



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 a
Significant Modification to a
Part 70 Operating Permit

for W & M Manufacturing, Inc. in Jay County

Significant Permit Modification No.: 075-36685-00017

The Indiana Department of Environmental Management (IDEM) has received an application from W & M Manufacturing, Inc., located at 1000 N Morton Street, Portland, IN 47371, for a significant modification of its Part 70 Operating Permit issued on November 15, 2011. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow W & M Manufacturing, Inc. to make certain changes at its existing source. W & M Manufacturing, Inc. has applied to remove EU-01 G and EU-01 H and construct and operate spray application booth AF-1.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g. changes that add or modify synthetic minor emission limits). IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

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

Jay County Public Library
315 N. Ship St.
Portland, IN 47371

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



A State that Works

application, please contact IDEM at the address below. Please refer to permit number SPM 075-36685-00017 in all correspondence.

Comments should be sent to:

Thomas Olmstead
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 3-9664
Or dial directly: (317) 233-9664
Fax: (317) 232-6749 attn: Thomas Olmstead
E-mail: tolmstea@idem.in.gov

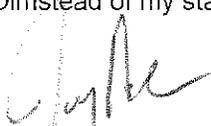
All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have 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 Thomas Olmstead or my staff at the above address.



Jenny Acker, Section Chief
Permits Branch
Office of Air Quality



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

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

Michael R. Pence
Governor

Carol S. Comer
Commissioner

DRAFT

Mr. Doug Oliver
W & M Manufacturing, Inc.
1000 N Morton Street
Portland, IN 47371

Re: 075-36685-00017
Significant Permit Modification to
Part 70 Renewal No.: T075-30299-00017

Dear Mr. Doug Oliver:

W & M Manufacturing, Inc. was issued Part 70 Operating Permit Renewal No. T075-30299-00017 on November 15, 2011 for a stationary injection molding & surface coating plant to mfg automotive & casket components located at 1000 N Morton Street, Portland, IN 47371. An application requesting changes to this permit was received on January 7, 2016. Pursuant to the provisions of 326 IAC 2-7-12, a Significant Permit Modification to this permit is hereby approved as described in the attached Technical Support Document.

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

- Attachment A: 40 CFR 63, Subpart Mmmm, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products
- Attachment B: 40 CFR 63, Subpart Pppp, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products

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

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

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

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

DRAFT

If you have any questions on this matter, please contact Thomas Olmstead, of my staff, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251 at 317-233-9664 or 1-800-451-6027, and ask for extension 3-9664.

Sincerely,

Jenny Acker, Section Chief
Permits Branch
Office of Air Quality

Attachments: Modified Permit and Technical Support Document

cc: File - Jay County
Jay County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch



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

DRAFT

Part 70 Operating Permit (Renewal)

OFFICE OF AIR QUALITY

**W & M Manufacturing, Inc.
1000 N Morton St
Portland, Indiana 47371-1631**

(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.: T075-30299-00017	
Issued by: Original Signed Tripurari P. Sinha, Ph. D., Section Chief Permits Branch, Office of Air Quality	Issuance Date: November 15, 2011 Expiration Date: November 15, 2016

First Significant Permit Modification No.: 075-36685-00017	
Issued by: Jenny Acker, Section Chief, Permits Branch Office of Air Quality	Issuance Date: Expiration Date: November 15, 2016

DRAFT

Table of Contents

SECTION A SOURCE SUMMARY 5

- A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]
- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]
- A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

SECTION B GENERAL CONDITIONS 7

- B.1 Definitions [326 IAC 2-7-1]
- B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]
- B.3 Term of Conditions [326 IAC 2-1.1-9.5]
- B.4 Enforceability [326 IAC 2-7-7][IC 13-17-12]
- B.5 Severability [326 IAC 2-7-5(5)]
- B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
- B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]
- B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]
- B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]
- B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]
- B.11 Emergency Provisions [326 IAC 2-7-16]
- B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]
- B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]
- B.14 Termination of Right to Operate [326 IAC 2-7-10][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]
- B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]
- B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]
- B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]
- B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]
- B.20 Source Modification Requirement [326 IAC 2-7-10.5]
- 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]
- B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]
- B.23 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-7-5(7)][326 IAC 2-1.1-7]
- B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]

SECTION C SOURCE OPERATION CONDITIONS 18

Emission Limitations and Standards [326 IAC 2-7-5(1)] 18

- C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]
- C.2 Opacity [326 IAC 5-1]
- C.3 Open Burning [326 IAC 4-1][IC 13-17-9]
- C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
- C.6 Stack Height [326 IAC 1-7]
- C.7 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]

Testing Requirements [326 IAC 2-7-6(1)] 20

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

Compliance Requirements [326 IAC 2-1.1-11] 20

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

DRAFT

Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]	20
C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]	
C.11 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]	
Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]	21
C.12 Emergency Reduction Plans [326 IAC 1-5-2][326 IAC 1-5-3]	
C.13 Risk Management Plan [326 IAC 2-7-5(11)][40 CFR 68]	
C.14 Response to Excursions or Exceedances [326 IAC 2-7-5][326 IAC 2-7-6]	
C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]	
Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19]	23
C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]	
C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]	
C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)][326 IAC 2-1.1-11]	
Stratospheric Ozone Protection	24
C.19 Compliance with 40 CFR 82 and 326 IAC 22-1	
SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS	25
Emission Limitations and Standards [326 IAC 2-7-5(1)]	25
D.1.1 Prevention of Significant Deterioration (PSD) Minor Source Limit [326 IAC 2-2]	
D.1.2 Volatile Organic Compound (VOC) Limitations [326 IAC 8-1-6]	
D.1.3 Volatile Organic Compound (VOC) Limit [326 IAC 8-6-1]	
D.1.4 Particulate [326 IAC 6-3-2(d)]	
D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(12)]	
Compliance Determination Requirements [326 IAC 2-7-5(1)]	26
D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4][326 IAC 8-1-2(a)]	
Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]	26
D.1.7 Monitoring	
Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19]	27
D.1.8 Record Keeping Requirements	
D.1.9 Reporting Requirements	
SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS	28
Emission Limitations and Standards [326 IAC 2-7-5(1)]	28
D.2.1 Incinerator Requirements [326 IAC 4-2-2]	
D.2.2 Carbon Monoxide [326 IAC 9-1-2]	
SECTION E.1 NESHAP	29
National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]	29
E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1][40 CFR Part 63, Subpart A]	
E.1.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products NESHAP [40 CFR Part 63, Subpart M][326 IAC 20-80]	
SECTION E.2 NESHAP	31
National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]	32
E.2.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1][40 CFR Part 63, Subpart A]	

DRAFT

E.2.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products NESHAP [40 CFR Part 63, Subpart P][326 IAC 20-81]

CERTIFICATION 34

EMERGENCY OCCURRENCE REPORT 35

Part 70 Quarterly Report..... 37

Part 70 Quarterly Report..... 38

QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT 39

Attachment A: 40 CFR 63, Subpart MMMM, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products

Attachment B: 40 CFR 63, Subpart P, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products

DRAFT

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 injection molding & surface coating plant to mfg automotive & casket components.

Source Address:	1000 N Morton St, Portland, Indiana 47371-1631
General Source Phone Number:	(260) 726-9844
SIC Code:	3647 (Vehicular Lighting Equipment) and 3995 (Burial Caskets)
County Location:	Jay
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) Spray coating operations, identified as EU-01, including six (6) spray booths described as follows:
- (1) EU-01 A, constructed in 1985, for application of coatings to plastic or metal substrates, with a maximum capacity of 1080 units per hour, using the HVLP method of spray application, using dry filters for particulate control, and exhausting to one (1) stack, identified as Stack S1;
 - (2) EU-01 B, constructed in 1984, for application of topcoats to metal and plastic substrates, with a maximum capacity of 560 units per hour, using the robotic HVLP method of spray application, using a water curtain for particulate control, and exhausting to one (1) stack, identified as Stack S2;
 - (3) EU-01 C, constructed in 1986, for application of coatings to plastic or metal substrates, with a maximum capacity of 50 units per hour, using the HVLP and air atomized methods of spray application, using a dry filter for particulate control, and exhausting to one (1) stack, identified as Stack S3;
 - (4) EU-01 D, constructed in 1978, for application of basecoats to plastic or metal substrates, with a maximum capacity of 560 units per hour, using the robotic HVLP method of spray application, using a water curtain for particulate control, and exhausting to one (1) stack, identified as Stack S4;
 - (5) EU-01 E, constructed in 1986, for application of basecoats and topcoats to plastic substrates, with a maximum capacity of 3,200 units per hour, using the robotic HVLP method of spray application, using a water curtain for particulate control, and exhausting to one (1) stack, identified as Stack S5; and

DRAFT

- (6) AF-1, approved in 2016 for construction, for application of anti-fog to plastic lenses, with a maximum capacity of 90 parts per hour, using HVLP method of spray application, equipped with 2 dry filters for particulate control, and exhausting through two (2) stacks, identified as Stack S7 and Stack S8.

Under the Surface Coating of Plastic Parts and Products NESHAP (40 CFR 63, Subpart PPPP), the spray coating operations (EU-01 A, EU-01 B, EU-01 C, EU-01 D, and EU-01 E) are considered existing general use surface coating operations, and AF-1 is considered a new automotive lamp-coating surface coating operation.

Under the Surface Coating of Miscellaneous Metal Parts and Products NESHAP (40 CFR 63, Subpart MMMM), the spray coating operations (EU-01 A, EU-01 B, EU-01 C, and EU-01 D) are considered existing surface coating operations used for surface coating of miscellaneous metal parts and products.

- (b) One (1) natural gas-fired air make-up unit, identified as EU-02, with a maximum heat input capacity of 10.5 MMBtu per hour, and exhausting through one (1) stack, identified as Stack S34.

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

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

- (a) Activities with emissions equal to or less than the following thresholds: 25 lb/day PM/PM10; 25 lbs/day NOX; 15 lb/day VOC; 1.0 ton/yr of a single HAP, or 2.5 tons/yr of any combination of HAPs:
 - (1) One multiple chambered incinerator, identified as EU-03, constructed in 1995, fueled by natural gas only with a maximum heat input capacity of 0.875 MMBtu per hour, with a maximum incineration capacity of 60 pounds of dried paint and/or topcoat varnish per hour, using an afterburner for VOC control, and exhausting through one (1) stack, identified as Stack BO-1. [326 IAC 4-2-2]
- (b) Solvent recycling systems with batch capacity less than or equal to 100 gallons. [40 CFR Part 63, Subparts MMMM and PPPP]

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).

DRAFT

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, T075-30299-00017, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

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

DRAFT

- (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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent 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.

DRAFT

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) If required by specific condition(s) in Section D of this permit, 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.

- (b) 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).
- (c) 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:

DRAFT

- (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.

DRAFT

- (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

DRAFT

- (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 T075-30299-00017 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

DRAFT

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

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

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

Request for renewal shall be submitted to:

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

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

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

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

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

DRAFT

Indianapolis, Indiana 46204-2251

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

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

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

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

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

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

DRAFT

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

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

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

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

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

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

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

DRAFT

- (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

DRAFT

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.

DRAFT

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

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

DRAFT

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.

DRAFT

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

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

DRAFT

Indianapolis, Indiana 46204-2251

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

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

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

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

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

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

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval 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 ninety (90) days after the date of issuance of this permit.

The ERP 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) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) 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]

DRAFT

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

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

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

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

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

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

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

DRAFT

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

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

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

Pursuant to 326 IAC 2-6-3(b)(2), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

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

The statement must be submitted to:

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

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

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

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:

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

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

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

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

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

DRAFT

permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

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

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:
- Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

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

DRAFT

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Spray coating operations, identified as EU-01, including six (6) spray booths described as follows:
- (1) EU-01 A, constructed in 1985, for application of coatings to plastic or metal substrates, with a maximum capacity of 1080 units per hour, using the HVLP method of spray application, using dry filters for particulate control, and exhausting to one (1) stack, identified as Stack S1;
 - (2) EU-01 B, constructed in 1984, for application of topcoats to metal and plastic substrates, with a maximum capacity of 560 units per hour, using the robotic HVLP method of spray application, using a water curtain for particulate control, and exhausting to one (1) stack, identified as Stack S2;
 - (3) EU-01 C, constructed in 1986, for application of coatings to plastic or metal substrates, with a maximum capacity of 50 units per hour, using the HVLP and air atomized methods of spray application, using a dry filter for particulate control, and exhausting to one (1) stack, identified as Stack S3;
 - (4) EU-01 D, constructed in 1978, for application of basecoats to plastic or metal substrates, with a maximum capacity of 560 units per hour, using the robotic HVLP method of spray application, using a water curtain for particulate control, and exhausting to one (1) stack, identified as Stack S4;
 - (5) EU-01 E, constructed in 1986, for application of basecoats and topcoats to plastic substrates, with a maximum capacity of 3,200 units per hour, using the robotic HVLP method of spray application, using a water curtain for particulate control, and exhausting to one (1) stack, identified as Stack S5; and
 - (6) AF-1, approved in 2016 for construction, for application of anti-fog to plastic lenses, with a maximum capacity of 90 parts per hour, using HVLP method of spray application, equipped with 2 dry filters for particulate control, and exhausting through two (2) stacks, identified as Stack S7 and Stack S8.

Under the Surface Coating of Plastic Parts and Products NESHAP (40 CFR 63, Subpart PPPP), the spray coating operations (EU-01 A, EU-01 B, EU-01 C, EU-01 D, and EU-01 E) are considered existing general use surface coating operations, and AF-1 is considered a new automotive lamp-coating surface coating operation.

Under the Surface Coating of Miscellaneous Metal Parts and Products NESHAP (40 CFR 63, Subpart MMMM), the spray coating operations (EU-01 A, EU-01 B, EU-01 C, and EU-01 D) are considered existing surface coating operations used for surface coating of miscellaneous metal parts and products.

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

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

D.1.1 Prevention of Significant Deterioration (PSD) Minor Source Limit [326 IAC 2-2]

The amount of VOC used by the six (6) spray coating booths (EU-01 A, EU-01 B, EU-01 C, EU-

DRAFT

01 D, EU-01 E, AF-1), including coatings, dilution solvents, and cleaning solvents, shall be less than 240 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this VOC usage limit, together with the potential to emit from other emission units shall limit VOC emission to less than 250 tons per year, and render the requirements of 326 IAC 2-2 not applicable to the entire source.

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

Pursuant to CP 075-2202-00017, issued on March 5, 1996, and 326 IAC 8-1-6 (Best Available Control Technology (BACT)) for the spray coating booths shall be as follows:

- (a) EU-01 A (Prime Coating of Plastic Parts) shall use an HVLP system;
- (b) EU-01 B (Top Coating of Plastic Parts and Metal Parts) shall use a robotic HVLP system for coating of plastic parts and an electrostatic spray system for coating of metal parts;
- (c) EU-01 C (Coating of Plastic Parts) shall use an HVLP system or atomized spray equipment;
- (d) EU-01 E (Base Coating and Top Coating of Plastic Parts) shall use hand-held air-atomized spray equipment; and

D.1.3 Volatile Organic Compound (VOC) Limit [326 IAC 8-6-1]

Pursuant to 326 IAC 8-6-1, the amount of VOC, including coatings, dilution solvents, and cleaning solvents, used at the spray coating booth EU-01 D, shall be less than 100 tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit will render the requirements of 326 IAC 8-6 not applicable to Coating Booth EU-01D.

D.1.4 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the spray coating booths EU-01 A, EU-01 C and AF-1 shall be controlled by dry particulate filters, particulate from the spray coating booths EU-01 B, EU-01 D and EU-01 E shall be controlled by water curtains, and the Permittee shall operate each control device in accordance with manufacturer's specifications.

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

A Preventive Maintenance Plan is required for the six (6) spray coating booths and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4][326 IAC 8-1-2(a)]

Compliance with the VOC usage limitations contained in Conditions D.1.1 and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.7 Monitoring

For spray booths EU-01 A, EU-01B, EU-01 C, EU-01 D, EU-01 E, and AF-1, the Permittee shall comply with the following:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading

DRAFT

of the filters and the correct operation of the water curtain overspray system based on the manufacturer specifications. To monitor the performance of the dry filters and water curtain over spray systems, weekly observations shall be made of the over spray from the spray coating booth stacks while one or more of the booths are in operation. If a condition exists which should result in a response, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response required by this condition. Failure to take a reasonable response shall be considered a deviation from this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of over spray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to a reasonable response required by this condition. Failure to take a reasonable response shall be considered a deviation from this permit.

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

D.1.8 Record Keeping Requirements

- (a) In order to document the compliance status with Conditions D.1.1 and D.1.3, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Conditions D.1.1 and D.1.3.
 - (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.
 - (2) The total VOC usage for each month.
- (b) In order to document the compliance status with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations and daily and monthly inspections.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1 and D.1.3 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1(35).

DRAFT

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Specifically-Regulated Insignificant Activities

- (a) Activities with emissions equal to or less than the following thresholds: 25 lb/day PM/PM10; 25 lbs/day NOX; 15 lb/day VOC; 1.0 ton/yr of a single HAP, or 2.5 tons/yr of any combination of HAPs:
 - (1) One multiple chambered incinerator, identified as EU-03, constructed in 1995, fueled by natural gas only with a maximum heat input capacity of 0.875 MMBtu per hour, with a maximum incineration capacity of 60 pounds of dried paint and/or topcoat varnish per hour, using an afterburner for VOC control, and exhausting through one (1) stack, identified as Stack BO-1. [326 IAC 4-2-2]

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

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

D.2.1 Incinerator Requirements [326 IAC 4-2-2]

Pursuant to 326 IAC 4-2-2, the insignificant multiple-chambered incinerator shall:

- (a) Consist of primary and secondary chambers or the equivalent.
- (b) Be equipped with a primary burner unless burning only wood products.
- (c) Comply with 326 IAC 5-1 and 326 IAC 2.
- (d) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in 326 IAC 4-2-2(c).
- (e) Be operated so that emissions of hazardous material including, but not limited to, viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented;
- (f) Not emit particulate matter in excess of five-tenths (0.5) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators with solid waste capacity less than two hundred (200) pounds per hour.
- (g) Be operated so as to not create a nuisance or fire hazard.
- (h) If any of the requirements of paragraphs (a) through (g) are not met, then the Permittee shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.

D.2.2 Carbon Monoxide [326 IAC 9-1-2]

Pursuant to 326 IAC 9-1-2(a)(3), the Permittee shall not operate the incinerator unless the waste gas stream is burned in a direct flame afterburner or secondary chamber.

DRAFT

SECTION E.1

NESHAP

Emissions Unit Description:

- (a) Spray coating operations, identified as EU-01, including six (6) spray booths described as follows:
 - (1) EU-01 A, constructed in 1985, for application of coatings to plastic or metal substrates, with a maximum capacity of 1080 units per hour, using the HVLP method of spray application, using dry filters for particulate control, and exhausting to one (1) stack, identified as Stack S1;
 - (2) EU-01 B, constructed in 1984, for application of topcoats to metal and plastic substrates, with a maximum capacity of 560 units per hour, using the robotic HVLP method of spray application, using a water curtain for particulate control, and exhausting to one (1) stack, identified as Stack S2;
 - (3) EU-01 C, constructed in 1986, for application of coatings to plastic or metal substrates, with a maximum capacity of 50 units per hour, using the HVLP and air atomized methods of spray application, using a dry filter for particulate control, and exhausting to one (1) stack, identified as Stack S3;
 - (4) EU-01 D, constructed in 1978, for application of basecoats to plastic or metal substrates, with a maximum capacity of 560 units per hour, using the robotic HVLP method of spray application, using a water curtain for particulate control, and exhausting to one (1) stack, identified as Stack S4;

Under the Surface Coating of Plastic Parts and Products NESHAP (40 CFR 63, Subpart PPPP), the spray coating operations (EU-01 A, EU-01 B, EU-01 C, EU-01 D, and EU-01 E) are considered existing general use surface coating operations, and AF-1 is considered a new automotive lamp-coating surface coating operation.

Under the Surface Coating of Miscellaneous Metal Parts and Products NESHAP (40 CFR 63, Subpart MMMM), the spray coating operations (EU-01 A, EU-01 B, EU-01 C, and EU-01 D) are considered existing surface coating operations used for surface coating of miscellaneous metal parts and products.

Specifically-Regulated Insignificant Activities

- (b) Solvent recycling systems with batch capacity less than or equal to 100 gallons. [40 CFR Part 63, Subparts MMMM and PPPP]

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

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

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

- (a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart MMMM.

DRAFT

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

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

E.1.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products NESHAP [40 CFR Part 63, Subpart M] [326 IAC 20-80]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart M (included as Attachment A to the operating permit), which are incorporated by reference as 326 IAC 20-80, for the emission unit(s) listed above:

- (1) 40 CFR 63.3880
- (2) 40 CFR 63.3881(a), (b), (c), (e)
- (3) 40 CFR 63.3882
- (4) 40 CFR 63.3883
- (5) 40 CFR 63.3890(b), (c)
- (6) 40 CFR 63.3891(a)
- (7) 40 CFR 63.3892(a)
- (8) 40 CFR 63.3893(a)
- (9) 40 CFR 63.3900(a)(1)
- (10) 40 CFR 63.3901
- (11) 40 CFR 63.3910(a), (b), (c)(1) – (7), (c)(8)(i), (c)(10)
- (12) 40 CFR 63.3920(a)(1), (a)(2), (a)(3)(i) – (iv), (a)(3)(vi), (a)(4), (a)(5)
- (13) 40 CFR 63.3930(a), (b), (c)(1), (c)(2), (d), (e), (f), (h), (i), (j)
- (14) 40 CFR 63.3931
- (15) 40 CFR 63.3940
- (16) 40 CFR 63.3941
- (17) 40 CFR 63.3942
- (18) 40 CFR 63.3980
- (19) 40 CFR 63.3981
- (20) Table 3 to 40 CFR 63, Subpart M
- (21) Table 4 to 40 CFR 63, Subpart M

DRAFT

SECTION E.2

NESHAP

Emissions Unit Description:

- (a) Spray coating operations, identified as EU-01, including six (6) spray booths described as follows:
- (1) EU-01 A, constructed in 1985, for application of coatings to plastic or metal substrates, with a maximum capacity of 1080 units per hour, using the HVLP method of spray application, using dry filters for particulate control, and exhausting to one (1) stack, identified as Stack S1;
 - (2) EU-01 B, constructed in 1984, for application of topcoats to metal and plastic substrates, with a maximum capacity of 560 units per hour, using the robotic HVLP method of spray application, using a water curtain for particulate control, and exhausting to one (1) stack, identified as Stack S2;
 - (3) EU-01 C, constructed in 1986, for application of coatings to plastic or metal substrates, with a maximum capacity of 50 units per hour, using the HVLP and air atomized methods of spray application, using a dry filter for particulate control, and exhausting to one (1) stack, identified as Stack S3;
 - (4) EU-01 D, constructed in 1978, for application of basecoats to plastic or metal substrates, with a maximum capacity of 560 units per hour, using the robotic HVLP method of spray application, using a water curtain for particulate control, and exhausting to one (1) stack, identified as Stack S4;
 - (5) EU-01 E, constructed in 1986, for application of basecoats and topcoats to plastic substrates, with a maximum capacity of 3,200 units per hour, using the robotic HVLP method of spray application, using a water curtain for particulate control, and exhausting to one (1) stack, identified as Stack S5; and
 - (6) AF-1, approved in 2016 for construction, for application of anti-fog to plastic lenses, with a maximum capacity of 90 parts per hour, using HVLP method of spray application, equipped with 2 dry filters for particulate control, and exhausting through two (2) stacks, identified as Stack S7 and Stack S8.

Under the Surface Coating of Plastic Parts and Products NESHAP (40 CFR 63, Subpart PPPP), the spray coating operations (EU-01 A, EU-01 B, EU-01 C, EU-01 D, and EU-01 E) are considered existing general use surface coating operations, and AF-1 is considered a new automotive lamp-coating surface coating operation.

Under the Surface Coating of Miscellaneous Metal Parts and Products NESHAP (40 CFR 63, Subpart MMMM), the spray coating operations (EU-01 A, EU-01 B, EU-01 C, and EU-01 D) are considered existing surface coating operations used for surface coating of miscellaneous metal parts and products.

Specifically-Regulated Insignificant Activities

- (b) Solvent recycling systems with batch capacity less than or equal to 100 gallons. [40 CFR Part 63, Subparts MMMM and PPPP]

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

DRAFT

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

E.2.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1][40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart PPPP.
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

E.2.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products NESHAP [40 CFR Part 63, Subpart PPPP][326 IAC 20-81]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart PPPP (included as Attachment B to the operating permit), which are incorporated by reference as 326 IAC 20-81,

- (a) Under 40 CFR 63, Subpart PPPP, spray coating operations (EU-01 A, EU-01 B, EU-01 C, EU-01 D, and EU-01 E) are existing general use surface coating operations:
 - (1) 40 CFR 63.4480
 - (2) 40 CFR 63.4481(a)(1), (a)(2), (b), (c), (e)
 - (3) 40 CFR 63.4482(a), (b), (e)
 - (4) 40 CFR 63.4483(b) and (d)
 - (5) 40 CFR 63.4490(b)(1), (c)
 - (6) 40 CFR 63.4491(a)
 - (7) 40 CFR 63.4492(a)
 - (8) 40 CFR 63.4493(a)
 - (9) 40 CFR 63.4500(a)(1)
 - (10) 40 CFR 63.4500(b)
 - (11) 40 CFR 63.4501
 - (12) 40 CFR 63.4510(a) - (b)
 - (13) 40 CFR 63.4510(c)(1) - (7)
 - (14) 40 CFR 63.4510(c)(8)(i)
 - (15) 40 CFR 63.4520(a)(1) - (2)
 - (16) 40 CFR 63.4520(a)(3)(i) - (iv)
 - (17) 40 CFR 63.4520(a)(4) - (5)
 - (18) 40 CFR 63.4530(a) - (b)
 - (19) 40 CFR 63.4530(c)(1) - (2)
 - (20) 40 CFR 63.4530(d) - (f)
 - (21) 40 CFR 63.4530(h)
 - (22) 40 CFR 63.4531
 - (23) 40 CFR 63.4540
 - (24) 40 CFR 63.4541
 - (25) 40 CFR 63.4542
 - (26) 40 CFR 63.4580
 - (27) 40 CFR 63.4581
 - (28) Table 2 to 40 CFR 63, Subpart PPPP (applicable portions)

DRAFT

- (29) Table 3 to 40 CFR 63, Subpart PPPP (applicable portions)
- (30) Table 4 to 40 CFR 63, Subpart PPPP (applicable portions)

- (b) Under 40 CFR 63, Subpart PPPP, spray coating operation AF-1 is a new automotive lamp surface coating operation:
 - (1) 40 CFR 63.4480
 - (2) 40 CFR 63.4481(a)(1), (a)(3), (b), (c), (e)
 - (3) 40 CFR 63.4482(a), (b), (c)(1), (c)(3)
 - (4) 40 CFR 63.4483(a)(2), (d)
 - (5) 40 CFR 63.4490(a)(2), (c)
 - (6) 40 CFR 63.4491(a)
 - (7) 40 CFR 63.4492(a)
 - (8) 40 CFR 63.4493(a)
 - (9) 40 CFR 63.4500(a)(1), (b)
 - (10) 40 CFR 63.4501
 - (11) 40 CFR 63.4510(a), (b)
 - (12) 40 CFR 63.4510(c)(1) - (7), (8)(i)
 - (13) 40 CFR 63.4520(a)(1), (2), (3)(i)-(iv), (4), (5)
 - (14) 40 CFR 63.4530(a), (b), (c)(1), (c)(2), (d), (e), (f), (h)
 - (15) 40 CFR 63.4531
 - (16) 40 CFR 63.4540
 - (17) 40 CFR 63.4541
 - (18) 40 CFR 63.4542
 - (19) 40 CFR 63.4580
 - (20) 40 CFR 63.4581
 - (21) Table 2 to 40 CFR 63, Subpart PPPP (applicable portions)
 - (22) Table 3 to 40 CFR 63, Subpart PPPP (applicable portions)
 - (23) Table 4 to 40 CFR 63, Subpart PPPP (applicable portions)

DRAFT

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

Source Name: W & M Manufacturing, Inc.
Source Address: 1000 N Morton St, Portland, Indiana 47371-1631
Part 70 Permit No.: T075-30299-00017

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:

DRAFT

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: W & M Manufacturing, Inc.
Source Address: 1000 N Morton St, Portland, Indiana 47371-1631
Part 70 Permit No.: T075-30299-00017

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:

DRAFT

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: _____

DRAFT

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

Part 70 Quarterly Report

Source Name: W & M Manufacturing, Inc.
Source Address: 1000 N Morton St, Portland, Indiana 47371-1631
Part 70 Permit No.: T075-30299-00017
Facility: Spray coating booths EU-01 A, EU-01 B, EU-01 C, EU-01 D, EU-01 E, and AF-1
Parameter: VOC usage, including coatings, dilution solvents, and cleaning solvents.
Limit: Less than 240 tons per twelve (12) month consecutive period, with compliance determined at the end of each month.

QUARTER : _____ YEAR: _____

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

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

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

DRAFT

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

Part 70 Quarterly Report

Source Name: W & M Manufacturing, Inc
Source Address: 1000 N Morton St, Portland, Indiana 47371-1631
Part 70 Permit No.: T075-30299-00017
Facility: Spray coating booth EU-01 D
Parameter: VOC usage, including coatings, dilution solvents, and cleaning solvents.
Limit: Less than 100 tons per twelve (12) month consecutive period, with compliance determined at the end of each month.

QUARTER : _____ YEAR: _____

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

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

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

DRAFT

**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: W & M Manufacturing, Inc.
Source Address: 1000 N Morton St, Portland, Indiana 47371-1631
Part 70 Permit No.: T075-30299-00017

Months: _____ to _____ Year: _____

Page 1 of 2

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

DRAFT

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

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

Source Description and Location

Source Name:	W & M Manufacturing, Inc.
Source Location:	1000 N Morton Street, Portland IN 47371
County:	Jay
SIC Code:	3647 (Vehicular Lighting Equipment) and 3995 (Burial Caskets)
Operation Permit No.:	T075-30299-00017
Operation Permit Issuance Date:	November 15, 2011
Significant Permit Modification No.:	T075-36685-00017
Permit Reviewer:	Thomas Olmstead

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. T075-30299-00017 on November 15, 2011. There have been no subsequent approvals issued.

County Attainment Status

The source is located in Jay 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. Jay 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}**
Jay County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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

Fugitive Emissions

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

Source Status - Existing Source

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

Pollutant	Emissions (ton/yr)
PM	5.70
PM10	6.00
PM2.5	6.00
SO2	0.03
NOX	5.00
VOC	240.30
CO	4.20
Worst Single HAP (methanol)	34.20
Total HAPs	85.50

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.

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant, excluding GHGs, is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) These emissions are based upon Technical Support Document T075-30299-00017.
- (c) This existing source is a major source of HAPs, as defined in 40 CFR 63.2, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than

twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by W & M Manufacturing, Inc. on January 7, 2016, relating to the removal of EU-01 G and EU-01 H and construction and operation of spray application AF-1. The following is a list of the proposed emission units and pollution control device(s):

- (a) AF-1, approved in 2016 for construction, for application of anti-fog to plastic lenses, with a maximum capacity of 90 parts per hour, using HVLP method of spray application, equipped with 2 dry filters for particulate control, and exhausting through two (2) stacks, identified as Stack S7 and Stack S8.

The following units have been removed from the source:

- (a) EU-01 G, constructed in 1987, for application of coatings to plastic or metal substrates, with a maximum capacity of 480 units per hour, using the HVLP method of spray application, using dry filters for particulate control, and exhausting to one (1) stack, identified as Stack S7.
- (b) One (1) flow coating booth, identified as EU-01 H, constructed in 2006, for application of UV-curable basecoat to plastic automotive headlight components or metal burial casket components, with a maximum capacity of 1,000 units per hour, exhausting to one (1) stack, identified as Stack S8.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

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

Permit Level Determination – Part 70 Modification to an Existing Source

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

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

Increase in PTE Before Controls of the Modification	
Pollutant	Potential To Emit (ton/yr)
PM	4.18
PM ₁₀	4.18
PM _{2.5}	4.18
SO ₂	--

Increase in PTE Before Controls of the Modification	
Pollutant	Potential To Emit (ton/yr)
VOC	8.26
CO	--
NO _x	--
Single HAPs	<10
Total HAPs	<25

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

Pursuant to 326 IAC 2-1.1-3(e) modifications with a PTE less than the levels specified at 326 IAC 2-1.1-3(e)(1)(A) through (G) are exempt from the modification approval requirements under 326 IAC 2-7-10.5.

The modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d)(1), because the change requires a case-by-case determination of an emission limitation or other standard.

Permit Level Determination – PSD

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

Process / Emission Unit	Project Emissions (ton/yr)						
	PM	PM₁₀	PM_{2.5}*	SO₂	NO_x	VOC	CO
AF-1	0.42	0.42	0.42	--	--	8.26	--
Total for Modification	0.42	0.42	0.42	--	--	8.26	--
PSD Major Source Thresholds	250	250	250	250	250	250	250

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

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

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

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

The amount of VOC used by the six (6) spray coating booths (EU-01 A, EU-01 B, EU-01 C, EU-

01 D, EU-01 E, AF-1), including coatings, dilution solvents, and cleaning solvents, shall be less than 240 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this VOC usage limit, together with the potential to emit from other emission units shall limit VOC emission to less than 250 tons per year, and render the requirements of 326 IAC 2-2 not applicable to the entire source.

Federal Rule Applicability Determination

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

NSPS:

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

NESHAP:

- (b) AF-1 is not subject to the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63.3880, Subpart MMMM), which is incorporated by reference as 326 IAC 20-80 because AF-1 does not surface coat miscellaneous metal parts and products.
- (c) AF-1 is subject to the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products (40 CFR 63.4480, Subpart PPPP), which is incorporated by reference as 326 IAC 20-81. AF-1 is considered a new affected source in the automotive lamp coating subcategory, because it commenced construction after December 4, 2002 and it used to perform plastic parts and products coating in a subcategory that was not previously performed. The unit subject to this rule includes the following:
- (1) AF-1, approved in 2016 for construction, for application of anti-fog to plastic lenses, with a maximum capacity of 90 parts per hour, using HVLP method of spray application, equipped with 2 dry filters for particulate control, and exhausting through two (2) stacks, identified as Stack S7 and Stack S8.

The emission unit is subject to the following portions of Subpart PPPP:

- (1) 40 CFR 63.4480
- (2) 40 CFR 63.4481(a)(1), (a)(3), (b), (c), (e)
- (3) 40 CFR 63.4482(a), (b), (c)(1), (c)(3)
- (4) 40 CFR 63.4483(a)(2), (d)
- (5) 40 CFR 63.4490(a)(2), (c)
- (6) 40 CFR 63.4491(a)
- (7) 40 CFR 63.4492(a)
- (8) 40 CFR 63.4493(a)
- (9) 40 CFR 63.4500(a)(1), (b)
- (10) 40 CFR 63.4501
- (11) 40 CFR 63.4510(a), (b)
- (12) 40 CFR 63.4510(c)(1) - (7), (8)(i)
- (13) 40 CFR 63.4520(a)(1), (2), (3)(i)-(iv), (4), (5)
- (14) 40 CFR 63.4530(a), (b), (c)(1), (c)(2), (d), (e), (f), (h)
- (15) 40 CFR 63.4531
- (16) 40 CFR 63.4540
- (17) 40 CFR 63.4541
- (18) 40 CFR 63.4542
- (19) 40 CFR 63.4580
- (20) 40 CFR 63.4581
- (21) Table 2 to 40 CFR 63, Subpart PPPP (applicable portions)
- (22) Table 3 to 40 CFR 63, Subpart PPPP (applicable portions)
- (23) Table 4 to 40 CFR 63, Subpart PPPP (applicable portions)

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

CAM:

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

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

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

CAM Applicability Analysis							
Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (ton/yr)	Controlled PTE (ton/yr)	Part 70 Major Source Threshold (ton/yr)	CAM Applicable (Y/N)	Large Unit (Y/N)
AF-1 (PM/PM10/PM2.5)	Dry filter	Y	4.18	0.42	100	N	N

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

State Rule Applicability Determination

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

326 IAC 2-2 (PSD)

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

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

The operation of AF-1 will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3(a)(2), (b)(2), an emission statement must be submitted triennially. The first report is due no later than July 1, 2017, and subsequent reports are due every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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

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

on their Title V annual compliance certification that submission to IDEM has satisfied reporting to EPA per Federal Register 79 FR 54978. This only applies to Title V Permittees and Title V compliance certifications.

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

Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2(d) are applicable to AF-1 since the unit has the potential to use more than five (5) gallons of coating per day.

Pursuant to 326 IAC 6-3-2(d), AF-1 shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, subject to the following:

- (1) The source shall operate the control device in accordance with manufacturer's specifications.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

Due to this modification, the source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions after the effect of any controls of equal to or greater than 25 tons per year.

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.

326 IAC 6.8 PM Limitations for Lake County

This source is not subject to 326 IAC 6.8 because it is not located in Lake County.

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

AF-1 is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from AF-1 are less than twenty-five (25) tons per year.

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

AF-1 is not subject to the requirements of 326 IAC 8-2-2, since AF-1 does not coat automobile or light duty trucks.

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

Pursuant to 326 IAC 8-2-9, AF-1 is not subject to the requirements of 326 IAC 8-2-9, since AF-1 does not surface coat metal. AF-1 surface coats plastic lenses. Therefore, the requirements of 326 IAC 8-2-9 do not apply to AF-1.

326 IAC 8-6 (Organic Solvent Emission Limitations)

AF-1 will be constructed after January 1, 1980. Therefore, 326 IAC 8-6 does not apply to AF-1.

Compliance Determination and Monitoring Requirements

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

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

arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

- (a) AF-1 has applicable compliance determination conditions as specified below:
 - (1) Compliance with the VOC usage limitations shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets (or MSDS). IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

- (a) AF-1 has applicable compliance monitoring conditions as specified below:

Emission Unit	Control	Parameter	Frequency	Range	Excursions and Exceedances
AF-1	Dry Filters	Inspections	Daily	Normal-Abnormal	Response Steps
		Observations of Overspray	Weekly		
		Observations of the stack exhausts	Monthly		

These monitoring conditions are necessary because the filters for AF-1 must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T075-30299-00017. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

Summary of Model Updates Throughout the Permit

- (a) Typographical errors have been corrected throughout.
- (b) Conditions and sections have been renumbered as necessary.
- (c) On October 27, 2010, the Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These revisions resulted in changes to the rule citations listed in the permit. These changes are not changes to the underlining provisions. The change is only to cite of these rules in Section A - General Information, Section A - Emission Units and Pollution Control Equipment Summary, Section A - Specifically Regulated Insignificant Activities, Section B - Preventative Maintenance Plan, Section B - Emergency Provisions, Section B - Permit Renewal, Section B - Operational Flexibility, Section C - Risk Management Plan, Section C - Emission Statement, and Section D - Compliance Monitoring Requirements.
- (d) On November 3, 2011, the Indiana Air Pollution Control Board issued a revision to 326 IAC 2. The revision resulted in a change to the rule cite of the "responsible official" definition. The rule citation has been changed throughout the permit as follows:

 326 IAC 2-7-1~~(34)~~**(35)**

Summary of Updates Specific for This Permit to Section A

- (a) Condition A.1 - General Information has been revised to include the change in phone number for the source contact and to include the descriptions of the SIC code.

The Source Nonattainment Status for PM_{2.5} has been removed because Jay County was classified as unclassifiable or attainment effective April 5, 2005, for the annual PM_{2.5} standard and unclassifiable or attainment effective December 13, 2009, for the 24-hour PM_{2.5} standard.

IDEM has added the Source Status Emission Offset Rules because the source remains a Minor Source, under PSD and Emission Offset Rules with the limits specified in Section D.1.

- (b) Condition A.2 - Emission Units and Pollution Control Equipment Summary has been revised to include AF-1 and to remove spray coating operation EU-01 G and flow coating booth EU-01 H with this significant permit modification.

AF-1 is a new surface coating operation subject to Surface Coating of Plastic Parts and Products NESHAP (40 CFR 63, Subpart PPPP) because the source is a major source under Section 112 of the Clean Air Act and performs surface coating of plastic parts and products.

The permit has been revised as follows:

A.1 General Information [326 IAC 2-7-4(c)]~~[326 IAC 2-7-5(4514)]~~[326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary ~~a stationary~~ injection molding & surface coating plant to mfg automotive & casket components--.

Source Address: 1000 N Morton St, Portland, Indiana 47371-1631
General Source Phone Number: (260) 726-~~9800~~**9844**
SIC Code: 3647, **(Vehicular Lighting Equipment) and 3995 (Burial Caskets)**
County Location: Jay
Source Location Status: ~~Nonattainment for PM_{2.5} standard~~
Attainment for all other criteria pollutants
Source Status: Part 70 Operating Permit Program
Minor Source, under PSD **and Emission Offset Rules**
Major Source, Section 112 of the Clean Air Act
Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]~~[326 IAC 2-7-5(4514)]~~

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

- (a) Spray coating operations, identified as EU-01, including six (6) spray booths described as follows:
- (1) EU-01 A, constructed in 1985, for application of coatings to plastic or metal substrates, with a maximum capacity of 1080 units per hour, using the HVLP method of spray application, using dry filters for particulate control, and exhausting to one (1) stack, identified as Stack S1;
 - (2) EU-01 B, constructed in 1984, for application of topcoats to metal and plastic substrates, with a maximum capacity of 560 units per hour, using the robotic HVLP method of spray application, using a water curtain for particulate control, and exhausting to one (1) stack, identified as Stack S2;
 - (3) EU-01 C, constructed in 1986, for application of coatings to plastic or metal

substrates, with a maximum capacity of 50 units per hour, using the HVLP and air atomized methods of spray application, using a dry filter for particulate control, and exhausting to one (1) stack, identified as Stack S3;

- (4) EU-01 D, constructed in 1978, for application of basecoats to plastic or metal substrates, with a maximum capacity of 560 units per hour, using the robotic HVLP method of spray application, using a water curtain for particulate control, and exhausting to one (1) stack, identified as Stack S4;
- (5) EU-01 E, constructed in 1986, for application of basecoats and topcoats to plastic substrates, with a maximum capacity of 3,200 units per hour, using the robotic HVLP method of spray application, using a water curtain for particulate control, and exhausting to one (1) stack, identified as Stack S5; and
- (6) ~~EU-01 G, constructed in 1987, for application of coatings to plastic or metal substrates, with a maximum capacity of 480 units per hour, using the HVLP method of spray application, using dry filters for particulate control, and exhausting to one (1) stack, identified as Stack S7.~~ **AF-1, approved in 2016 for construction, for application of anti-fog to plastic lenses, with a maximum capacity of 90 parts per hour, using HVLP method of spray application, equipped with 2 dry filters for particulate control, and exhausting through two (2) stacks, identified as Stack S7 and Stack S8.**

Under the Surface Coating of Plastic Parts and Products NESHAP (40 CFR 63, Subpart PPPP), the spray coating operations (EU-01 A, EU-01 B, EU-01 C, EU-01 D, ~~EU-01 E~~ and EU-01 ~~GE~~) are considered existing **general use** surface coating operations ~~used for parts and products operation~~, **and AF-1 is considered a new automotive lamp-coating** surface coating of plastic parts and products operation.

Under the Surface Coating of Miscellaneous Metal Parts and Products NESHAP (40 CFR 63, Subpart MMMM), the spray coating operations (EU-01 A, EU-01 B, EU-01 C, ~~EU-01 D~~, and EU-01 ~~GD~~) are considered existing surface coating operations used for surface coating of miscellaneous metal parts and products.

- (b) One (1) natural gas-fired air make-up unit, identified as EU-02, with a maximum heat input capacity of 10.5 MMBtu per hour, and exhausting through one (1) stack, identified as Stack S34.
- ~~(c) One (1) flow coating booth, identified as EU-01 H, constructed in 2006, for application of UV-curable basecoat to plastic automotive headlight components or metal burial casket components, with a maximum capacity of 1,000 units per hour, exhausting to one (1) stack, identified as Stack S8.~~

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

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

- (a) Activities with emissions equal to or less than the following thresholds: 25 lb/day PM/PM10; 25 lbs/day NOX; 15 lb/day VOC; 1.0 ton/yr of a single HAP, or 2.5 tons/yr of any combination of HAPs:
 - (1) One multiple chambered incinerator, identified as EU-03, constructed in 1995, fueled by natural gas only with a maximum heat input capacity of 0.875 MMBtu per hour, with a maximum incineration capacity of 60 pounds of dried paint and/or topcoat varnish per hour, using an afterburner for VOC control, and exhausting through one (1) stack, identified as Stack BO-1. [326 IAC 4-2-2]

Modifications to Section B

- (a) **Section B – Annual Compliance Certification**
Instructions for the original Condition B.9 – Annual Compliance Certification (ACC) have been revised. The emission statement reporting requirements changed.
- (b) **Section B - Preventive Maintenance Plan**
IDEM, OAQ has revised Section B - Preventive Maintenance Plan.
- (c) **Section B – Operational Flexibility**
For clarification purposes, Section B – Operational Flexibility has been revised.

The permit has been revised as follows:

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

- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:
 - (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(3435), and
 - (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(3435).

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. **AllThe initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent** 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(3435).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(4),(3) and (1312)][326 IAC 2-71-6(1) and (6)][326 IAC 1-6-3]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.~~

(ba) 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(3435).

~~The Permittee shall implement the PMPs.~~

~~(c)~~

The Permittee shall implement the PMPs.

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

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

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

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

B.14 Termination of Right to Operate [326 IAC 2-7-10][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(~~3435~~).

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(~~4042~~). The renewal application does require a

certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3435).

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

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3435).

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

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

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

- (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)~~, ~~or (e)(1)~~. The Permittee shall make such records available, upon reasonable request, for public review.

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

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(~~3637~~)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (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(~~3435~~).

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

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]

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(~~3435~~).

Modifications to Section C

- (a) **Section C - Compliance Monitoring**
IDEM is changing the Section C - Compliance Monitoring Condition to clearly describe when new monitoring for new and existing units must begin.
- (b) **Section C - Instrument Specifications**
IDEM has clarified Section C - Instrument Specifications to indicate that the analog instrument must be capable of measuring the parameters outside the normal range.
- (c) **Section C - Emergency Reduction Plans**
IDEM has added Section C - Emergency Reduction Plans because as specified in 326 IAC 1-5-2, all persons responsible for the operation of a source that has the potential to emit one hundred (100) tons per year, or more, of any pollutant shall prepare, and submit to the commissioner, for approval, written emergency reduction plans consistent with safe operating procedures.
- (d) **Section C - General Record Keeping Requirements**
IDEM has added "where applicable" to the lists in Section C - General Record Keeping Requirements to more closely match the underlining rule.
- (e) **Section C - General Reporting Requirements**
IDEM, OAQ has clarified the Permittee's responsibility with regards to record keeping. IDEM, OAQ has clarified the interaction of the Quarterly Deviation and Compliance Monitoring Report and the Emergency Provisions.

The permit has been revised as follows:

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3435).

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3435).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3435).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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(3435).

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

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

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

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

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

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

- (a) **The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.**

- (b) **These ERPs shall be submitted for approval 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 ninety (90) days after the date of issuance of this permit.

The ERP 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) **If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.**
- (d) **These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.**
- (e) **Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.**

- (f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]**

C.13 Risk Management Plan [326 IAC 2-7-5(4211)][40 CFR 68]

C.4314 Response to Excursions or Exceedances [326 IAC 2-7-5][326 IAC 2-7-6]

C.4415 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(3435).

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

C.4516 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

Pursuant to 326 IAC 2-6-3(b)(2), starting in 2005 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(3233) ("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(3435).

C.4617 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring

sample, measurement, report, or application. **Support information includes the following, where applicable:**

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

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

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

C.4718 General Reporting Requirements [326 IAC 2-7-5(3)(C)][326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. **Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph.** Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(~~3435~~). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (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)~~ **(d) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period.** 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.4819 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.

Modifications to Section D.1

- (a) Condition D.1 Emissions Unit Description has been revised to include AF-1 and to remove spray coating operation EU-01 G and flow coating booth EU-01 H with this significant permit modification.

The one (1) natural gas-fired air make-up unit, identified as EU-02 has been removed because this unit has no applicable requirements in Section D.1.
- (b) Condition D.1.1 Prevention of Significant Deterioration (PSD) Minor Source Limit has been revised to include AF-1 into the PSD minor limit in order to maintain the source as minor for PSD, rendering the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) not applicable. Spray coating operation EU-01 G and flow coating booth EU-01 H have been removed from the source and therefore, have also been removed from the PSD limit.
- (c) Condition D.1.2 Volatile Organic Compound (VOC) Limitations has been revised to remove the BACT requirements for spray coating operation EU-01 G because the source has removed this unit.
- (d) Condition D.1.4 Volatile Organic Compound (VOC) Limit and associated compliance determination requirements, monitoring, record keeping requirements and reporting requirements have been removed because the source has removed flow coating booth EU-01 G.
- (e) Condition D.1.5 Particulate has been revised to include AF-1 that is subject to the requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) that require AF-1 to be controlled by a dry particulate filter and has removed spray coating operation EU-01 G that has been removed from the source.
- (f) Condition D.1.5 Preventive Maintenance Plan has been revised to update to IDEM model language.
- (g) IDEM added the rule citation 326 IAC 2-7-5(1) to the Compliance Determination Requirements subsection title in Section D. 1 to clarify the authority of this condition. The rule citation has been changed in the permit as follows:

Compliance Determination Requirements **[326 IAC 2-7-5(1)]**
- (h) Condition D.1.7 Monitoring has been revised to include AF-1, which has compliance monitoring requirements applicable to this modification. Condition D.1.7 Monitoring has been revised to update to IDEM model language.

The permit has been revised as follows:

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Spray coating operations, identified as EU-01, including six (6) spray booths described as follows:
 - (1) EU-01 A, constructed in 1985, for application of coatings to plastic or metal substrates, with a maximum capacity of 1080 units per hour, using the HVLPP method of spray application, using dry filters for particulate control, and exhausting to one (1) stack, identified as Stack S1;

- (2) EU-01 B, constructed in 1984, for application of topcoats to metal and plastic substrates, with a maximum capacity of 560 units per hour, using the robotic HVLP method of spray application, using a water curtain for particulate control, and exhausting to one (1) stack, identified as Stack S2;
- (3) EU-01 C, constructed in 1986, for application of coatings to plastic or metal substrates, with a maximum capacity of 50 units per hour, using the HVLP and air atomized methods of spray application, using a dry filter for particulate control, and exhausting to one (1) stack, identified as Stack S3;
- (4) EU-01 D, constructed in 1978, for application of basecoats to plastic or metal substrates, with a maximum capacity of 560 units per hour, using the robotic HVLP method of spray application, using a water curtain for particulate control, and exhausting to one (1) stack, identified as Stack S4;
- (5) EU-01 E, constructed in 1986, for application of basecoats and topcoats to plastic substrates, with a maximum capacity of 3,200 units per hour, using the robotic HVLP method of spray application, using a water curtain for particulate control, and exhausting to one (1) stack, identified as Stack S5; and
- (6) ~~EU-01 G, constructed in 1987, for application of coatings to plastic or metal substrates, with a maximum capacity of 480 units per hour, using the HVLP method of spray application, using dry filters for particulate control, and exhausting to one (1) stack, identified as Stack S7.~~ **AF-1, approved in 2016 for construction, for application of anti-fog to plastic lenses, with a maximum capacity of 90 parts per hour, using HVLP method of spray application, equipped with 2 dry filters for particulate control, and exhausting through two (2) stacks, identified as Stack S7 and Stack S8.**

Under the Surface Coating of Plastic Parts and Products NESHAP (40 CFR 63, Subpart PPPP), the spray coating operations (EU-01 A, EU-01 B, EU-01 C, EU-01 D, ~~EU-01 E and EU-01 G~~) are considered existing **general use** surface coating operations used for, **and AF-1 is considered a new automotive lamp-coating surface coating of plastic parts and products operation.**

Under the Surface Coating of Miscellaneous Metal Parts and Products NESHAP (40 CFR 63, Subpart MMMM), the spray coating operations (EU-01 A, EU-01 B, EU-01 C, ~~EU-01 D, and EU-01 G~~) are considered existing surface coating operations used for surface coating of miscellaneous metal parts and products.

- ~~(b) One (1) natural gas-fired air make-up unit, identified as EU-02, with a maximum heat input capacity of 10.5 MMBtu per hour, and exhausting through one (1) stack, identified as Stack S34.~~
- ~~(c) One (1) flow coating booth, identified as EU-01 H, constructed in 2006, for application of UV-curable basecoat to plastic automotive headlight components or metal burial casket components, with a maximum capacity of 1,000 units per hour, exhausting to one (1) stack, identified as Stack S8.~~

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

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

D.1.1 Prevention of Significant Deterioration (PSD) Minor Source Limit [326 IAC 2-2]

The amount of VOC used by the six (6) spray coating booths (EU-01 A, EU-01 B, EU-01 C, EU-01 D, EU-01 E, ~~EU-01 G~~) and the flow coating booth (~~EU-01 H~~ **AF-1**), including coatings, dilution solvents, and cleaning solvents, shall be less than 240 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this VOC usage

limit, together with the potential to emit from other emission units shall limit VOC emission to less than 250 tons per year, and render the requirements of 326 IAC 2-2 not applicable to the entire source.

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

Pursuant to CP 075-2202-00017, issued on March 5, 1996, and 326 IAC 8-1-6 (Best Available Control Technology (BACT)) for the spray coating booths shall be as follows:

- (a) EU-01 A (Prime Coating of Plastic Parts) shall use an HVLP system;
- (b) EU-01 B (Top Coating of Plastic Parts and Metal Parts) shall use a robotic HVLP system for coating of plastic parts and an electrostatic spray system for coating of metal parts;
- (c) EU-01 C (Coating of Plastic Parts) shall use an HVLP system or atomized spray equipment;
- (d) EU-01 E (Base Coating and Top Coating of Plastic Parts) shall use hand-held air-atomized spray equipment; and
- ~~(e) EU-01 G (Base Coating and Top Coating of Plastic Parts) shall use an HVLP system.~~

D.1.3 Volatile Organic Compound (VOC) Limit [326 IAC 8-6-1]

D.1.4 Volatile Organic Compound (VOC) Limit [326 IAC 8-2-9]

~~The amount of VOC, including coatings, dilution solvents, and cleaning solvents, used at the spray coating booth EU-01 G, shall be less than 25 tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit shall render the requirements of 326 IAC 8-2-9 not applicable to Coating Booth EU-01 G.~~

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

Pursuant to 326 IAC 6-3-2(d), particulate from the spray coating booths EU-01 A, EU-01 C and ~~EU-01 G~~ **AF-1** shall be controlled by dry particulate filters, particulate from the spray coating booths EU-01 B, EU-01 D and EU-01 E shall be controlled by water curtains, and the Permittee shall operate each control device in accordance with manufacturer's specifications.

D.1.65 Preventive Maintenance Plan [326 IAC 2-7-5(1312)]

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the six (6) spray coating booths and their control devices.~~ **Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

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

D.1.76 Volatile Organic Compounds (VOC) [326 IAC 8-1-4][326 IAC 8-1-2(a)]

Compliance with the VOC usage limitations contained in Conditions D.1.1, ~~D.1.3~~ and D.1.43 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-65(1)][326 IAC 2-7-56(1)]

D.1.87 Monitoring

~~In order to demonstrate compliance status with Condition D.1.5, the Permittee shall monitor the particulate emissions from~~ **For** spray booths EU-01 A, EU-01B, EU-01 C, EU-01 D, EU-01 E, ~~EU-01 G and EU-01 H.~~ **AF-1**, the Permittee shall comply with the following:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters and the correct operation of the water curtain overspray system based on the manufacturer specifications. To monitor the performance of the dry filters and water curtain over spray systems, weekly observations shall be made of the over spray from the spray coating booth stacks 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 a reasonable response ~~steps in accordance with~~. Section C - Response to Excursions or Exceedances ~~contains the Permittee's obligation with regard to the reasonable response required by this condition~~. Failure to take ~~response steps in accordance with Section C - Response to Excursions or Exceedances~~, **a reasonable response** shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of over spray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take a reasonable response ~~steps in accordance with~~. Section C - Response to Excursions or Exceedances ~~contains the Permittee's obligation with regard to a reasonable response required by this condition~~. Failure to take ~~response steps in accordance with Section C - Response to Excursions or Exceedances~~, **a reasonable response** shall be considered a deviation from this permit.

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

D.1.98 Record Keeping Requirements

- (a) In order to document the compliance status with Conditions D.1.1, ~~D.1.3~~, and D.1.43, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Conditions D.1.1, ~~D.1.3~~ and D.1.43.
- (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.
- (2) The total VOC usage for each month.
- (b) In order to document the compliance status with Condition D.1.87, the Permittee shall maintain a log of weekly overspray observations and daily and monthly inspections.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.109 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1, ~~D.1.3~~ and D.1.43 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, ~~within~~ **not later than** thirty (30) days after the end of the quarter being reported. **Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1(35).**

Modifications to Section D.2

- (a) Condition D.2 Emissions Unit Description has been revised to update to IDEM model language.

The permit has been revised as follows:

SECTION D.2
OPERATION CONDITIONS

~~FACILITY EMISSIONS UNIT~~

Facility Description ~~[326 IAC 2-7-5(15)]: Specifically-Regulated Insignificant Activities~~

- ~~(a) Activities with emissions equal to or less than the following thresholds: 25 lbs/day PM/PM₁₀; 25 lbs/day NO_x; 15 lbs/day VOC; 1.0 ton/yr of a single HAP, or 2.5 tons/yr of any combination of HAPs: One multiple chambered incinerator, identified as EU-03, constructed in 1995, fueled by natural gas only with a maximum heat input capacity of 0.875 MMBtu per hour, with a maximum incineration capacity of 60 pounds of dried paint and/or topcoat varnish per hour, using an afterburner for VOC control, and exhausting through one (1) stack, identified as Stack BO-1. [326 IAC 4-2-2]~~

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

Emissions Unit Description:

Specifically-Regulated Insignificant Activities

- (a) **Activities with emissions equal to or less than the following thresholds: 25 lb/day PM/PM₁₀; 25 lbs/day NO_x; 15 lb/day VOC; 1.0 ton/yr of a single HAP, or 2.5 tons/yr of any combination of HAPs:**
- (1) **One multiple chambered incinerator, identified as EU-03, constructed in 1995, fueled by natural gas only with a maximum heat input capacity of 0.875 MMBtu per hour, with a maximum incineration capacity of 60 pounds of dried paint and/or topcoat varnish per hour, using an afterburner for VOC control, and exhausting through one (1) stack, identified as Stack BO-1. [326 IAC 4-2-2]**

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

Modifications to Section E.1

- (a) Section E.1 Emissions Unit Description has been revised to remove spray coating operation EU-01 G and flow coating booth EU-01 H that have been removed from the source with this significant permit modification.

EU-01 E has been removed from the Emissions Unit Description because EU-01 E is not subject to 40 CFR 63, Subpart M.

The one (1) natural gas-fired air make-up unit, identified as EU-02 has been removed from the Emissions Unit Description because this unit has no applicable requirements in Section E.1.

The solvent recycling systems have been added to the Emissions Unit Description because the solvent recycling systems are subject to 40 CFR 63, Subpart M.

- (b) IDEM, OAQ has updated Conditions E.1.1 and E.1.2 for clarity.

The permit has been revised as follows:

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

Emissions Unit Description:

- (a) Spray coating operations, identified as EU-01, including six (6) spray booths described as follows:
- (1) EU-01 A, constructed in 1985, for application of coatings to plastic or metal substrates, with a maximum capacity of 1080 units per hour, using the HVLP method of spray application, using dry filters for particulate control, and exhausting to one (1) stack, identified as Stack S1;
 - (2) EU-01 B, constructed in 1984, for application of topcoats to metal and plastic substrates, with a maximum capacity of 560 units per hour, using the robotic HVLP method of spray application, using a water curtain for particulate control, and exhausting to one (1) stack, identified as Stack S2;
 - (3) EU-01 C, constructed in 1986, for application of coatings to plastic or metal substrates, with a maximum capacity of 50 units per hour, using the HVLP and air atomized methods of spray application, using a dry filter for particulate control, and exhausting to one (1) stack, identified as Stack S3;
 - (4) EU-01 D, constructed in 1978, for application of basecoats to plastic or metal substrates, with a maximum capacity of 560 units per hour, using the robotic HVLP method of spray application, using a water curtain for particulate control, and exhausting to one (1) stack, identified as Stack S4;
 - ~~(5) EU-01 E, constructed in 1986, for application of basecoats and topcoats to plastic substrates, with a maximum capacity of 3,200 units per hour, using the robotic HVLP method of spray application, using a water curtain for particulate control, and exhausting to one (1) stack, identified as Stack S5; and~~
 - ~~(6) EU-01 G, constructed in 1987, for application of coatings to plastic or metal substrates, with a maximum capacity of 480 units per hour, using the HVLP method of spray application, using dry filters for particulate control, and exhausting to one (1) stack, identified as Stack S7.~~

Under the Surface Coating of Plastic Parts and Products NESHAP (40 CFR 63, Subpart PPPP), the spray coating operations (EU-01 A, EU-01 B, EU-01 C, EU-01 D, ~~EU-01 E~~ and EU-01 ~~G~~) are considered existing surface coating operations **and AF-1 is considered a new surface coating operation**, used for surface coating of plastic parts and products.

Under the Surface Coating of Miscellaneous Metal Parts and Products NESHAP (40 CFR 63, Subpart MMMM), the spray coating operations (EU-01 A, EU-01 B, EU-01 C, ~~EU-01 D~~, and EU-01 ~~G~~) are considered existing surface coating operations used for surface coating of miscellaneous metal parts and products.

- ~~(b) One (1) natural gas-fired air make-up unit, identified as EU-02, with a maximum heat input capacity of 10.5 MMBtu per hour, and exhausting through one (1) stack, identified as Stack S34.~~
- ~~(c) One (1) flow coating booth, identified as EU-01 H, constructed in 2006, for application of UV-curable basecoat to plastic automotive headlight components or metal burial casket components, with a maximum capacity of 1,000 units per hour, exhausting to one (1) stack, identified as Stack S8.~~

Specifically-Regulated Insignificant Activities

- (b) **Solvent recycling systems with batch capacity less than or equal to 100 gallons. [40 CFR Part 63, Subparts MMMM and PPPP]**

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

information and does not constitute enforceable conditions.)

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]
E.1.1 General Provisions Relating to ~~NESHAP M M M M~~ **National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63** [326 IAC 20-1][40 CFR Part 63, Subpart A]

(a) Pursuant to 40 CFR 63.40890(i), ~~1~~ the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A — General Provisions, **which are incorporated by reference as 326 IAC 20-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart M M M M.**

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

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

E.1.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products ~~NESHAP~~ [40 CFR Part 63, Subpart M M M M][**326 IAC 20-80**]

~~Pursuant to CFR Part 63, Subpart M M M M (included as Attachment A of this permit),~~ The Permittee shall comply with the **following** provisions of 40 CFR Part 63, ~~M M M M~~ **Subpart M M M M (included as Attachment A to the operating permit), which are incorporated by reference as 326 IAC 20-80, for spray coating booths and solvent recycling operations as specified as follows: the emission unit(s) listed above:**

- (1) 40 CFR 63.3880
- (2) 40 CFR 63.3881(a), (b), (c), (e)
- (3) 40 CFR 63.3882
- (4) 40 CFR 63.3883
- (5) 40 CFR 63.3890(b), (c)
- (6) 40 CFR 63.3891(a)
- (7) 40 CFR 63.3892(a)
- (8) 40 CFR 63.3893(a)
- (9) 40 CFR 63.3900(a)(1)
- (10) 40 CFR 63.3901
- (11) 40 CFR 63.3910(a), (b), (c)(1) – (7), (c)(8)(i), (c)(10)
- (12) 40 CFR 63.3920(a)(1), (a)(2), (a)(3)(i) – (iv), (a)(3)(vi), (a)(4), (a)(5)
- (13) 40 CFR 63.3930(a), (b), (c)(1), (c)(2), (d), (e), (f), (h), (i), (j)
- (14) 40 CFR 63.3931
- (15) 40 CFR 63.3940
- (16) 40 CFR 63.3941
- (17) 40 CFR 63.3942
- (18) 40 CFR 63.3980
- (19) 40 CFR 63.3981
- (20) Table 3 to 40 CFR 63, Subpart M M M M
- (21) Table 4 to 40 CFR 63, Subpart M M M M

Modifications to Section E.2

(a) Section E.2 Emissions Unit Description has been revised to remove spray coating operation EU-01 G and flow coating booth EU-01 H that have been removed from the source with this significant permit modification.

The one (1) natural gas-fired air make-up unit, identified as EU-02 has been removed from the Emissions Unit Description because this unit has no applicable requirements in Section E.2.

The solvent recycling systems have been added to the Emissions Unit Description because the solvent recycling systems are subject to 40 CFR 63, Subpart PPPP.

- (b) IDEM, OAQ has updated Conditions E.2.1 and E.2.2 for clarity and has added unit AF-1 that is a new surface coating operation subject to Surface Coating of Plastic Parts and Products NESHAP (40 CFR 63, Subpart PPPP) because the source is a major source under Section 112 of the Clean Air Act and performs surface coating of plastic parts and products.

The permit has been revised as follows:

SECTION E.1 FACILITY OPERATION CONDITIONS2NESHAP

Emissions Unit Description:

- (a) Spray coating operations, identified as EU-01, including six (6) spray booths described as follows:
- (1) EU-01 A, constructed in 1985, for application of coatings to plastic or metal substrates, with a maximum capacity of 1080 units per hour, using the HVLP method of spray application, using dry filters for particulate control, and exhausting to one (1) stack, identified as Stack S1;
 - (2) EU-01 B, constructed in 1984, for application of topcoats to metal and plastic substrates, with a maximum capacity of 560 units per hour, using the robotic HVLP method of spray application, using a water curtain for particulate control, and exhausting to one (1) stack, identified as Stack S2;
 - (3) EU-01 C, constructed in 1986, for application of coatings to plastic or metal substrates, with a maximum capacity of 50 units per hour, using the HVLP and air atomized methods of spray application, using a dry filter for particulate control, and exhausting to one (1) stack, identified as Stack S3;
 - (4) EU-01 D, constructed in 1978, for application of basecoats to plastic or metal substrates, with a maximum capacity of 560 units per hour, using the robotic HVLP method of spray application, using a water curtain for particulate control, and exhausting to one (1) stack, identified as Stack S4;
 - (5) EU-01 E, constructed in 1986, for application of basecoats and topcoats to plastic substrates, with a maximum capacity of 3,200 units per hour, using the robotic HVLP method of spray application, using a water curtain for particulate control, and exhausting to one (1) stack, identified as Stack S5; and
 - (6) ~~EU-01 G, constructed in 1987, for application of coatings to plastic or metal substrates, with a maximum capacity of 480 units per hour, using the HVLP method of spray application, using dry filters for particulate control, and exhausting to one (1) stack, identified as Stack S7.~~ **AF-1, approved for construction in 2016, for application of anti-fog to plastic lenses, with a maximum capacity of 90 parts per hour, using HVLP method of spray application, equipped with 2 dry filters for particulate control, and exhausting through two (2) stacks, identified as Stack S7 and Stack S8.**

Under the Surface Coating of Plastic Parts and Products NESHAP (40 CFR 63, Subpart PPPP), the spray coating operations (EU-01 A, EU-01 B, EU-01 C, EU-01 D, ~~EU-01 E~~ and EU-01 ~~G~~E) are considered existing surface coating operations **and AF-1 is considered a new surface coating operation**, used for surface coating of plastic parts and products.

Under the Surface Coating of Miscellaneous Metal Parts and Products NESHAP (40 CFR 63, Subpart MMMM), the spray coating operations (EU-01 A, EU-01 B, EU-01 C,

~~EU-01 D, and EU-01 G~~ are considered existing surface coating operations used for surface coating of miscellaneous metal parts and products.

~~(b) One (1) natural gas-fired air make-up unit, identified as EU-02, with a maximum heat input capacity of 10.5 MMBtu per hour, and exhausting through one (1) stack, identified as Stack S34.~~

~~(c) One (1) flow coating booth, identified as EU-01 H, constructed in 2006, for application of UV-curable basecoat to plastic automotive headlight components or metal burial casket components, with a maximum capacity of 1,000 units per hour, exhausting to one (1) stack, identified as Stack S8.~~

Specifically-Regulated Insignificant Activities

(b) Solvent recycling systems with batch capacity less than or equal to 100 gallons. [40 CFR Part 63, Subparts MMMM and PPPP]

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

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

E.2.1 General Provisions Relating to ~~NESHAP PPPP~~ **National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63** [326 IAC 20-1][40 CFR Part 63, Subpart A]

(a) Pursuant to 40 CFR 63.40890(i), 1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A — General Provisions, **which are incorporated by reference as 326 IAC 20-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart PPPP.**

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

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

E.2.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products **NESHAP** [40 CFR Part 63, Subpart PPPP][**326 IAC 20-81**]

~~Pursuant to~~ **The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart PPPP (included as Attachment B of this to the operating permit), the Permittee shall comply with the provisions of which are incorporated by reference as 326 IAC 20-81,**

(a) ~~Under 40 CFR Part 63, Subpart PPPP, for the spray coating booths and solvent recycling operations as follows.~~ **(EU-01 A, EU-01 B, EU-01 C, EU-01 D, and EU-01 E) are existing general use surface coating operations:**

- (1) 40 CFR 63.4480**
- (2) 40 CFR 63.4481(a)(1), (a)(2), (b), (c), (e)**
- (3) 40 CFR 63.4482(a), (b), (e)**
- (4) 40 CFR 63.4483(b) and (d)**
- (5) 40 CFR 63.4490(b)(1), (c)**
- (6) 40 CFR 63.4491(a)**
- (7) 40 CFR 63.4492(a)**
- (8) 40 CFR 63.4493(a)**
- (9) 40 CFR 63.4500(a)(1)**
- (10) 40 CFR 63.4500(b)**
- (11) 40 CFR 63.4501**

- (12) 40 CFR 63.4510(a) — (b)
- (13) 40 CFR 63.4510(c)(1) — (7)
- (14) 40 CFR 63.4510(c)(8)(i) — ~~(iii)~~
- (15) 40 CFR 63.4520(a)(1) — (2)
- (16) 40 CFR 63.4520(a)(3)(i) — (iv)
- (17) 40 CFR 63.4520(a)(4) — (5)
- (18) 40 CFR 63.4530(a) — (b)
- (19) 40 CFR 63.4530(c)(1) — (2)
- (20) 40 CFR 63.4530(d) — (f)
- (21) 40 CFR 63.4530(h)
- (22) 40 CFR 63.4531
- (23) 40 CFR 63.4540
- (24) 40 CFR 63.4541
- (25) 40 CFR 63.4542
- (26) 40 CFR 63.4580
- (27) 40 CFR 63.4581
- (28) **Table 2 to 40 CFR 63, Subpart PPPP (applicable portions)**
- (29) Table 3 to 40 CFR 63, Subpart PPPP (applicable portions)
- (30) Table 4 to 40 CFR 63, Subpart PPPP (applicable portions)

(b) Under 40 CFR 63, Subpart PPPP, spray coating operation AF-1 is a new automotive lamp surface coating operation:

- (1) 40 CFR 63.4480
- (2) 40 CFR 63.4481(a)(1), (a)(3), (b), (c), (e)
- (3) 40 CFR 63.4482(a), (b), (c)(1), (c)(3)
- (4) 40 CFR 63.4483(a)(2), (d)
- (5) 40 CFR 63.4490(a)(2), (c)
- (6) 40 CFR 63.4491(a)
- (7) 40 CFR 63.4492(a)
- (8) 40 CFR 63.4493(a)
- (9) 40 CFR 63.4500(a)(1), (b)
- (10) 40 CFR 63.4501
- (11) 40 CFR 63.4510(a), (b)
- (12) 40 CFR 63.4510(c)(1) - (7), (8)(i)
- (13) 40 CFR 63.4520(a)(1), (2), (3)(i)-(iv), (4), (5)
- (14) 40 CFR 63.4530(a), (b), (c)(1), (c)(2), (d), (e), (f), (h)
- (15) 40 CFR 63.4531
- (16) 40 CFR 63.4540
- (17) 40 CFR 63.4541
- (18) 40 CFR 63.4542
- (19) 40 CFR 63.4580
- (20) 40 CFR 63.4581
- (21) **Table 2 to 40 CFR 63, Subpart PPPP (applicable portions)**
- (22) **Table 3 to 40 CFR 63, Subpart PPPP (applicable portions)**
- (23) **Table 4 to 40 CFR 63, Subpart PPPP (applicable portions)**

Modifications to Report Form

- (a) The Part 70 Quarterly Report form has been revised to incorporate AF-1 into the reporting facilities and remove spray coating operation EU-01 G and flow coating booth EU-01 H with this significant permit modification.

The permit has been revised as follows:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR QUALITY COMPLIANCE AND ENFORCEMENT BRANCH

Part 70 Quarterly Report

Source Name: W & M Manufacturing, Inc.
 Source Address: 1000 N Morton St, Portland, Indiana 47371-1631
 Part 70 Permit No.: T075-30299-00017
 Facility: Spray coating booths EU-01 A, EU-01 B, EU-01 C, EU-01 D, EU-01 E, ~~EU-01~~
Gand AF-1

~~and flow coating booth EU-01 H~~
 Parameter: VOC usage, including coatings, dilution solvents, and cleaning solvents.
 Limit: Less than 240 tons per twelve (12) month consecutive period, with compliance determined at the end of each month.

QUARTER : _____ YEAR: _____

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on:

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

Part 70 Quarterly Report

Source Name: W & M Manufacturing, Inc
 Source Address: 1000 N Morton St, Portland, Indiana 47371-1631

Part 70 Permit No.: T075-30299-00017
 Facility: Spray coating booth EU-01 D
 Parameter: VOC usage, including coatings, dilution solvents, and cleaning solvents.
 Limit: Less than 100 tons per twelve (12) month consecutive period, with compliance determined at the end of each month.

QUARTER : _____ YEAR: _____

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

No deviation occurred in this quarter.

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

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

Modifications to Report Form

- (a) The Part 70 Quarterly Report form has been removed for spray coating booth EU-01 G because the source has removed this unit.

The permit has been revised as follows:

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

~~**Part 70 Quarterly Report**~~

~~Source Name: W & M Manufacturing, Inc
 Source Address: 1000 N Morton St, Portland, Indiana 47371-1631
 Part 70 Permit No.: T075-30299-00017
 Facility: Spray coating booth EU-01 G
 Parameter: VOC usage, including coatings, dilution solvents, and cleaning solvents.
 Limit: Less than 25 tons per twelve (12) month consecutive period, with compliance determined at the end of each month.~~

_____ QUARTER : _____ YEAR: _____

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

~~No deviation occurred in this quarter.~~

~~Deviation/s occurred in this quarter.~~

~~— Deviation has been reported on:~~

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Conclusion and Recommendation

The operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. T075-36685-00017. The staff recommend to the Commissioner that this Part 70 Significant Permit Modification be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Thomas Olmstead at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-9664 or toll free at 1-800-451-6027 extension 3-9664.
- (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
PTE Summary**

Company Name: W & M Manufacturing, Inc.
Address: 1000 North Morton Street, Portland, Indiana 47371
Significant Permit Modification No.: T075-36685-00017
Reviewer: Thomas Olmstead
Date: January 2015

Uncontrolled Potential to Emit (tons/yr)							
Emission Unit	PM	PM10	PM2.5 *	SO₂	NOx	VOC	CO
Spray Coating: EU-01; A-E	26.62	26.62	26.62	--	--	313.96	--
AF-1	4.18	4.18	4.18	--	--	8.26	--
Heater: EU02	0.09	0.35	0.35	0.03	4.60	3.86	0.25
Incinerator: EU03	0.01	0.03	0.03	0.00	0.38	0.32	0.02
Total	30.89	31.18	31.18	0.03	4.98	326.40	0.27

* PM2.5 listed is direct PM2.5

Potential to Emit after Issuance (tons/yr)							
Emission Unit	PM	PM10	PM2.5 *	SO₂	NOx	VOC	CO
Spray Coating: EU-01; A-E	5.32	5.32	5.32	--	--	240.00	--
AF-1	0.42	0.42	0.42	--	--		--
Heater: EU02	0.09	0.35	0.35	0.03	4.60	3.86	0.25
Incinerator: EU03	0.01	0.03	0.03	0.00	0.38	0.32	0.02
Total	5.84	6.12	6.12	0.03	4.98	244.19	0.27

* PM2.5 listed is direct PM2.5

Note: The shaded cells indicate where limits are included.

Note: Pursuant to 326 IAC 6-3-2(d), the particulate emissions from surface coating operations shall be controlled by dry particulate filters and the Permittee shall operate the control devices in accordance with the manufacturer's specifications. Compliance with this standard, in conjunction with a conservative assumption of 90% capture and control, shall limit PM, PM10, and PM2.5 emissions from the surface coating operations to the values shown.

**Appendix A: Emission Calculations
HAP Summary**

Company Name: W & M Manufacturing, Inc.
Address: 1000 North Morton Street, Portland, Indiana 47371
Significant Permit Modification No.: T075-36685-00017
Reviewer: Thomas Olmstead
Date: January 2015

Uncontrolled Potential to Emit (tons/yr)							
Emission Unit	Hexane	Glycol Ether	Methyl Isobutyl Ketone	Methyl Alcohol	Methanol	Xylene	Total HAP
Spray Coating: EU-01; A-E	--	13.38	0.10	--	31.73	10.47	55.69
AF-1	--	--	--	0.67	--	--	0.67
Heater: EU02	0.08	--	--	--	--	--	0.09
Incinerator: EU03	0.01	--	--	--	--	--	0.01
Total HAP	0.09	13.38	0.10	0.67	31.73	10.47	56.46

Potential to Emit after Issuance (tons/yr)							
Emission Unit	Hexane	Glycol Ether	Methyl Isobutyl Ketone	Methyl Alcohol	Methanol	Xylene	Total HAP
Spray Coating: EU-01; A-E	--	13.38	0.10	--	31.73	10.47	55.69
AF-1	--	--	--	0.67	--	--	0.67
Heater: EU02	0.08	--	--	--	--	--	0.09
Incinerator: EU03	0.01	--	--	--	--	--	0.01
Total HAP	0.09	13.38	0.10	0.67	31.73	10.47	56.46

**Appendix A: Emissions Calculations
Modification Summary**

Company Name: W & M Manufacturing, Inc.
Address: 1000 North Morton Street, Portland, Indiana 47371
Significant Permit Modification No.: T075-36685-00017
Reviewer: Thomas Olmstead
Date: January 2015

Uncontrolled Potential to Emit (tons/yr)								
Emission Unit	PM	PM10	PM2.5	SO ₂	NOx	VOC	CO	Total HAPs
AF-1	4.18	4.18	4.18	--	--	8.26	--	0.67
Total	4.18	4.18	4.18	-	-	8.26	-	0.67

Potential to Emit after Issuance (tons/yr)								
Emission Unit	PM	PM10	PM2.5	SO ₂	NOx	VOC	CO	Total HAPs
AF-1	0.42	0.42	0.42	--	--	8.26	--	0.67
Total	0.42	0.42	0.42	-	-	8.26	-	0.67

**Appendix A: Emissions Calculations
VOC and Particulate From Surface Coating: AF-1**

**Company Name: W & M Manufacturing, Inc.
Address: 1000 North Morton Street, Portland, Indiana 47371
Significant Permit Modification No.: T075-36685-00017
Reviewer: Thomas Olmstead
Date: January 2015**

Emission unit	Coating	Density (lbs/gal)	Max. Coated Surface (in ²)	Dry Film Thickness (microns)	Dry Vol. on part (gal)	% volatile by volume	Weight % Solids	Wet volume on part (gal)	Transfer Efficiency (%)	Gallons Sprayed per part (gal/part)	Cycle Time (sec/part)	Production Rate (part/hr)	Gallons Sprayed per hour (gal/hr)
AF-1	UVT200	7.57	432.00	6.00	4.42E-04	68%	90%	1.38E-03	50%	2.75E-03	40.00	90.00	0.25
AF-1	GAF209V4 ¹	7.45	432.00	1.50	1.10E-04	92%	11%	1.43E-03	50%	2.86E-03	40.00	90.00	0.26

METHODOLOGY

The source calcs are back calculated from the dry film thickness to what is applied to the anti-fog lenses

¹ The source calculates the densities of GAF209V4 and Volume % solids below

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

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

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

Catalyst ratio to paint is 1:4.

Production Rate (part/hr) = 60 sec/1 min * 60 min/1 hour * 1/ Cycle Time (sec/part)

Gallons sprayed per hour(gal/hr) = Gallons sprayed per part (gal/part) * Production Rate (part/hr)

	Theor. VOC lb/gal	Mix Ratio	Parts Volatile
2K Antifog Coating Part A	6.49	4.00	25.95
2K Antifog Coating Part B	7.15	1.00	7.15
		5.00	33.10
	combined theor VOC lb/gal		6.6204

	Density lb/gal	Mix Ratio	Parts Density
2K Antifog Coating Part A	7.47	4.00	29.88
2K Antifog Coating Part B	7.38	1.00	7.38
		5.00	37.25
	combined Density lb/gal		7.4508

	Volume Solids %	Mix Ratio	Parts Density
2K Antifog Coating Part A	9.38	4.00	37.53
2K Antifog Coating Part B	1.06	1.00	1.06
		5.00	38.59
	combined Density lb/gal		7.72

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

**Company Name: W & M Manufacturing, Inc.
Address: 1000 North Morton Street, Portland, Indiana 47371
Significant Permit Modification No.: T075-36685-00017
Reviewer: Thomas Olmstead
Date: January 2015**

Process ID	Material	Density (lbs/gal)	Weight % Organics	Weight % Solids	Max. Usage (gals/unit)	Maximum Throughput (units/hour)	Pounds VOC per Gallon of Coating	PTE of VOC (tons/year)	Transfer Efficiency (%)	PM / PM ₁₀ / PM _{2.5}		
										PTE Uncontrolled (tons/year)	Control Efficiency (%)	PTE Controlled (tons/year)
EU-01 A	Primer (LHP-100)	7.60	94.0%	6.0%	0.0004	1080	7.14	13.5	70%	0.26	80%	0.05
EU-01 B	Topcoat (AS-4000)	7.70	77.0%	13.0%	0.0056	560	5.93	81.4	70%	4.12	80%	0.82
EU-01 C	Argent (AE261-18130)	7.77	70.6%	21.5%	0.0004	50	5.48	0.49	70%	0.04	80%	0.01
EU-01 D	Shertone Topcoat (22838)	10.2	52.4%	23.7%	0.0103	560	5.35	135	70%	18.4	80%	3.67
EU-01 E	Topcoat (M202T4)	6.50	91.6%	8.40%	0.0010	3200	5.95	83.5	50%	3.83	80%	0.77
TOTALS								314.0		26.6		5.3

Particulate emissions from the spray booths are controlled with dry filter.

METHODOLOGY

Lbs VOC (less water) per gallon of coating (lbs/gal) = Density (lbs/gal) x Weight % Organics

PTE of VOC (tons/year) = Density (lbs/gal) x Weight % Organics x Max. Usage (gals/unit) x Max. Throughput (units/hour) x 8760 (hours/year) x 1 ton/2000 lbs

PTE of PM/PM₁₀ Uncontrolled (tons/yr) = Density (lbs/gal) x Weight % Solids x Max. Usage (gals/unit) x Max. Throughput (units/hour) x (1- Transfer Efficiency %) x 8760 hours/year x 1 ton/2000 lbs

PTE of PM/PM₁₀ Controlled (tons/year) = Density (lbs/gal) x Weight % Solids x Max. Usage (gals/unit) x Max. Throughput (units/hour) x (1- Transfer Efficiency %) x (1-Control Efficiency %) x 8760 hours/year x 1 ton/2000 lbs

Appendix A: Emission Calculations
HAP Emissions from Surface Coating Operations

Company Name: W & M Manufacturing, Inc.
Address: 1000 North Morton Street, Portland, Indiana 47371
Significant Permit Modification No.: T075-36685-00017
Reviewer: Thomas Olmstead
Date: January 2015

Process ID	Material	Density (lbs/gal)	Max. Usage (gals/unit)	Maximum Throughput (units/hour)	Weight % Glycol Ether	Weight % Toluene	Weight % Methyl Isobutyl Ketone	Weight % Methyl Alcohol	Weight % Methanol	Weight % Xylene
Spray Coat										
EU-01 A	Primer (LHP-100)	7.6	0.0004	1080	93.1%	0.0%	0.0%	0.0%	0.0%	0.0%
EU-01 B	Topcoat (AS-4000)	7.70	0.0056	560	0.0%	0.0%	0.0%	0.0%	30.0%	0.0%
EU-01 C	Argent (AE261-18130)	7.77	0.0004	50	0.0%	0.0%	15.0%	0.0%	0.0%	0.0%
EU-01 D	Shertone Topcoat (22838)	10.2	0.0103	560	0.0%	0.0%	0.0%	0.0%	0.0%	4.06%
EU-01 E	Topcoat (M202T4)	6.50	0.0010	3200	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
AF-1	GAF209N4	7.45	0.2576	1	0.0%	0.0%	0.0%	8.0%	0.0%	0.0%

Process ID	Material	Density (lbs/gal)	Max. Usage (gals/unit)	Maximum Throughput (units/hour)	PTE of Glycol Ether (tons/yr)	PTE of Toluene (tons/yr)	PTE of Methyl Isobutyl Ketone (tons/yr)	PTE of Methyl Alcohol (tons/yr)	PTE of Methanol (tons/yr)	PTE of Xylene (tons/yr)	Total HAPs
Spray Coat											
EU-01 A	Primer (LHP-100)	7.6	0.0	1080.0	13.38	0.0	0.0	0.0	0.0	0.0	13.4
EU-01 B	Topcoat (AS-4000)	7.7	0.0	560.0	0.0	0.0	0.0	0.0	31.73	0.0	31.7
EU-01 C	Argent (AE261-18130)	7.8	0.0	50.0	0.0	0.0	0.10	0.0	0.00	0.0	0.1
EU-01 D	Shertone Topcoat (22838)	10.2	0.0	560.0	0.0	0.0	0.0	0.0	0.0	10.47	10.5
EU-01 E	Topcoat (M202T4)	6.5	0.0	3200.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
AF-1	Basecoat (SM1852R1)	7.5	0.3	1.0	0.0	0.00	0.00	0.67	0.00	0.00	0.7
Totals					13.4	0.0	0.1	0.7	31.7	10.5	56.36

METHODOLOGY

PTE of HAPS (tons/year) = Density (lbs/gal) x Max. Usage (gals/unit) x Max. Throughput (units/hour) x Weight % HAP x 8760 hours/year x 1 ton/2000 lbs

	HAP Density (Lb/Gal)	Mix Ratio	Parts Density
GAF209AN4	0.75	4.00	2.99
GAF209BN4	0.00	1.00	0.00
		5.00	2.99
Combined Density HAP (lb/gal)			0.60

**Appendix A: Emissions Calculations
Natural Gas Fired Space Heaters and Combustion Units**

Company Name: **W & M Manufacturing, Inc.**
 Address: **1000 North Morton Street, Portland, Indiana 47371**
 Significant Permit Modification No.: **T075-36685-00017**
 Reviewer: **Thomas Olmstead**
 Date: **January 2015**

# of Emission Units	Emission Unit Description	Total Heat Input Capacity (mm Btu/hr)	Maximum Gas Throughput (mm scf/yr)	Maximum Material Throughput (tons/yr)
1	Air Make-up Unit (EU-02)	10.50	92.0	-
1	Incinerator (EU-03) - Nat. Gas	0.88	7.7	-
	Incinerator (EU-03) - Solids	-	-	262.8
Total =			99.6	

Emission Factors - Nat. Gas (lbs/mm scf)								
PM*	PM10*	PM2.5	SO ₂	NO _x **	CO	VOC	HAP (Hex.)	Total HAPs
1.9	7.6	7.6	0.6	100	84	5.5	1.80	1.89

Emission Factors - Solid Refuse Combustion (lbs/ton)								
PM*	PM10*	PM2.5	SO ₂	NO _x	CO	VOC	HAP	Total HAPs
7.0	7.0	7.0	2.5	3.0	1.0	3.0	0.0	0.0

Potential To Emit (tons/yr)									
Emission Unit ID	PM	PM10	PM2.5	SO ₂	NO _x	CO	VOC	HAP (Hex.)	Total HAPs
Air Make-up Unit (EU-02)	0.09	0.35	0.35	0.03	4.60	3.86	0.25	0.08	0.087
Incinerator (EU-03) - Nat. Gas	0.01	0.03	0.03	0.00	0.38	0.32	0.02	0.01	0.007
Incinerator (EU-03) - Solids	0.92	0.92	0.92	0.33	0.39	0.13	0.39	0.00	0.0
TOTALS	0.09	0.38	0.38	0.03	4.98	4.19	0.27	0.090	0.09

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

**Emission factor for NO_x: Uncontrolled = 100 lb/MMCF

Emission factors are from AP-42, Chapter 1.4 - Natural Gas Combustion, Tables 1.4-1, 1.4-2, 1.4-3 and 1.4-4. SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03. (AP-42 Supplement D 7/98)

1 MMBtu = 1,000,000 Btu

1 MMCF = 1,000,000 cubic feet of gas

All Emission factors are based on normal firing.

Methodology

Max. Potential Throughput (MMCF/year) = Heat Input Capacity (MMBtu/hour) x 8,760 hours/year x 1 MMCF/1,000 MMBtu

PTE (tons/year) = Max. Potential Throughput (MMCF/year) x Emission Factor (lbs/MMCF) x 1 ton/2,000 lbs

**Appendix A: Emissions Calculations
Greenhouse Gases
Natural Gas Fired Space Heaters and Combustion Units**

**Company Name: W & M Manufacturing, Inc.
Address: 1000 North Morton Street, Portland, Indiana 47371
Significant Permit Modification No.: T075-36685-00017
Reviewer: Thomas Olmstead
Date: January 2015**

**GREENHOUSE GASES
(Natural Gas Combustion)**

Total Gas Consumption = 99.6 MMSCF/yr

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	5979	0.1	0.1
Summed Potential Emissions in tons/yr	5,979		
CO2e Total in tons/yr	6,015		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64. Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03. Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

NOTE

At this source, all GHG's (CO2, CH4 and N2O) are due to n.g. combustion.



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

January 28, 2016

Mr. Doug Oliver
W & M Manufacturing, Inc.
1000 North Morton Street
Portland, IN 47371

Re: Public Notice
W & M Manufacturing, Inc.
Permit Level: Title V Significant Permit Modification
Permit Number: 075-36685-00017

Dear Mr. Oliver:

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

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Commercial Review in Portland, Indiana publish the abbreviated version of the public notice no later than February 1, 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 Jay County Public Library, 315 North Ship Street in Portland, 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 Thomas Olmstead, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-9664 or dial (317) 233-9664.

Sincerely,

Vivian Haun

Vivian Haun
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 8/27/2015



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

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

January 28, 2016

Commercial Review
309 West Main Street
PO Box 1049
Portland, IN 47371

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for W & M Manufacturing, Inc., Jay 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 February 1, 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 Vivian Haun at 800-451-6027 and ask for extension 3-6878 or dial 317-233-6878.

Sincerely,

Vivian Haun

Vivian Haun
Permit Branch
Office of Air Quality

Permit Level: Title V Significant Permit Modification
Permit Number: 075-36685-00017

Enclosure

PN Newspaper.dot 8/27/2015



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

January 28, 2016

To: Jay County Public Library

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

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

Applicant Name: W & M Manufacturing, Inc.
Permit Number: 075-36685-00017

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

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

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

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

If you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library.dot 8/27/2015



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

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

Michael R. Pence
Governor

Carol S. Comer
Commissioner

Notice of Public Comment

January 28, 2016
W & M Manufacturing, Inc.
075-36685-00017

Dear Concerned Citizen(s):

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

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

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

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

Enclosure
PN AAA Cover.dot 8/27/2015



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

AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD DRAFT INDIANA AIR PERMIT

January 28, 2016

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

Permit Number: 075-36685-00017
Applicant Name: W & M Manufacturing, Inc.
Location: Portland, Jay County, Indiana

The public notice, draft permit and technical support documents can be accessed via the **IDEM Air Permits Online** site at:

<http://www.in.gov/ai/appfiles/idem-caats/>

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

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

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at chammack@idem.IN.gov or (317) 233-2414.

Affected States Notification.dot 8/27/2015

Mail Code 61-53

IDEM Staff	VHAUN 1/28/2016 W & M Manufacturing, Inc. 075-36685-00017 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	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Doug Oliver W & M Manufacturing, Inc. 1000 N Morton St Portland IN 47371-1631 (Source CAATS)										
2		Jim Hiester W & M Manufacturing, Inc. 1000 N Morton St Portland IN 47371-1631 (RO CAATS)										
3		Jay County Commissioners Jay County Courthouse Portland IN 47371 (Local Official)										
4		Portland City Council and Mayors Office 321 N. Meridian Portland IN 47371 (Local Official)										
5		Jay County Public Library 315 N. Ship Street Portland IN 47371 (Library)										
6		Jay County Health Department 504 West Arch Street Portland IN 47371 (Health Department)										
7		Tony DeMarco Bruce Carter Associates 616 S 4th Street Elkhart IN 46516 (Consultant)										
8												
9												
10												
11												
12												
13												
14												
15												

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
7			