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 30-DAY PERIOD
FOR PUBLIC COMMENT
Preliminary Findings Regarding the Renewal of a
Part 70 Operating Permit

for Ficosa North America Corporation in Adams County

Part 70 Operating Permit Renewal No.: T001-36452-00023

The Indiana Department of Environmental Management (IDEM) has received an application from Ficosa North America Corporation located at 917 Liechty Road, Berne, IN 46711 for a renewal of its Part 70 Operating Permit issued on July 1, 2011. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow Ficosa North America Corproation to continue to operate its existing source.

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

Berne Public Library
166 N Sprunger Street
Berne, IN 46711

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 T001-36452-00023 in all correspondence.

Comments should be sent to:

Nicholas Eilerman
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003

Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-5373
Or dial directly: (317) 234-5373
Fax: (317) 232-6749 attn: Nicholas Eilerman
E-mail: neilerma@idem.IN.gov

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

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: http://www.in.gov/idem/5881.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

What will happen after IDEM makes a decision?

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

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

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

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Commissioner

DRAFT

Part 70 Operating Permit Renewal
OFFICE OF AIR QUALITY

Indiana Coatings, Inc.
917 Liechty Road
Berne, Indiana 46711

(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.: T001-36452-00023	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

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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 molded plastic parts spray painting operation.

Source Address:	917 Liechty Road, Berne, Indiana 46711
General Source Phone Number:	(260) 589-7200
SIC Code:	3089 (Plastics Products, Not Elsewhere Classified)
County Location:	Adams
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

(a) One (1) prime coating spray booth used to coat plastic and metal parts, identified as EU-001, with a maximum capacity of 25.4 gallons of primer per hour, using water wash system, identified as CE-001, as particulate matter (PM) control and a natural gas 5.0 million British thermal units per hour (MMBtu/hr) thermal oxidizer, identified as CE-003, as volatile organic compound (VOC) control on the one (1) natural gas prime bake oven, identified as EU-013, with a maximum capacity of 2.5 mmBtu/hr, using no control, and exhausting to stack SV-011, constructed in 1987, and exhausting to 2 stacks SV-007 and SV-008.

(b) One (1) prime coating spray booth used to coat plastic and metal parts, identified as EU-002, with a maximum capacity of 38 gallons of primer per hour, using water wash system, identified as CE-001 as particulate matter (PM) control and a natural gas 5.0 million British thermal units per hour (MMBtu/hr) thermal oxidizer, identified as CE-003, as volatile organic compound (VOC) control on the one (1) natural gas prime bake oven, identified as EU-013, with a maximum capacity of 2.5 mmBtu/hr, using no control, and exhausting to stack SV-011, constructed in 1987, and exhausting to 2 stacks SV-009 and SV-010.

Thermal oxidizer CE-003 is common control for the 2 bake ovens of the 2 prime coating spray booths EU-001 and EU-002.

(c) One (1) base coating spray booth used to coat plastic and metal parts, identified as EU-003, with a maximum capacity of 25.4 gallons of base coating per hour, using water wash system, identified as CE-001, as PM control, constructed in 1987, and exhausting to 2 stacks SV-013 and SV-014.

(d) One (1) base coating spray booth used to coat plastic and metal parts, identified as EU-004, with a maximum capacity of 38 gallons of base coating per hour, using water wash

system, identified as CE-001, as PM control, constructed in 1987, and exhausting to 2 stacks SV-015 and SV-016.

(e) One (1) base coating spray booth used to coat plastic and metal parts, identified as EU-005, with a maximum capacity of 25.4 gallons of base coating per hour, using water wash system, identified as CE-001, as PM control, constructed in 1987, and exhausting to 2 stacks SV-017 and SV-018.

(f) One (1) clear coating spray booth used to coat plastic and metal parts, identified as EU-006, with a maximum capacity of 25.4 gallons of clear coat per hour using water wash system, identified as CE-001, as PM control, constructed in 1987, and exhausting to 2 stacks SV-019 and SV-020.

(g) One (1) clear coating spray booth used to coat plastic and metal parts, identified as EU-007, with a maximum capacity of 38 gallons of clear coat per hour, using waterwash system, identified as CE-001, as PM control, constructed in 1987, and exhausting to 2 stacks SV-021 and SV-022 then using One (1) natural gas final bake oven, identified as EU-014, with a maximum capacity of 2.5 mmBTU/hr, using no control, and exhausting to stack SV-023.

Water wash system CE-001 is common control for the following:
- 2 prime coating spray booths EU-001 and EU-002,
- 3 base coating spray booths EU-003, EU-004, EU-005; and
- 2 clear coating spray booths EU-006, EU-007.

(h) One (1) quality control spray booth used to coat plastic and metal parts, identified as EU-010, with a maximum capacity of 6.34 gallons of paint per hour, using dry panel filter CE-002 as PM control, constructed in 1987, and exhausting to 1 stack SV-024.

(i) One (1) mix room cleaning table, identified as EU-015, with a maximum capacity of 0.08 gallons of solvent per hour, using no control, constructed in 1987, and exhausting to 1 stack SV-025.

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

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

The source also consists of the following insignificant activities:

(a) Paved roads and parking lots with public access.

(b) One (1) natural gas heater for Stage 1 Washer used to clean parts with water, identified as EU-021, with a maximum capacity of of 4.0 mmBTU/hr, and exhausting to stack SV-031.

(c) Noncontact cooling tower systems with either of the following: forced and induced draft cooling tower system not regulated under a NESHAP.

(d) Closed loop heating and cooling systems.

(e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(f) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling.

(g) A laboratory as defined in 326 IAC 2-7-1(21)(H).

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

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

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, T001-36452-00023, 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 or of permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control).

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

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

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

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

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

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

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

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

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

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

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

(a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

(1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) A "responsible official" is defined at 326 IAC 2-7-1(35).

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

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

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

and

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

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

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

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

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

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

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

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

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

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

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865

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

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

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

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

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

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

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

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

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

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

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

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

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(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 T001-36452-00023 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, except for permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control)

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

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

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

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

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

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

Request for renewal shall be submitted to:

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

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the

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

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

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12] [40 CFR 72]

(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) Pursuant to 326 IAC 2-7-11(b) and 326 IAC 2-7-12(a), administrative Part 70 operating permit amendments and permit modifications for purposes of the acid rain portion of a Part 70 permit shall be governed by regulations promulgated under Title IV of the Clean Air Act. [40 CFR 72]

(c) 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).

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

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

(a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

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

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

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

(4) The Permittee notifies the:

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

and

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

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

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

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

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

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

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

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

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.

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

(f) This condition does not apply to emission trades of SO_2 or NO_X under 326 IAC 21 or 326 IAC 10-4.

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

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

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

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

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

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

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

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

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

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

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

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

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using ambient air quality modeling pursuant to 326 IAC 1-7-4. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2,

326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

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

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

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

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

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

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

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

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

(b) For existing units:
Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of

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

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

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

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

(c) For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

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

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

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

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

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

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

C.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

(l) Upon detecting an excursion where a response step is required by the D Section, or an exceedance of a limitation, not subject to CAM, in this permit:

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(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.

(II)

(a) CAM *Response to excursions or exceedances.*

(1) Upon detecting an excursion or exceedance, subject to CAM, the Permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(2) Determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

(b) If the Permittee identifies a failure to achieve compliance with an emission limitation, subject to CAM, or standard, subject to CAM, for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the IDEM, OAQ and, if necessary, submit a proposed significant permit modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

(c) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a Quality Improvement Plan (QIP). The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.

(d) Elements of a QIP:
The Permittee shall maintain a written QIP, if required, and have it available for inspection. The plan shall conform to 40 CFR 64.8 b (2).

(e) If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the IDEM, OAQ if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

(f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(c) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:

(1) Failed to address the cause of the control device performance problems; or

(2) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(g) Implementation of a QIP shall not excuse the Permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.

(h) *CAM recordkeeping requirements.*

(1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to paragraph (II)(c) of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

(2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

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

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

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

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

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

"responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

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

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

(1) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

(2) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

(3) A description of the actions taken to implement a QIP during the reporting period as specified in Section C-Response to Excursions or Exceedances. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

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

(b) The address for report submittal is:

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) prime coating spray booth used to coat plastic and metal parts, identified as EU-001, with a maximum capacity of 25.4 gallons of primer per hour, using water wash system, identified as CE-001, as particulate matter (PM) control and a natural gas 5.0 million British thermal units per hour (MMBtu/hr) thermal oxidizer, identified as CE-003, as volatile organic compound (VOC) control on the one (1) natural gas prime bake oven, identified as EU-013, with a maximum capacity of 2.5 mmBtu/hr, using no control, and exhausting to stack SV-011, constructed in 1987, and exhausting to 2 stacks SV-007 and SV-008.

(b) One (1) prime coating spray booth used to coat plastic and metal parts, identified as EU-002, with a maximum capacity of 38 gallons of primer per hour, using water wash system, identified as CE-001 as particulate matter (PM) control and a natural gas 5.0 million British thermal units per hour (MMBtu/hr) thermal oxidizer, identified as CE-003, as volatile organic compound (VOC) control on the one (1) natural gas prime bake oven, identified as EU-013, with a maximum capacity of 2.5 mmBtu/hr, using no control, and exhausting to stack SV-011, constructed in 1987, and exhausting to 2 stacks SV-009 and SV-010.

Thermal oxidizer CE-003 is common control for the 2 bake ovens of the 2 prime coating spray booths EU-001 and EU-002.

(c) One (1) base coating spray booth used to coat plastic and metal parts, identified as EU-003, with a maximum capacity of 25.4 gallons of base coating per hour, using water wash system, identified as CE-001, as PM control, constructed in 1987, and exhausting to 2 stacks SV-013 and SV-014.

(d) One (1) base coating spray booth used to coat plastic and metal parts, identified as EU-004, with a maximum capacity of 38 gallons of base coating per hour, using water wash system, identified as CE-001, as PM control, constructed in 1987, and exhausting to 2 stacks SV-015 and SV-016.

(e) One (1) base coating spray booth used to coat plastic and metal parts, identified as EU-005, with a maximum capacity of 25.4 gallons of base coating per hour, using water wash system, identified as CE-001, as PM control, constructed in 1987, and exhausting to 2 stacks SV-017 and SV-018.

(f) One (1) clear coating spray booth used to coat plastic and metal parts, identified as EU-006, with a maximum capacity of 25.4 gallons of clear coat per hour using water wash system, identified as CE-001, as PM control, constructed in 1987, and exhausting to 2 stacks SV-019 and SV-020.

(g) One (1) clear coating spray booth used to coat plastic and metal parts, identified as EU-007, with a maximum capacity of 38 gallons of clear coat per hour, using waterwash system, identified as CE-001, as PM control, constructed in 1987, and exhausting to 2 stacks SV-021 and SV-022 then using One (1) natural gas final bake oven, identified as EU-014, with a maximum capacity of 2.5 mmBTU/hr, using no control, and exhausting to stack SV-023.

Water wash system CE-001 is common control for the following:
- 2 prime coating spray booths EU-001 and EU-002,

- 3 base coating spray booths EU-003, EU-004, EU-005; and
- 2 clear coating spray booths EU-006, EU-007.

(h) One (1) quality control spray booth used to coat plastic and metal parts, identified as EU-010, with a maximum capacity of 6.34 gallons of paint per hour, using dry panel filter CE-002 as PM control, constructed in 1987, and exhausting to 1 stack SV-024.

(i) One (1) mix room cleaning table, identified as EU-015, with a maximum capacity of 0.08 gallons of solvent per hour, using no control, constructed in 1987, and exhausting to 1 stack SV-025.

(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 Hazardous Air Pollutants (HAPs) Limitations [326 IAC 2-4.1] [40 CFR 63 Subpart PPPP (Plastic Parts Surface Coating)] [40 CFR 63 Subpart MMMM (Surface Coating for Miscellaneous Metal Products)]

In order to render the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP), 40 CFR 63 Subpart PPPP (Plastic Parts Surface Coating) and 40 CFR 63, Subpart MMMM (Surface Coating for Miscellaneous Metal Products) not applicable, the Permittee shall comply with the following:

(a) The total usage of each individual HAP at the coating spray booths EU-001 through EU-007, and EU-010, minus the amount of HAP in the solvent material shipped offsite for recovery, shall be limited to less than ten (10) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) The total usage of the combination of all HAPs at the coating spray booths EU-001 through EU-007, and EU-010, minus the amount of HAP in the solvent material shipped offsite for recovery, shall be limited to less than twenty-four (24) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(c) Collected solvent materials shall be retained in closed containers until shipped offsite for recycling or disposal.

Compliance with theses, in conjunction with single and combination HAP emissions from all other emission units including insignificant activities, shall ensure that the source-wide emissions are less than ten (10) tons of a single HAP and less than twenty-five (25) tons of a combination of HAPs per twelve (12) consecutive month period, respectively and shall render the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP), 40 CFR 63 Subpart PPPP (Plastic Parts Surface Coating) and 40 CFR 63, Subpart MMMM (Surface Coating for Miscellaneous Metal Products) not applicable.

D.1.2 PSD Minor Limit [326 IAC 2-2]

Pursuant to Construction Permit 001-2662-00030, issued on April 12, 1993 and in order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the VOC input (including coatings, dilution solvents, and cleaning solvents) to the coating spray booths EU-001, EU-002, EU-003, EU-004, EU-005, EU-006, EU-007, and EU-010 shall be less than 248 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month.

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 250 tons

per 12 consecutive month period and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.3 Best Available Control Technology (BACT) [326 IAC 8-1-6]

When coating plastic parts, pursuant to 326 IAC 8-1-6 and BACT from the Construction Permit 001-2662-00030, issued on April 12, 1993, the coating spray booths, identified as EU-001, EU-002, EU-003, EU-004, EU-005, EU-006, EU-007, and EU-010, have the following requirements:

(a) The application method for primer shall be high volume low pressure (HVLP).

(b) The VOC content of coatings shall be limited as follows:

(1) Primer VOC content shall not exceed 6.0 pounds per gallon,

(2) Basecoat VOC content shall not exceed 6.34 pounds per gallon,

(3) Clearcoat VOC content shall not exceed 4.8 pounds per gallon.

D.1.4 VOC Limit for Metal Parts Coating [326 IAC 8-2-9]

When coating metal parts, in order to render the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating), the VOC input from each coating spray booths to EU-001, EU-002, EU-003, EU-004, EU-005, EU-006, EU-007, and EU-010 shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month.

Compliance with these limits shall render the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating) not applicable to EU-001, EU-002, EU-003, EU-004, EU-005, EU-006, EU-007, and EU-010 when coating metal parts.

D.1.5 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the coating spray booths, EU-001, EU-002, EU-003, EU-004, EU-005, EU-006, EU-007, and EU-010, 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. The control devices for particulate control shall be in operation and control emissions from the surface coating operating at all times the surface coating is in operation.

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

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

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

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

If the Permittee elects to use the thermal oxidizer (identified as CE-01) to comply with the VOC PSD minor limit in Condition D.1.2, the Permittee shall perform stack testing to determine the overall VOC efficiency (capture and destruction) of the coating spray booths (EU-001 and EU-002) with its thermal oxidizer, using methods approved by the Commissioner. The stack tests shall be performed no later than 180 days after commencing operation of the thermal oxidizer and shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.

The overall control efficiency from the most recent stack tests shall be used for the calculations required in Condition D.1.8.

Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C- Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

D.1.8 Hazardous Air Pollutants (HAPs) [326 IAC 8-1-4][326 IAC 8-1-2(a)]

(a) Compliance with the HAP usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” Material Safety Data Sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) Pursuant to 326 IAC 8-1-2(a), the Permittee shall perform an analysis of the solvent materials shipped offsite for recovery once (1) per shipment to determine single and/or combined HAP content of this material when claiming credit for HAP shipped offsite in order to demonstrate compliance with Condition D.1.1.

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

(a) Compliance with the VOC content and usage limitations contained in Conditions D.1.2, D.1.3, and D.1.4, shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” or “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) Compliance with the VOC input limit contained in Condition D.1.2, shall be calculated as follows:

VOC = (Input VOC to base coating spray booths)
+ (Input VOC to clear coating spray booths)
+ (Input VOC from solvent usage)
+ (Input VOC to primer coating spray booths)
(when thermal oxidizer is not operating)
+ {(Input VOC to primer coating spray booths) * (100% - (% Efficiency)}
(when thermal oxidizer is operating)

Where: EF is the overall control efficiency of the thermal oxidizer CE-003.
% Efficiency shall equal 22.5% or the value determined in the most recent stack test.

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

D.1.10 Monitoring [40 CFR Part 64]

Pursuant to 40 CFR 64,

(a) Particulate Matter:

(1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters and water flow to the water wash. To monitor the performance of the dry filters and water wash, weekly observations shall be made of the overspray from the coating spray booths, SV-007, SV-008, SV-009, SV-010, SV-013, SV-014, SV-015, SV-016, SV-017, SV-018, SV-019, SV-020, SV-021, SV-022, and SV-024, while one or more of the booths are in operation. If a condition exists which should result in a response step the Permittee shall take reasonable response. Section C – Response to Excursions or Exceedances

contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take reasonable response steps shall be considered a deviation from this permit.

(2) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Response to Excursions or Exceedances for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. If a condition exists which should result in a response step the Permittee shall take reasonable response. Section C – Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take reasonable response steps shall be considered a deviation from this permit.

(3) Daily inspections shall be performed to verify that the water level in the water wash meets the manufacturer's recommended level.

To monitor the performance of the water flow, visual inspections of the water curtain shall be made weekly to identify any gaps or other disruptions in water flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water sheet.

To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer.

If a condition exists which should result in a response step the Permittee shall take reasonable response. Section C – Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take reasonable response steps shall be considered a deviation from this permit.

(b) Volatile Organic Compounds:

(1) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature if the thermal oxidizer is operated. For the purpose of this condition, continuous means no less than once per fifteen (15) minutes. The output of this system shall be recorded as a three-hour rolling average. The Permittee shall take reasonable response steps whenever the three-hour rolling average temperature of the thermal oxidizer is below 1400°F. A three-hour rolling average temperature that is below 1400°F is not a deviation from this permit. Section C – Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take reasonable response steps shall be considered a deviation from this permit.

(2) The Permittee shall determine the three-hour rolling average temperature from the most recent valid stack test that demonstrates compliance with limits in Condition D.1.2, if the thermal oxidizer is operated.

(3) On and after the date the stack test results are available, the Permittee shall take reasonable response steps whenever the three-hour rolling average temperature of the thermal oxidizer is below the three-hour rolling average temperature as observed during the compliant stack test. A three-hour rolling average temperature that is below the three-hour rolling average temperature as

observed during the compliant stack test is not a deviation from this permit. Section C – Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.1.11 Parametric Monitoring [40 CFR Part 64]

Pursuant to 40 CFR 64,

(a) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance with limit in Condition D.1.2, if the thermal oxidizer is operated.

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

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

D.1.12 Record Keeping Requirement

(a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with one (1) through six (6) below. Records maintained for one (1) through six (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits and the HAP emission limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available no later than thirty (30) days after the end of each compliance period.

(1) The HAPs content of each coating material and solvent used including clean-up solvents.

(2) The amount of coating material and solvent used on a monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The amount and HAP content of the solvent material shipped offsite for recovery for single and combined HAP.

(4) The calculated monthly single and combined HAP recovered from solvent material shipped offsite for recovery.

(5) The total single and combined HAPs usage for each month; and

(6) The source-wide single and combined HAPs emitted for each compliance period.

(b) To document the compliance status with Conditions D.1.2, D.1.3, and D.1.4, , the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient

to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.2, D.1.3, and D.1.4.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(6) The continuous temperature records (on a three-hour rolling average basis) for the thermal oxidizer when the thermal oxidizer is operated and the three-hour average rolling temperature used to demonstrate compliance during the most recent compliance stack test. To document the compliance status with Condition D.1.2, the Permittee shall record the dates and times, on an hourly basis, of all periods of startup and shutdown of the thermal oxidizer, identified as CE-003 when the thermal oxidizer is operated.

(7) Daily records of the duct pressure or fan amperage when the thermal oxidizer is operated.

(c) To document the compliance status with Condition D.1.10(a)(3), the Permittee shall maintain weekly observations of the water level for the water curtains, a log of weekly overspray observations, and daily and monthly inspections.

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

D.1.13 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1, D.1.2, and D.1.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, 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. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “Responsible Official” as defined by 326 IAC 2-7-1(34).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

One (1) natural gas heater for Stage 1 Washer used to clean parts with water, identified as EU-021, with a maximum capacity of of 4.0 mmBTU/hr, and exhausting to stack SV-031.

(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 Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the particulate matter (PM) emissions from the natural gas heater for the Stage 1 Washer shall not exceed 0.60 pounds of PM per million British thermal units.

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

Source Name: Indiana Coatings, Inc.
Source Address: 917 Liechty Road, Berne, Indiana 46711
Part 70 Permit No.: T001-36452-00023

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)

☐ Report (specify)

☐ Notification (specify)

☐ Affidavit (specify)

☐ Other (specify)

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

Signature:
Printed Name:
Title/Position:
Phone:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
Fax: (317) 233-6865

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Indiana Coatings, Inc.
Source Address: 917 Liechty Road, Berne, Indiana 46711
Part 70 Permit No.: T001-36452-00023

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**) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

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

Part 70 Quarterly Report

Source Name: Indiana Coatings, Inc.
Source Address: 917 Liechty Road, Berne, Indiana 46711
Part 70 Permit No.: T001-36452-00023
Facility: Coating and Cleaning Operations (EU-001, EU-002, EU-003, EU-004, EU-005, EU-006, EU-007, EU-008, EU-009, and EU-010)
Parameter: VOC input
Limit: Shall not exceed 248 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

QUARTER : _____ YEAR: _____

Month	VOC Input			Controls		Emissions		
	Primer	Basecoat and Clearcoat	Solvent	Overall Control Efficiency	Down Time	Monthly Total*	Prior 11 Months Total	12 Month Rolling Total**

* (Input VOC to base coating spray booths) + (Input VOC to clear coating spray booths) + (VOC from solvent usage) + {(VOC input to primer coating spray booths when thermal oxidizer is operating) * (100% - (% Efficiency)} + (VOC input to primer coating spray booths when thermal oxidizer is not operating)
**Monthly Total + Prior 11 Months Total

☐ No deviation occurred in this quarter.

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

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

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

Part 70 Quarterly Report

Source Name: Indiana Coatings, Inc.
Source Address: 917 Liechty Road, Berne, Indiana 46711
Part 70 Permit No.: T001-36452-00023
Facility: Coating and Cleaning Operations (EU-001)
Parameter: VOC Input
Limit: The VOC input when coating metal parts shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated 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: _____

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

Part 70 Quarterly Report

Source Name: Indiana Coatings, Inc.
Source Address: 917 Liechty Road, Berne, Indiana 46711
Part 70 Permit No.: T001-36452-00023
Facility: Coating and Cleaning Operations (EU-002)
Parameter: VOC Input
Limit: The VOC input when coating metal parts shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated 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: _____

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

Part 70 Quarterly Report

Source Name: Indiana Coatings, Inc.
Source Address: 917 Liechty Road, Berne, Indiana 46711
Part 70 Permit No.: T001-36452-00023
Facility: Coating and Cleaning Operations (EU-003)
Parameter: VOC Input
Limit: The VOC input when coating metal parts shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated 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: _____

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

Part 70 Quarterly Report

Source Name: Indiana Coatings, Inc.
Source Address: 917 Liechty Road, Berne, Indiana 46711
Part 70 Permit No.: T001-36452-00023
Facility: Coating and Cleaning Operations (EU-004)
Parameter: VOC Input
Limit: The VOC input when coating metal parts shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated 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: _____

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

Part 70 Quarterly Report

Source Name: Indiana Coatings, Inc.
Source Address: 917 Liechty Road, Berne, Indiana 46711
Part 70 Permit No.: T001-36452-00023
Facility: Coating and Cleaning Operations (EU-005)
Parameter: VOC Input
Limit: The VOC input when coating metal parts shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated 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: _____

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

Part 70 Quarterly Report

Source Name: Indiana Coatings, Inc.
Source Address: 917 Liechty Road, Berne, Indiana 46711
Part 70 Permit No.: T001-36452-00023
Facility: Coating and Cleaning Operations (EU-006)
Parameter: VOC Input
Limit: The VOC input when coating metal parts shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated 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: _____

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

Part 70 Quarterly Report

Source Name: Indiana Coatings, Inc.
Source Address: 917 Liechty Road, Berne, Indiana 46711
Part 70 Permit No.: T001-36452-00023
Facility: Coating and Cleaning Operations (EU-007)
Parameter: VOC Input
Limit: The VOC input when coating metal parts shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated 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: _____

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

Part 70 Quarterly Report

Source Name: Indiana Coatings, Inc.
Source Address: 917 Liechty Road, Berne, Indiana 46711
Part 70 Permit No.: T001-36452-00023
Facility: Coating and Cleaning Operations (EU-008)
Parameter: VOC Input
Limit: The VOC input when coating metal parts shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated 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: _____

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

Part 70 Quarterly Report

Source Name: Indiana Coatings, Inc.
Source Address: 917 Liechty Road, Berne, Indiana 46711
Part 70 Permit No.: T001-36452-00023
Facility: Coating and Cleaning Operations (EU-009)
Parameter: VOC Input
Limit: The VOC input when coating metal parts shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated 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: _____

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

Part 70 Quarterly Report

Source Name: Indiana Coatings, Inc.
Source Address: 917 Liechty Road, Berne, Indiana 46711
Part 70 Permit No.: T001-36452-00023
Facility: Coating and Cleaning Operations (EU-010)
Parameter: VOC Input
Limit: The VOC input when coating metal parts shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated 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: _____

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

Part 70 Quarterly Report

Source Name: Indiana Coatings, Inc.
Source Address: 917 Liechty Road, Berne, Indiana 46711
Part 70 Permit No.: T001-36452-00023
Facility: EU-001 through EU-007, and EU-010
Parameter: Single and Combined HAPs Usage
Limit: Single HAP usage minus the amount of HAP in the solvent material shipped offsite for recovery shall be limited to less than ten (10) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Combined HAP usage minus the amount of HAP in the solvent material shipped offsite for recovery shall be limited to less than twenty-four (24) tons per twelve (12) consecutive month period, with compliance determined at the end of each month

QUARTER: YEAR:

Month	Column 1	Column 2 (Shipped Solvents)	Column 3	Column 4 (Shipped Solvents)	Column 1 + Column 2 + Column 3 + Column 4
	This Month	This Month	Previous 11 Months	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: _____

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: Indiana Coatings, Inc.
Source Address: 917 Liechty Road, Berne, Indiana 46711
Part 70 Permit No.: T001-36452-00023

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

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C-General Reporting. Any deviation from the requirements 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".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	**Indiana Coatings, Inc.**
Source Location:	**917 Liechty Road, Berne, Indiana, 46711**
County:	**Adams**
SIC Code:	**3089 (Plastics Products, Not Elsewhere Classified)**
Permit Renewal No.:	**T001-36452-00023**
Permit Reviewer:	**Nicholas Eilerman**

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Indiana Coatings, Inc. relating to the operation of a stationary molded plastic parts spray painting operation. On November 04, 2015, Indiana Coatings, Inc. submitted an application to the OAQ requesting to renew the operating permit of Ficosa North America and to request a change in the source name. Ficosa North America was issued its second Part 70 Operating Permit Renewal Renewal T001-30158-00023 on July 01, 2011 for Plant 1 (917 Liechty Road, Berne, Indiana 46711) and Plant 2 (725 Parr Road, Berne, Indiana 46711).

Ficosa North America Corporation ceased operations at Plants 1 and 2 in May, 2013. In September, 2015 Ficosa North America sold the plant assets, including the permitted emission units in Plant 1, to Indiana Coatings, Inc. The real estate was sold to Sherrell Investments on October 28, 2015, who leases space to Indiana Coatings, Inc. The Parr Road Plant 2 was not part of the transaction. Emissions units in Plant 2 are not incorporated in this renewal.

In consideration of the application for permit renewal, IDEM OAQ evaluated the implications for permitting for this source based on information provided by the consultant and plant manager representing Indiana Coatings, Inc.

After evaluation, IDEM considers Indiana Coatings, Inc. to be an existing source based on the presumption that the exact same manufacturing equipment that was permitted previously by Ficosa North America will be used by Indiana Coatings, and based on the following additional factors:

(a) Two US EPA memorandas, from 1980 and 1987, outlined permitting implications when sources that have been shut down wish to reopen. One of the major considerations in determining if a source would be a “new source” for permitting purposes is the intent of the owner or operator to reopen the source.

After the facility shut down, Ficosa North America continued to pay their annual Part 70 Operating Permit fees while looking for a buyer for the facility's assets, and applied for a permit renewal. In addition, the source has maintained the permitted equipment in an operable condition. These factors indicate intent to reopen the source.

An IDEM OAQ inspector visited the plant on December 15, 2015 to confirm the presence and condition of the permitted emission units. The inspector confirmed that seven (7) coating booths, three (3) natural gas ovens, one (1) quality control booth, and one (1) mix room cleaning table were present and appeared to be operable. The plant was not operational at the time of the IDEM visit, but a representative from Indiana Coatings Inc. stated the intent to re-open within six months.

(b) The location of the plant is in Adams County, which is designated an attainment area for all criteria pollutants. Therefore, emissions from this source are not used in any emission reduction plan, and there will be no negative effect in plant reactivation.

(c) IDEM has made a similar decision in at least two other instances:

(i) Marathon Petroleum Co., Permit No. T129-27007-00005, issued May 28, 2009.

(ii) Aqua Environmental Container Corporation, Permit No. T181-35875-00044, issued on November 11, 2015.

Both sources were determined to be existing sources using the criteria outlined by the above referenced EPA memoranda.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

(a) One (1) prime coating spray booth used to coat plastic and metal parts, identified as EU-001, with a maximum capacity of 25.4 gallons of primer per hour, using water wash system, identified as CE-001, as particulate matter (PM) control and a natural gas 5.0 million British thermal units per hour (MMBtu/hr) thermal oxidizer, identified as CE-003, as volatile organic compound (VOC) control on the one (1) natural gas prime bake oven, identified as EU-013, with a maximum capacity of 2.5 mmBtu/hr, using no control, and exhausting to stack SV-011, constructed in 1987, and exhausting to 2 stacks SV-007 and SV-008.

(b) One (1) prime coating spray booth used to coat plastic and metal parts, identified as EU-002, with a maximum capacity of 38 gallons of primer per hour, using water wash system, identified as CE-001 as particulate matter (PM) control and a natural gas 5.0 million British thermal units per hour (MMBtu/hr) thermal oxidizer, identified as CE-003, as volatile organic compound (VOC) control on the one (1) natural gas prime bake oven, identified as EU-013, with a maximum capacity of 2.5 mmBtu/hr, using no control, and exhausting to stack SV-011, constructed in 1987, and exhausting to 2 stacks SV-009 and SV-010.

Thermal oxidizer CE-003 is common control for the 2 bake ovens of the 2 prime coating spray booths EU-001 and EU-002.

(c) One (1) base coating spray booth used to coat plastic and metal parts, identified as EU-003, with a maximum capacity of 25.4 gallons of base coating per hour, using water wash system, identified as CE-001, as PM control, constructed in 1987, and exhausting to 2 stacks SV-013 and SV-014.

(d) One (1) base coating spray booth used to coat plastic and metal parts, identified as EU-004, with a maximum capacity of 38 gallons of base coating per hour, using water wash system, identified as CE-001, as PM control, constructed in 1987, and exhausting to 2 stacks SV-015 and SV-016.

(e) One (1) base coating spray booth used to coat plastic and metal parts, identified as EU-005, with a maximum capacity of 25.4 gallons of base coating per hour, using water wash system, identified as CE-001, as PM control, constructed in 1987, and exhausting to 2 stacks SV-017 and SV-018.

(f) One (1) clear coating spray booth used to coat plastic and metal parts, identified as EU-006, with a maximum capacity of 25.4 gallons of clear coat per hour using water wash

system, identified as CE-001, as PM control, constructed in 1987, and exhausting to 2 stacks SV-019 and SV-020.

(g) One (1) clear coating spray booth used to coat plastic and metal parts, identified as EU-007, with a maximum capacity of 38 gallons of clear coat per hour, using waterwash system, identified as CE-001, as PM control, constructed in 1987, and exhausting to 2 stacks SV-021 and SV-022 then using One (1) natural gas final bake oven, identified as EU-014, with a maximum capacity of 2.5 mmBTU/hr, using no control, and exhausting to stack SV-023.

Water wash system CE-001 is common control for the following:
- 2 prime coating spray booths EU-001 and EU-002,
- 3 base coating spray booths EU-003, EU-004, EU-005; and
- 2 clear coating spray booths EU-006, EU-007.

(h) One (1) quality control spray booth used to coat plastic and metal parts, identified as EU-010, with a maximum capacity of 6.34 gallons of paint per hour, using dry panel filter CE-002 as PM control, constructed in 1987, and exhausting to 1 stack SV-024.

(i) One (1) mix room cleaning table, identified as EU-015, with a maximum capacity of 0.08 gallons of solvent per hour, using no control, constructed in 1987, and exhausting to 1 stack SV-025.

Emission Units and Pollution Control Equipment Removed From the Source

The source has removed the following emission unit:

One (1) service spray booth, located in Plant 2, used to coat plastic and metal parts, identified as EU-016, with a maximum capacity of 8.4 gallons of coating per hour using dry panel filter CE-004 as PM control, constructed in 2003, and exhausting to stack SV-027. This unit was constructed in 2003.

This emission unit was located in the former Ficosa America Plant 2 building located at 725 Parr Road. The Plant 2 building was not part of the sale of assets to Indiana Coatings, Inc.; therefore, this emission unit is being removed in this permit renewal.

The source has removed the following insignificant activities:

(a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; polymer sanding operations with particulate less than 25 lbs/day; and woodworking operations.

(c) Any unit emitting greater than 1 pound per day but less than 5 pounds per day or one ton per year of a single HAP; greater than 1 pound per day less than 12.5 pounds per day or 2.5 tons per year of any combination of HAPs; and VOC emissions less than 3 pounds per hour and 15 pounds per day.

(d) Mold release agents using low volatile products (vapor pressure less than or equal to two (2) kilopascals measured at 38 degrees C).

(e) Any unit emitting greater than 1 pound per day but less than 5 pounds per day or one ton per year of a single HAP: warehouse paint booth.

(f) Other activities with emissions equal to or less than thresholds require listing only:

(A) Polymer sanding operations - particulate less than 25 lb/day

(B) Warehouse paint booth - volatile organic compounds less than 15 lb/day

Insignificant Activities

The source also consists of the following insignificant activities:

(a) Paved roads and parking lots with public access.

(b) One (1) natural gas heater for Stage 1 Washer used to clean parts with water, identified as EU-021, with a maximum capacity of of 4.0 mmBTU/hr, and exhausting to stack SV-031.

(c) Noncontact cooling tower systems with either of the following: forced and induced draft cooling tower system not regulated under a NESHAP.

(d) Closed loop heating and cooling systems.

(e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(f) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling.

(g) A laboratory as defined in 326 IAC 2-7-1(21)(H).

Existing Approvals

The source was issued Part 70 Operating Permit 001-30158-00023 on July 1, 2011. There have been no subsequent approvals issued.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Enforcement Issue

In accordance with 326 IAC 2-7-4(a)(1)(D), a timely renewal application is one that is submitted at least nine (9) months prior to the expiration date of the source's existing operating permit. This source's existing permit expires on July 1, 2016. The source's permit renewal application was not received by IDEM until November 04, 2015. IDEM is reviewing this matter and will take appropriate action.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Adams County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard.[1]
$PM_{2.5}$	Unclassifiable or attainment effective April 5, 2005, for the annual $PM_{2.5}$ standard.
$PM_{2.5}$	Unclassifiable or attainment effective December 13, 2009 for the 24-hour $PM_{2.5}$ standard.
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
[1]Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Adams 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) $PM_{2.5}$
Adams County has been classified as attainment for $PM_{2.5}$. Therefore, direct $PM_{2.5}$, SO_2, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Other Criteria Pollutants
Adams County has been classified as attainment or unclassifiable in Indiana for all other 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.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	Potential To Emit (tons/year)
PM	1,206.10
PM10	1,206.44
PM2.5	1,206.44
SO_2	0.04
VOC	4,642.60
CO	5.05
NO_x	6.01

HAPs	Potential To Emit (tons/year)
Single HAP	173.79 (Xylene)
TOTAL	176.20

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

Part 70 permit level was determined in a previous approval. Therefore, the potential to emit was not recalculated for this source. These are the same PTE values as the existing permit.

(a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of PM_{10}, $PM_{2.5}$, and VOCs is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit Renewal.

(b) The unrestricted potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and the unrestricted potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) 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 GHGs emissions to determine operating permit applicability or PSD applicability to a source or modification.

Actual Emissions

The following table shows the actual emissions as reported by the source. This information reflects the 2012 OAQ emission data.

Actual Emissions (tons/year)							
PM	PM_{10}	$PM_{2.5}$	SO_2	NOx	VOC	CO	HAP
Not Reported	**0**	**0**	**0**	**2**	**56**	**1**	**0.00 Lead**

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, because the source met the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Potential to Emit After Issuance

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

Limited Potential to Emit (tons/year)									
	PM[a]	PM_{10}*	$PM_{2.5}$**	SO_2	NOx	VOC[b]	CO	Total HAPs	Single HAPs
Primer Booth EU-001	8.40	8.40	8.40	-	-	<248	-	<24	<9
Primer Booth EU-002	12.57	12.57	12.57	-	-		-		
Base Booth EU-003	5.60	5.60	5.60	-	-		-		
Base Booth EU-004	8.38	8.38	8.38	-	-		-		
Base Booth EU-005	9.09	9.09	9.09	-	-		-		
Clear Booth EU-006	5.92	5.92	5.92	-	-		-		
Clear Booth EU-007	8.86	8.86	8.86	-	-		-		
QC Booth EU-010	1.48	1.48	1.48	-	-		-		
Mix Room Cleaning Table EU-015	negl.	negl.	negl.	-	-	negl.	-		
Combustion Units	0.11	0.46	0.46	0.04	6.01		5.05		

Insignificant Activites	negl.	negl.	negl.	negl.	negl.	negl.	negl.	negl.	negl.
Total PTE	**60.41**	**60.76**	**60.76**	**0.04**	**6.01**	**248.33**	**5.05**	**24.11**	**9.11**
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA

negl. = negligble
* Under the Part 70 Permit program (40 CFR 70), PM_{10} and $PM_{2.5}$, not particulate matter (PM), are each considered as a "regulated air pollutant".
**$PM_{2.5}$ listed is direct $PM_{2.5}$.
(a) The particulate emissions from the surface coating booths are limited by 326 IAC 6-3.
(b) The VOC input to booths EU-001, EU-002, EU-003, EU-004, EU-005, EU-006, EU-007,and EU-010, for application of adhesive to metal parts is limited to less than 25 tons per twelve (12) consecutive month period (See discussion of 326 8-2-9 applicability) and the VOC input to all spray booths located at this source is limited to 248 tons per twelve (12) consecutive month period (see discussion of 326 IAC 2-2 limits).

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant 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 not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are limited to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

(c) 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 GHGs emissions to determine operating permit applicability or PSD applicability to a source or modification.

Federal Rule Applicability

(a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:

(1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;

(2) is subject to an emission limitation or standard for that pollutant; and

(3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each existing emission unit and specified pollutant subject to CAM:

CAM Applicability Analysis								
Emission Unit	**Pollutant**	**Control Device Used**	**Emission Limitation (Y/N)**	**Uncontrolled PTE (tons/year)**	**Controlled PTE (tons/year)**	**Major Source Threshold (tons/year)**	**CAM Applicable (Y/N)**	**Large Unit (Y/N)**
Spray Booth EU-001	PM	Yes	Y 326 IAC 6-3	>100	<100	100	Y	N
	VOC	Yes	Y 326 IAC 2-2	>100	<100	100	Y	N
Spray Booth EU-002	PM	Yes	Y 326 IAC 6-3	>100	<100	100	Y	N
	VOC	Yes	Y 326 IAC 2-2	>100	<100	100	Y	N
Spray Booth EU-003	PM	Yes	Y 326 IAC 6-3	>100	<100	100	Y	N
	VOC	None	-	-	-	100	N	-
Spray Booth EU-004	PM	Yes	Y 326 IAC 6-3	>100	<100	100	Y	N
	VOC	None	-	-	-	100	N	-
Spray Booth EU-005	PM	Yes	Y 326 IAC 6-3	>100	<100	100	Y	N
	VOC	None	-	-	-	100	N	-
Spray Booth EU-006	PM	Yes	Y 326 IAC 6-3	>100	<100	100	Y	N
	VOC	None	-	-	-	100	N	-
Spray Booth EU-007	PM	Yes	Y 326 IAC 6-3	>100	<100	100	Y	N
	VOC	None	-	-	-	100	N	-
Quality Control Booth EU-010	PM	Yes	Y 326 IAC 6-3	>100	<100	100	Y	N
	VOC	None	-	-	-	100	N	-
Mix Room Cleaning Table EU-015	PM	None	-	-	-	100	N	-
	VOC	None	-	-	-	100	N	-

Based on this evaluation, the requirements of 40 CFR Part 64, CAM remain applicable to EU-001 and EU-002 for VOC and PM and to EU-003, EU-004, EU-005, EU-006, and EU-007 for PM. This is the same determination in the previous second renewal and no changes have been made in this third renewal.

(b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

(c) This source is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Plastic Parts Surface Coating (40 CFR Part 63, Subpart PPPP), and 326 IAC 20-81-1, while the source does have a thermal oxidizer and an unlimited potential to emit greater than 10 tons per year for any single HAP and 25 tons per year for any combination of HAPs, the source has chosen to limit HAP usage rather than use the control device to limit the single and combined HAP emissions. As a result, this source is not a major source of HAPs. See limits as explained in 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) of this TSD.

(d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating for Miscellaneous Metal Products, 40 CFR 63, Subpart MMMM, are not included in the permit, because the source has chosen to limit HAP usage rather than use the control device to limit the single and combined HAP emissions. As a result, this source is not a major source of HAPs. See limits as explained in 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) of this TSD.

(e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Metal Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH, are not included in the permit, since the facility's manufacturing process does not meet the criteria as described in the applicability section of Subpart HHHHHH. The source does not perform any metal stripping operations; the source does not perform autobody refinishing operations; and the source does not perform a spray application of coatings containing compounds of chromium, lead, manganese, nickel, or cadmium. Therefore, the requirements of 40 CFR Part 63, Subpart HHHHHH do not apply.

(f) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

State Rule Applicability - Entire Source

326 IAC 1-5-2 (Emergency Reduction Plans)
The source submitted an Emergency Reduction Plan (ERP) on July 24, 1998.

326 IAC 1-6-3 (Preventive Maintenance Plans)
The source submitted a Preventive Maintenance Plan (PMP) on July 24, 1998.

326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
Pursuant to Construction Permit 001-2662-00030, issued on April 12, 1993 and in order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the VOC input (including coatings, dilution solvents, and cleaning solvents) to the surface coating facilities shall be less than 248 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month.

This is an existing limit and no change has been made in this renewal.

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 250 tons per 12 consecutive month period and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

The source has the option to use the thermal oxidizer to meet this PSD minor limit

The VOC input shall be calculated as follows:

(Input VOC to basecoat) + (Input VOC to clearcoat) + (VOC from solvent usage) + {(VOC input to primer when control is operating) * (100% - (% Efficiency)} + (VOC input to primer when control is not operating)

% Efficiency shall equal 22.5% or the value determined in the most recent stack test. Where EF is the overall control efficiency of the thermal oxidizer CE-003.

This is an existing limit that is not being revised in this permit renewal.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
In order to render the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) and 326 IAC 20-81-1 (Surface Coating of Plastic Parts and Products) not applicable, the Permittee shall comply with the following:

(a) The total usage of each individual HAP at all emission units at the source, including EU-001 through EU-007, and EU-010 minus the amount of HAP in the solvent material shipped offsite for recovery shall be limited to less than ten (10) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Prior to this permit renewal this limit included all insignificant activities. However, the natural gas combustion units are the only remaining insignificant activities at the source that emit HAPs. The unlimited potential to emit HAPs from these units is negligible; therefore it is not necessary to include insignificant activities in this limit. This is a Title 1 change.

(b) The total usage of the combination of all HAPs at the source, including EU-001 through EU-007, and EU-010, minus the amount of HAP in the solvent material shipped offsite for recovery shall be limited to less than twenty-four (24) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Prior to this permit renewal this limit included all insignificant activities. However, the natural gas combustion units are the only remaining insignificant activities at the source that emit HAPs. The unlimited potential to emit HAPs from these units is negligible; therefore it is not necessary to include insignificant activities in this limit. This is a Title 1 change.

(c) Collected solvent materials shall be retained in closed containers until shipped offsite for recycling or disposal.

Compliance with the single and combination HAP usage limits in D.1.1(a) and (b), in conjunction with single and combination HAP emissions from all other emission units including insignificant activities, shall ensure that the source-wide emissions are less than ten (10) tons of a single HAP and less than twenty-five (25) tons of a combination of HAPs per twelve (12) consecutive month period, respectively and shall render the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) and 326 IAC 20-81-1 (Surface Coating of Plastic Parts and Products) not applicable.

326 IAC 2-6 (Emission Reporting)
This source, not located in Lake, Porter, or LaPorte County, is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7 (Part 70). The potential to emit of VOC and PM10 is less than 250 tons per year; and the potential to emit of CO, NOx, and SO2 is less than 2,500 tons per year. Therefore, pursuant to 326 IAC 2-6-3(a)(2), triennial reporting is required. An emission statement shall be submitted in accordance with the compliance schedule in 326 IAC 2-6-3 by July 1, 2016, and 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 Cerification)
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 5-1 (Opacity Limitations)
This source is subject to the opacity limitations specified in 326 IAC 5-1-2(1).

326 IAC 6-4 (Fugitive Dust Emissions)
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 6.5 PM Limitations Except Lake County
This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

State Rule Applicability – Individual Facilities

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

(a) Pursuant to 326 IAC 6-3-2(d), particulate from the coating spray booths(EU-001, EU-002, EU-003, EU-004, EU-005, EU-006, EU-007, and EU-010) 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. The control devices for particulate control shall be in operation and control emissions from the surface coating operating at all times the surface coating is in operation.

(b) Pursuant to 326 IAC 6-3-1(b)(15), the mixing room table does not use five (5) gallons of coatings per day. Therefore 326 IAC 6-3-2 will not apply.

326 IAC 8-1-6 (New facilities; general reduction requirements)
Pursuant to BACT from the Construction Permit 001-2662-00030, issued on April 12, 1993, the Spray coating booths, identified as EU-001, EU-002, EU-003, EU-004, EU-005, EU-006, EU-007, and EU-010 have the following requirements, when coating plastic parts:

(a) The application method for primer shall be high volume low pressure (HVLP).

(b) The VOC content of coatings shall be limited as follows:

(1) Primer VOC content shall not exceed 6.0 pounds per gallon,

(2) Basecoat VOC content shall not exceed 6.34 pounds per gallon,

(3) Clearcoat VOC content shall not exceed 4.8 pounds per gallon.

This is an existing applicable requirement and no change has been made in this renewal.

326 IAC 8-2-9 (Miscellaneous Metal Coating)
Pursuant to 326 IAC 8-2-1(a)(2), when coating metal parts the requirements of 326 IAC 8-2-9 are applicable to each paint booth since they were constructed after January 1, 1980 and have potential to emit greater than twenty-five (25) tons of VOCs per year, the VOC input from each spray coating booths to EU-001, EU-002, EU-003, EU-004, EU-005, EU-006, EU-007, and EU-010 shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period for each booth with compliance demonstrated at the end of each month, therefore 326 IAC 8-2-9 will not apply.

This is an existing limit and no change has been made in this renewal.

326 IAC 4-2 (Incinerators)
The three (3) natural gas fired curing ovens, (EU-03, EU-13, and EU-14) and the one (1) natural gas oxidizer, (EU-21) are not considered solid waste disposal units (incinerators). Therefore; they are not subject to the requirements of 326 IAC 4-2.

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
The natural gas heater for the Stage 1 Washer unit is subject to 326 IAC 6-2-4, because it was constructed after September 21, 1983. Pursuant to this rule, the particulate matter emissions from the natural gas heater shall not exceed 0.60 lb/MMBtu when the total source operating capacity is less than 10 MMBtu/hr. The total source operating capacity is 4.00 MMBtu/hr.

This is a new requirement in the permit renewal due to the addition of the stage 1 washer unit

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Each of the natural gas-fired units at this source is exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight. In addition, pursuant to 326 IAC 6-3-1(b)(14), each of the natural gas-fired units at this source is also exempt from the requirements of 326 IAC 6-3, because they each have potential particulate emissions of less than five hundred fifty one thousandths (0.551) pound per hour.
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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 monitoring requirements applicable to this source are as follows:

Emission Unit / Control Device	Operating Parameters	Frequency of Testing
(EU-001,EU-02)/ Thermal Oxidizer, CE-003	Operating Temperature	Continuous
	Fan Amperage or Duct Pressure	Once Per day when in operation
EU-001 through EU-007/Water Wash System, CE-001	Water level of the water pans meet the manufacturer's recommended level	Once per day
	Water level of the pans shall be maintained at a level where surface agitation indicates impact of the air flow	Once per week
	Baffle Panel Inspections	Once per week
	Overspray Observations	Once per week
	Stack Exhaust Inspections	Once per month
EU-10/Dry Filter, CE-002	Filter inspection	Once per day
	Overspray observation	Once per week
	Overspray on the rooftops and the nearby ground	Once per month

(a) Particulate Matter:

(1) These monitoring conditions are necessary because the water wash system and dry filters for particulate matter control must operate properly ton ensure compliance with 326 IAC 2-2 (PSD) and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes). These are exisitng requirements that are not being modified in this proposed renewal.

(b) Volatile Organic Compounds:

(1) These monitoring conditions are necessary because the thermal oxidizer for VOC control must operate properly to ensure compliance with 326 IAC 2-2 (PSD). These are exisitng requirements that are not being modified in this proposed renewal.

The testing requirements applicable to this source are as follows:

Testing Requirements				
Emission Unit	**Control Device**	**Pollutant**	**Timeframe for Testing**	**Frequency of Testing**
EU-001 and EU-002	Thermal Oxidizer, CE-003	Overall VOC control efficiency	No later than ninety (90) days after commencing operation of the thermal oxidizer	Once every five (5) years
		3-hr rolling average temp		
		Fan amperage or fan hertz or duct pressure		

These testing requirements are only necessary if the source elects to use the thermal oxidizer to demonstrate compliance with the VOC PSD minor limit to render 326 IAC 2-2 (PSD) not applicable. To date the source has not elected to use the thermal oxidizer to comply with 326 IAC 2-2 (PSD); therefore, no previous test results are available. These are existing requirements that are not being modified in this proposed renewal.

Recommendation

The staff recommends to the Commissioner that the Part 70 Operating Permit Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on November 05, 2015. Additional information was received on December 02, 2015.

Conclusion

The operation of this stationary molded plastic parts spray painting operation shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. 001-36452-00023.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Nicholas Eilerman 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) 234-5373or toll free at 1-800-451-6027 extension 4-5373.

(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- PTE for Criteria Pollutants of Entire Source

Company Name: Indiana Coatings
Address: 917 Liechty Road, Berne, IN 46711
Permit Number: T001-36452-00023
Reviewer: Nicholas Eilerman

Potential to Emit (tons/year)									
	PM	PM_{10}	$PM_{2.5}$	SO_2	NOx	VOC	CO	Total HAPs	Single HAPs
Primer Booth EU-001	167.91	167.91	167.91	-	-	672	-	8.17	8.17 Xylene
Primer Booth EU-002	251.36	251.36	251.36	-	-	1005	-	12.22	12.22 Xylene
Base Booth EU-003	112.04	112.04	112.04	-	-	449	-	12.02	12.02 Xylene
Base Booth EU-004	167.62	167.62	167.62	-	-	671	-	17.98	17.98 Xylene
Base Booth EU-005	181.73	181.73	181.73	-	-	545	-	9.01	9.01 Xylene
Clear Booth EU-006	118.49	118.49	118.49	-	-	474	-	45.84	45.84 Xylene
Clear Booth EU-007	177.26	177.26	177.26	-	-	709	-	68.57	68.57 Xylene
QC Booth EU-010	29.57	29.57	29.57	-	-	118	-	2.29	2.46 Hexamthylene-1,6-diisocyante
Mix Room Cleaning Table EU-015	negl.	negl.	negl.	-	-	negl.	-	negl.	negl.
Combustion units	0.11	0.46	0.46	0.04	6.01	0.33	5.05	0.11	0.11 Hexane
Insignificant Activites	negl.	negl.	negl.	negl.	negl.	negl.	negl.	negl.	negl.
Total PTE	**1,206.10**	**1,206.44**	**1,206.44**	**0.04**	**6.01**	**4,642.60**	**5.05**	**176.20**	**173.79 (Xylene)**
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
Fugitive Dust - Paved Roads	3.15	0.63	0.15	-	-	-	-	-	-

Limited Potential to Emit (tons/year)									
	PM	PM_{10}	$PM_{2.5}$	SO_2	NOx	VOC	CO	Total HAPs	Single HAPs
Primer Booth EU-001	8.40	8.40	8.40	-	-	<248	-	<24	<9
Primer Booth EU-002	12.57	12.57	12.57	-	-		-		
Base Booth EU-003	5.60	5.60	5.60	-	-		-		
Base Booth EU-004	8.38	8.38	8.38	-	-		-		
Base Booth EU-005	9.09	9.09	9.09	-	-		-		
Clear Booth EU-006	5.92	5.92	5.92	-	-		-		
Clear Booth EU-007	8.86	8.86	8.86	-	-		-		
QC Booth EU-010	1.48	1.48	1.48	-	-		-		
Mix Room Cleaning Table EU-015	negl.	negl.	negl.	-	-	negl.	-	negl.	negl.
Combustion units	0.11	0.46	0.46	0.04	6.01	0.33	5.05	0.11	0.11 Hexane
Insignificant Activites	negl.	negl.	negl.	negl.	negl.	negl.	negl.	negl.	negl.
Total PTE	**60.41**	**60.76**	**60.76**	**0.04**	**6.01**	**248.33**	**5.05**	**24.11**	**9.11**
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
Fugitive Dust - Paved Roads	3.15	0.63	0.15	-	-	-	-	-	-

Appendix A: Emissions Calculations

VOC and Particulate from Spray Booths

Company Name: **Indiana Coatings, Inc.**
Address: **917 Liechty Road, Berne, IN 46711**
Permit Number: **T001-36452-00023**
Reviewer: **Nicholas Eilerman**

Emission Unit	Max. Usage (gal/hr) of Worst Case Coating	Density (lb/gal)	Weight % VOC	PTE VOC (lbs/hour)	PTE VOC (tons/year)
Primer Booth EU-001	25.4	7.34	82.3%	153	672
Primer Booth EU-002	38.0	7.34	82.3%	229	1005
Base Booth EU-003	25.4	10.8	37.3%	102	449
Base Booth EU-004	38.0	10.8	37.3%	153	671
Base Booth EU-005	25.4	8.1	60.5%	125	545
Clear Booth EU-006	25.4	8.24	51.7%	108	474
Clear Booth EU-007	38.0	8.24	51.7%	162	709
QC Booth EU-010	6.34	8.24	51.7%	27.0	118
Mix Room Cleaning Table EU-015	0.08	6.67	0.1%	0.001	0.002
			TOTAL	**907**	**3,971**

Emission Unit	Max. Usage (gal/hr) of Worst Case Coating	Density (lb/gal)	Weight % PM	Transfer Efficiency	PTE of PM (lbs/hr)	PTE of PM (tons/yr)	Control Effiency	PTE after controls
Primer Booth EU-001	25.4	7.34	82.3%	0.75	38.3	168	0.95	8.40
Primer Booth EU-002	38.0	7.34	82.3%	0.75	57.4	251	0.95	12.57
Base Booth EU-003	25.4	10.8	37.3%	0.75	25.6	112	0.95	5.60
Base Booth EU-004	38.0	10.8	37.3%	0.75	38.3	168	0.95	8.38
Base Booth EU-005	25.4	10.8	60.5%	0.75	41.5	182	0.95	9.09
Clear Booth EU-006	25.4	8.24	51.7%	0.75	27.1	118	0.95	5.92
Clear Booth EU-007	38.0	8.24	51.7%	0.75	40.5	177	0.95	8.86
QC Booth EU-010	6.34	8.24	51.7%	0.75	6.8	29.6	0.95	1.48
Mix Room Cleaning Table EU-015	0.08	6.67	0.1%	1.00	0.000	0.000	0.0	0.000
				TOTAL	**275.3**	**1,206.0**		**60.30**

Methodology

PTE of VOC (lbs/hr) = Max. Usage (gal/hr of worst case coating) *Density (lb/gal) * Weight % VOC
PTE of VOC (tons per year) = VOC (lbs/hr) * 8760 (hr/yr) * 1 ton/2000 lbs
PTE of PM (lbs/hr) = Max. Usage (gal/hr of worst case coating) *Density (lb/gal) * Weight % PM * (1-Transfer efficiency)
PTE of PM (tons/yr) = PM (lbs/hr) * 8760 (hr/yr) * 1 ton/2000 lbs
Assume PM= PM_{10} = $PM_{2.5}$

Appendix A: Emissions Calculations
Hazardous Air Pollutants (HAPs)
From Surface Coating Operations
Company Name: Indiana Coatings, Inc.
Source Address: 917 Liechty Road, Berne, IN 46711
Permit Number: T001-36452-00023
Reviewer: Nicholas Eilerman

Process	Material	Density (Lb/Gal)	Gal of Mat. (gal/hr)	Weight % Methanol	Weight % Hexamthylene-1,6-diisocyante	Weight % Xylene	Methanol Emissions (ton/yr)	Hexamthylene-1,6-diisocyante Emissions (ton/yr)	Xylene Emissions (ton/yr)	Total HAPs (ton/yr)
Primer Booth EU-001	Primer	7.34	25.40	0.00%	0.00%	1.00%	0.00	0.00	8.17	8.17
Primer Booth EU-002	Primer	7.34	38.00	0.00%	0.00%	1.00%	0.00	0.00	12.22	12.22
Base Booth EU-003	Base White	10.80	25.4	0.00%	0.00%	1.00%	0.00	0.00	12.02	12.02
Base Booth EU-004	Base White	10.80	38.0	0.00%	0.00%	1.00%	0.00	0.00	17.98	17.98
Base Booth EU-005	Base Black	8.10	25.4	0.00%	0.00%	1.00%	0.00	0.00	9.01	9.01
Clear Booth EU-006	Clear	8.24	25.4	0.00%	0.00%	5%	0.00	0.00	45.84	45.84
Clear Booth EU-007	Clear	8.24	38.0	0.00%	0.00%	5%	0.00	0.00	68.57	68.57
QC Booth EU-010	Clear	8.24	6.34	0.00%	1.00%	0.00%	0.00	2.29	0.00	2.29
Mix room cleaning Table EU-015	SP-79	6.67	0.08	0.10%	0.00%	0.00%	0.002	0.00	0.00	0.00
METHODOLOGY						Totals		**2.29**	**173.79**	**176.08**

Potential HAPs Tons per Year = Density (lb/gal) * Gal of Material (gal/hr) * Weight % HAP * (8760 hr/yr) * (1 ton/2000 lbs)

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

Company Name: Indiana Coatings, Inc.
Source Address: 917 Liechty Road, Berne, IN 46711
Permit Number: T001-36452-00023
Reviewer: Nicholas Eilerman

	Heat Input Capacity MMBtu/hr	HHV mmBtu/mmscf	Potential Throughput MMCF/yr
Bake Oven	2.5	1020	21.5
Bake Oven	2.5	1020	21.5
RTO	5.0	1020	42.9
Stage 1 Washer	4.0	1020	34.4
Total		Total	120.2

	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	0.11	0.46	0.46	0.04	6.01	0.33	5.05

*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 1-03-006-0
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBt
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	1.3E-04	7.2E-05	4.5E-03	0.11	2.0E-04	**0.11**

	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	3.0E-05	6.6E-05	8.4E-05	2.3E-05	1.3E-04	**3.3E-04**
Methodology is the same as above.					**Total HAPs**	**0.11**
The five highest organic and metal HAPs emission factors are provided above.					**Worst HAP**	**0.11**

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

Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: **Indiana Coatings, Inc.**
Source Address: **917 Liechty Road, Berne, IN 46711**
Permit Number: **T001-36452-00023**
Reviewer: **Nicholas Eilerman**

Paved Roads at Industrial Site
The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011)

Vehicle Informtation (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	50.0	1.0	50.0	10.0	500.0	1000	0.189	9.5	3456.4
Vehicle (leaving plant) (one-way trip)	50.0	1.0	50.0	10.0	500.0	1000	0.189	9.5	3456.4
		Totals	**100.0**		**1000.0**			**18.9**	**6912.9**

Average Vehicle Weight Per Trip = 10.0 tons/trip
Average Miles Per Trip = 0.19 miles/trip

Unmitigated Emission Factor, Ef = [k * (sL)^0.91 * (W)^1.02] (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	10.0	10.0	10.0	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m^2 = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [1 - (p/4N)] (Equation 2 from AP-42 13.2.1)
Mitigated Emission Factor, Eext = Ef * [1 - (p/4N)]
where p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	0.911	0.182	0.0447	lb/mile
Mitigated Emission Factor, Eext =	0.833	0.167	0.0409	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	1.57	0.31	0.08	1.44	0.29	0.07
Vehicle (leaving plant) (one-way trip)	1.57	0.31	0.08	1.44	0.29	0.07
Totals	**3.15**	**0.63**	**0.15**	**2.88**	**0.58**	**0.14**

Methodology
Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip) / [5280 ft/mile
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)

Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs
Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs
Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] * [1 - Dust Control Efficiency

Abbreviations
PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particle Matter (<2.5 um)
PTE = Potential to Emit

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

Notice of Public Comment

May 4, 2016
Ficosa North America Corporation
001-36452-00023

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 2/17/2016

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AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD
DRAFT INDIANA AIR PERMIT

May 4, 2016

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

Permit Number: **001-36452-00023**
Applicant Name: **Ficosa North America Corporation**
Location: **Berne, Adams 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.

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Carol S. Comer
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May 4, 2016

Ms. Carol Poling
Ficosa North America Corporation
917 Liechty Road
Berne, IN 46711

Re: Public Notice
Ficosa North America Corporation
Permit Level: Part 70 Operating Permit Renewal
Permit Number: 001-36452-00023

Dear Ms. Poling:

Enclosed is a copy of your draft Part 70 Operating Permit Renewal, 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 Decatur Daily Democrat in Decatur, Indiana publish the abbreviated version of the public notice no later than May 8, 2016. 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 Berne Public Library, 166 N Sprunger Street in Berne, 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 Nicholas Eilerman, 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 4-5373 or dial (317) 234-5373.

Sincerely,

Greg Hotopp

Greg Hotopp
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 2/17/2016

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May 4, 2016

To: Berne 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: Ficosa North America Corporation
Permit Number: 001-36452-00023

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 2/16/2016

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

May 4, 2016

Decatur Daily Democrat
141 South Second Street
PO Box 1001
Decatur, IN 46733

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Ficosa North America Corporation, Adams 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 May 7, 2016.

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: Part 70 Operating Permit Renewal
Permit Number: 001-36452-00023

Enclosure

PN Newspaper.dot 2/17/2016

Mail Code 61-53

IDEM Staff	GHOTOPP 5/4/2016 Ficosa North America Corporation 001-36452-00023 Draft		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**

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1		Carol Poling Ficosa North America Corporation 917 Liechty Rd Berne IN 46711 (Source CAATS)									
2		Wade Bearman Director of Operations Ficosa North America Corporation 917 Liechty Rd Berne IN 46711 *(RO CAATS)*									
3		Berne Public Library 166 N Sprunger Berne IN 46711-1595 *(Library)*									
4		Adams County Commissioners 313 West Jefferson Street Decatur IN 46733 *(Local Official)*									
5		Adams County Health Department County Svcs Complex, 313 W. Jefferson # 314 Decatur IN 46733-1673 *(Health Department)*									
6		Berne City Council and Mayors Office 158 W. Franklin St. Berne IN 46711 *(Local Official)*									
7		Mr. Jason Morrison SevenGen 604 West Wayne Street Fort Wayne IN 46802 *(Consultant)*									
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