort Wayne-Allen County Health Department 200 E Berry St Suite 360 Fort Wayne IN 46802 (Health Department)									
10											
11											
12											
13											
14											
15											

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50,000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <i>Domestic Mail Manual</i> R900, S913, and S921 for limitations of coverage on inured and COD mail. See <i>International Mail Manual</i> for limitations of coverage on international mail.
			mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.