



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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

Michael R. Pence
Governor

Carol S. Comer
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Significant Modification to a
Part 70 Operating Permit
for Precision Painting, Inc. in Marshall County

Significant Permit Modification No.: 099-36447-00096

The Indiana Department of Environmental Management (IDEM) has received an application from Precision Painting, Inc., located at 218 East 2nd Street, 730 High Road, and 1205 North Street, Bremen, Indiana 46506, for a significant modification of its Part 70 Operating Permit Renewal issued on January 8, 2014. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow Precision Painting, Inc. to make certain changes at its existing source. Precision Painting, Inc. has applied to add emission units at another building location.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, 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). IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

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

Bremen Public Library
304 North Jackson Street
Bremen, IN 46506

and

IDEM Northern Regional Office
300 N. Michigan Street, Suite 450
South Bend, IN 46601-1295

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 30th 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 099-36447-00096 in all correspondence.

Comments should be sent to:

Curtis Taylor
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-5176
Or dial directly: (317) 234-5176
Fax: (317) 232-6749 attn: Curtis Taylor
E-mail: CTaylor3@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, at the IDEM Regional Office indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

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



Jason R. Krawczyk, Section Chief
Permits Branch
Office of Air Quality



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Mr. Todd Hundt
Precision Painting, Inc.
PO Box 214
Bremen, IN 46506

Re: 099-36447-00096
Significant Permit Modification to
Part 70 Renewal No.: T099-33142-00096

Dear Mr. Hundt:

Precision Painting, Inc. was issued Part 70 Operating Permit Renewal No. T099-33142-00096 on January 8, 2014 for a stationary recreational vehicle (RV) and automotive surface coating facility located at 218 East 2nd Street, 730 High Road, and 1205 North Street, Bremen, Indiana 46506. An application to modify the source was received on November 4, 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 attachments. Since this attachment has been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of this attachment with this modification:

Attachment A: National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products, Subpart PPPP

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

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

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

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

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If you have any questions on this matter, please contact Curtis Taylor, of my staff, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251 at 317-234-5176 or 1-800-451-6027, and ask for extension 4-5176.

Sincerely,

Jason R. Krawczyk, Section Chief
Permits Branch
Office of Air Quality

Attachments: Modified Permit and Technical Support Document

cc: File - Marshall County
Marshall County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch
IDEM Northern Regional Office



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DRAFT Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**Precision Painting, Inc.
218 East 2nd Street, 730 High Road, & 1205 North Street
Bremen, Indiana 46506**

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

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

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

Operation Permit No.: T099-33142-00096	
Issued by: <i>Original Signed by</i> Jason R. Krawczyk, Section Chief Permits Branch, Office of Air Quality	Issuance Date: January 8, 2014 Expiration Date: January 8, 2019

Administrative Amendment No. 099-35848-00096, issued on July 10, 2015.

Significant Permit Modification No.: 099-36447-00096	
Issued by: Jason R. Krawczyk, Section Chief, Permits Branch Office of Air Quality	Issuance Date: Expiration Date: January 8, 2019

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary recreational vehicle (RV) and automotive surface coating facility.

Source Address:	218 East 2nd Street, 730 High Road, & 1205 North Street, Bremen, Indiana 46506
General Source Phone Number:	574-546-4473
SIC Code:	7532 (Top, Body, and Upholstery Repair Shops and Paint Shops)
County Location:	Marshall
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This recreational vehicle (RV) and automotive surface coating facility consists of three (3) plants:

- (a) Plant 1 is located at 218 East 2nd Street, Bremen, Indiana;
- (b) Plant 2 is located at 730 High Road, Bremen, Indiana; and
- (c) Plant 3 is located at 1205 North Street, Bremen, Indiana.

These three (3) plants are located on adjacent properties, have the same two-digit SIC code, and are under common ownership and common control. Therefore IDEM, OAQ has determined that they are one (1) major source, as defined by 326 IAC 2-7-1(22).

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

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

Plant 1 (218 East 2nd Street)

- (a) One (1) paint spray booth, constructed in 2002 and identified as Paint Booth 1, with a maximum capacity of 0.20 recreational vehicles per hour, equipped with HVLP spray applicators and dry filters for particulate control, exhausting to Stacks S1 and S2. This facility is subject to the provisions of 40 CFR 63, Subpart PPPP.

Plant 2 (730 High Road)

- (b) One (1) paint spray booth, constructed in 2004 and identified as Paint Booth A, with a maximum capacity of 0.50 recreational vehicles per hour, equipped with HVLP spray

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applicators and dry filters for particulate control, exhausting to Stack S1. This facility is subject to the provisions of 40 CFR 63, Subpart PPPP.

- (c) One (1) paint spray booth, constructed in 2004 and identified as Paint Booth B, with a maximum capacity of 0.50 recreational vehicles per hour, equipped with HVLP spray applicators and dry filters for particulate control, exhausting to Stack S2. This facility is subject to the provisions of 40 CFR 63, Subpart PPPP.
- (d) Four (4) paint spray booths, constructed in 2007 and identified as PB-C, PB-D, PB-E, and PB-F, each with a maximum capacity of 0.50 recreational vehicles per hour, equipped with HVLP spray applicators and dry filters for particulate control, and exhausting at stacks PBSV-3, PBSV-4, PBSV-5, and PBSV-6. These facilities are subject to the provisions of 40 CFR 63, Subpart PPPP.
- (e) One (1) paint spray booth, constructed in 2007 and identified as PB-Repair, with a maximum capacity of 0.50 recreational vehicle per hour, equipped with HVLP spray applicators and dry filters for particulate control, and exhausting at stack PBSV-7. This facility is subject to the provisions of 40 CFR 63, Subpart PPPP.

Plant 3 (1205 North Street)

- (f) One (1) paint spray booth, identified as PB2, approved in 2015 for construction, with a maximum capacity of 0.125 recreational vehicles per hour, equipped with three (3) HVLP spray applicators and dry filters for particulate control, identified as PB2DF, exhausting to Stack PB2SV1. This facility is subject to the provisions of 40 CFR 63, Subpart PPPP.

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour each:
 - (1) Two (2) natural gas-fired process water heaters, identified as PWH1 and PWH2, constructed in 2007, each with a maximum heat input rate of 0.20 MMBtu per hour, and exhausting to PWH1S and PWH2S, respectively.
 - (2) Four (4) air make-up units, identified as AM1 - AM4, constructed in 2007, each with a maximum heat input rate of 2.50 MMBtu/hr.
 - (3) Two (2) air make-up units, identified as AM5 and AM6, constructed in 2007, each with a maximum heat input rate of 3.20 MMBtu/hr.
 - (4) One (1) air make-up unit, constructed in 2007, with a maximum heat input rate of 2.91 MMBtu/hr.
 - (5) One (1) forced air furnace, identified as H1, constructed in 2007, with a maximum heat input rate of 0.13 MMBtu/hr, and exhausting to H1S.
 - (6) One (1) forced air furnace, identified as H2, constructed in 2007, with a maximum heat input rate of 0.04 MMBtu/hr, and exhausting to H2S.
 - (7) One (1) water heater, identified as WH1, constructed in 2007, with a maximum heat input rate of 0.04 MMBtu/hr, and exhausting to WH1S.

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- (8) One (1) natural gas-fired air make-up unit, identified as AM8, approved in 2015 for construction, with a maximum heat input rate of 2.50 MMBtu/hr.

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

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

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

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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, T099-33142-00096, 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.

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

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

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

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

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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The

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PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

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

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

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

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

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

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

- (A) A description of the emergency;

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- (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

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requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

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

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

- (a) All terms and conditions of permits established prior to T099-33142-00096 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification,

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revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

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

Request for renewal shall be submitted to:

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

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

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- (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:

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

and

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

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

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

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

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

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

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

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.

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

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

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

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

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

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

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

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

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

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

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

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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.

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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 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:

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- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

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

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

C.7 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:

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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.8 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.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

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

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

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

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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.10 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.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

C.12 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.13 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system);
or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.

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- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

C.14 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.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

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

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

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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.16 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;

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

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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- (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.18 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.

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SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Plant 1 (218 East 2nd Street)

- (a) One (1) paint spray booth, constructed in 2002 and identified as Paint Booth 1, with a maximum capacity of 0.20 recreational vehicles per hour, equipped with HVLP spray applicators and dry filters for particulate control, exhausting to Stacks S1 and S2. This facility is subject to the provisions of 40 CFR 63, Subpart PPPP.

Plant 2 (730 High Road)

- (b) One (1) paint spray booth, constructed in 2004 and identified as Paint Booth A, with a maximum capacity of 0.50 recreational vehicles per hour, equipped with HVLP spray applicators and dry filters for particulate control, exhausting to Stack S1. This facility is subject to the provisions of 40 CFR 63, Subpart PPPP.
- (c) One (1) paint spray booth, constructed in 2004 and identified as Paint Booth B, with a maximum capacity of 0.50 recreational vehicles per hour, equipped with HVLP spray applicators and dry filters for particulate control, exhausting to Stack S2. This facility is subject to the provisions of 40 CFR 63, Subpart PPPP.
- (d) Four (4) paint spray booths, constructed in 2007 and identified as PB-C, PB-D, PB-E, and PB-F, each with a maximum capacity of 0.50 recreational vehicles per hour, equipped with HVLP spray applicators and dry filters for particulate control, and exhausting at stacks PBSV-3, PBSV-4, PBSV-5, and PBSV-6. These facilities are subject to the provisions of 40 CFR 63, Subpart PPPP.
- (e) One (1) paint spray booth, constructed in 2007 and identified as PB-Repair, with a maximum capacity of 0.50 recreational vehicle per hour, equipped with HVLP spray applicators and dry filters for particulate control, and exhausting at stack PBSV-7. This facility is subject to the provisions of 40 CFR 63, Subpart PPPP.

Plant 3 (1205 North Street)

- (f) One (1) paint spray booth, identified as PB2, approved in 2015 for construction, with a maximum capacity of 0.125 recreational vehicles per hour, equipped with three (3) HVLP spray applicators and dry filters for particulate control, identified as PB2DF, exhausting to Stack PB2SV1. This facility is subject to the provisions of 40 CFR 63, Subpart PPPP.

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

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

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

The VOC usage at Paint Booth 1 shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply to Paint Booth 1.

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D.1.2 VOC BACT [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (BACT), the Paint Booths A and B, PB-C through F, and PB-Repair are subject to the following requirements:

- (a) The following management practices:
- (1) All containers of solvents, solutions, or VOC containing materials shall be kept closed when not in actual use except during product transfers to minimize evaporation.
 - (2) All waste materials including spent wiping rags, spent solvents, and spent VOC containing materials shall be stored in closed containers at all times except during product transfers to minimize solvent evaporation. Rags used for VOC containing materials shall not be allowed to air dry to allow for reuse.
 - (3) Waste solvents, solutions, or VOC containing materials shall not be disposed by allowing products to evaporate.
 - (4) All VOC containing solvents used to flush lines shall be directed into containers. Line flushing shall not be performed at excess pressures that will create unnecessary atomization of the solvent.
 - (5) Preventive maintenance shall be performed of product transfer equipment to minimize leaks.
- (b) The use of high-volume low-pressure (HVLP) spray application equipment or spray equipment with the same or greater transfer efficiency.
- HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.
- (c) The use of coatings with the following VOC content:
- (1) Primers: 3.50 lbs VOC per gallon;
 - (2) Basecoats: 5.90 lbs VOC per gallon;
 - (3) Clearcoats: 3.50 lbs VOC per gallon; and
 - (4) Cleaners: 6.50 lbs VOC per gallon.
- (d) A VOC material usage limit of 194 tons of VOC per twelve (12) consecutive month period with compliance determined at the end of each month.

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

Pursuant to 326 IAC 6-3-2(d), particulate from all paint booths (Paint Booth 1, PB2, Paint Booth A, Paint Booth B, PB-C through F, and PB-Repair) shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

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

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC content and usage limitations contained in Conditions D.1.1, D.1.2(c) and D.1.2(d) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.6 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S1, S2, PBSV-3 through PBSV-7, and PB2SV1) while one or more of the booths are in operation. If a condition exists which should result in a response, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response required by this condition. Failure to take a reasonable response shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response required by this condition. Failure to take a reasonable response shall be considered a deviation from this permit.

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

D.1.7 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.1.1 and D.1.2, 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 VOC usage limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each month; and
 - (4) The total VOC usage for each month.
- (b) To document the compliance status with Condition D.1.6, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.

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

D.1.8 Reporting Requirements

Quarterly summaries of the information to document the compliance status with Conditions D.1.1 and D.1.2(d) shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no 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 reports submitted by the Permittee 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).

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SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour each:
 - (1) Two (2) natural gas-fired process water heaters, identified as PWH1 and PWH2, constructed in 2007, each with a maximum heat input rate of 0.20 MMBtu per hour, and exhausting to PWH1S and PWH2S, respectively.
 - (7) One (1) water heater, identified as WH1, constructed in 2007, with a maximum heat input rate of 0.04 MMBtu/hr, and exhausting to WH1S.

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

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

D.2.1 Particulate Emissions Limitations for Source 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 indirect heaters (identified as PWH1, PWH2 and WH1) each shall be limited to 0.6 pounds per MMBtu heat input.

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SECTION E.1

NESHAP

Emissions Unit Description:

Plant 1 (218 East 2nd Street)

- (a) One (1) paint spray booth, constructed in 2002 and identified as Paint Booth 1, with a maximum capacity of 0.20 recreational vehicles per hour, equipped with HVLP spray applicators and dry filters for particulate control, exhausting to Stacks S1 and S2. This facility is subject to the provisions of 40 CFR 63, Subpart PPPP.

Plant 2 (730 High Road)

- (b) One (1) paint spray booth, constructed in 2004 and identified as Paint Booth A, with a maximum capacity of 0.50 recreational vehicles per hour, equipped with HVLP spray applicators and dry filters for particulate control, exhausting to Stack S1. This facility is subject to the provisions of 40 CFR 63, Subpart PPPP.
- (c) One (1) paint spray booth, constructed in 2004 and identified as Paint Booth B, with a maximum capacity of 0.50 recreational vehicles per hour, equipped with HVLP spray applicators and dry filters for particulate control, exhausting to Stack S2. This facility is subject to the provisions of 40 CFR 63, Subpart PPPP.
- (d) Four (4) paint spray booths, constructed in 2007 and identified as PB-C, PB-D, PB-E, and PB-F, each with a maximum capacity of 0.50 recreational vehicles per hour, equipped with HVLP spray applicators and dry filters for particulate control, and exhausting at stacks PBSV-3, PBSV-4, PBSV-5, and PBSV-6. These facilities are subject to the provisions of 40 CFR 63, Subpart PPPP.
- (e) One (1) paint spray booth, constructed in 2007 and identified as PB-Repair, with a maximum capacity of 0.50 recreational vehicle per hour, equipped with HVLP spray applicators and dry filters for particulate control, and exhausting at stack PBSV-7. This facility is subject to the provisions of 40 CFR 63, Subpart PPPP.

Plant 3 (1205 North Street)

- (f) One (1) paint spray booth, identified as PB2, approved in 2015 for construction, with a maximum capacity of 0.125 recreational vehicles per hour, equipped with three (3) HVLP spray applicators and dry filters for particulate control, identified as PB2DF, exhausting to Stack PB2SV1. This facility is subject to the provisions of 40 CFR 63, Subpart PPPP.

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

**National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements
[326 IAC 2-7-5(1)]**

E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.1, 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, for the affected facilities, as specified in Table 2 of 40 CFR Part 63, Subpart PPPP in accordance with the schedule contained in 40 CFR 63, Subpart PPPP.

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

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

E.1.2 National Emissions Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products: Requirements [40 CFR Part 63, Subpart PPPP]

Pursuant to 40 CFR Part 63, Subpart PPPP, the Permittee shall comply with the following applicable provisions of 40 CFR Part 63, Subpart PPPP (included as Attachment A), which are incorporated by reference as 326 IAC 20-81:

- (1) 40 CFR 63.4480
- (2) 40 CFR 63.4481
- (3) 40 CFR 63.4482
- (4) 40 CFR 63.4483
- (5) 40 CFR 63.4490
- (6) 40 CFR 63.4491(a) and (b)
- (7) 40 CFR 63.4492(a) and (c)
- (8) 40 CFR 63.4493(a) and (c)
- (9) 40 CFR 63.4500(a)(1) and (b)
- (10) 40 CFR 63.4501
- (11) 40 CFR 63.4510(a), (b), (c)(1) through (c)(8), (c)(10), and (c)(11)
- (12) 40 CFR 63.4520(a)(1) through (a)(6)
- (13) 40 CFR 63.4530(a), (b), (c)(1) through (c)(3), and (d) through (h)
- (14) 40 CFR 63.4531
- (15) 40 CFR 63.4540
- (16) 40 CFR 63.4541
- (17) 40 CFR 63.4542
- (18) 40 CFR 63.4550
- (19) 40 CFR 63.4551
- (20) 40 CFR 63.4552
- (21) 40 CFR 63.4580
- (22) 40 CFR 63.4581
- (23) Table 1
- (24) Table 2
- (25) Table 3
- (26) Table 4
- (27) Appendix A

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

Source Name: Precision Painting, Inc.
Source Address: 218 East 2nd Street & 730 High Road, Bremen, Indiana 46506
Part 70 Permit No.: T099-33142-00096

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:

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**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: Precision Painting, Inc.
Source Address: 218 East 2nd Street & 730 High Road, Bremen, Indiana 46506
Part 70 Permit No.: T099-33142-00096

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:

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Report

Source Name: Precision Painting, Inc.
Source Address: 218 East 2nd Street & 730 High Road, Bremen, Indiana 46506
Part 70 Permit No.: T099-33142-00096
Facility: Paint Booth 1
Parameter: VOC Usage
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month

QUARTER :

YEAR:

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

No deviation occurred in this quarter.

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

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

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

Part 70 Quarterly Report

Source Name: Precision Painting, Inc.
Source Address: 218 East 2nd Street & 730 High Road, Bremen, Indiana 46506
Part 70 Permit No.: T099-33142-00096
Facility: PB-A through PB-F, and PB-Repair
Parameter: VOC Usage
Limit: Less than one hundred ninety four (194) tons per twelve (12) consecutive month period, with compliance determined at the end of each month

QUARTER :

YEAR:

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on:

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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**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: Precision Painting, Inc.
Source Address: 218 East 2nd Street & 730 High Road, Bremen, Indiana 46506
Part 70 Permit No.: T099-33142-00096

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

**Technical Support Document (TSD) for a Part 70
Minor Source Modification and
a Significant Permit Modification**

Source Description and Location

Source Name:	Precision Painting, Inc.
Source Location:	
Plant 1:	218 East 2nd Street, Bremen, Indiana 46506
Plant 2:	730 High Road, Bremen, Indiana 46506
Plant 3:	1205 North Street, Bremen, Indiana 46506
County:	Marshall
SIC Code:	7532 (Top, Body, and Upholstery Repair Shops and Paint Shops)
Operation Permit No.:	T099-33142-00095
Operation Permit Issuance Date:	January 8, 2014
Minor Source Modification No.:	099-36445-00096
Significant Permit Modification No.:	099-36447-00096
Permit Reviewer:	Curtis Taylor

Source Definition

Precision Painting, Inc. operates three (3) buildings consisting of three (3) stationary recreational vehicle (RV) and automotive surface coating facilities. Plant 1 is located at 218 East 2nd Street, Bremen, Plant 2 is located at 730 High Road, Bremen, and Plant 3 is located at 1205 North Street, Bremen. The primary operation at these sites is the top coating of RVs. IDEM, OAQ has examined whether these facilities, referred to as Plant 1, Plant 2, and Plant 3, are part of the same major source. The term "major source" is defined at 326 IAC 2-7-1(22). In order for these plants to be considered one major source, they must meet all three of the following criteria:

- (1) the plants must be under common ownership or common control;
- (2) the plants must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for another; and,
- (3) the plants must be located on the same, contiguous or adjacent properties.

The plants are all owned and operated by Precision Painting, Inc. Since common ownership and common control exists, the first element of the definition of "major source" is met.

The plants have the same four-digit SIC Code: 7532 (Top, Body, and Upholstery Repair Shops and Paint Shops). Since the plants have the same two-digit SIC Code, 75, they meet the second part of the definition, it is not necessary to determine whether they are also qualified as support facilities.

The last criterion of the definition is whether the plants are on the same, contiguous or adjacent properties. Plant 1, Plant 2, and Plant 3 are located on separate properties that do not share any common boundary. Since they are not on contiguous properties, IDEM, OAQ examined whether the plants are on adjacent properties.

The term "adjacent" is not defined in Indiana's rules. IDEM's Nonrule Policy Document Air-005 is guidance for applying the definition of "major source" in 326 IAC 2-7-1(22). NPD Air-005 adds the following guidance:

- properties that actually abut at any point would satisfy the requirement of contiguous or adjacent property.
- properties that are separated by a public road or public property would satisfy this requirement, absent special circumstances.
- other scenarios would be examined on an individual basis with the focus on the distance between the activities and the relationship between the activities.

The U.S. EPA has a similar view on how to interpret the term “adjacent” when defining a source. Two U.S. EPA letters; the May 21, 1988 letter from U.S. EPA Region 8 to the Utah Division of Air Quality, and the U.S. EPA Region 5 letter dated October 18, 2010 to Scott Huber at Summit Petroleum Corporation, discuss the term “adjacent” as it is used in making major source determinations. These letters are not binding on IDEM but they are persuasive for two reasons. The letters follow the guidance in NPD Air-005 that IDEM will examine both the distance between the sources and their relationship and, secondly, they illustrate a longstanding U.S. EPA analysis used to determine if two sources are “adjacent” going back to the preamble to the 1980 NSR program definition of “major source”. U.S. EPA’s consistent approach is that any evaluation of what is “adjacent” must relate to the guiding principal of a common sense notion of “source”.

All IDEM evaluations of adjacency are done on a case-by-case basis looking at the specific factors for the plants involved. In addition to determining the distance between the plant properties, IDEM asks:

- (1) Are materials routinely transferred between the plants?
- (2) Do managers or other workers frequently shuttle back and forth to be involved actively in the plants?
- (3) Is the production process itself split in any way between the plants?

These questions focus on whether the separate sources are so interrelated that they are functioning as one plant, and whether the distance between them is small enough that it enables them to operate as one plant. U.S. EPA Assistant Administrator Gina McCarty issued a memorandum on September 22, 2009 that confirmed U.S. EPA’s view that each source determination must be done on a case-by-case basis and stated that after that analysis is completed it may be that physical proximity serves as an overwhelming factor in determining if the plants are adjacent.

Plant 1 is the location where the ordering and receiving of products is conducted. All products are either coated in Plant 1, or shipped to Plant 2 or Plant 3, based on the specialty coating needed. All of the material that is coated at Plant 2 and Plant 3 comes from Plant 1. After the coating is completed, products at Plant 2 and Plant 3 are sent back to Plant 1 in preparation for delivery to customers. Plants 2 and 3 send all of their production to Plant 1. Plant 1 is approximately 0.7 miles away from Plant 2. Plant 1 is approximately 1.3 miles away from Plant 3. Plant 2 is approximately 1.1 miles away from Plant 3. Managers and workers frequently shuttle back and forth to be actively involved in each plant. Considering all these factors, IDEM, OAQ has determined that Plant 1, Plant 2, and Plant 3 are located on adjacent properties, meeting the third part of the major source definition.

These plants are located on adjacent properties, have the same two-digit SIC Code and are under common ownership and common control. Therefore IDEM, OAQ has determined that they are one (1) major source, as defined by 326 IAC 2-7-1(22).

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. T099-33142-00096 on January 8, 2014. The source has since received Administrative Amendment No. 099-35848-00096, issued on July 10, 2015.

County Attainment Status

The source is located in Marshall County.

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

¹Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.

- (a) **Ozone Standards**
 Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Marshall County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
 Marshall County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
 Marshall County has been classified as attainment or unclassifiable in Indiana for all other regulated criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Source Status - Existing Source

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

Pollutant	Emissions (ton/yr)
PM	Less than 100
PM ₁₀	Less than 100
PM _{2.5}	Less than 100
SO ₂	Less than 100
NO _x	Less than 100
VOC	Greater than 100, Less than 250
CO	Less than 100
Total HAPs	Greater than 25
Worst Single HAP	Greater than 10

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant, excluding GHGs, is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is a major source of HAPs, as defined in 40 CFR 63.2, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Precision Painting, Inc. on November 4, 2015, relating to the addition of emission units at a another building location. The following is a list of the proposed emission units and pollution control device:

Plant 3 (1205 North Street, Bremen, IN 46506)

- (a) One (1) paint spray booth, identified as PB2, approved in 2015 for construction, with a maximum capacity of 0.125 recreational vehicles per hour, equipped with three (3) HVLP spray applicators and dry filters for particulate control, identified as PB2DF, exhausting to Stack PB2SV1. This facility is subject to the provisions of 40 CFR 63, Subpart PPPP.
- (b) One (1) natural gas-fired air make-up unit, identified as AM8, approved in 2015 for construction, with a maximum heat input rate of 2.50 MMBtu/hr.

Enforcement Issues

There are no pending enforcement actions.

Emission Calculations

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

Permit Level Determination – Part 70 Modification to an Existing Source

Pursuant to 326 IAC 2-1.1-1(12), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit. If the control equipment has been determined to be integral, the table reflects the PTE after consideration of the integral control device.

Increase in PTE Before Controls of the Modification (New Units)	
Pollutant	Potential To Emit (ton/yr)
PM	3.56
PM ₁₀	3.62
PM _{2.5}	3.62
SO ₂	0.01
VOC	20.19
CO	0.90
NO _x	1.07
Single HAP	1.58 (Xylene)
Total HAPs	3.22

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

This source modification is subject to 326 IAC 2-7-10.5(e)(1)(B)(iii) because the potential to emit of VOC is greater than ten (10) tons per year before control. Additionally, the modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d)(1), because the modification requires significant changes in existing Part 70 monitoring permit terms and conditions

Permit Level Determination – PSD

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

Process / Emission Unit	Project Emissions (ton/yr)							
	PM	PM ₁₀	PM _{2.5} [*]	SO ₂	NO _x	VOC	CO	Single HAP
Air Makeup Units (AM1-AM4)	0.02	0.08	0.08	0.01	1.07	0.06	0.90	0.02 Hexane
Paint Booth 2 (Worst Case)	3.54	3.54	3.54	-	-	20.13	-	1.58 Xylene
Total for Modification	3.56	3.62	3.62	0.01	1.07	20.19	0.90	1.58 Xylene
PSD Major Source Thresholds	250	250	250	250	250	250	250	250

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

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

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

Federal Rule Applicability Determination

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

New Source Performance Standard (NSPS):

- (a) This source is not subject to the requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60.390, Subpart MM, because this source is not an automobile or light duty truck assembly plant.
- (b) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (a) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR 63.3080, Subpart IIII, because pursuant to 40 CFR 63.3081(c)(1). The paint spray booth, identified as PB2, is subject to the requirements of 40 CFR 63, Subpart PPPP.
- (b) This source is subject to the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products, 40 CFR Part 63, Subpart PPPP, which is incorporated by reference as 326 IAC 20-81. The paint spray booth, identified as PB2,

coating operation falls under the "assembled on-road vehicle coating" subcategory as specified in 40 CFR 63.4481(a)(5). The units subject to this rule include the following:

- (1) All coating operations as defined in 40 CFR 63.4581;
- (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
- (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
- (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

Nonapplicable portions of the NESHAP will not be included in the permit. The Permittee has chosen to comply with the requirements by either the compliant material option or the emission rate without add-on control option. This source is subject to the following portions of Subpart PPPP.

- (1) 40 CFR 63.4480
- (2) 40 CFR 63.4481
- (3) 40 CFR 63.4482
- (4) 40 CFR 63.4483
- (5) 40 CFR 63.4490
- (6) 40 CFR 63.4491(a) and (b)
- (7) 40 CFR 63.4492(a) and (c)
- (8) 40 CFR 63.4493(a) and (c)
- (9) 40 CFR 63.4500(a)(1) and (b)
- (10) 40 CFR 63.4501
- (11) 40 CFR 63.4510(a), (b), (c)(1) through (c)(8), (c)(10), and (c)(11)
- (12) 40 CFR 63.4520(a)(1) through (a)(6)
- (13) 40 CFR 63.4530(a), (b), (c)(1) through (c)(3), and (d) through (h)
- (14) 40 CFR 63.4531
- (15) 40 CFR 63.4540
- (16) 40 CFR 63.4541
- (17) 40 CFR 63.4542
- (18) 40 CFR 63.4550
- (19) 40 CFR 63.4551
- (20) 40 CFR 63.4552
- (21) 40 CFR 63.4580
- (22) 40 CFR 63.4581
- (23) Table 1
- (24) Table 2
- (25) Table 3
- (26) Table 4
- (27) Appendix A

The provisions of 40 CFR 63 Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart PPPP.

- (c) The source is not subject to the National Emissions Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH, because this source is a major source of HAPs.
- (d) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) applicable to this proposed modification.

Compliance Assurance Monitoring (CAM)

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

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

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

CAM Applicability Analysis							
Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (ton/yr)	Controlled PTE (ton/yr)	Major Source Threshold (ton/yr)	CAM Applicable (Y/N)	Large Unit (Y/N)
Paint Booth (PB2) - PM	Dry Filter	Y 326 IAC 6-3	PM < 100	PM < 100	100*	N	N
Paint Booth (PB2) - PM10/PM2.5	Dry Filter	N	PM ₁₀ < 100 PM _{2.5} < 100	PM ₁₀ < 100 PM _{2.5} < 100	100	N	N
Paint Booth (PB2) - VOC	None	N	VOC < 100	VOC < 100	100	N	N

*PM does not have a major source threshold because under the Part 70 Permit Program (40 CFR 70), PM is not considered as a "regulated air pollutant". PM10 is used as a surrogate for PM to determine if the emission unit is subject to CAM.

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

State Rule Applicability Determination

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

326 IAC 2-2 (PSD)

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

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

The operation of paint booth (PB2) will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially. The first report is due no later than July 1, 2004, and subsequent reports are due every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 2-7-6(5) (Annual Compliance Certification)

The U.S. EPA Federal Register 79 FR 54978 notice does not exempt Title V Permittees from the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D), but the submittal of the Title V annual compliance certification to IDEM satisfies the requirement to submit the Title V annual compliance certifications to EPA. IDEM does not intend to revise any permits since the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D) still apply, but Permittees can note on their Title V annual compliance certification that submission to IDEM has satisfied reporting to EPA per Federal Register 79 FR 54978. This only applies to Title V Permittees and Title V compliance certifications.

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

Pursuant to 326 IAC 6-3-2(d), the particulate matter (PM) from the paint booth (PB2), shall be controlled by dry particulate filters, waterwash, or an equivalent control device and the Permittee shall operate the control device in accordance with manufacturer's specifications.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

Paint spray booth (PB2) has potential VOC emissions of less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 do not apply to this unit.

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

The source is not subject to the requirements of 326 IAC 8-2-2, because this source is not an automobile or light duty truck assembly plant

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

The source is not subject to the requirements of 326 IAC 8-2-9, since it does not perform metal surface coating of large and small farm machinery, small household appliances, office equipment, or commercial and industrial machinery, and does not coat metal parts or products under the Standard Industrial Classification Code of major groups #33, #34, #35, #36, #37, #38, or #39. This source performs the surface coating of recreational vehicles under the Standard Industrial Classification Code of major group #75, 7532 (Top, Body, and Upholstery Repair Shops and Paint Shops).

326 IAC 8-10 (Automobile Refinishing)

The source is not subject to the requirements of 326 IAC 8-10, because the source does not perform refinishing as defined in 326 IAC 8-10-2(35). The source performs surface coating of RV units by applying the initial coating to original equipment manufacturing (OEM) parts. Therefore the requirements of 326 IAC 8-10 do not apply.

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 determination requirements applicable to this modification are as follows:

- (a) Pursuant to 326 IAC 6-3-2(d), particulate from the spray surface coating booth, identified as PB2, 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.
- (b) There are no testing requirements applicable to this modification.

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

Control	Parameter	Frequency	Excursions and Exceedances
Dry Filters (PB2DF) [Paint Spray Booth (PB2)]	Filter Inspections	Daily	Response Steps
	Overspray Observations	Weekly	
	Overspray Inspections	Monthly	

These compliance determination and monitoring conditions are necessary because the dry particulate filters for PB2 must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T099-33142-00096. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

Additional Changes:

IDEM, OAQ made additional modifications to the permit as described below in order to update the language to match the most current version of the applicable rule, to eliminate redundancy within the permit, and to provide clarification regarding the requirements of these conditions.

IDEM, OAQ has included Condition A.2 - Part 70 Source Definition. This condition was inadvertently removed from Part 70 Operating Permit Renewal No. T099-33142-00096, issued on January 8, 2014.

IDEM, OAQ added the rule citation 326 IAC 2-7-5(1) to the Compliance Determination Requirements subsection title in Section D.1 to clarify the authority of these conditions.

IDEM, OAQ has revised Condition D.1.8 - Reporting Requirements, to clarify the Permittee's obligations with regards to the reporting requirements required by this condition.

IDEM, OAQ revised Section E.1 for clarity.

The Quarterly Report form has been modified to remove the numbered months. The Permittee should state which months are being reported.

IDEM, OAQ has corrected typographical errors.

The permit has been revised as follows:

...

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 recreational vehicle (RV) and automotive surface coating facility.

Source Address: 218 East 2nd Street, & 730 High Road, & 1205 North Street, Bremen, Indiana 46506

...

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This recreational vehicle (RV) and automotive surface coating facility consists of three (3) plants:

- (a) Plant 1 is located at 218 East 2nd Street, Bremen, Indiana;
- (b) Plant 2 is located at 730 High Road, Bremen, Indiana; and
- (c) Plant 3 is located at 1205 North Street, Bremen, Indiana.

These three (3) plants are located on adjacent properties, have the same two-digit SIC code, and are under common ownership and common control. Therefore IDEM, OAQ has determined that they are one (1) major source, as defined by 326 IAC 2-7-1(22).

...

A.23 Emission Units and Pollution Control Equipment Summary
[326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

...

Plant 3 (1205 North Street)

- (f) **One (1) paint spray booth, identified as PB2, approved in 2015 for construction, with a maximum capacity of 0.125 recreational vehicles per hour, equipped with three (3) HVLP spray applicators and dry filters for particulate control, identified as PB2DF, exhausting to Stack PB2SV1. This facility is subject to the provisions of 40 CFR 63, Subpart PPPP.**

...

A.34 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour each:
 - ...
 - (8) **One (1) natural gas-fired air make-up unit, identified as AM8, approved in 2015 for construction, with a maximum heat input rate of 2.50 MMBtu/hr.**

...

A.54 Part 70 Permit Applicability [326 IAC 2-7-2]

...

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

...
Plant 3 (1205 North Street)

- (f) **One (1) paint spray booth, identified as PB2, approved in 2015 for construction, with a maximum capacity of 0.125 recreational vehicles per hour, equipped with three (3) HVLP spray applicators and dry filters for particulate control, identified as PB2DF, exhausting to Stack PB2SV1. This facility is subject to the provisions of 40 CFR 63, Subpart PPPP.**

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

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

Pursuant to 326 IAC 6-3-2(d), particulate from all paint booths (Paint Booth 1, **PB2**, Paint Booth A, Paint Booth B, PB-C through F, and PB-Repair) shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

...
Compliance Determination Requirements [326 IAC 2-7-5(1)]

...
D.1.6 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S1, S2, ~~and~~ PBSV-3 through PBSV-7, **and PB2SV1**) while one or more of the booths are in operation. If a condition exists which should result in a response, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response required by this condition. Failure to take a reasonable response shall be considered a deviation from this permit.

...
D.1.8 Reporting Requirements

~~A quarterly summary~~ of the information to document the compliance status with Conditions D.1.1 and D.1.2(d) shall be submitted using the reporting forms located at the end of this permit, or ~~its~~ **their** equivalent, no 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 reports submitted by the Permittee ~~does~~ require a certification that meets the requirements of 326 IAC ~~2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).~~

SECTION E.1 FACILITY OPERATION CONDITIONS ~~NESHAP~~

Emissions Unit Description:
 ...

Plant 3 (1205 North Street)

(f) One (1) paint spray booth, identified as PB2, approved in 2015 for construction, with a maximum capacity of 0.125 recreational vehicles per hour, equipped with three (3) HVLP spray applicators and dry filters for particulate control, identified as PB2DF, exhausting to Stack PB2SV1. This facility is subject to the provisions of 40 CFR 63, Subpart PPPP.

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

...

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements: **[326 IAC 2-7-5(1)]**

E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.45041, 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, for the affected facilities, as specified in Table 2 of 40 CFR Part 63, Subpart PPPP in accordance with the schedule contained in 40 CFR 63, Subpart PPPP.

...

E.1.2 National Emissions Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products: Requirements [40 CFR Part 63, Subpart PPPP]

Pursuant to 40 CFR Part 63, Subpart PPPP, the Permittee shall comply with the **following** applicable provisions of 40 CFR Part 63, Subpart PPPP (included as Attachment A), which are incorporated by reference as 326 IAC 20-81, ~~for the affected facilities described below:~~

...

Part 70 Quarterly Report

...

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

...

Conclusion and Recommendation

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 099-36445-00096 and Significant Permit Modification No. 099-36447-00096. The staff recommend to the Commissioner that this Part 70 Minor Source and Significant Permit Modification be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Curtis Taylor 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) 234-5176 or toll free at 1-800-451-6027 extension 4-5176.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emissions Calculations
Summary**

Company Name: Precision Painting, Inc.

Address: 218 East 2nd Street, 730 High Road, and 1205 North Street, Bremen, Indiana 46506

Part 70 Operating Permit Renewal No.: T099-33142-00096

Minor Source Modification: 099-36445-00096

Significant Permit Modification: 099-36447-00096

Reviewer: Curtis Taylor

Potential To Emit (ton/yr)

Emission Units	PM	PM10	PM2.5	SO₂	NOx	VOC	CO	Total HAPs	Worst Single HAP
Paint Booth 1	4.54	4.54	4.54	-	-	27.39	-	31.09	14.04 Xylene
Paint Booth (PB2)	3.54	3.54	3.54	-	-	20.13	-	3.20	1.58 Xylene
Paint Booth A through F	23.67	23.67	23.67	-	-	189.85	-	59.67	28.50 Xylene
Paint Spray Repair	0.00	0.00	0.00	-	-	3.69	-	2.21	0.64 Xylene
NG Combustion	0.18	0.73	0.73	0.06	9.64	0.53	8.10	0.18	0.17 Hexane
Total	31.93	32.48	32.48	0.06	9.64	241.59	8.10	96.34	44.93 Xylene

Limited Emissions (ton/yr)

Emission Units	PM	PM10	PM2.5	SO₂	NOx	VOC	CO	Total HAPs	Worst Single HAP
* Paint Booth 1	4.54	4.54	4.54	-	-	< 25.00	-	31.09	14.04 Xylene
Paint Booth (PB2)	3.54	3.54	3.54	-	-	20.13	-	3.20	1.58 Xylene
** Paint Booth A through F	23.67	23.67	23.67	-	-	< 194.00	-	59.67	28.50 Xylene
** Paint Spray Repair	0.00	0.00	0.00	-	-		-	2.21	0.64 Xylene
NG Combustion	0.18	0.73	0.73	0.06	9.64	0.53	8.10	0.18	0.17 Hexane
Total	31.93	32.48	32.48	0.06	9.64	< 239.66	8.10	96.34	44.93 Xylene

* Limited to less than 25 tons of VOC per twelve consecutive month period, with compliance determined at the end of each month.

** Limited to a usage limit equal to 194 pursuant to BACT.

**Appendix A: Emissions Calculations
Modification Summary**

Company Name: Precision Painting, Inc.
Address: 218 East 2nd Street, 730 High Road, and 1205 North Street, Bremen, Indiana 46506
Part 70 Operating Permit Renewal No.: T099-33142-00096
Minor Source Modification: 099-36445-00096
Significant Permit Modification: 099-36447-00096
Reviewer: Curtis Taylor

Unit	Potential to Emit (ton/yr)									
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Single HAP	
Air Makeup Units (AM1-AM4)	0.02	0.08	0.08	0.01	1.07	0.06	0.90	0.02	0.02	Hexane
Paint Booth (PB2) (Worst Case)	3.54	3.54	3.54	-	-	20.13	-	3.20	1.58	Xylene
Total	3.56	3.62	3.62	0.01	1.07	20.19	0.90	3.22	1.58	Xylene
Minor Source Modification Threshold	5	5	5	10	10	10	25	2.50	1	
Significant Source Modification Threshold	25	25	25	25	25	25	100	25	10	
PSD Significant Threshold	250	250	250	250	250	250	250	N/A	N/A	

Appendix A: Emissions Calculations (Plant 1)
Surface Coating: Paint Booth 1
VOC and Particulate Emissions

Company Name: Precision Painting, Inc.

Address: 218 East 2nd Street, 730 High Road, and 1205 North Street, Bremen, Indiana 46506

Part 70 Operating Permit Renewal No.: T099-33142-00096

Minor Source Modification: 099-36445-00096

Significant Permit Modification: 099-36447-00096

Reviewer: Curtis Taylor

Substrate: Plastic

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Material Usage Rate (gal/unit)	Maximum Throughput (unit/hour)	Pounds VOC per Gallon of Coating less Water	Pounds VOC per Gallon of Coating	PTE of VOC (lbs/hour)	PTE of VOC (tons/year)	PTE of PM/PM10/PM2.5 (tons/year)	Transfer Efficiency
Worst Case Reducer	7.31	99.0%	0.0%	99.0%	0.0%	0.00%	4.32	0.20	7.24	7.24	6.25	27.4	0.07	75%
Worst Case Basecoat	7.24	97.0%	0.0%	97.0%	0.0%	2.50%	4.34	0.20	7.02	7.02	6.10	26.7	0.21	75%
Worst Case Clearcoat	7.88	49.0%	0.0%	49.0%	0.0%	50.59%	1.25	0.20	3.86	3.86	0.97	4.23	1.10	75%
Worst Case Promoter	7.29	80.0%	0.0%	80.0%	0.0%	19.06%	0.11	0.20	5.83	5.83	0.13	0.56	0.04	75%
Filler	8.84	61.0%	0.0%	61.0%	0.0%	38.76%	0.24	0.20	5.39	5.39	0.26	1.13	0.18	75%
Hardener	9.60	0.0%	0.0%	0.0%	0.0%	98.21%	2.16	0.20	0.00	0.00	0.00	0.00	4.54	75%
Worst Case Paint	7.78	78.0%	0.0%	78.0%	0.0%	66.66%	4.98	0.20	6.07	6.07	6.04	26.5	1.87	75%

PM Control Efficiency: 90%

Uncontrolled	6.25	27.39	4.54
Controlled	6.25	27.39	0.45

Note: Only one (1) coating can be sprayed at a time, using HVLP spray applicator

METHODOLOGY

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

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

PTE of VOC (lbs/hour) = Pounds of VOC per Gallon of Coating (lb/gal) * Material Usage Rate (gal/unit) * Maximum Throughput (units/hour)

PTE of VOC (tons/year) = Pounds of VOC per Gallon of Coating (lbs/gal) * Material Usage Rate (gal/unit) * Maximum Throughput (units/hour) * 8760 hours/year * 1 ton/2000 lbs

PTE of PM/PM10 (tons/year) = Maximum Throughput (units/hour) * Material Usage Rate (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer Efficiency %) * 8760 hours/year * 1 ton/2000 lbs

Appendix A: Emissions Calculations (Plant 1)
Surface Coating: Paint Booth 1
HAP Emissions

Company Name: Precision Painting, Inc.
Address: 218 East 2nd Street, 730 High Road, and 1205 North Street, Bremen, Indiana 46506
Part 70 Operating Permit Renewal No.: T099-33142-00096
Minor Source Modification: 099-36445-00096
Significant Permit Modification: 099-36447-00096
Reviewer: Curtis Taylor

Material	Density (lbs/gal)	Material Usage Rate (gal/unit)	Max. Throughput (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MIBK	Weight % Ethylbenzene	Weight % Glycol Ethers	PTE of Xylene (tons/year)	PTE of Toluene (tons/year)	PTE of MIBK (tons/year)	PTE of Ethylbenzene (tons/year)	PTE of Glycol Ethers (tons/year)
Reducer US-1	6.75	4.32	0.20	0.0%	0.00%	2.00%	0.00%	0.00%	0.00	0.00	0.511	0.00	0.00
Reducer US-2	6.92	4.32	0.20	0.0%	0.00%	1.00%	0.00%	0.00%	0.00	0.00	0.262	0.00	0.00
Reducer US-3	7.08	4.32	0.20	0.0%	0.00%	1.00%	0.00%	0.00%	0.00	0.00	0.268	0.00	0.00
Reducer US-4	7.31	4.32	0.20	0.0%	0.00%	0.00%	0.00%	12.0%	0.00	0.00	0.00	0.00	3.32
Basecoat BCS-600	7.25	4.34	0.20	32.0%	38.0%	0.00%	6.00%	0.00%	8.82	10.47	0.00	1.65	0.00
Basecoat BCS-605	7.24	4.34	0.20	51.0%	0.00%	0.00%	9.00%	0.00%	14.04	0.00	0.00	2.48	0.00
Clearcoat CC-633	7.88	1.25	0.20	0.0%	0.00%	9.00%	0.00%	0.00%	0.00	0.00	0.777	0.00	0.00
Clearcoat UH-80	9.03	1.25	0.20	0.0%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Promoter S63	7.20	0.11	0.20	3.00%	54.0%	0.00%	0.00%	0.00%	0.021	0.375	0.00	0.00	0.00
Promoter S65	7.29	0.11	0.20	12.0%	0.00%	1.00%	2.00%	0.00%	0.084	0.00	0.007	0.014	0.00
Filler E2G980	8.84	0.24	0.20	4.00%	5.00%	9.00%	0.00%	10.0%	0.074	0.09	0.167	0.00	0.186
Hardener	9.60	2.16	0.20	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Paint U7000	7.78	4.98	0.20	28.0%	0.00%	0.00%	5.00%	0.00%	9.50	0.00	0.00	1.70	0.00
Paint U7001	7.79	4.98	0.20	28.0%	0.00%	0.00%	5.00%	0.00%	9.52	0.00	0.00	1.70	0.00
Paint U7002	7.78	4.98	0.20	28.0%	0.00%	0.00%	5.00%	0.00%	9.50	0.00	0.00	1.70	0.00
Paint U7004	7.92	4.98	0.20	29.0%	0.00%	0.00%	5.00%	0.00%	10.02	0.00	0.00	1.73	0.00
Paint U7005	7.89	4.98	0.20	29.0%	0.00%	0.00%	5.00%	0.00%	9.98	0.00	0.00	1.72	0.00
Paint U7006	7.78	4.98	0.20	28.0%	0.00%	0.00%	5.00%	0.00%	9.50	0.00	0.00	1.70	0.00
Paint U7007	7.89	4.98	0.20	29.0%	0.00%	0.00%	5.00%	0.00%	9.98	0.00	0.00	1.72	0.00
Paint U7012	7.75	4.98	0.20	29.0%	0.00%	0.00%	5.00%	0.00%	9.80	0.00	0.00	1.69	0.00
									14.04	10.47	0.78	2.48	3.32

Note: Only one (1) coating can be sprayed at a time.

METHODOLOGY

PTE of HAPS (tons/year) = Density (lbs/gal) * Material Usage Rate (gal/unit) * Maximum Throughput (unit/hour) * Weight % HAP * 8760 hours/year * 1 ton/2000 lb

Appendix A: Emissions Calculations (Plant 2)

**Surface Coating: Paint Booth A through F
VOC and Particulate Emissions**

Company Name: Precision Painting, Inc.

Address: 218 East 2nd Street, 730 High Road, and 1205 North Street, Bremen, Indiana 46501

Part 70 Operating Permit Renewal No.: T099-33142-00096

Minor Source Modification: 099-36445-00096

Significant Permit Modification: 099-36447-00096

Reviewer: Curtis Taylor

Material	Density (lb/gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water & Exempt	Weight % Organics	Volume % Water & Exempt	Weight % Non-Volatiles (solids)	Material Usage Rate (gal/unit)	Max. Throughput (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE VOC (lbs/hour)	PTE VOC (tons/year)	PTE PM/PM10 (tons/year)	**Transfer Efficiency
Basecoat Application - Step 1														
BCS-605 Reducer	7.24	100%	0.00%	100%	0.00%	0.00%	2.00	0.50	7.24	7.24	7.24	31.7	0.00	75%
Basecoat U7002	7.78	78.8%	0.00%	78.8%	0.00%	21.2%	2.00	0.50	6.13	6.13	6.13	26.8	1.81	75%
Urethane Sealer S56	10.94	33.5%	0.00%	33.5%	0.00%	66.5%	0.75	0.50	3.66	3.66	1.37	6.00	2.99	75%
Etching Reducer ER992	6.87	100%	1.70%	98.3%	1.77%	0.00%	0.49	0.50	6.87	6.75	1.65	7.25	0.00	75%
Striping Application - Step 2														
V7011 Toner	7.77	78.9%	0.00%	78.9%	0.00%	21.1%	2.50	0.50	6.13	6.13	7.66	33.5	2.24	75%
RHF 75 Reducer	7.36	92.1%	0.00%	92.1%	0.00%	7.88%	2.50	0.50	6.78	6.78	8.47	37.1	0.79	75%
Clearcoat Application - Step 3														
Clearcoat CC720	7.89	44.1%	12.4%	31.7%	14.9%	55.9%	4.33	0.50	2.94	2.50	5.41	23.7	10.5	75%
UH924 Hardener	9.11	18.8%	0.00%	18.8%	0.00%	81.2%	1.33	0.50	1.71	1.71	1.14	4.98	5.39	75%
DR635 Reducer	6.91	100%	23.9%	76.1%	25.0%	0.00%	1.33	0.50	7.01	5.26	3.50	15.3	0.00	75%
Cleaning Solvent														
R7K158 Surface Cleaner (Unit Cleaner)	6.21	100%	0.00%	100%	0.00%	0.00%	0.25	0.50	6.21	6.21	0.78	3.40	0.00	100%
Worst Case Coating Stage and Cleaning Materials (Coatings are Mutually Exclusive)											189.85	23.67		

Worst Case Coating Stage and Cleaning Materials (Coatings are Mutually Exclusive)

189.85

23.67

** Coating applied using high volume, low pressure (HVLV) spray application and manual (hand wiping) cleaning. Overspray controlled by dry filter:

METHODOLOGY

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

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

PTE of VOC (lbs/hour) = Pounds of VOC per Gallon Coating (lb/gal) * Material Usage Rate (gal/unit) * Maximum Throughput (units/hour)

PTE of VOC (tons/year) = Pounds of VOC per Gallon of Coating (lbs/gal) * Material Usage Rate (gal/unit) * Maximum Throughput (units/hour) * 8760 hours/year * 1 ton/2000 lbs

PTE of PM/PM10 (tons/year) = Maximum Throughput (units/hour) * Material Usage Rate (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer Efficiency %) * 8760 hours/year * 1 ton/2000 lbs

Add Worst Case Coating to Cleanup Solvents = Basecoat for VOC and Clearcoat for Particulate Matter

Appendix A: Emissions Calculations (Plant 2)
Surface Coating: Paint Booth A through F
HAP Emissions

Company Name: Precision Painting, Inc.

Address: 218 East 2nd Street, 730 High Road, and 1205 North Street, Bremen, Indiana 46506

Part 70 Operating Permit Renewal No.: T099-33142-00096

Minor Source Modification: 099-36445-00096

Significant Permit Modification: 099-36447-00096

Reviewer: Curtis Taylor

Material	Density (lb/gal)	Material Usage Rate (gal/unit)	Max.Throughput (unit/hour)	Weight % Ethyl Benzene	Weight % Isocyanate Compounds	Weight % MIBK	Weight % Xylene	PTE Ethyl Benzene (tons/year)	PTE Isocyanate (tons/year)	PTE MIBK (tons/year)	PTE Xylene (tons/year)
Basecoat Application - Step 1											
BCS-605 Reducer	7.24	2.00	0.50	9.0%	0.0%	0.0%	51.0%	2.85	0.00	0.00	16.2
Basecoat U7002	7.78	2.00	0.50	0.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.00
Urethane Sealer S56	10.94	0.75	0.50	0.0%	0.0%	9.0%	0.0%	0.00	0.00	1.62	0.00
Etching Reducer ER992	6.87	0.49	0.50	0.0%	0.0%	2.0%	0.0%	0.00	0.00	0.15	0.00
Striping Application - Step 2											
V7011 Toner	7.77	2.50	0.50	5.0%	0.0%	0.0%	29.0%	2.13	0.00	0.00	12.3
RHF 75 Reducer	7.36	2.50	0.50	0.0%	6.0%	0.0%	0.0%	0.00	2.42	0.00	0.00
Clearcoat Application - Step 3											
Clearcoat CC720	7.89	4.33	0.50	0.2%	0.0%	0.0%	0.0%	0.15	0.00	0.00	0.00
UH924 Hardener	9.11	1.33	0.50	0.1%	82.3%	0.0%	0.0%	0.03	21.836	0.00	0.00
DR635 Reducer	6.91	1.33	0.50	0.0%	0.0%	0.0%	0.0%	0.00	0.000	0.00	0.00
Cleaning Solvent											
R7K158 Surface Cleaner (Unit Cleaner)	6.21	0.25	0.50	0.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.00
								5.16	24.25	1.76	28.50

Worst Case Coating for HAP - Add Cleanup Solvent to Worst Case Coating for HAP

METHODOLOGY

PTE of HAPs (tons/year) = Density (lb/gal) * Material Usage Rate (gal/unit) * Maximum Throughput (unit/hour) * Weight % HAP * 8760 hours/year * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations (PB2)**

Company Name: Precision Painting, Inc.
Address: 218 East 2nd Street, 730 High Road, and 1205 North Street, Bremen, Indiana 46506
Part 70 Operating Permit Renewal No.: T099-33142-00096
Minor Source Modification: 099-36445-00096
Significant Permit Modification: 099-36447-00096
Reviewer: Curtis Taylor

Paint Preparation

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC (ton/yr)	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency*
Paint Booth 2																
387041 M600 Pre-Cleaner	6.30	100.00%	0.0%	100.00%	0.00%	0.00%	0.188	0.125	6.30	6.30	0.148	3.54	0.65	0.00	0	100%
391057 Filler	12.57	29.36%	0.0%	29.36%	0.00%	49.89%	0.500	0.125	3.69	3.69	0.231	5.54	1.01	0.00	7.40	100%
387005 Primer	7.00	98.82%	0.0%	98.82%	0.00%	1.20%	0.250	0.125	6.92	6.92	0.216	5.19	0.95	0.003	576.45	75%
4-PLT Lacquer (Cleanup)	7.07	100.00%	0.0%	100.00%	0.00%	0.00%	0.281	0.125	7.07	7.07	0.249	5.97	1.09	0.00	0	100%

PM Control Efficiency: 95.00%

Totals:	Uncontrolled	0.84	20.23	3.69	0.0028
	Controlled	0.84	20.23	3.69	0.0001

*Transfer Efficiency = 75% for HVLP Application of Primer and 100% for Hand Application of Pre-Cleaner, Filler, Cleanup Solvent

Basecoat Application

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC (ton/yr)	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency*
Paint Booth 2																
391533 Reducer	7.36	100.00%	0.0%	100.00%	0.00%	0.00%	1.915	0.125	7.36	7.36	1.761	42.27	7.71	0.00	0	75%
397309 Hardener	9.10	15.00%	0.0%	15.00%	0.00%	79.93%	0.383	0.125	1.37	1.37	0.065	1.57	0.29	0.41	1.71	75%
391082 Binder	7.67	82.87%	0.0%	82.87%	0.00%	13.74%	0.767	0.125	6.36	6.36	0.609	14.62	2.67	0.14	46.26	75%
398266 Toner	11.81	39.57%	0.0%	39.57%	0.00%	37.07%	3.063	0.125	4.67	4.67	1.789	42.94	7.84	2.99	12.61	75%
4-PLT Lacquer (Cleanup)	7.07	100.00%	0.0%	100.00%	0.00%	0.00%	0.420	0.125	7.07	7.07	0.371	8.91	1.63	0.00	0	100%

PM Control Efficiency: 95.00%

Totals:	Uncontrolled	4.60	110.30	20.13	3.54
	Controlled	4.60	110.30	20.13	0.18

*Transfer Efficiency = 75% for HVLP Application of Basecoat and 100% for Hand Application of Cleanup Solvent

Clearcoat Application

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC (ton/yr)	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency*
Paint Booth 2																
391533 Reducer	7.36	100.00%	0.0%	100.00%	0.00%	0.00%	0.875	0.125	7.36	7.36	0.805	19.32	3.53	0.00	0	75%
381167 Autoclear	8.08	45.32%	3.1%	42.23%	3.78%	49.09%	2.917	0.125	3.55	3.41	1.244	29.86	5.45	1.76	6.95	75%
397309 Hardener	9.10	15.00%	0.0%	15.00%	0.00%	79.93%	1.458	0.125	1.37	1.37	0.249	5.97	1.09	1.54	1.71	75%
4-PLT Lacquer (Cleanup)	7.07	100.00%	0.0%	100.00%	0.00%	0.00%	0.438	0.125	7.07	7.07	0.387	9.28	1.69	0.00	0	100%

PM Control Efficiency: 95.00%

Totals:	Uncontrolled	2.68	64.43	11.76	3.31
	Controlled	2.68	64.43	11.76	0.17

*Transfer Efficiency = 75% for HVLP Application of Clearcoat and 100% for Hand Application of Cleanup Solvent

Maximum Potential to Emit for Worst Case Coating Operation Before Control				4.60	110.30	20.13	3.54
Maximum Potential to Emit for Worst Case Coating Operation After Control				4.60	110.30	20.13	0.18

Note:

Assumed PM = PM10/PM2.5

Methodology:

Paint Preparation, Basecoat Application, and Clearcoat Application are mutually exclusive operations, only one application can be performed at a time. Based on the PTE calculations, the basecoat application provides the worst case scenario for determining both VOC and particulate PTE.

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

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

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

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

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

Controlled Particulate Potential Tons per Year = Uncontrolled Particulate Potential Tons per Year * (1 - Control Efficiency%)

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

**Appendix A: Emission Calculations
HAP Emission Calculations (PB2)**

Company Name: Precision Painting, Inc.
Address: 218 East 2nd Street, 730 High Road, and 1205 North Street, Bremen, Indiana 46504
Part 70 Operating Permit Renewal No.: T099-33142-00096
Minor Source Modification: 099-36445-00096
Significant Permit Modification: 099-36447-00096
Reviewer: Curtis Taylor

Paint Preparation

Material	Density (Lb/Gal)	Gallons of (gal/unit)	Maximum (unit/hour)	Weight % Toluene	Weight % Xylene	Weight % Glycol Ethers	Weight % Methanol	Weight % MIBK	Weight % Styrene	Weight % Ethylbenzene	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Glycol Ether Emissions (ton/yr)	Methanol Emissions (ton/yr)	MIBK Emissions (ton/yr)	Styrene Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Total Emissions (ton/yr)
Paint Booth 2																		
387041 M600 Pre-Cleaner	6.30	0.188	0.125	0.00%	5.00%	0.00%	0.00%	0.00%	0.00%	1.00%	0	0.03	0	0	0	0	0.01	0.04
391057 Filler	12.57	0.500	0.125	0.00%	25.00%	0.00%	0.00%	10.00%	1.00%	5.00%	0	0.86	0	0	0.34	0.03	0.17	1.41
387005 Primer	7.00	0.250	0.125	0.00%	65.00%	0.00%	0.00%	0.00%	0.00%	25.00%	0	0.62	0	0	0	0	0.24	0.86
4-PLT Lacquer (Cleanup)	7.07	0.281	0.125	66.28%	5.59%	0.00%	9.38%	0.00%	0.00%	0.00%	0.72	0.06	0	0.10	0	0	0	0.88
Totals:											0.72	1.58	0	0.10	0.34	0.03	0.42	3.20

Basecoat Application

Material	Density (Lb/Gal)	Gallons of (gal/unit)	Maximum (unit/hour)	Weight % Toluene	Weight % Xylene	Weight % Glycol Ethers	Weight % Methanol	Weight % MIBK	Weight % Styrene	Weight % Ethylbenzene	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Glycol Ether Emissions (ton/yr)	Methanol Emissions (ton/yr)	MIBK Emissions (ton/yr)	Styrene Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Total Emissions (ton/yr)
Paint Booth 2																		
391533 Reducer	7.36	1.915	0.125	0.00%	0.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0	0	0.39	0	0	0	0	0.39
397309 Hardener	9.10	0.383	0.125	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0	0	0	0	0	0	0	0
391082 Binder	7.67	0.767	0.125	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0	0	0	0	0	0	0	0
398266 Toner	11.81	3.063	0.125	0.00%	5.00%	0.00%	0.00%	0.00%	0.00%	1.00%	0	0.99	0	0	0	0	0.20	1.19
4-PLT Lacquer (Cleanup)	7.07	0.420	0.125	66.28%	5.59%	0.00%	9.38%	0.00%	0.00%	0.00%	1.08	0.09	0	0.15	0	0	0	1.32
Totals:											1.08	1.08	0.39	0.15	0.00	0.00	0.20	2.89

Clearcoat Application

Material	Density (Lb/Gal)	Gallons of (gal/unit)	Maximum (unit/hour)	Weight % Toluene	Weight % Xylene	Weight % Glycol Ethers	Weight % Methanol	Weight % MIBK	Weight % Styrene	Weight % Ethylbenzene	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Glycol Ether Emissions (ton/yr)	Methanol Emissions (ton/yr)	MIBK Emissions (ton/yr)	Styrene Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Total Emissions (ton/yr)
Paint Booth 2																		
391533 Reducer	7.36	0.875	0.125	0.00%	0.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0	0	0.18	0	0	0	0	0.18
381167 Autoclear	8.08	2.917	0.125	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0	0	0	0	0	0	0	0
397309 Hardener	9.10	1.458	0.125	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0	0	0	0	0	0	0	0
4-PLT Lacquer (Cleanup)	7.07	0.438	0.125	66.28%	5.59%	0.00%	9.38%	0.00%	0.00%	0.00%	1.12	0.09	0	0.16	0	0	0	1.38
Totals:											1.12	0.09	0.18	0.16	0	0	0	1.55

Maximum Potential to Emit for Worst Case Coating Operation Before Control	1.12	1.58	0.39	0.16	0.34	0.03	0.42	3.20
Maximum Potential to Emit for Worst Case Coating Operation After Control	1.12	1.58	0.39	0.16	0.34	0.03	0.42	3.20

Methodology:
Paint Preparation, Basecoat Application, and Clearcoat Application are mutually exclusive operations, only one application can be performed at a time. Based on the PTE calculations, the paint preparation provides the worst case scenario for determining HAP PTE.
HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations (Plant 2)
Surface Coating: Paint Repair Booth
VOC and Particulate Emissions

Company Name: Precision Painting, Inc.

Address: 218 East 2nd Street, 730 High Road, and 1205 North Street, Bremen, Indiana 46506

Part 70 Operating Permit Renewal No.: T099-33142-00096

Minor Source Modification: 099-36445-00096

Significant Permit Modification: 099-36447-00096

Reviewer: Curtis Taylor

Material	Density (lb/gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water & Exempt	Weight % Organics	Volume % Water	Weight % Non-Volatiles (solids)	Material Usage Rate (gal/unit)	Maximum Throughput (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE VOC (lbs/hour)	PTE VOC (tons/year)	PTE PM/PM10 (tons/year)	**Transfer Efficiency
BCS 605 Reducer	7.24	100%	0.00%	100%	0.0%	0.0%	0.079	0.50	7.24	7.24	0.29	1.25	0.00	100%
Basecoat U7002	7.76	78.8%	0.00%	78.8%	0.0%	21.2%	0.078	0.50	6.11	6.11	0.24	1.05	0.00	100%
Urethane Sealer S56	10.9	33.5%	0.00%	35.5%	0.0%	66.5%	0.078	0.50	3.88	3.88	0.15	0.66	0.00	100%
Clearcoat CC720	7.89	44.1%	12.43%	31.7%	11.8%	55.9%	0.079	0.50	2.83	2.50	0.10	0.43	0.00	100%
UH924 Hardener	9.11	18.8%	0.00%	18.8%	0.0%	81.2%	0.078	0.50	1.71	1.71	0.07	0.29	0.00	100%
												3.69	0.00	

** Applied using manual caulk guns and hand buffers.

METHODOLOGY

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

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

PTE of VOC (lbs/hour) = Pounds of VOC per Gallon Coating (lb/gal) * Material Usage Rate (gal/unit) * Maximum Throughput (units/hour)

PTE of VOC (tons/year) = Pounds of VOC per Gallon of Coating (lbs/gal) * Material Usage Rate (gal/unit) * Maximum Throughput (units/hour) * 8760 hours/year * 1 ton/2000 lbs

PTE of PM/PM10 (tons/year) = Maximum Throughput (units/hour) * Material Usage Rate (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer Efficiency %) * 8760 hours/year * 1 ton/2000 lbs

**Appendix A: Emissions Calculations (Plant 2)
Surface Coating: Paint Repair Booth
HAP Emissions**

Company Name: Precision Painting, Inc.

Address: 218 East 2nd Street, 730 High Road, and 1205 North Street, Bremen, Indiana 46506

Part 70 Operating Permit Renewal No.: T099-33142-00096

Minor Source Modification: 099-36445-00096

Significant Permit Modification: 099-36447-00096

Reviewer: Curtis Taylor

HAZARDOUS AIR POLLUTANTS

Material	Density (lbs/gal)	Material Usage Rate (gal/unit)	Max. Throughput (unit/hour)	Weight % Ethyl Benzene	Weight % Xylene	Weight % MIBK	Weight % Isocyanate Compounds	PTE Ethyl Benzene (tons/year)	PTE Xylene (tons/year)	PTE MIBK (tons/year)	PTE Isocyanate (tons/year)
BCS 605 Reducer	7.24	0.079	0.50	9.00%	51.0%	0.00%	0.00%	0.11	0.64	0.00	0.00
Basecoat U7002	7.76	0.078	0.50	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Urethane Sealer S56	10.9	0.078	0.50	0.00%	0.00%	9.00%	0.00%	0.00	0.00	0.17	0.00
Clearcoat CC720	7.89	0.079	0.50	0.20%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
UH924 Hardener	9.11	0.078	0.50	0.10%	0.00%	0.00%	82.30%	0.00	0.00	0.00	1.28
								0.12	0.64	0.17	1.28

METHODOLOGY

PTE of HAPs (tons/year) = Density (lb/gal) * Material Usage Rate (gal/unit) * Maximum Throughput (unit/hour) * Weight % HAP * 8760 hours/year * 1 ton/2000 lbs

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

Company Name: Precision Painting, Inc.

Address: 218 East 2nd Street, 730 High Road, and 1205 North Street, Bremen, Indiana 46506

Part 70 Operating Permit Renewal No.: T099-33142-00096

Minor Source Modification: 099-36445-00096

Significant Permit Modification: 099-36447-00096

Reviewer: Curtis Taylor

	Heat Input Capacity MMBtu/hr (each)	Quantity	Heat Input Capacity MMBtu/hr (Total)
Air Makeup Units (AM1-AM4)	2.5	4	10
Air Makeup Units (AM5-AM6)	3.2076	2	6.4152
Air Makeup Unit (AM7)	2.916	1	2.916
Forced Air Furnace (H1)	0.132	1	0.132
Forced Air Furnace (H2)	0.046	1	0.046
Water Heater (W1)	0.04	1	0.04
Process Water Heaters (PWH1-PWH2)	0.2	2	0.4
Air Makeup Unit (AM8)	2.5	1	2.5
Total		13	22.45

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
22.45	1020	192.8

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	0.18	0.73	0.73	0.06	9.64	0.53	8.10

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

PM2.5 emission factor is filterable and condensable PM2.5 combined.

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

Hazardous Air Pollutants (HAPs)

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	2.02E-04	1.16E-04	7.23E-03	1.74E-01	3.28E-04	0.18

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	4.82E-05	1.06E-04	1.35E-04	3.66E-05	2.02E-04	5.28E-04
					Total HAPs	0.18
					Worst HAP	0.17

Methodology is the same as above.

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

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

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

Company Name: Precision Painting, Inc.

Address: 218 East 2nd Street, 730 High Road, and 1205 North Street, Bremen, Indiana 46506

Part 70 Operating Permit Renewal No.: T099-33142-00096

Minor Source Modification: 099-36445-00096

Significant Permit Modification: 099-36447-00096

Reviewer: Curtis Taylor

	Heat Input Capacity MMBtu/hr (each)	Quantity	Heat Input Capacity MMBtu/hr (Total)
Air Makeup Unit (AM8)	2.5	1	2.5
Total		1	2.50

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
2.50	1020	21.5

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.02	0.08	0.08	0.01	1.07	0.06	0.90

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

PM2.5 emission factor is filterable and condensable PM2.5 combined.

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

Hazardous Air Pollutants (HAPs)

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	2.3E-05	1.3E-05	8.1E-04	1.9E-02	3.7E-05	0.02

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	5.4E-06	1.2E-05	1.5E-05	4.1E-06	2.3E-05	5.9E-05
					Total HAPs	0.02
					Worst HAP	0.02

Methodology is the same as above.

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

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



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

Carol S. Comer
Commissioner

Notice of Public Comment

December 18, 2015
Precision Painting, Inc.
099-36447-00096

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 8/27/2015



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Governor

Carol S. Comer
Commissioner

AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD DRAFT INDIANA AIR PERMIT

December 18, 2015

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

Permit Number: 099-36447-00096
Applicant Name: Precision Painting, LLC
Location: Bremen, Marshall 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 chammack@idem.IN.gov or (317) 233-2414.

Affected States Notification.dot 8/27/2015



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Commissioner

December 18, 2015

Mr. Todd Hundt
Precision Painting, Inc.
PO Box 21
Bremen, IN 46506

Re: Public Notice
Precision Painting, Inc.
Permit Level: Significant Permit Modification
Permit Number: 099-36447-00096

Dear Mr. Hundt:

Enclosed is a copy of your draft 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 Plymouth Pilot News in Plymouth, Indiana publish the abbreviated version of the public notice no later than December 22, 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 Bremen Public Library, 304 North Jackson Street in Bremen, 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 Curtis Taylor, 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 4-5176 or dial (317) 234-5176.

Sincerely,

Greg Hotopp

Greg Hotopp
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 8/27/2015



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Governor

Carol S. Comer
Commissioner

December 18, 2015

To: Bremen 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: Precision Painting, Inc
Permit Number: 099-36447-00096

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 8/27/2015



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Michael R. Pence
Governor

Carol S. Comer
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

December 18, 2015

Plymouth Pilot News
PO Box 220
Plymouth, IN 46563

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Precision Painting, Inc., Marshall 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 December 22, 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 Greg Hotopp at 800-451-6027 and ask for extension 4-3493 or dial 317-234-3493.

Sincerely,

Greg Hotopp

Greg Hotopp
Permit Branch
Office of Air Quality

Permit Level: Significant Permit Modification
Permit Number: 099-36447-00096

Enclosure

PN Newspaper.dot 8/27/2015

Mail Code 61-53

IDEM Staff	GHOTOPP 12/17/2015 Precision Painting Inc 099-36447-00096 Draft		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

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		Todd Hundt Precision Painting Inc PO Box 214 Bremen IN 46506 (Source CAATS)										
2		Bremen Public Library 304 N Jackson St Bremen IN 46506-1130 (Library)										
3		Marshall County Commissioners 112 West Jefferson Street Plymouth IN 46563 (Local Official)										
4		Bremen Town Council and Town Manager 111 South Center Street Bremen IN 46506 (Local Official)										
5		Mr. Doug Elliott D & B Environmental Services, Inc. 401 Lincoln Way West Osceola IN 46561 (Consultant)										
6		Marshall County Health Department 112 W Jefferson Street, Suite 103 Plymouth IN 46563-1764 (Health Department)										
7		LaPaz Town Council PO Box 0820 LaPaz IN 46537 (Local Official)										
8		Ms. Julie Grzesiak 139 N. Michigan St. Argos IN 46501 (Affected Party)										
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