



# 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](http://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 Revision to a  
Federally Enforceable State Operating Permit (FESOP)  
for Vehicle Service Group in Jefferson County  
Significant Permit Revision No.: 077-36812-00011

The Indiana Department of Environmental Management (IDEM) has received an application from Vehicle Service Group located at 2700 Lanier Drive, Madison Indiana, 47250, for a significant revision of its FESOP issued on February 18, 2015. If approved by IDEM's Office of Air Quality (OAQ), this proposed revision would allow Vehicle Service Group to make certain changes at its existing source. Vehicle Service Group has applied to add emission units and modify existing emission units.

The applicant intends to 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). The potential to emit of any regulated air pollutants will continue to be limited to less than the Title V and PSD major threshold levels. 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:

Madison-Jefferson County Local Library  
420 West Main Street  
Madison IN, 47250

and

IDEM Southeast Regional Office  
820 West Sweet Street  
Brownstown, IN 47220-9557

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

### How can you participate in this process?

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

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

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SPR F077-36812-00011 in all correspondence.

**Comments should be sent to:**

Kendra Sutherland  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for extension 4-5401  
Or dial directly: (317) 234-5401  
Fax: (317) 232-6749 attn: Kendra Sutherland  
E-mail: Ksutherl@idem.IN.gov

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

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

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

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

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



Tripurari P. Sinha, Ph.D., 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](http://www.idem.IN.gov)

**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

## DRAFT

Jim Torline  
Vehicle Service Group  
2700 Lanier Drive  
Madison IN, 47250

Re: 077-36812-00011  
Significant Revision to  
F077-34980-00011

Dear Mr. Torline:

Vehicle Service Group was issued a Federally Enforceable State Operating Permit (FESOP) No. F077-34980-00011 on February 18, 2015, for a stationary automotive hydraulic lift manufacturer, located at 2700 Lanier Drive, Madison IN, 47250. On February 8, 2016, the Office of Air Quality (OAQ) received an application from the source requesting to add emission units and modify existing emission units. The attached Technical Support Document (TSD) provides additional explanation of the changes to the source/permit. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit.

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire FESOP as revised. The permit references the below listed attachments, since these attachments were provided in previously issued approvals for this source, IDEM OAQ has not included a copy of these attachments with this revision:

Attachment A - New Source Performance Standards for Stationary Spark Ignition Internal Combustion Engines (NSPS) [40 CFR Part 60, Subpart JJJJ]

Attachment B - National Emission Standards for Stationary Reciprocating Internal Combustion Engines (NESHAP) [40 CFR Part 63, Subpart ZZZZ]

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](http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl).

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Kendra Sutherland of my staff at 317-234-5401 or 1-800-451-6027, and ask for extension 4-5401

Sincerely,

Tripurari P. Sinha, Ph. D., Section Chief  
Permits Branch  
Office of Air Quality

Attachments:  
Revised FESOP  
Technical Support Document  
Appendix A (Emissions Calculations)

TS/KS

cc: File - Jefferson County  
Jefferson County Health Department  
U.S. EPA, Region V  
Compliance and Enforcement Branch  
IDEM Southeast Regional Office



Michael R. Pence  
Governor

Carol S. Comer  
Commissioner

DRAFT

# New Source Construction and Federally Enforceable State Operating Permit OFFICE OF AIR QUALITY

**Vehicle Service Group  
2700 Lanier Drive  
Madison, Indiana 47250**

(herein known as the Permittee) is hereby authorized to construct and 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. 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 2-8 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.

Indiana statutes from IC 13 and rules from 326 IAC, quoted 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 FESOP under 326 IAC 2-8.

Operation Permit No.: F077-34980-00011	
Issued by:  Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: February 18, 2015  Expiration Date: February 18, 2020

Significant Permit Revision No.: F077-36812-00011	
Issued by:  Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date:  Expiration Date: February 18, 2020

## TABLE OF CONTENTS

<b>SECTION A</b>	<b>SOURCE SUMMARY .....</b>	<b>5</b>
A.1	General Information [326 IAC 2-8-3(b)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3	Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]	
A.4	Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]	
A.5	FESOP Applicability [326 IAC 2-8-2]	
<b>SECTION B</b>	<b>GENERAL CONDITIONS .....</b>	<b>10</b>
B.1	Definitions [326 IAC 2-8-1]	
B.2	Revocation of Permits [326 IAC 2-1.1-9(5)]	
B.3	Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]	
B.4	Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.5	Term of Conditions [326 IAC 2-1.1-9.5]	
B.6	Enforceability [326 IAC 2-8-6] [IC 13-17-12]	
B.7	Severability [326 IAC 2-8-4(4)]	
B.8	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.9	Duty to Provide Information [326 IAC 2-8-4(5)(E)]	
B.10	Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]	
B.11	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.12	Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.13	Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]	
B.14	Emergency Provisions [326 IAC 2-8-12]	
B.15	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.16	Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]	
B.17	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]	
B.18	Permit Renewal [326 IAC 2-8-3(h)]	
B.19	Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]	
B.20	Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]	
B.22	Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]	
B.23	Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
B.24	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]	
B.25	Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]	
<b>SECTION C</b>	<b>SOURCE OPERATION CONDITIONS.....</b>	<b>20</b>
	<b>Emission Limitations and Standards [326 IAC 2-8-4(1)] .....</b>	<b>20</b>
C.1	Overall Source Limit [326 IAC 2-8]	
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]	
C.8	Performance Testing [326 IAC 3-6]	
	<b>Compliance Requirements [326 IAC 2-1.1-11] .....</b>	<b>22</b>
C.9	Compliance Requirements [326 IAC 2-1.1-11]	
	<b>Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)].....</b>	<b>23</b>
C.10	Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]	
C.11	Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]	

<b>Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]</b> .....	<b>23</b>
C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]	
C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]	
C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]	
C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]	
<b>Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]</b> .....	<b>25</b>
C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]	
C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]	
<b>Stratospheric Ozone Protection</b> .....	<b>26</b>
C.18 Compliance with 40 CFR 82 and 326 IAC 22-1	
<b>SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS</b> .....	<b>27</b>
<b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b> .....	<b>27</b>
D.1.1 FESOP Limits, Emission Offset Limit and PSD Minor Limit [326 IAC 2-8-4][326 IAC 2-3][326 IAC2-2]	
D.1.2 Particulate Emission Limitations [326 IAC 6-3-2(d)]	
<b>SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS</b> .....	<b>30</b>
<b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b> .....	<b>30</b>
D.2.1 FESOP. Emission Offset Minor Limit [326 IAC 2-3]	
D.2.2 PSD Minor Limit [326 IAC 2-2]	
D.2.3 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]	
D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]	
<b>Compliance Determination Requirements [326 IAC 2-8-4(1)]</b> .....	<b>31</b>
D.2.5 Particulate Control	
<b>Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]</b> .....	<b>31</b>
D.2.6 Parametric Monitoring	
<b>Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]</b> .....	<b>32</b>
D.2.7 Record Keeping Requirements	
D.2.8 Broken or Failed Bag Detection	
<b>SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS</b> .....	<b>33</b>
<b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b> .....	<b>33</b>
D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]	
D.3.2 VOC (Material Requirements for Cold Cleaner Degreasers) [326 IAC 8-3-8]	
<b>Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]</b> .....	<b>34</b>
D.3.3 Record Keeping Requirements	
<b>SECTION E.1 NSPS</b> .....	<b>35</b>
<b>New Source Performance Standards (NSPS) Requirements [326 IAC 2-8-4(1)]</b> .....	<b>35</b>
E.1.1 General Provisions Relating to New Source Performance Standards [326 IAC 12- 1][40 CFR Part 60, Subpart A]	
E.1.2 New Source Performance Standards for Stationary Spark Ignition Internal Combustion Engines, NSPS [326 IAC 12-1][40 CFR Part 60, Subpart JJJJ]	
<b>SECTION E.2 NESHAP</b> .....	<b>37</b>
<b>National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-8-4(1)]</b> .....	<b>37</b>
E.2.1 General Provisions Relating to New Source Performance Standards [326 IAC 12- 1][40 CFR Part 60, Subpart A]	

E.2.2 National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines NESHAP [326 IAC 20-82][40 CFR Part 63, Subpart ZZZZ]

Attachment A - New Source Performance Standards for Stationary Spark Ignition Internal Combustion Engines (NSPS) [40 CFR Part 60, Subpart JJJJ]

Attachment B - National Emission Standards for Stationary Reciprocating Internal Combustion Engines (NESHAP) [40 CFR Part 63, Subpart ZZZZ]

## 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 2-8-3(b)]

---

The Permittee owns and operates a stationary automotive hydraulic lift manufacturing plants.

Source Address:	2700 Lanier Drive, Madison, Indiana 47250
General Source Phone Number:	812-265-1622
SIC Code:	3534
County Location:	Jefferson (within Madison Township)
Source Location Status:	Nonattainment for PM <sub>2.5</sub> standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

---

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

- (a) Plant 1 Paint Line consisting of two (2) paint booths, identified as EU 1-2, installed in 1985, with a combined nominal capacity of 3.9 gallons of paint per hour, using dry filters as particulate control exhausting to two (2) stacks (S/V 1-19 and 1-20).
- (b) Plant 1 Touch up coating area, installed in 1985, using aerosol spray cans, VOC emissions less than 15 pounds per day.
- (c) Plant 2 Paint Line 1 consisting of two (2) Paint Booths, identified as EU 2-2, installed in 1988, with a combined nominal capacity of 1.9 gallons of paint per hour, using dry filters as particulate control, and exhausting to three (3) stacks (S/V 2-9 thru 2-11).
- (d) Plant 2 Paint Line 2, identified as EU 2-5, consisting of one (1) Paint Booth, with three (3) spray guns with the ability to operate only one spray gun at a time; approved for construction in 2014, with a maximum capacity of 1.9 gallons of paint per hour per gun, using dry filters as particulate control, and exhausting through stack (S/V 2 20); the EU 2-5 paint booth can serve as a natural gas-fired curing oven when not being used for painting with a heat input capacity of 1.6 MMBtu/hr, and will use propane as a back-up fuel.
- (e) Plant 2 Touch up coating area, installed in 1988, using aerosol spray cans, VOC emissions less than 15 pounds per day.
- (f) Plant 1 shot blaster with an integral baghouse, constructed in 1988, identified as EU 1-1, with a nominal capacity of 6,000 pounds of steel and 50 pounds of steel shot or steel grit per hour and exhausting to Stack 1-21.
- (g) Plant 2 shot blaster with an integral baghouse, constructed in 1988, identified as EU 2-1, with a nominal capacity of 6,000 pounds of steel and 50 pounds of steel shot or steel grit per hour and exhausts to stack (S/V 2 8).

- (h) Plant 2 manual grit blast booth with a dust collector, which is used for collecting and recycling the grit; approved for construction in 2014, identified as EU 2-6, with a maximum capacity of 4,000 pounds of metal parts blasted per hour and a maximum abrasive flow rate of 50 pounds of grit blasted per hour, with emissions venting outside the building through stack (S/V2-21).
- (i) One (1) natural gas fired Curing/Drying Oven with a cooling area for the Plant 1 Paint Line, constructed in 1985, with a maximum capacity of 3.2 MMBTU per hour and exhausting to two (2) stacks (S/V 1 9 and S/V 1 48).
- (j) One (1) natural gas fired Curing/Drying Oven with a cooling area for the Plant 2 Paint Line, constructed in 1985, with a maximum capacity of 4.0 MMBTU per hour and exhausting to two (2) stacks (S/V 2 4 and S/V 2 1).
- (k) One (1) Waste/Used Oil Furnace Clean Burn, identified as Model CB-90 AH, with a maximum capacity of 0.185 MMBTU per hour.
- (l) Natural gas heaters with propane back-up with maximum capacities as listed below:
  - (1) One (1) heater with a maximum capacity of 0.06 MMBTU per hour.
  - (2) Two (2) heaters each with a maximum capacity of 0.074 MMBTU per hour.
  - (3) One (1) heater with a maximum capacity of 0.075 MMBTU per hour.
  - (4) Fifteen (15) heaters each with a maximum capacity of 0.080 MMBTU per hour..
  - (6) One (1) heater with a maximum capacity of 0.115 MMBTU per hour.
  - (7) One (1) heater with a maximum capacity of 120,000 BTU per hour.
  - (8) Three (3) heaters each with a maximum capacity of 125,000 BTU per hour.
  - (9) Two (2) heaters each with a maximum capacity of 145,000 BTU per hour.
  - (10) Four (4) heaters each with a maximum capacity of 180,000 BTU per hour.
  - (11) Two (2) heaters each with a maximum capacity of 205,000 BTU per hour.
  - (12) One (1) heater with a maximum capacity of 250,000 BTU per hour.
  - (13) One (1) heater with a maximum capacity of 260,000 BTU per hour. 4.023
  - (14) Three (3) heaters each with a maximum capacity of 950,000 BTU per hour.
  - (15) One (1) heater with a maximum capacity of 1,250,000 BTU per hour.
  - (16) One (1) heater with a maximum capacity of 1,500,000 BTU per hour.
  - (17) Two (2) heaters each with a maximum capacity of 2,500,000 BTU per hour.
  - (18) Four (4) heaters each with a maximum capacity of 3,400,000 BTU per hour.
  - (19) Two (2) heaters each with a maximum capacity of 5,000,000 BTU per hour.
- (m) One (1) natural gas-fired heater with a maximum heat input capacity of 250,000 Btu per hour.
- (n) Welding
  - (1) Plant 1 has sixty-one (61) MIG stations with the maximum average hourly consumption of 0.98 pounds of electrode per hour. This is 60.76 pounds per hour total for the sixty-one (61) stations.
  - (2) Plant 1 has one (1) submerged arc welder with maximum electrode consumption of 0.97 pounds per hour.
  - (3) Plant 1 has one (1) TIG welder with maximum electrode consumption of 0.97 pounds per hour.
  - (4) Plant 2 has forty-five (45) MIG stations each with a maximum hourly consumption of 0.84 pounds per hour. This is 37.8 pounds per hour for the forty-five (45) stations.

- (o) Four (4) burners in Plant 1 are as follows:
- (1) CL840 Laser burner #3031 with a maximum metal thickness of 0.75 inches and maximum cutting rate of 34 inches per minute.
  - (2) CL7 Laser burner #3029 with a maximum metal thickness of 0.5 inches and max cutting rate of 48 inches per minute.
  - (3) CL7 Laser burner #3030 with a maximum metal thickness of 0.5 inches and max cutting rate of 48 inches per minute.
  - (4) Plasma burner with a maximum metal thickness of 2.25 inches thick and a cutting rate of 25 inches per minute
- (p) Two (2) burners in Plant 2 are as follows:
- (1) Plasma burner with the capability of cutting metal up to 2.25 inches thick and a cutting rate of 25 inches per minute.
  - (2) Buggo Burner #3061, with maximum metal thickness of 0.5 inches and a maximum cutting rate of 62 inches per minute.
- (q) Plant 1 natural gas fired emergency generator, constructed in 2011. The generator has a 4 cycle spark ignited engine with a maximum capacity of 60 kW.
- [Under NSPS 40 CFR 60, Subpart JJJJ, this emergency generator is considered an affected facility.]  
[Under NESHAP CFR 63, Subpart ZZZZ, this emergency generator is considered an affected facility.]
- (r) Plant 2 natural gas fired emergency generator, constructed in 2009. The generator has a 4 cycle spark ignited engine with a maximum capacity of 45 kW.
- [Under NSPS 40 CFR 60, Subpart JJJJ, this emergency generator is considered an affected facility.]  
[Under NESHAP CFR 63, Subpart ZZZZ, this emergency generator is considered an affected facility.]
- (s) One natural gas fired air makeup unit in Plant 1, with a maximum heat input capacity of 4.19 MMBtu per hour using propane as back-up fuel.
- (t) One natural gas fired air makeup unit in Plant 2, with a maximum heat input capacity of 4.19 MMBtu per hour, using propane as back-up fuel

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

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

- (a) Degreasing operations that do not exceed 145 gallons per 12 months consisting of degreaser which is a standard parts washer, a cold cleaner, except if subject to 326 IAC 20-6. [326 IAC 8-3]

A.4 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

- (a) Plant 1 electric powered Powder Paint Infrared Curing oven, constructed in 1996.
- (b) A number of vessels storing lubricating oils, used oil, hydraulic oils, machining oils, etc. including the following:
  - 1) Vessels located in Building H:
    - (A) 275 Gallon Diesel Tank.
    - (B) Used Oil Tank 1 in South Section (500 Gallons).
    - (C) Used Oil Tank 2 in South Section (500 Gallons).
    - (D) Used Oil Tank in Center Section (350 Gallons) and
    - (E) 55 Gallon Drums containing Used Oil (number on hand varies from 0 to less than 10)
  - (2) One (1) RP-25 Oil Tank (55 Gallons) located in Building F.
  - (3) One (1) 275 Gallon Used Oil Tank for Used Oil Furnace located in Building J.
  - (4) Vessels located in Building A:
    - (A) Six (6) 55 Gallon Oil Dispensing Drums; and
    - (B) Okuma Machine (OP 2525) (165 Gallons of water-coolant mixture).
  - (5) One (1) RP-25 Oil Tank (55 Gallons) located in Building F.
  - (6) One (1) 275 Gallon Used Oil Tank for Used Oil Furnace located in Building J.
- (c) Application of Oil Coating in Dip Tank.
- (d) Machining operations include a number of machines with different names, but all of them consist of one or more of the following: Saws, lathes, drills or mills (mills are like wood planes for metal). The material being machined is steel and an aqueous cutting coolant continuously floods the machining interface.
- (e) Five (5) closed non-vented Rotary Tumblers (three (3) located in Plant 1 and two (2) located in Plant 2) used for cleaning or deburring metal products without abrasive blasting.\*
- (f) Plant 1 enclosed Powder Paint Booth, with negligible emissions and no exhaust.
- (g) Touch up coating area for the Plant 1 Powder Paint Booth using aerosol spray cans with VOC emissions less than 15 pounds per day.
- (h) One (1) Assembly Operation, identified as EU 36, constructed in 1995, and associated with the Arm Cell process which is the last step before shipping. This step may include bolting parts together, putting parts into shipping containers and banding the various shipping containers together to prepare a specific model of the product for shipment.
- (i) Two (2) Excess Shot removal operations associated with the two (2) shot blasters (EU 1-1 and EU 2-1), constructed in 1985 and 1988, using compressed air, which blows any remaining shot residue off the cleaned parts before they are painted.\*
- (j) Six (6) Final Assembly which consists of packaging the various parts needed to make a final product for shipping. This may include bolting parts together, putting parts into shipping containers and banding the various shipping containers together to prepare a specific model of the product for shipment.\*
- (k) One (1) solvent recycling system.\*

\* There are no emissions from these operations.

A.5 FESOP Applicability [326 IAC 2-8-2]

---

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

## SECTION B GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-8-1]

---

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 Revocation of Permits [326 IAC 2-1.1-9(5)]

---

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

### B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]

---

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-8 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

### B.4 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

---

- (a) This permit, F077-34980-00011, 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, until the renewal permit has been issued or denied.

### B.5 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.6 Enforceability [326 IAC 2-8-6] [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.7 Severability [326 IAC 2-8-4(4)]**

---

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.8 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

---

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

**B.9 Duty to Provide Information [326 IAC 2-8-4(5)(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.10 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]**

---

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
  - (1) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), 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) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

**B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

---

- (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

- (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 2-8-4(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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

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

The Permittee shall implement the PMPs.

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

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

#### B.14 Emergency Provisions [326 IAC 2-8-12]

- (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 except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ or Southeast Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

Compliance and Enforcement Branch)  
Facsimile Number: 317-233-6865  
Southeast Regional Office phone: (812) 358-2027; fax: (812) 358-2058.

- (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 2-8-4(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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-3(c)(6) 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 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) 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.

- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
  - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

---

- (a) All terms and conditions of permits established prior to F077-34980-00011 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

**B.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]**

---

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 2-8-3(h) and 326 IAC 2-8-9.

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]**

---

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State 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 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 2-8-8(a)]
- (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 2-8-8(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(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 2-8-8(c)]

**B.18 Permit Renewal [326 IAC 2-8-3(h)]**

---

- (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 2-8-3. 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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 2-8 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 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

**B.19 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]**

---

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (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 approval required by 326 IAC 2-8-11.1 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 2-8-15(b)(1) and (c). 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 2-8-15(b)(1) and (c).

- (b) Emission Trades [326 IAC 2-8-15(b)]  
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 2-8-15(b).

- (c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]  
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 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (d) 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.21 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.22 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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 FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, 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, at reasonable times, 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, at reasonable times, 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.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) 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.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
  - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
  - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

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

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

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

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

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

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

---

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

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

---

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

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

---

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

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

---

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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.

### **Testing Requirements [326 IAC 2-8-4(3)]**

#### **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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 2-8-4][326 IAC 2-8-5(a)(1)]**

### **C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]**

---

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

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

### **C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(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 2-8-4][326 IAC 2-8-5(a)(1)]**

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

---

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

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

C.13 Risk Management Plan [326 IAC 2-8-4] [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 2-8-4] [326 IAC 2-8-5]

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 2-8-4][326 IAC 2-8-5]

- (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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

#### **C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

---

- (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. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

#### **C.17 General Reporting Requirements [326 IAC 2-8-4(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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). 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.18 Compliance with 40 CFR 82 and 326 IAC 22-1**

---

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

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) Plant 1 Paint Line consisting of two (2) paint booths, identified as EU 1-2, installed in 1985, with a combined nominal capacity of 3.9 gallons of paint per hour, using dry filters as particulate control exhausting to two (2) stacks (S/V 1 19 and 1 20).
- (c) Plant 2 Paint Line 1 consisting of two (2) Paint Booths, identified as EU 2-2, installed in 1988, with a combined nominal capacity of 1.9 gallons of paint per hour, using dry filters as particulate control, and exhausting to three (3) stacks (S/V 2 9 thru 2 11).
- (d) Plant 2 Paint Line 2, identified as EU 2-5, consisting of one (1) Paint Booth, with three (3) spray guns with the ability to operate only one spray gun at a time; approved for construction in 2014, with a maximum capacity of 1.9 gallons of paint per hour per gun, using dry filters as particulate control, and exhausting through stack (S/V 2 20); the EU 2-5 paint booth can serve as a natural gas-fired curing oven when not being used for painting with a heat input capacity of 1.6 MMBtu/hr, and will use propane as a back-up fuel.

(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 2-8-4(1)]

#### D.1.1 FESOP Limits, Emission Offset Limit and PSD Minor Limit [326 IAC 2-8-4][326 IAC 2-3][326 IAC 2-2]

Pursuant to 326 IAC 2-8-4, and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable the Permittee shall comply with the following:

- (a) The total VOC input to the paint lines (EU 1-1, EU 2-2, and EU 2-5), and associated clean-up activities, combined, shall not exceed 83.25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The total HAPS input to the paint lines (EU1-1, EU2-2, and EU 2-5) and associated clean-up activities, combined, shall not exceed 23.33 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) The input of any single HAP to the paint lines (EU 1-1, EU 2-2, and EU 2-5), and associated clean-up activities, combined, shall be less than 9.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits and Conditions D.2.1 and D.2.2, combined with the potential to emit PM, PM10, PM2.5, VOC, single HAP, and total HAPs, from all other emission units at this source, shall limit the source-wide total potential to emit VOCs, PM10, and PM2.5 to less than one hundred (100) tons, PM to less than 250 tons, total HAPs to less than 25 tons, and any single HAP to less than 10 tons per twelve (12) consecutive month period, respectively, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits), Emission Offset (326 IAC 2-3), and Prevention of Significant Deterioration (PSD) (326 IAC 2-2) not applicable to the entire source.

#### D.1.2 Particulate Emission Limitations [326 IAC 6-3-2(d)]

- (a) Particulate from EU 1-1, EU 2-2, and EU 2-5 shall be controlled by a dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

#### D.1.3 Volatile Organic Compounds [326 IAC 8-2-9]

---

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the Plant 1 Paint Line, identified as EU 1-2; the Plant 2 Paint Line 1, identified as EU 2-2; and the Plant 2 Paint Line 2, identified as EU 2-5; shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.
- (b) Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not limited to, the following:
- (1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
  - (2) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
  - (3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
  - (4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
  - (5) Minimize VOC emissions from the cleaning application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

#### Compliance Determination Requirements

##### D.1.4 Particulate Control

---

In order to comply with Condition D.1.2, the dry particulate filters associated with each of the paint lines (EU 1-1, EU 2-2, and EU 2-5), shall be in place at all times that the respective paint lines are in operation.

##### D.1.5 Volatile Organic Compounds [326 IAC 8-1-2] [326 IAC 8-1-4]

---

Compliance with the VOC limitations contained in Condition D.1.1, 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 2-8-4][326 IAC 2-8-5(a)(1)]

##### D.1.6 Monitoring

---

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters associated with each of the paint lines (EU 1-1, EU 2-2, and EU 2-5). To monitor the performance of the dry filters, weekly observations shall be made of the overspray from each of the paint line stacks (S/V 1-19 and 1-20; S/V 2-9 through 2-11; and S/V2-20) while one or more of the lines 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 overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response required by this condition. Failure to take a reasonable response shall be considered a deviation from this permit.

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

#### **D.1.7 Record Keeping Requirements**

---

- (a) To document the compliance status with Conditions D.1.1 and D.1.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC input limitations established in Conditions D.1.1 and D.1.3.
  - (1) The VOC content of each coating material and solvent used.
  - (2) The amount of coating material and solvent used on monthly basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The cleanup solvent usage for each month.
  - (4) The total VOC input for each month.
- (b) To document the compliance status with Condition D.1.6, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

#### **D.1.8 Reporting Requirements**

---

Quarterly summaries of the information to document the compliance status with Condition D.1.1 (a), shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The reports submitted by the Permittee do require a certification, that meets the requirements of 326 IAC 2-8-5(a)(1), by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (f) Plant 1 shot blaster with an integral baghouse, constructed in 1988, identified as EU 1-1, with a nominal capacity of 6,000 pounds of steel and 50 pounds of steel shot or steel grit per hour and exhausting to Stack 1-21.
- (g) Plant 2 shot blaster with an integral baghouse, constructed in 1988, identified as EU 2-1, with a nominal capacity of 6,000 pounds of steel and 50 pounds of steel shot or steel grit per hour and exhausts to stack (S/V 2 8).
- (h) Plant 2 manual grit blast booth with a dust collector, which is used for collecting and recycling the grit; approved for construction in 2014, identified as EU 2-6, with a maximum capacity of 4,000 pounds of metal parts blasted per hour and a maximum abrasive flow rate of 50 pounds of grit blasted per hour, with emissions venting outside the building through stack (S/V2-21).

(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 2-8-4(1)]

#### D.2.1 FESOP, PSD, and Emission Offset Limit [326 IAC 2-8-4] [326 IAC 2-2] [326 IAC 2-3]

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-3 Emission Offset not applicable:

- (a) Plant 1 Shot Blaster (EU 1-1) and Plant 2 Shot Blaster (EU 2-1)  
The PM10/PM2.5 emissions shall not exceed 5.11 lbs/hr each
- (b) Grit Blast Booth (EU 2-6)  
The PM10/PM2.5 emissions shall not exceed 5.11 lbs/hr each

Compliance with these limits combined with the potential to emit PM10, and PM2.5, from all other emission units at this source, shall limit the source-wide total potential to emit PM10, and PM2.5 to less than one hundred (100) tons/year, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits), Emission Offset (326 IAC 2-3), and Prevention of Significant Deterioration (PSD)(326 IAC 2-2) not applicable to the entire source.

#### D.2.2 PSD Minor Limit [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable,

- (a) The PM emissions from the Plant 1 Shot Blaster (EU 1-1) shall not exceed 5.11 pounds per hour.
- (b) The PM emissions from the Plant 2 Shot Blaster (EU 2-1) shall not exceed 5.11 pounds per hour.
- (c) The PM emissions from the Grit Blaster (EU 2-6) shall not exceed 5.11 pounds per hour.

Compliance with these limits combined with the potential to emit PM, from all other emission units, shall limit the source-wide total potential to emit of PM to less than 250 tons per year shall render the requirements of Prevention of Significant Deterioration (PSD)(326 IAC 2-2) not applicable to the entire source.

#### D.2.3 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the shot blasting operations identified as EU 1-1 and EU 2-1, shall not exceed 8.61 pounds per hour, each, when operating at a process weight rate of 3.025 tons per hour of metal and blasting media combined for each blaster.
- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the grit blasting operation identified as EU 2-6, shall not exceed 6.52 pounds per hour when operating at a process weight rate of 2.0 tons per hour of metal and recycled blasting media combined.

The pound per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

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

#### D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

### **Compliance Determination Requirements [326 IAC 2-8-4(1)]**

#### D.2.5 Particulate Control

- (a) In order to comply with Conditions D.2.1 the baghouses and dust collector systems for particulate control shall be in operation and control emissions from each of the blasting operations at all times that any of these facilities are in operation.
- (b) In the event that bag failure is observed in multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify IDEM, OAQ of the expected date the failed units will be repaired or replace. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

### **Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

#### D.2.6 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the Plant 2 shot blaster (EU 2-1) and grit blaster (EU 2-6) at least once per day when the process is in operation. If the pressure drop is outside the range of 0 to 5 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once per year.

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

#### **D.2.7 Record Keeping Requirements**

---

- (a) To document the compliance status with Condition D.2.6, the Permittee shall maintain daily records of the pressure drops for the baghouses. The Permittee shall include in its daily record when a pressure reading is not taken and the reason for the lack of pressure reading (e.g., the process did not operate that day).
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

#### **D.2.8 Broken or Failed Bag Detection**

---

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

## SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) Degreasing operations that do not exceed 145 gallons per 12 months consisting of degreaser which is a standard parts washer, a cold cleaner, except if subject to 326 IAC 20-6. [326 IAC 8-3]

(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 2-8-4(1)]

#### D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

- (a) Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements), for cold cleaning degreasers without remote solvent reservoirs constructed after July 1, 1990:
- (1) Equip the degreaser with a cover.
  - (2) Equip the degreaser with a device for draining cleaned parts.
  - (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
  - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.
  - (5) Provide a permanent, conspicuous label that lists the operating requirements in (a)(3), (a)(4), (a)(6), and (a)(7) of this condition.
  - (6) Store waste solvent only in closed containers.
  - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
- (b) The Permittee shall ensure the following additional control equipment and operating requirements are met:
- (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent used is insoluble in, and heavier than, water.
    - (C) A refrigerated chiller.
    - (D) Carbon adsorption.
    - (E) An alternative system of demonstrated equivalent or better control as those outlined in (b)(1)(A) through (D) of this condition that is approved

by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.

- (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
- (3) If used, solvent spray:
  - (A) must be a solid, fluid stream; and
  - (B) shall be applied at a pressure that does not cause excessive splashing.

**D.3.2 VOC (Material Requirements for Cold Cleaner Degreasers) [326 IAC 8-3-8]**

---

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), on and after January 1, 2015, the Permittee shall not operate a cold cleaner degreaser with a solvent that has a VOC composite partial vapor pressure than exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

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

**D.3.3 Record Keeping Requirements**

---

- (a) Pursuant to 326 IAC 8-3-8(c)(2), on and after January 1, 2015, the following records shall be maintained for each purchase of cold cleaner degreaser solvent:
  - (1) The name and address of the solvent supplier.
  - (2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).
  - (3) The type of solvent purchased.
  - (4) The total volume of the solvent purchased.
  - (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

**SECTION E.1**

**NSPS**

**Emissions Unit Description:**

- (q) Plant 1 natural gas fired emergency generator, constructed in 2011. The generator has a 4 cycle spark ignited engine with a maximum capacity of 60 kW.

[Under NSPS 40 CFR 60, Subpart JJJJ, this emergency generator is considered an affected facility.]

[Under NESHAP CFR 63, Subpart ZZZZ, this emergency generator is considered an affected facility.]

- (r) Plant 2 natural gas fired emergency generator, constructed in 2009. The generator has a 4 cycle spark ignited engine with a maximum capacity of 45 kW.

[Under NSPS 40 CFR 60, Subpart JJJJ, this emergency generator is considered an affected facility.]

[Under NESHAP CFR 63, Subpart ZZZZ, this emergency generator is considered an affected facility.]

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

**New Source Performance Standards (NSPS) Requirements [326 IAC 2-8-4(1)]**

**E.1.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1][40 CFR Part 60, Subpart A]**

- (a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference as 326 AC 12-1, for the above listed emissions units, except as otherwise specified in 40 CFR Part 60, Subpart JJJJ.

- (b) Pursuant to 40 CFR 60.4, 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 New Source Performance Standards for Stationary Spark Ignition Internal Combustion Engines, NSPS [326 IAC 12-1][40 CFR Part 60, Subpart JJJJ]**

Pursuant to 40 CFR Part 60, Subpart JJJJ, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart JJJJ, which are incorporated by reference as 326 IAC 12 (included as Attachment A to this permit), for the above listed emissions units, as specified as follows:

- (1) 40 CFR 60.4230(b), (e), (f)
- (2) 40 CFR 60.4230(a)(4)(iv)
- (3) 40 CFR 60.4230(a)(4)(iii)
- (4) 40 CFR 60.4230(a)(4)(i)
- (5) 40 CFR 60.4233(b), (c), (d), (g)
- (6) 40 CFR 60.4233(f)(4)

- (7) 40 CFR 60.4234
- (8) 40 CFR 60.4237(c)
- (9) 40 CFR 60.4243(d), (g)
- (10) 40 CFR 60.4243(c), (i), (i)(1), (i)(2)
- (11) 40 CFR 60.4243(b)(2)(i)
- (12) 40 CFR 60.4244(a), (b), (c), (e)
- (13) 40 CFR 60.4245(b), (d), (e)
- (14) 40 CFR 60.4245(a)(1), (a)(2), (a)(3), (a)(4)
- (15) 40 CFR 60.4246

**SECTION E.2**

**NESHAP**

**Emissions Unit Description:**

- (q) Plant 1 natural gas fired emergency generator, constructed in 2011. The generator has a 4 cycle spark ignited engine with a maximum capacity of 60 kW.

[Under NSPS 40 CFR 60, Subpart JJJJ, this emergency generator is considered an affected facility.]

[Under NESHAP CFR 63, Subpart ZZZZ, this emergency generator is considered an affected facility.]

- (r) Plant 2 natural gas fired emergency generator, constructed in 2009. The generator has a 4 cycle spark ignited engine with a maximum capacity of 45 kW.

[Under NSPS 40 CFR 60, Subpart JJJJ, this emergency generator is considered an affected facility.]

[Under NESHAP CFR 63, Subpart ZZZZ, this emergency generator is considered an affected facility.]

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

**National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-8-4(1)]**

**E.2.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1][40 CFR Part 60, 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 AC 20-1-1, for the above listed emissions units, as specified in 40 CFR Part 63, Subpart ZZZZ, in accordance with the schedule in 40 CFR Part 63, Subpart ZZZZ.

- (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 (NESHAP) for Stationary Reciprocating Internal Combustion Engines NESHAP [326 IAC 20-82][40 CFR Part 63, Subpart ZZZZ]**

Pursuant to 40 CFR Part 63, Subpart ZZZZ, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart ZZZZ, which are incorporated by reference as 326 IAC 20-82 (included as Attachment B to this permit), for the above listed emissions units, as specified as follows:

- (1) 40 CFR 63.6580
- (2) 40 CFR 63.6585
- (3) 40 CFR 63.6590(a)(2)(iii) and (c)(1)
- (4) 40 CFR 63.6595(a)(6) and/or (a)(7)

- (5) 40 CFR 63.6665
- (6) 40 CFR 63.6670
- (7) 40 CFR 63.6675

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Vehicle Service Group  
Source Address: 2700 Lanier Drive, Madison, Indiana 47250  
FESOP Permit No.: F077-34980-00011

**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:

Date:

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Vehicle Service Group  
Source Address: 2700 Lanier Drive, Madison, Indiana 47250  
FESOP Permit No.: F077-34980-00011

**This form consists of 2 pages**

**Page 1 of 2**

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

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

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

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

Page 2 of 2

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Vehicle Service Group  
Source Address: 2700 Lanier Drive, Madison, Indiana 47250  
FESOP Permit No.: F077-34980-00011  
Facility: Paint Line EU 1-2, Paint Line 1 EU 2-2, Paint Line 2 EU 2-5  
Parameter: VOC Input  
Limit: 83.25 tons per twelve (12) consecutive month period

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**

**FESOP Quarterly Report**

Source Name: Vehicle Service Group  
Source Address: 2700 Lanier Drive, Madison, Indiana 47250  
FESOP Permit No.: F077-34980-00011  
Facility: Paint Line EU 1-2, Paint Line 1 EU 2-2, Paint Line 2 EU 2-5  
Parameter: Total HAP Input  
Limit: 23.33 tons per twelve (12) consecutive month period

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**

**FESOP Quarterly Report**

Source Name: Vehicle Service Group  
Source Address: 2700 Lanier Drive, Madison, Indiana 47250  
FESOP Permit No.: F077-34980-00011  
Facility: Paint Line EU 1-2, Paint Line 1 EU 2-2, Paint Line 2 EU 2-5  
Parameter: worst single HAP Input  
Limit: 9.9 tons per twelve (12) consecutive month period

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  
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Vehicle Service Group  
Source Address: 2700 Lanier Drive, Madison, Indiana 47250  
FESOP Permit No.: F077-34980-00011

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

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

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

Technical Support Document (TSD) for a Significant Permit Revision to a  
Federally Enforceable State Operating Permit (FESOP)

**Source Description and Location**

<b>Source Name:</b>	<b>Vehicle Service Group</b>
<b>Source Location:</b>	<b>2700 Lanier Drive, Madison IN, 47250</b>
<b>County:</b>	<b>Jefferson County (Madison Township)</b>
<b>SIC Code:</b>	<b>3534</b>
<b>Operation Permit No.:</b>	<b>F 077-34980-00011</b>
<b>Operation Permit Issuance Date:</b>	<b>February 18, 2015</b>
<b>Significant Permit Revision No.:</b>	<b>F 077-36812-00011</b>
<b>Permit Reviewer:</b>	<b>Kendra Sutherland</b>

On February 8, 2016, the Office of Air Quality (OAQ) received an application from Vehicle Service Group related to the addition and modification of emission units to an existing stationary automotive hydraulic lift manufacturer.

**Source Definition**

This automotive hydraulic lift manufacturing company consists of two (2) plants (Plant 1 and Plant 2). Both plants are located at 2700 Lanier Drive, Madison, IN 47250.

Since the two (2) plants are located in contiguous properties, have the same SIC codes and are under common ownership, they will be considered one (1) source. This conclusion was initially determined under Part 70 Operating Permit (T077-7652-00011) on April 23, 2004.

**Existing Approvals**

The source was issued FESOP No. F077-34980-00011, on February 18, 2015. There have been no subsequent approvals issued.

**County Attainment Status**

The source is located in Jefferson County (Madison Township)

Pollutant	Designation
SO <sub>2</sub>	Cannot be classified.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. <sup>1</sup>
PM <sub>2.5</sub>	Basic nonattainment designation effective federally April 5, 2005, for PM <sub>2.5</sub> . for the Madison Township. Unclassifiable or attainment for all townships except Madison Township, effective April 5, 2005, for the annual PM <sub>2.5</sub> standard.
PM <sub>2.5</sub>	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM <sub>2.5</sub> standard.
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

<sup>1</sup>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<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Jefferson County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM<sub>2.5</sub>**  
U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Jefferson County, Madison Township, as nonattainment for PM<sub>2.5</sub>. On March 7, 2005, the Indiana Attorney General's Office, on behalf of IDEM, filed a lawsuit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's New Source Review Rule for PM<sub>2.5</sub> promulgated on May 8, 2008. These rules became effective on July 15, 2008. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NO<sub>x</sub> emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5.
- (c) **Other Criteria Pollutants**  
Jefferson County has been classified as attainment or unclassifiable in Indiana for all other regulated 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.

#### **Status of the Existing Source**

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

Process/ Emission Unit	Potential To Emit of the Entire Source Before Revision (tons/year)								
	PM	PM10*	PM2.5*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Waste (Used) Oil Combustion	0.12	0.10	0.10	0.31	0.09	0.01	0.01	0.15	0.15-Lead
Plant 1 Paint Line	1.22	1.22	1.22	0.00	0.00	97.26	0.00	3.0	2.26 Xylene
Plant 2, Paint Line 1	0.59	0.59	0.59	0.00	0.00		0.00	1.46	1.10 Xylene
Plant 2, Paint Line 2	2.63	2.63	2.63	0.00	0.00		0.00	2.63	1.16 Methyl Isobutyl Ketone
Touch-Up Paints	0.10	0.10	0.10	0.00	0.00	0.20	0.00	0.01	0.00 Ethyl Benzene
NG Emergency Generators	0.00	0.00	0.00	0.00	0.20	0.00	0.33	0.00	0.00 Formaldehyde
Plant 2, Paint Line 2 Curing Oven **	0.02	0.05	0.05	0.00	1.00	0.06	0.57	0.00	-
Insignificant Heaters & Ovens **	0.37	1.50	1.50	0.12	23.91	1.47	16.55	0.37	0.37 Hexane
Plant 1 Welding	1.60	1.60	1.60	0.00	0.00	0.00	0.00	0.20	0.19 Manganese
Plant 1 Burner Cutting	3.24	3.24	3.24	0.00	0.00	0.00	0.00	0.00	-
Plant 2 Welding	0.89	0.89	0.89	0.00	0.00	0.00	0.00	0.08	0.08 Manganese
Plant 2 Burner Cutting	1.76	1.76	1.76	0.00	0.00	0.00	0.00	0.00	-
Shot Blaster EU 1-1	30.0	30.0	30.0	0.00	0.00	0.00	0.00	0.05	-
Shot Blaster EU 2-1	30.0	30.0	30.0	0.00	0.00	0.00	0.00	0.08	-
Grit Blaster EU 2-6	25.0	25.0	25.0	0.00	0.00	0.00	0.00	3.29	-
<b>Total PTE of Entire Source</b>	<b>97.55</b>	<b>98.7</b>	<b>98.7</b>	<b>0.43</b>	<b>25.20</b>	<b>99.00</b>	<b>17.47</b>	<b>7.77</b>	<b>3.36 Xylene</b>
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds**	250	250	-	-	250	250	250	-	-
Emission Offset/ Nonattainment NSR Major Source Thresholds (PM2.5 nonattainment)	-	-	100	100	100	-	-	-	-
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant". ** Worst Case PTE when combusting either Natural Gas or Propane.									

- (a) This existing source is not a major stationary source under PSD (326 IAC 2-2), because no PSD regulated pollutant, is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major stationary source under Emission Offset (326 IAC 2-3), because nonattainment pollutants, PM<sub>2.5</sub>, NO<sub>x</sub> or SO<sub>2</sub> are not emitted at a rate of 100 tons per year or more.
- (c) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the Permittee has accepted limits on HAPs emissions to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

<b>Description of Proposed Revision</b>
---

The Office of Air Quality (OAQ) has reviewed an application, submitted by Vehicle Service Group on February 8, 2016, relating to the modification, addition, and removal of emission units.

The following is a list of the new emission units:

- (a) Plasma burner with a maximum metal thickness of 2.25 inches thick and a cutting rate of 25 inches per minute in plant 1
- (b) Plasma burner with a maximum metal thickness of 2.25 inches thick and a cutting rate of 25 inches per minute in plant 2
- (c) Buggo Burner #3061, with maximum metal thickness of 0.5 inches and a maximum cutting rate of 62 inches per minute.
- (d) One natural gas fired air makeup unit in Plant 1, with a maximum heat input capacity of 4.19 MMBtu per hour using propane as back-up fuel.
- (e) One natural gas fired air makeup unit in Plant 2, with a maximum heat input capacity of 4.19 MMBtu per hour, using propane as back-up fuel

The following is a list of the modified emission units:

- (f) **CL840** Laser burner **#3031** (~~Arm Cell North 2311~~) with a **maximum** metal thickness **of 0.75** ~~cut ranging from 0 to 1.0 inches~~ and **maximum** cutting rate **of 34** ~~ranging from 26 to 230 inches per minute.~~
- (g) **CL7** Laser burner **#3029** (~~Arm Cell South 2312~~) with a **maximum** metal thickness **of 0.5** ~~cut ranging from 0 to 1.0 inches~~ and **maximum** cutting rate **of 48** ~~ranging from 26 to 230 inches per minute.~~
- (h) **CL7** Laser burner **#3030** (~~Arm Cell South 2313~~) with a **maximum** metal thickness **of 0.5** ~~cut ranging from 0 to 1.0 inches~~ and **maximum** cutting rate **of 48** ~~ranging from 26 to 230 inches per minute.~~
- (i) Changes in paint formulations for Plant 1 Paint Line, Plant 2 Paint Line 1, Plant 2 Paint Line 2, and Touch up coating area.
- (j) Increase in emissions from the unpaved roads due to the addition of an automatic tarping system.

The following is a list of removed emission units:

- (l) Oxy burner (Jack Line 1410) with a metal thickness cut ranging from 0 to 0.75 inches and cutting rate ranging from 20 to 230 inches per minute.
- (m) Plasma burner (Jack Line 2610) with a metal thickness cut ranging from 0 to 0.75 inches and cutting rate ranging from 130 to 230 inches per minute.
- (n) Plasma burner (Runway 3810 back) with a metal thickness cut ranging from 0.188 to 1.0 inches and cutting rate ranging from 40 to 275 inches per minute.
- (o) Plasma burner (Rolling Bridge 3320 front) with a metal thickness cut ranging from 0 to 1.0 inches and cutting rate ranging from 20 to 170 inches per minute.

#### **“Integral Part of the Process” Determination**

Plant 1 Shot Blaster (EU 1-1) and Plant 2 Shot Blaster (EU 2-1)

In 2006, the Permittee submitted information requesting that the baghouses be considered as integral parts of the blasting operation, identified as Plant 1 Shot Blaster (EU 1-1) and Plant 2 Shot Blaster (EU 2-1).

IDEM, OAQ evaluated the justifications at that time and agreed that the baghouses for the Plant 1 Shot Blaster (EU1-1) and Plant 2 Shot Blaster (EU2-1) will be considered integral. This evaluation and approval were discussed in FESOP 077-22872-00011 issued on December 27, 2006.

#### **Enforcement Issues**

There are no pending enforcement actions related to this revision.

#### **Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

#### **Permit Level Determination – FESOP Revision**

The following table is used to determine the appropriate permit level under 326 IAC 2-8-11.1 (Permit Revisions. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit. If the control equipment has been determined to be integral, the table reflects the PTE after consideration of the integral control device.

Increase in PTE Before Controls of the Modification (New Units)	
Pollutant	Potential To Emit (ton/yr)
PM	1.48
PM <sub>10</sub>	1.68
PM <sub>2.5</sub>	1.68
SO <sub>2</sub>	0.02
VOC	0.32
CO	3.08
NO <sub>x</sub>	5.21
Total HAPs	0.07
Worst Single HAP	Hexane - 0.07

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

PTE Change of the Modified Processes			
Pollutant	PTE Before Modification (ton/year)	PTE After Modification (ton/year)	Increase from Modification (ton/year)
PM	90.96	109.96	18.07
PM <sub>10</sub>	90.82	107.21	16.39
PM <sub>2.5</sub>	90.82	107.21	16.39
SO <sub>2</sub>	0.00	0.00	0.00
VOC	197.3	241.32	44.02
CO	0.00	0.00	0.00
NO <sub>x</sub>	0.00	0.00	0.00
HAPs	7.10	21.86	14.76
Worst Single HAP	4.46-xylene	16.10-xylene	11.64-xylene

Total PTE Increase due to the Modification			
Pollutant	PTE New Emission Units (ton/year)	Increase to PTE of Modified Emission Units (ton/year)	Total PTE for New and Modified Units (ton/year)
PM	1.48	18.07	19.55
PM <sub>10</sub>	1.68	16.39	18.07
PM <sub>2.5</sub>	1.68	16.39	18.07
SO <sub>2</sub>	0.02	0	0.02
VOC	0.32	44.02	44.34
CO	3.08	0	3.08
NO <sub>x</sub>	5.21	0	5.21
HAPs	0.07	14.76	14.83
Worst Single HAP	Hexane - 0.07	11.64-xylene	11.64-Xylene

Pursuant to 326 IAC 2-8-11.1(f)(1)(E), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit revision and the proposed revision involves the addition of new emission units and modified existing units with potential to emit greater than or equal to twenty-five (25) tons per year of Volatile Organic Compounds (VOC).

Pursuant to 326 IAC 2-8-11.1(f)(1)(G), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit revision and the proposed revision has a potential to emit greater than or equal to ten (10) tons per year of a single HAP

Pursuant to 326 IAC 2-8-11.1(f), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit revision and the proposed revision involves revising FESOP and PSD Minor Limits.

<b>PTE of the Entire Source After Issuance of the FESOP Revision</b>
--

The table below summarizes the potential to emit of the entire source (*reflecting adjustment of existing limits*), with updated emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

Process/ Emission Unit	Potential To Emit of the Entire Source After Revision (tons/year)								
	PM	PM10*	PM2.5*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Waste (Used) Oil Combustion	0.12	0.10	0.10	0.31	0.09	0.01	0.01	0.15	0.15-Lead
Plant 1 Paint Line	<del>1.22</del> <b>1.21</b>	<del>1.22</del> <b>1.21</b>	<del>1.22</del> <b>1.21</b>	0.00	0.00	97.26 <b>83.25</b>	0.00	<del>3.00</del> 1.46	<del>2.26</del> 1.40 xylene
Plant 2 Paint Line 1	0.59	0.59	0.59	0.00	0.00		0.00	2.63	1.46
Plant 2 Paint Line 2	<del>2.63</del> <b>2.76</b>	<del>2.63</del> <b>2.76</b>	<del>2.63</del> <b>2.76</b>	0.00	0.00		0.00	<b>23.33</b>	<b>9.99</b> xylene
Touch Up Paints	0.10 <b>2.16</b>	0.10 <b>2.16</b>	0.10 <b>2.16</b>	0.00	0.00	0.20 <b>4.69</b>	0.00	0.01 <b>0.10</b>	0.00 <b>0.05</b> Ethyl Benzene
NG Emergency Generators	0.00	0.00	0.00	0.00	0.20	0.00	0.33	0.00	0.00 Formaldehyde
50 Heaters and 3 Curing Ovens **	0.45	1.58	1.58	0.12	29.26	1.80	17.05	0.38	0.37-Hexane
Plant 1 Welding	<del>1.60</del> <b>1.62</b>	<del>1.60</del> <b>1.62</b>	<del>1.60</del> <b>1.62</b>	0.00	0.00	0.00	0.00	<del>0.20</del> 0.19	0.18 Manganese
Plant 1 Burner Cutting	<del>3.24</del> <b>5.53</b>	<del>3.24</del> <b>5.53</b>	<del>3.24</del> <b>5.53</b>	0.00	0.00	0.00	0.00	0.00 <b>0.03</b>	<b>0.02</b> Manganese
Plant 2 Welding	<del>0.89</del> <b>0.91</b>	<del>0.89</del> <b>0.91</b>	<del>0.89</del> <b>0.91</b>	0.00	0.00	0.00	0.00	0.08 <b>0.09</b>	0.08 Manganese
Plant 2 Burner Cutting	<del>1.76</del> <b>3.72</b>	<del>1.76</del> <b>3.72</b>	<del>1.76</del> <b>3.72</b>	0.00	0.00	0.00	0.00	0.00 <b>0.02</b>	<b>0.01</b> Manganese
Shot Blaster EU 1-1	<del>30.00</del> 22.40	<del>25.00</del> 22.40	<del>25.00</del> 22.40	0.00	0.00	0.00	0.00	0.0	0.00
Shot Blaster EU 2-1	<del>30.0</del> 22.40	<del>30.00</del> 22.40	<del>30.00</del> 22.40	0.00	0.00	0.00	0.00	0.0	0.00
Grit Blaster EU 2-6	<del>25.00</del> 22.40	<del>25.00</del> 22.40	<del>25.00</del> 22.40	0.00	0.00	0.00	0.00	0.0	0.00
<b>Two (2) Air Make Up Units**</b>	<b>0.08</b>	<b>0.28</b>	<b>0.28</b>	<b>0.02</b>	<b>5.21</b>	<b>0.32</b>	<b>3.08</b>	<b>0.07</b>	<b>0.07</b> Hexane
<b>Total PTE of Entire Source</b>	<del><b>97.55</b></del> <b>86.97</b>	<del><b>98.7</b></del> <b>88.29</b>	<del><b>98.7</b></del> <b>88.29</b>	<del><b>0.43</b></del> <b>0.46</b>	<del><b>25.20</b></del> <b>35.05</b>	<del><b>99.00</b></del> <b>90.08</b>	<del><b>17.47</b></del> <b>20.55</b>	<del><b>7.77</b></del> <b>24.36</b>	<del><b>3.36</b></del> <b>9.99</b> Xylene
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds**	250	250	-	-	250	250	250	-	-
Emission Offset/ Nonattainment NSR Major Source Thresholds (PM2.5 nonattainment)	-	-	100	100	100	-	-	-	-
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant". ** Worst Case PTE when combusting either Natural Gas or Propane.									

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. (Note: the table below was generated from the above table, with bold text un-bolded and strikethrough text deleted).

Process/ Emission Unit	Potential To Emit of the Entire Source After Revision (tons/year)								
	PM	PM10*	PM2.5*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Waste (Used) Oil Combustion	0.12	0.10	0.10	0.31	0.09	0.01	0.01	0.15	0.15-Lead
Plant 1 Paint Line	1.21	1.21	1.21	0.00	0.00	83.25	0.00	23.33	9.99 xylene
Plant 2 Paint Line 1	0.59	0.59	0.59	0.00	0.00		0.00		
Plant 2 Paint Line 2	2.76	2.76	2.76	0.00	0.00		0.00		
Touch Up Paints	2.16	2.16	2.16	0.00	0.00	4.69	0.00	0.10	0.05 Ethyl Benzene
NG Emergency Generators	0.00	0.00	0.00	0.00	0.20	0.00	0.33	0.00	0.00 Formaldehyde
50 Heaters and 3 Curing Ovens **	0.45	1.58	1.58	0.12	29.26	1.80	17.05	0.38	0.37-Hexane
Plant 1 Welding	1.62	1.62	1.62	0.00	0.00	0.00	0.00	0.19	0.18 Manganese
Plant 1 Burner Cutting	5.53	5.53	5.53	0.00	0.00	0.00	0.00	0.03	0.02 Manganese
Plant 2 Welding	0.91	0.91	0.91	0.00	0.00	0.00	0.00	0.09	0.08 Manganese
Plant 2 Burner Cutting	3.72	3.72	3.72	0.00	0.00	0.00	0.00	0.02	0.01 Manganese
Shot Blaster EU 1-1	22.40	22.40	22.40	0.00	0.00	0.00	0.00	0.0	0.00
Shot Blaster EU 2-1	22.40	22.40	22.40	0.00	0.00	0.00	0.00	0.0	0.00
Grit Blaster EU 2-6	22.40	22.40	22.40	0.00	0.00	0.00	0.00	0.0	0.00
Air Make Up Unit**	0.08	0.28	0.28	0.02	5.21	0.32	3.08	0.07	0.07 Hexane
<b>Total PTE of Entire Source</b>	<b>86.97</b>	<b>88.29</b>	<b>88.29</b>	<b>0.46</b>	<b>35.05</b>	<b>90.08</b>	<b>20.55</b>	<b>24.59</b>	<b>9.99 Xylene</b>
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds**	250	250	-	-	250	250	250	-	-
Emission Offset/ Nonattainment NSR Major Source Thresholds (PM2.5 nonattainment)	-	-	100	100	100	-	-	-	-
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant". ** Worst Case PTE when combusting either Natural Gas or Propane.									

(a) FESOP Status

This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants and HAPs from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).

(1) Criteria Pollutants

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

- (1) Plant 1 Shot Blaster (EU1-1) and Plant 2 Shot Blaster (EU2-1)-The PM10/PM2.5, emissions shall not exceed 5.11 lbs/hr
- (2) Grit Blast Booth (EU-2-6) -The PM10/PM2.5, emissions shall not exceed 5.11 lbs/hr
- (3) The total VOC input to the paint lines (EU 1-1, EU2-2, and EU2-5) and associated cleanup activities, combined shall not exceed 83.25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit PM10, PM2.5 and VOCs from all other emission units at this source, shall limit the source-wide total potential to emit of PM10, PM2.5, and VOCs to less than 100 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), and 326 IAC 2-3 (Emission Offset) not applicable to the entire source.

(2) HAPs

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

- (1) The total HAPS input to the paint lines (EU1-1, EU 2-2, and EU 2-5), and associated cleanup activities, combined, shall not exceed 23.33 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (2) The input of any single HAP to the paint lines (EU1-1, EU 2-2, and EU 2-5), and associated cleanup activities, combined, shall be less than 9.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit HAP from all other emission units at this source, shall limit the source-wide total potential to emit of any single HAP to less than ten (10) tons and, total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period, respectively, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and shall make the source an area source under CAA Section 122 .

(b) PSD Minor Source – PM

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), the Permittee shall comply with the following:

- (1) The PM emissions from the Plant 1 Shot Blaster (EU 1-1) shall not exceed 5.11 pounds per hour
- (2) The PM emissions from the Plant 2 Shot Blaster (EU 2-1) shall not exceed 5.11 pounds per hour
- (3) The PM emissions from the the Grit Blaster (EU 2-6) shall not exceed 5.11 pounds per hour

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

<b>Federal Rule Applicability Determination</b>
---

- (1) New Source Performance Standards (NSPS)
  - (a) The requirements of the New Source Performance Standard for Small Industrial-Commercial Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included for this proposed revision, since the maximum heat input capacity is less than 10 MMBtu per hour.
  - (b) There are no New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included for this proposed revision.
- (2) National Emission Standards for Hazardous Air Pollutants (NESHAP)
  - (c) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR Part 63.3880, Subpart Mmmm, are not included in the permit because this source consisting of surface coating operation is not a major source of HAPs. The potential to emit of any combination of HAPs and any single HAP is less than 25 and 10 tons per year, respectively. Therefore, 40 CFR 63, Subpart Mmmm is not applicable.
  - (d) There are no National Emission Standards for Hazardous Air Pollutants (40 CFR Part 63), 326 IAC 14 and 326 IAC 20 included for this proposed revision.
- (3) Compliance Assurance Monitoring (CAM)

Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

### State Rule Applicability Determination

- (a) 326 IAC 2-8-4 (FESOP)  
See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))  
See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (c) 326 IAC 2-3 (Emission Offset)  
See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
None of the emission units is subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of single HAP and combined HAPs from the new and modified units is less than ten (10) tons per year and less than twenty-five (25) tons per year, respectively.
- (e) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (f) 326 IAC 5-1 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations).
- (g) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)  
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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
- (h) 326 IAC 12 (New Source Performance Standards)  
See Federal Rule Applicability Section of this TSD.
- (i) 326 IAC 20 (Hazardous Air Pollutants)  
See Federal Rule Applicability Section of this TSD.

### State Rule Applicability Determination-Individual Emission Units

#### Air Make Up Units

#### **326 IAC 8-1-6 (New Facilities; General Reduction Requirements)**

Pursuant to 326 IAC 8-1-6(1), the natural gas air fired makeup units are not subject to the provisions of 326 IAC 8-1-6, because the potential to emit VOC from each emission unit are less than twenty-five (25) tons per year.

#### **326 IAC 6-2-1 (Particulate Emission Limitations for Sources of Indirect Heat)**

Pursuant to 326 IAC 6-2-1, the natural gas air fired make up units are not subject to the provisions of 326 IAC 6-2-4, since this is a source of direct heat.

#### Welding and Burning Operations

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

- (a) Pursuant to 326 IAC 6-3-1(b)(9), the 61 MIG welding station, one TIG welder and the one submerged arc welding station in plant 1 and 45 MIG welding stations from plant 2, are exempt

from particulate emission limitations for manufacturing processes because each welding station consumes less than 625 pounds of wire per day.

- (b) Pursuant to 326 IAC 6-3-1(b)(14), CL840 #3031, CL7 #3029, Plasma Burner, and CL7 #3030, located in Plant 1 and Plasma Burner and Buggo #3061 located in Plant 2, are exempt from particulate emission limitations for manufacturing processes, because each of these cutting machines have potential to emit less than 0.551 pound per hour.

#### Painting Operations

##### **326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices, and Control Technologies)**

Pursuant to 326 IAC 6-3-2(d), particulate emissions from the three (3) paint lines (EU 1-2, EU 2-2, and EU 2-5) shall be controlled by a dry particulate filter, water wash, or equivalent control device.

##### **326 IAC 8-1-6 (General Reduction Requirements)**

326 IAC 8-1-6 (General Reduction Requirements) does not apply, because the surface coating facilities and touch up coating areas are subject to other provisions of Article 8 (326 IAC 8-2-9).

##### **326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)**

The source is subject to 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations), because it coats metal parts or products under the Standard Industrial Classification Code (SIC) of Major Group 35: Industrial and Commercial Machinery and Computer Equipment; it was constructed after January 1, 1980 and That have potential emissions of 25 tons per year or greater per year of VOC

- (1) Pursuant to 326 IAC 8-2-9 (b) and (c)(2) (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the Plant 1 Paint Line, identified as EU 1-2; the Plant 2 Paint Line 1, identified as EU 2-2; and the Plant 2 Paint Line 2, identified as EU 2-5; shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Based on information provided by the source (MSDS), all coatings contain less than 3.5 pounds of VOCs per gallon of coating. .

#### **Proposed Changes**

The following changes listed below are due to the proposed Revision. Deleted language appears as ~~striketrough~~ text and new language appears as **bold** text:

##### A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary automotive hydraulic lift manufacturing plants.

Source Address: 2700 Lanier Drive, Madison, Indiana 47250  
General Source Phone Number: **812-265-1622**

\*\*\*

##### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

\*\*\*

- (f) Plant 1 shot blaster with an integral baghouse, constructed in 1988, identified as EU 1-1, with a nominal capacity of 6,000 pounds of steel and 50 pounds of steel shot or steel grit per hour and ~~exhausts inside of the building~~ **exhausting to Stack 1-21.**

\*\*\*

- (h) Plant 2 manual grit blast booth with a dust collector, which is used for collecting and recycling the grit; approved for construction in 2014, identified as EU 2-6, with a maximum capacity of 4,000 pounds of metal parts blasted per hour **and a maximum abrasive flow rate of 50 pounds of grit blasted per hour**, with emissions venting outside the building through stack (S/V2-21).

\*\*\*

(n) Welding

- (1) Plant 1 has sixty-one (61) MIG stations with the maximum average hourly consumption of 0.98 pounds of electrode per hour. This is ~~59.79~~ **60.76** pounds per hour total for the sixty-one (61) stations.
  - (2) Plant 1 has one (1) submerged arc welder with maximum electrode consumption of 0.97 pounds per hour.
  - (3) Plant 1 has one (1) TIG welder with maximum electrode consumption of 0.97 pounds per hour.
  - (4) Plant 2 has ~~forty-four (44)~~ **forty-five (45)** MIG stations with **maximum hourly actual average hourly electrode** consumption of 0.84 pounds per hour. This is ~~36.96~~ 37.8 pounds per hour for the forty-five (45) stations.
- (o) ~~Five (5)~~ **Four (4)** burners in Plant 1 are as follows:
- (1) ~~Oxy burner (Jack Line 1410) with a metal thickness of cut ranging from 0 to 0.75 inches and cutting rate ranging from 20 to 230 inches per minute.~~
  - (2) ~~Plasma burner (Jack Line 2610) with a metal thickness cut ranging from 0 to 0.75 inches and cutting rate ranging from 130 to 230 inches per minute, each.~~
  - (~~3-1~~) **CL840 Laser burner #3031 (Arm Cell North 2311)** with a **maximum** metal thickness of **0.75** cut ranging from 0 to 1.0 inches and **maximum** cutting rate of **34** ranging from 26 to 230 inches per minute.
  - (4-2) **CL7 Laser burner #3029 (Arm Cell South 2312)** with a **maximum** metal thickness of **0.5** cut ranging from 0 to 1.0 inches and **maximum** cutting rate of **48** ranging from 26 to 230 inches per minute.
  - (~~5-3~~) **CL7 Laser burner #3030 (Arm Cell South 2313)** with a **maximum** metal thickness of **0.5** cut ranging from 0 to 1.0 inches and **maximum** cutting rate of **48** ranging from 26 to 230 inches per minute.
  - (4) **Plasma burner with a maximum metal thickness of 2.25 inches thick and a cutting rate of 25 inches per minute**
- (p) ~~Four (4)~~ **Two (2)** burners in Plant 2 are as follows:
- (1) ~~Plasma burner (Runway 3810 back) with a metal thickness cut ranging from 0.188 to 1.0 inches and cutting rate ranging from 40 to 275 inches per minute, each.~~
  - (2) ~~Plasma burner (Rolling Bridge 3320 front) with a metal thickness of 0.5 cut ranging from 0 to 1.0 inches and cutting rate of ranging from 20 to 170 inches per minute.~~

- (1) **Plasma burner with the cutting a maximum thickness of metal of 2.25 inches thick and a cutting rate of 25 inches per minute.**
- (2) **Buggo Burner #3061, with maximum metal thickness of 0.5 inches and a maximum cutting rate of 62 inches per minute.**

\*\*\*

- (s) **One natural gas fired air makeup unit in Plant 1, with a maximum heat input capacity of 4.19 MMBtu per hour using propane as back-up fuel.**
- (t) **One natural gas fired air makeup unit in Plant 2, with a maximum heat input capacity of 4.19 MMBtu per hour, using propane as back-up fuel**

\*\*\*

D.1.1 FESOP Limits - ~~[326 IAC 2-8-4][326 IAC 2-2][326 IAC 2-1.1-5]~~

---

Pursuant to 326 IAC 2-8-4, and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable the Permittee shall comply with the following:

- (a) The total VOC input to the paint lines (EU 1-1, EU 2-2, and EU 2-5), and associated clean-up activities, combined, shall not exceed ~~ninety-seven and twenty-six one-hundredths (97.26)~~ **83.25** tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) **The total HAPS input to the paint lines (EU1-1, EU2-2, and EU 2-5) and associated clean-up activities, combined, shall not exceed 23.33 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.**
- (c) **The input of any single HAP to the paint lines (EU 1-1, EU 2-2, and EU 2-5), and associated clean-up activities, combined, shall be less than 9.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month,**

Compliance with this limit combined with the potential to emit VOCs **and HAPs**, from all other emission units at this source, shall limit the source-wide total potential to emit VOCs to less than one hundred (100) tons, **total HAPs to less than 25 tons and any single HAP to less than 10 tons per twelve (12) consecutive month period, respectively**, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable to the entire source.

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (f) Plant 1 shot blaster with an integral baghouse, constructed in 1988, identified as EU 1-1, with a nominal capacity of 6,000 pounds of steel and 50 pounds of steel shot or steel grit per hour and ~~exhausts inside of the building~~ **exhausting to Stack 1-21.**
- (g) Plant 2 shot blaster with an integral baghouse, constructed in 1988, identified as EU 2 1, with a nominal capacity of 6,000 pounds of steel and 50 pounds of steel shot or steel grit per hour and exhausts to stack (S/V 2 8).
- (h) Plant 2 manual grit blast booth with a dust collector, which is used for collecting and recycling the grit; approved for construction in 2014, identified as EU 2-6, with a maximum capacity of 4,000 pounds of metal parts blasted per hour **and a maximum abrasive flow rate of 50 pounds of grit blasted per hour**, with emissions venting outside the building through stack (S/V2-21).

(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 2-8-4(1)]

#### D.2.1 FESOP, PSD, and Emission Offset Limit [326 IAC 2-8-4] [326 IAC 2-2] [326 IAC 2-3] PSD, Nonattainment New Source Review Minor Limits [326 IAC 2-8][326 IAC 2-2][326 IAC 2-1.1-5]

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-3 Emission Offset not applicable:

- (a) Plant 1 Shot Blaster (EU 1-1) and Plant 2 Shot Blaster (EU 2-1)  
The PM<sub>10</sub>/PM<sub>2.5</sub> emissions shall not exceed ~~6.84 lbs/hr, each.~~ **5.11 lbs/hr each**
- (b) Grit Blast Booth (EU 2-6)  
The PM<sub>10</sub>/PM<sub>2.5</sub> emissions shall not exceed ~~5.74 lbs/hr.~~ **5.11 lbs/hr each**

**Compliance with these limits combined with the potential to emit PM<sub>10</sub>, and PM<sub>2.5</sub>, from all other emission units at this source, shall limit the source-wide total potential to emit PM<sub>10</sub>, and PM<sub>2.5</sub> to less than one hundred (100) tons/year, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits), Emission Offset (326 IAC 2-3), and Prevention of Significant Deterioration (PSD)(326 IAC 2-2) not applicable to the entire source.**

#### D.2.2 PSD Minor Limit (PM) [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable,

- (a) The PM emissions from the Plant 1 Shot Blaster (EU 1-1) shall not exceed ~~6.84~~ **5.11** pounds per hour.
- (b) The PM emissions from the Plant 2 Shot Blaster (EU 2-1) shall not exceed ~~6.84~~ **5.11** pounds per hour.
- (c) The PM emissions from the Grit Blaster (EU 2-6) shall not exceed ~~5.74~~ **5.11** pounds per hour.

**Compliance with these limits combined with the potential to emit PM, from all other emission units, shall limit the source-wide total potential to emit of PM to less than 250 tons per year shall render the requirements of Prevention of Significant Deterioration (PSD)(326 IAC 2-2) not applicable to the entire source.**

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

**FESOP Quarterly Report**

**Source Name:** Vehicle Service Group  
**Source Address:** 2700 Lanier Drive, Madison, Indiana 47250  
**FESOP Permit No.:** F077-34980-00011  
**Facility:** Paint Line EU 1-2, Paint Line 1 EU 2-2, Paint Line 2 EU 2-5  
**Parameter:** Total HAP Input  
**Limit:** 23.33 tons per twelve (12) consecutive month period

**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**

**FESOP Quarterly Report**

**Source Name:** Vehicle Service Group  
**Source Address:** 2700 Lanier Drive, Madison, Indiana 47250  
**FESOP Permit No.:** F077-34980-00011  
**Facility:** Paint Line EU 1-2, Paint Line 1 EU 2-2, Paint Line 2 EU 2-5  
**Parameter:** worst single HAP Input  
**Limit:** 9.99 tons per twelve (12) consecutive month period

**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:** \_\_\_\_\_

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

**B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]**

(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 46204-2254~~

~~The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

~~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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

~~(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.~~

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

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

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

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

**The Permittee shall implement the PMPs.**

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

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;**
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and**
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.**

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

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

**The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).**

**The Permittee shall implement the PMPs.**

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).**
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.**

\*\*\*

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### ~~Emission Limitations and Standards [326 IAC 2-8-4(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.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
  - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
  - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

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

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

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

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

---

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

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

---

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

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

---

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

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

---

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

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

---

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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.

### **Testing Requirements [326 IAC 2-8-4(3)]**

#### **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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 2-8-4][326 IAC 2-8-5(a)(1)]**

**C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]**

---

(a) ~~For new units:~~

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

(b) ~~For existing units:~~

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

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

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

~~The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

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

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

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

**The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).**

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

**C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(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 2-8-4][326 IAC 2-8-5(a)(1)]**

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

---

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

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

**C.13 Risk Management Plan [326 IAC 2-8-4] [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 2-8-4] [326 IAC 2-8-5]**

---

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 2-8-4][326 IAC 2-8-5]

- (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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

**C.16** General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (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 FESOP.~~

~~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.~~

- (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. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.**
- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

**C.17** General Reporting Requirements [326 IAC 2-8-4(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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). 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.18** Compliance with 40 CFR 82 and 326 IAC 22-1

---

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

### Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on February 8, 2016.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 077-36812-00011. The staff recommends to the Commissioner that this FESOP Significant Permit Revision be approved.

### IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Kendra Sutherland at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5401 or toll free at 1-800-451-6027, extension 4-5401.
- (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: Emission Calculations  
Significant Permit Revision Modifications**

Company Name: Vehicle Service Group  
Address City IN Zip: 2700 Lanier Drive, Madison, IN 47250  
Permit No.: 077-36812-00011  
Reviewer: Kendra Sutherland

SPR 36812 modified units										
Emission Unit	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP	
3031 before	0.55	0.55	0.55	-	-	-	-	0.00	0.00	-
3031 after	0.25	0.25	0.25	-	-	-	-	0.00	0.00	-
3031 difference	-0.31	-0.31	-0.31	-	-	-	-	-	-	-
3029 before	0.55	0.55	0.55	-	-	-	-	-	-	-
3029 after	0.23	0.23	0.23	-	-	-	-	-	-	-
3029 difference	-0.32	-0.32	-0.32	-	-	-	-	-	-	-
3030 before	0.55	0.55	0.55	-	-	-	-	-	-	-
3030 after	0.23	0.23	0.23	-	-	-	-	-	-	-
3030 difference	-0.32	-0.32	-0.32	-	-	-	-	-	-	-
Plant 1, Paint Line before	24.42	24.42	24.42	-	-	63.70	-	3.00	2.26	xylene
Plant 1, Paint Line after	24.28	24.28	24.28	-	-	66.26	-	8.30	6.45	xylene
Plant 1, Paint Line difference	-0.14	-0.14	-0.14	-	-	2.56	-	5.30	4.19	xylene
Plant 2, Paint Line 1 before	11.90	11.90	11.90	-	-	31.17	-	1.46	1.10	xylene
Plant 2, Paint Line 1 after	24.28	24.28	24.28	-	-	64.69	-	8.30	6.45	xylene
Plant 2, Paint Line 1 difference	12.38	12.38	12.38	-	-	33.52	-	6.84	5.35	xylene
Plant 2, Paint Line 2 before	52.69	52.69	52.69	-	-	102.23	-	2.63	1.10	xylene
Plant 2, Paint Line 2 after	55.15	55.15	55.15	-	-	105.67	-	5.21	3.14	xylene
Plant 2, Paint Line 2 difference	2.46	2.46	2.46	-	-	3.44	-	2.58	2.04	xylene
Touch-Up Paints before	0.10	0.10	0.10	-	-	0.20	-	0.01	0.00	xylene
Touch-Up Paints after	2.16	2.16	2.16	-	-	4.69	-	0.05	0.05	xylene
touch up paints difference	2.06	2.06	2.06	-	-	4.49	-	0.04	0.05	xylene
Unpaved Roads before	0.19	0.05	0.05	-	-	-	-	-	-	-
Unpaved Roads after	2.45	0.62	0.62	-	-	-	-	-	-	-
Unpaved Roads difference	2.26	0.57	0.57	-	-	-	-	-	-	-
Total Increase for all modified units	18.07	16.39	16.39	-	-	44.02	-	14.76	11.64	xylene

\*Integral Baghouse

SPR 36812 new units										
Emission Unit	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP	
Two (2) Air Make up Units**	0.08	0.28	0.28	0.02	5.21	0.32	3.08	0.07	0.07	Hexane
Two (2) Plasma Burners	1.09	1.09	1.09	-	-	-	-	-	-	-
Buggo Burner 3061	0.30	0.30	0.30	-	-	-	-	-	-	-
Total for after emission units	1.48	1.68	1.68	0.02	5.21	0.32	3.08	0.07	0.07	Hexane

Total PTE Increase due to the Modification			
Pollutant	PTE New Emission Units (ton/year)	Increase to PTE of Modified Emission Units (ton/year)	Total PTE for New and Modified Units (ton/year)
PM	1.48	18.07	19.55
PM <sub>10</sub>	1.68	16.39	18.07
PM <sub>2.5</sub>	1.68	16.39	18.07
SO <sub>2</sub>	0.02	0	0.02
VOC	0.32	44.02	44.34
CO	3.08	0	3.08
NO <sub>x</sub>	5.21	0	5.21
HAPs	0.07	14.76	14.83
Worst Single HAPs	Hexane - 0.07	11.64- xylene	11.64- Xylene

Appendix A: Emission Calculations  
PTE Summary Tables

Company Name: Vehicle Service Group  
Address City IN Zip: 2700 Lanier Drive, Madison, IN 47250  
Permit No.: 077-36812-00011  
Reviewer: Kendra Sutherland

Uncontrolled Potential to Emit (tons/yr) of Entire source										
Emission Unit	PM	PM10	PM2.5 *	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP	
Waste (Used) Oil Combustion	0.12	0.10	0.10	0.31	0.09	0.01	0.01	0.15	0.15	Pb
Plant 1 Paint Line	24.28	24.28	24.28	0.00	0.00	66.26	0.00	8.30	6.45	Xylene
Plant 2, Paint Line 1	24.28	24.28	24.28	0.00	0.00	64.69	0.00	8.30	6.45	Xylene
Plant 2, Paint Line 2	55.15	55.15	55.15	0.00	0.00	105.67	0.00	5.21	3.14	Xylene
Touch-Up Paints	2.16	2.16	2.16	0.00	0.00	4.69	0.00	0.10	0.05	Ethyl Benzene
NG Emergency Generators	0.00	0.00	0.00	0.00	0.20	0.00	0.33	0.00	0.00	-
50 Heaters and 3 Curing Ovens **	0.45	1.59	1.59	0.12	29.54	1.82	17.12	0.38	0.37	Hexane
Plant 1 Welding	1.62	1.62	1.62	0.00	0.00	0.00	0.00	0.19	0.18	Mn
Plant 1 Burner Cutting	5.53	5.53	5.53	0.00	0.00	0.00	0.00	0.03	0.02	Mn
Plant 2 Welding	0.91	0.91	0.91	0.00	0.00	0.00	0.00	0.09	0.08	Mn
Plant 2 Burner Cutting	3.72	3.72	3.72	0.00	0.00	0.00	0.00	0.02	0.01	Mn
Grit Blaster EU 2-6 (dust collector not integral)	2.19	1.53	1.53	0.00	0.00	0.00	0.00	0.00	0.00	-
Paved Roads (fugitive emissions)	7.52	1.50	0.37	0.00	0.00	0.00	0.00	0.00	0.00	-
Unpaved Roads (fugitive emissions)	2.45	0.62	0.62	0.00	0.00	0.00	0.00	0.00	0.00	-
Shot Blaster EU 1-1 (Integral baghouse)	0.03	0.02	0.02	0.00	0.00	0.00	0.00	0.00	0.00	-
Shot Blaster EU 2-1 (Integral baghouse)	0.03	0.02	0.02	0.00	0.00	0.00	0.00	0.00	0.00	-
Two (2) Air Make up Units**	0.08	0.28	0.28	0.02	5.21	0.32	3.08	0.07	0.07	Hexane
<b>Total</b>	<b>130.51</b>	<b>123.33</b>	<b>122.19</b>	<b>0.46</b>	<b>35.05</b>	<b>243.46</b>	<b>20.55</b>	<b>22.84</b>	<b>16.05</b>	<b>Xylene</b>

Controlled Emissions (tons/yr)										
Emission Unit	PM	PM10	PM2.5 *	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP	
Waste (Used) Oil Combustion	0.12	0.10	0.10	0.31	0.09	0.01	0.01	0.15	0.15	Pb
Plant 1 Paint Line	1.21	1.21	1.21	0.00	0.00	66.26	0.00	8.30	6.45	Xylene
Plant 2, Paint Line 1	1.21	1.21	1.21	0.00	0.00	64.69	0.00	8.30	6.45	Xylene
Plant 2, Paint Line 2	2.76	2.76	2.76	0.00	0.00	105.67	0.00	5.21	3.14	Xylene
Touch-Up Paints	2.16	2.16	2.16	0.00	0.00	4.69	0.00	0.10	0.05	Ethyl Benzene
NG Emergency Generators	0.00	0.00	0.00	0.00	0.20	0.00	0.33	0.00	0.00	-
50 Heaters and 3 Curing Ovens **	0.45	1.59	1.59	0.12	29.54	1.82	17.12	0.38	0.37	Hexane
Plant 1 Welding	1.62	1.62	1.62	0.00	0.00	0.00	0.00	0.19	0.18	Mn
Plant 1 Burner Cutting	5.53	5.53	5.53	0.00	0.00	0.00	0.00	0.03	0.02	Mn
Plant 2 Welding	0.91	0.91	0.91	0.00	0.00	0.00	0.00	0.09	0.08	Mn
Plant 2 Burner Cutting	3.72	3.72	3.72	0.00	0.00	0.00	0.00	0.02	0.01	Mn
Grit Blaster EU 2-6 (dust collector not integral)	0.07	0.05	0.05	0.00	0.00	0.00	0.00	0.00	0.00	-
Two (2) Air Make up Units**	0.08	0.28	0.28	0.00	5.21	0.32	3.08	0.07	0.07	Hexane
Shot Blaster EU 1-1 (Integral baghouse)	0.03	0.02	0.02	0.00	0.00	0.00	0.00	0.00	0.00	-
Shot Blaster EU 2-1 (Integral baghouse)	0.03	0.02	0.02	0.00	0.00	0.00	0.00	0.00	0.00	-
<b>Total</b>	<b>19.89</b>	<b>21.18</b>	<b>21.18</b>	<b>0.43</b>	<b>35.05</b>	<b>243.46</b>	<b>20.55</b>	<b>22.84</b>	<b>16.05</b>	<b>Xylene</b>

\*\* Worst Case PTE when combusting either Natural Gas or Propane.

\* PM2.5 listed is direct PM2.5

Limited (FESOP) Potential to Emit (tons/yr) of Entire Source										
Emission Unit	PM	PM10	PM2.5 *	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP	
Waste (Used) Oil Combustion	0.12	0.10	0.10	0.31	0.09	0.01	0.01	0.15	0.15	Pb
Plant 1 Paint Line	1.21	1.21	1.21	0.00	0.00		0.00			Xylene
Plant 2, Paint Line 1	1.21	1.21	1.21	0.00	0.00		0.00			Xylene
Plant 2, Paint Line 2	2.76	2.76	2.76	0.00	0.00	83.25	0.00	23.33	9.99	Xylene
Touch-Up Paints	2.16	2.16	2.16	0.00	0.00	4.69	0.00	0.10	0.05	Ethyl Benzene
NG Emergency Generators	0.00	0.00	0.00	0.00	0.20	0.00	0.33	0.00	0.00	-
50 Heaters and 3 Curing Ovens **	0.45	1.59	1.59	0.12	29.54	1.82	17.12	0.38	0.37	Hexane
Plant 1 Welding	1.62	1.62	1.62	0.00	0.00	0.00	0.00	0.19	0.18	Mn
Plant 1 Burner Cutting	5.53	5.53	5.53	0.00	0.00	0.00	0.00	0.03	0.02	Mn
Plant 2 Welding	0.91	0.91	0.91	0.00	0.00	0.00	0.00	0.09	0.08	Mn
Plant 2 Burner Cutting	3.72	3.72	3.72	0.00	0.00	0.00	0.00	0.02	0.01	Mn
Grit Blaster EU 2-6 (dust collector not integral)	22.40	22.40	22.40	0.00	0.00	0.00	0.00	0.00	0.00	-
Two (2) Air Make up Units**	0.08	0.28	0.28	0.02	5.21	0.32	3.08	0.07	0.07	Hexane
Shot Blaster EU 1-1	22.40	22.40	22.40	0.00	0.00	0.00	0.00	0.00	0.00	-
Shot Blaster EU 2-1	22.40	22.40	22.40	0.00	0.00	0.00	0.00	0.00	0.00	-
<b>Total</b>	<b>86.97</b>	<b>88.29</b>	<b>88.29</b>	<b>0.46</b>	<b>35.05</b>	<b>90.08</b>	<b>20.55</b>	<b>24.36</b>	<b>9.99</b>	<b>Xylene</b>

\*\* Worst Case PTE when combusting either Natural Gas or Propane.

\* 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

**Appendix A: Emissions Calculations  
Waste Oil Combustion**

**Company Name:** Vehicle Service Group  
**Address City IN Zip:** 2700 Lanier Drive, Madison, IN 47250  
**Permit Number:** 077-36812-00011  
**Reviewer:** Kendra Sutherland

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	A = Weight % Ash =	0.3
		L = Weight % Lead =	0.5
		S = Weight % Sulfur =	0.5
0.185	11.659		

Emission Factor in lb/kgal	Pollutant							
	PM*	PM10*	direct PM2.5**	SO2	NOx	VOC	CO	Pb
	19.8 (66A)	17.10 (57A)	17.10 (57A)	53.5 (107S)	16.0	1.0	2.10	25.0000 (50L)
Potential Emission in tons/	0.12	0.10	0.10	0.31	0.09	0.01	0.01	0.15

\*No information was given in AP-42 regarding whether the PM/PM10 emission factors included filterable and condensable PM.

\*\* No direct PM2.5 emission factor was given. Direct PM2.5 is a subset of PM10. If one assumes all PM10 to be all direct PM2.5, then a worst case assumption of direct PM2.5 can be made, notwithstanding the filterable and condensable issue formentioned.

**Methodology**

Emission Factor Units are lb/1000 gal

A = weight% ash in fuel, L = weight% lead in fuel, S = weight % sulfur in fuel

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.139 MM Btu

Emission Factors from AP-42, Chapter 1.11 SCC 1-05-001-13 and 1-05-002-13 (Supplement B 10/96)

Emission (tons/yr) = Throughput kgals per year x Emission Factor (lb/kgal)/2,000 lb/ton

See page 6 for HAPs Calculations

HAPs - Metals						
Emission Factor in lb/kgal	Arsenic	Cadmium	Chromium	Manganese	Nickel	
	6.0E-02	1.2E-02	1.8E-01	5.0E-02	1.6E-01	
Potential Emission in tons/	3.50E-04	7.00E-05	1.05E-03	2.91E-04	9.33E-04	
						2.69E-03

HAPs - Organics						
Emission Factor in lb/kgal	Phenol	Naphthalene	Phenanthrene/ anthracene	Dibutylphthalate	Pyrene	
	2.8E-05	9.2E-05	1.0E-04	3.4E-05	8.3E-06	
Potential Emission in tons/	1.63E-07	5.36E-07	5.83E-07	1.98E-07	4.84E-08	
						1.53E-06
	<b>Total</b>					<b>2.69E-03</b>

Methodology is the same as previous page.

The five metal and five organic HAPs with the highest emission factors are presented above.

Additional emission factors for additional HAPs with smaller emission factors are available in AP-42, 5th edition (Supplement B 10/96).

Appendix A: Emissions Calculations  
Plant 1 Paint Line

Company Name: Vehicle Service Group  
Address City IN Zip: 2700 Lanier Drive, Madison, IN 47250  
Permit Number: 077-36812-00011  
Reviewer: Kendra Sutherland

Material			Density (Lb/Gal)	Weight % Volatile (H2O & Organics) *	Weight % Water & Exempt Solvents	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat per hour (gal/hr)	Pounds VOC per gallon of coating less water as mixed	Pounds VOC per gallon of coating as mixed	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Urethanes	KPA1131 & 53-X145B.2000	R-CURE 800 DTM SP-11407-1 SATURN GRAY URETHANE MIXED WITH COMPONENT B URETHANE CATALYST	8.62	40.40%	0.00%	40.40%	0.00%	52.63%	3.900	3.48	3.48	13.58	325.96	59.49	17.55	6.62	80%
	KPA1363 & 53-X145B.2000	R-CURE 800 DTM RAL 7030 STONE GRAY URETHANE MIXED WITH COMPONENT B URETHANE CATALYST	8.68	40.24%	0.00%	40.24%	0.00%	52.46%	3.900	3.49	3.49	13.62	326.93	59.66	17.72	6.66	80%
Epoxies	EEA0003 & CEC0198	R-CURE 220 BM BLACK MERCEDES MIXED WITH R-CURE 200 CLEAR EPOXY CURING AGENT	8.92	41.51%	3.38%	38.13%	0.0%	50.62%	3.900	3.40	3.40	13.26	318.35	58.10	17.82	6.72	80%
	EEW0098 & CEC0198	R-CURE 220 RAL 9002 GRAY WHITE EPOXY MIXED WITH R-CURE 200 CLEAR EPOXY CURING AGENT	10.30	30.99%	3.21%	27.78%	0.0%	62.27%	3.900	2.86	2.86	11.16	267.82	48.88	24.28	4.60	80%
	EEL0018 & CEC0198	R-CURE 220 RAL 5005 SIGNAL BLUE MIXED WITH R-CURE 220 CLEAR EPOXY CURING AGENT	9.73	28.91%	2.92%	25.99%	0.0%	66.44%	3.900	2.53	2.53	9.86	236.70	43.20	23.63	3.81	80%
Solvents	MEK		6.71	0.00%	0.00%	0.00%	0.0%	0.00%	0.194	0.00	0.00	1.30	31.22	5.70	0.00		
	ethanol		6.58	0.00%	0.00%	0.00%	0.0%	0.00%	0.031	0.00	0.00	0.20	4.90	0.89	0.00		
	acetone (non-VOC)									0.00	0.00	0.00	0.00	0.00	0.00		

State Potential Emissions

Add worst case coating to all solvents

15.13	363.05	66.26	24.28
Control Efficiency =	95.00%		
Controlled PM Emissions =	1.21		

Notes:

Plant 1 uses epoxies and urethanes.

Plant 2 only uses epoxies (no urethanes).

All urethanes are mixed with a catalyst 53-X145B (ratio 3 parts paint: 1 part catalyst)

All epoxies are mixed with curing agent CEC0198 (ratio 1:1)

Methodology

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

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

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

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

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

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

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

Total = Worst Coating + Sum of all solvents used

**Appendix A: Emissions Calculations  
Plant 1 Paint Line**

**Company Name: Vehicle Service Group  
Address City IN Zip: 2700 Lanier Drive, Madison, IN 47250  
Permit Number: 077-36812-00011  
Reviewer: Kendra Sutherland**

Material			Density as mixed (lb/gal)	Gal of Mat per hour	HAPs Content as Mixed (Weight %)							HAPs Emissions (tons/yr)						
					Xylene	Ethyl Benzene	Cumene	Methanol	Toluene	Nathphalene	Methyl Isobutyl Ketone	Xylene	Ethyl Benzene	Cumene	Methanol	Toluene	Nathphalene	Methyl Isobutyl Ketone
Urethanes	KPA1072 mixed with 53-X145B.2000	R-CURE 800 DTM RAL 7040 WINDOW DOWN GRAY URETHANE	8.94	3.90	1.18%	0.20%	0.33%	0.01%	0.00%	0.01%	0.00%	1.802	0.305	0.504	0.015	0.000	0.015	0.000
Epoxies	EAA0003 mixed with CEC0198	R-CURE 220 BM BLACK MERCEDES MIXED WITH R-CURE 200 CLEAR EPOXY CURING AGENT	8.92	3.90	3.57%	0.58%	0.33%	0.01%	0.04%	0.01%	0.00%	5.440	0.884	0.503	0.015	0.061	0.015	0.000
	EAA0160 mixed with CEC0198	R-CURE 220 RAL 9005 JET BLACK	9.26	3.90	4.08%	0.73%	0.22%	0.01%	0.05%	0.06%	0.00%	6.454	1.155	0.348	0.016	0.079	0.095	0.000
Solvents	MEK		6.71	0.19	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	ethanol		6.58	0.03	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	acetone (non-VOC)		0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Potential Emissions 6.454 1.155 0.504 0.016 0.079 0.095 0.000

Notes:

- Plant 1 uses epoxies and urethanes.
- Plant 2 only uses epoxies (no urethanes).
- All urethanes are mixed with a catalyst 53-X145B (ratio 3 parts paint: 1 part catalyst)
- All epoxies are mixed with curing agent CEC0198 (ratio 1:1)

**Total HAPs 8.30**

**METHODOLOGY**

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material per hour(gal/hour) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs



**Appendix A: Emissions Calculations**

**Plant 2 Paint Line #1**

Company Name: Vehicle Service Group  
 Address City IN Zip: 2700 Lanier Drive, Madison, IN 47250  
 Permit Number: 077-36812-00011  
 Reviewer: Kendra Sutherland

Material			Density (lb/gal)	Gal of Mat per hour	HAPs Content as Mixed (Weight %)							HAPs Emissions (tons/yr)						
					Xylene	Ethyl Benzene	Cumene	Methanol	Toluene	Nathphalene	Methyl Isobutyl Ketone	Xylene	Ethyl Benzene	Cumene	Methanol	Toluene	Nathphalene	Methyl Isobutyl Ketone
Epoxies	EEA0003 mixed with CEC0198	R-CURE 220 BM BLACK MERCEDES MIXED WITH R-CURE 200 CLEAR EPOXY CURING AGENT	8.92	3.90	3.57%	0.58%	0.33%	0.01%	0.04%	0.01%	0.00%	5.440	0.884	0.503	0.015	0.061	0.015	0.000
	EEA0160 mixed with CEC0198	R-CURE 220 RAL 9005 JET BLACK	9.26	3.90	4.08%	0.73%	0.22%	0.01%	0.05%	0.06%	0.00%	6.454	1.155	0.348	0.016	0.079	0.095	0.000
Solvents	MEK		6.71	0.19	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	ethanol		6.58	0.03	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	acetone (non-VOC)		0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Potential Emissions **6.454 1.155 0.503 0.016 0.079 0.095 0.000**

**Total HAPs 8.30**

Notes:

- Plant 1 uses epoxies and urethanes.
- Plant 2 only uses epoxies (no urethanes).
- All urethanes are mixed with a catalyst 53-X145B (ratio 3 parts paint: 1 part catalyst)
- All epoxies are mixed with curing agent CEC0198 (ratio 1:1)

**METHODOLOGY**

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material per hour(gal/hour) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

Appendix A: Emission Calculations  
Plant 2 Paint Line #2

Company Name: Vehicle Service Group  
Address City IN Zip: 2700 Lanier Drive, Madison, IN 47250  
Permit Number: 077-36812-00011  
Reviewer: Kendra Sutherland

Material		Density (Lb/Gal)	Weight % Volatile (H2O & Organics) *	Weight % Water & Exempt Solvents	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat per hour (gal/hr)	Pounds VOC per gallon of coating less water as	Pounds VOC per gallon of coating as mixed	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Zinc Primer	Zinc Primer (EEG0015, CEC0240)	17.48	16.67%	0.0%	16.67%	0.0%	58.79%	1.900	2.91	2.91	5.54	132.87	24.25	24.24	4.96	80%
Epoxies	EEA0003 & CEC0198 R-CURE 220 BM BLACK MERCEDES MIXED WITH R-CURE 200 CLEAR EPOXY CURING AGENT	8.92	41.51%	3.38%	38.13%	0.00%	50.62%	1.900	3.40	3.40	6.46	155.09	28.30	8.68	6.72	80%
	EEW0098 & CEC0198 R-CURE 220 RAL 9002 GRAY WHITE EPOXY MIXED WITH R-CURE 200 CLEAR EPOXY CURING AGENT	10.30	30.99%	3.21%	27.78%	0.00%	62.27%	1.900	2.86	2.86	5.44	130.48	23.81	11.83	4.60	80%
	EEL0018 & CEC0198 R-CURE 220 RAL 5005 SIGNAL BLUE MIXED WITH R-CURE 220 CLEAR EPOXY CURING AGENT	9.73	28.91%	2.92%	25.99%	0.00%	66.44%	1.900	2.53	2.53	4.80	115.31	21.04	11.51	3.81	80%
Polyurea	CTC0002 DURASPAR ULTRA ADHESION PROMOTER	9.88	42.16%	0.0%	42.16%	0.0%	42.87%	1.900	4.17	4.17	7.91	189.94	34.66	9.51	9.72	80%
	DURASPAR ULTRA SPECIAL COATING (CTC0001, CEA0001, WQC0001)	8.15	29.49%	12.0%	17.49%	0.0%	70.51%	1.900	1.43	1.43	2.71	65.00	11.86	9.56	2.02	80%
Solvents	MEK	6.71	0.00%	0.00%	0.00%	0.00%	0.00%	0.194	0.00	0.00	1.30	31.22	5.70			N/A
	ethanol	6.58	0.00%	0.00%	0.00%	0.00%	0.00%	0.031	0.00	0.00	0.20	4.90	0.89			N/A
	acetone (non-VOC)	0.00	0.00%	0.00%	0.00%	0.00%	0.00%						0.00			N/A

State Potential Emissions

Add worst case coating to all solvents

24.13 579.03 105.67 55.15

Control Efficiency =	95.00%
Controlled PM Emissions =	2.76

Notes:

Plant 1 uses epoxies and urethanes

Plant 2 only uses epoxies (no urethanes)

All urethanes are mixed with a catalyst 53-X145B (ratio 3 parts paint: 1 part catalyst)

All epoxies are mixed with curing agent CEC0198 (ratio 1:1)

Zinc primer and Polyurea are used only in Plant 2 Paint Booth #2

In Plant 2 Paint Booth #2, there are three guns, but only one gun may be used at a time. The first gun is used to apply the zinc primer, the second is used to apply epoxy coatings, and the third is used to apply the polyurea. Products may receive some or all three types of coatings.

METHODOLOGY

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

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

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

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

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

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

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

Total = Worst Coating + Sum of all solvents used

**Appendix A: Emission Calculations  
Plant 2 Paint Line #2**

Company Name: Vehicle Service Group  
Address City IN Zip: 2700 Lanier Drive, Madison, IN 47250  
Permit Number: 077-36812-00011  
Reviewer: Kendra Sutherland

Material		Density (lb/gal)	Gal of Mat per hour	HAPs Content as Mixed (Weight %)							HAPs Emissions (tons/yr)						
				Xylene	Ethyl Benzene	Cumene	Methanol	Toluene	Nathphalene	Methyl Isobutyl Ketone	Xylene	Ethyl Benzene	Cumene	Methanol	Toluene	Nathphalene	Methyl Isobutyl Ketone
Zinc Primer	Zinc Primer (EEG0015, CEC0240)	17.48	1.90	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.80%	0.000	0.000	0.000	0.000	0.000	0.000	1.164
Epoxies	EAA0003 mixed with CEC0198	8.92	1.90	3.57%	0.58%	0.33%	0.01%	0.04%	0.01%	0.00%	2.650	0.431	0.245	0.007	0.030	0.007	0.000
	EAA0160 mixed with CEC0198	9.26	1.90	4.08%	0.73%	0.22%	0.01%	0.05%	0.06%	0.00%	3.144	0.563	0.170	0.008	0.039	0.046	0.000
Polyurea	CTC0002 DURASPAR ULTRA ADHESION PROMOTER	10.74	1.90	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000	0.000	0.000	0.000
	DURASPAR ULTRA SPECIAL COATING (CTC0001, CEA0001, WQC0001)	8.15	1.90	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Solvents	MEK	6.71	0.19	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	ethanol	6.58	0.03	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	acetone (non-VOC)	0.00		0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Potential Emissions 3.144 0.563 0.245 0.008 0.039 0.046 1.164

Notes: **Total HAPs 5.21**

Plant 1 uses epoxies and urethanes  
 Plant 2 only uses epoxies (no urethanes)  
 All urethanes are mixed with a catalyst 53-X145B (ratio 3 parts paint: 1 part catalyst)  
 All epoxies are mixed with curing agent CEC0198 (ratio 1:1)  
**Zinc primer and Polyurea are used only in Plant 2 Paint Booth #2**  
**In Plant 2 Paint Booth #2, there are three guns, but only one gun may be used at a time. The first gun is used to apply the zinc primer, the second is used to apply epoxy coatings, and the third is used to apply the polyurea. Products may receive some or all three types of coatings.**

**METHODOLOGY**

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material per hour(gal/hour) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

Touch-up Coating Process

Company Name: Vehicle Service Group  
 Address City IN Zip: 2700 Lanier Drive, Madison, IN 47250  
 Permit Number: 077-36812-00011  
 Reviewer: Kendra Sutherland

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics) *	Weight % Water & Exempt Solvents	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat per hour (gal/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
AAA1422 DURASPAR 440 F/D RAL7040 GRAY REPAIR	9.66	43.74%	0.00%	43.74%	0.00%	42.05%	0.01	4.23	4.23	0.05	1.16	0.21	0.14	10.05	50%
AAA1436 DURASPAR 440 F/D RAL 9005 BLACK REPAIR	8.23	55.72%	0.00%	55.72%	0.00%	37.06%	0.01	4.59	4.59	0.05	1.26	0.23	0.09	12.37	50%
AAA1453 RAL 7012 BASALT GRAY DURASPAR 440 F/D	6.87	78.96%	28.35%	50.61%	0.00%	12.49%	0.01	3.48	3.48	0.04	0.95	0.17	0.04	27.84	50%
AAA1488 DURASPAR 440 F/D RAL 7015 DAIMLER SILVER REPAIR	8.83	50.67%	0.00%	50.67%	0.00%	38.59%	0.01	4.47	4.47	0.05	1.23	0.22	0.11	11.59	50%
AAA1572 DURASPAR 440 F/D RAL 7021 BLACK GRAY REPAIR	8.52	53.84%	0.00%	53.84%	0.00%	37.01%	0.01	4.59	4.59	0.05	1.26	0.23	0.10	12.39	50%
AAA1579 DURASPAR 440 F/D SP-12207-2 PARK PLACE GRAY	8.84	51.63%	0.00%	51.63%	0.00%	37.36%	0.01	4.56	4.56	0.05	1.25	0.23	0.11	12.22	50%
AAA1580 DURASPAR 440 F/D BM BLACK MERCEDES	8.54	52.55%	0.00%	52.55%	0.00%	38.49%	0.01	4.49	4.49	0.05	1.23	0.22	0.10	11.66	50%
AAA1588 RAL 7021 BLACK GRAY DURASPAR 440 F/D	6.88	78.50%	28.35%	50.15%	0.00%	12.77%	0.01	3.45	3.45	0.04	0.95	0.17	0.04	27.02	50%
AAB0062 RAL 8017 CHOCOLATE BROWN DURA 440 F/D	6.79	80.04%	28.35%	51.69%	0.00%	12.46%	0.01	3.51	3.51	0.04	0.96	0.18	0.03	28.17	50%
AAE0004 DURASPAR 440 R/D RAL 2004 ORANGE	8.72	49.37%	0.00%	49.37%	0.00%	41.23%	0.01	4.31	4.31	0.05	1.18	0.22	0.11	10.44	50%
AAE0232 DURASPAR 440 RAL2013 ORANGE N/M REPAIR	8.94	52.17%	0.00%	52.17%	0.00%	36.02%	0.01	4.66	4.66	0.05	1.28	0.23	0.11	12.95	50%
AAG1037 SP 12561 JAGUAR LANDROVER BILLIARD GREEN	6.84	78.25%	28.35%	49.90%	0.00%	13.50%	0.01	3.41	3.41	0.04	0.94	0.17	0.04	25.28	50%
AAG1063 DURASPAR 440 F/D SP-11406 HUNTER GREEN	8.64	52.21%	0.00%	52.21%	0.00%	38.05%	0.01	4.51	4.51	0.05	1.24	0.23	0.10	11.86	50%
AAG1068 DURASPAR 440 F/D SP-13002 S/G DIRECT LIFT GREEN CC	8.8	51.17%	0.00%	51.17%	0.00%	38.16%	0.01	4.50	4.50	0.05	1.23	0.23	0.11	11.80	50%
AAL0874 DURASPAR 440 F/D RAL 4GU1 9005 SIGNAL BLUE	8.78	48.50%	0.00%	48.50%	0.00%	41.54%	0.01	4.26	4.26	0.05	1.17	0.21	0.11	10.25	50%
AAL0921 DURASPAR 440 F/D RAL 9026 NIGHT BLUE N/P	8.59	51.78%	0.00%	51.78%	0.00%	38.98%	0.01	4.45	4.45	0.05	1.22	0.22	0.10	11.41	50%
AAR0764 DURASPAR 440 F/D RAL 3002 CARMINE RED	8.71	51.98%	0.00%	51.98%	0.00%	38.13%	0.01	4.53	4.53	0.05	1.24	0.23	0.10	11.87	50%
AAR0793 DURASPAR 440 RAL 3005 WINE RED	8.59	52.36%	0.00%	52.36%	0.00%	38.33%	0.01	4.50	4.50	0.05	1.23	0.22	0.10	11.73	50%
AAR0798 DURASPAR 440 F/D VSGA RED CC M/G	8.56	52.66%	0.00%	52.66%	0.00%	38.23%	0.01	4.51	4.51	0.05	1.23	0.23	0.10	11.79	50%
AAW1343 DURASPAR 440 F/D RAL 9002 GRAY WHITE REPAIR	9.88	42.16%	0.00%	42.16%	0.00%	42.87%	0.01	4.17	4.17	0.05	1.14	0.21	0.14	9.72	50%
AAW5054 DURASPAR 440 F/D RAL 1003 SIGNAL YELLOW	8.76	47.52%	0.00%	47.52%	0.00%	43.03%	0.01	4.16	4.16	0.05	1.14	0.21	0.11	9.67	50%
AAW5070 DURASPAR 440 F/D RAL 1003 SIGNAL YELLOW	10.74	40.78%	0.00%	40.78%	0.00%	40.23%	0.01	4.38	4.38	0.05	1.20	0.22	0.16	10.89	50%

Potential Emissions 1.07 25.67 4.69 2.16

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)  
 Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)  
 Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
 Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
 Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)  
 Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1-Weight % Volatiles) \* (1-Transfer efficiency) \* (8760 hrs/yr) \* (1 ton/2000 lbs)  
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)

**Appendix A: Emission Calculations**  
**HAP Emission Calculations**  
**From Surface Coating Operations**  
**Touch-up Paints**  
**Vehicle Service Group**  
**2700 Lanier Drive, Madison, IN 47250**  
**Permit Number 077-34980**  
**Plant ID Number 077-00011**

**Appendix A: Emission Calculations**  
**Touch-up Coating Process**

**Company Name: Vehicle Service Group**  
**Address City IN Zip: 2700 Lanier Drive, Madison, IN 47250**  
**Permit Number: 077-36812-00011**  
**Reviewer: Kendra Sutherland**

Material	Density (lb/gal)	Gal of Mat per hour	HAPs Content as Mixed (Weight %)								HAPs Emissions (tons/yr)						
			Xylene	Ethyl Benzene	Cumene	Methanol	Toluene	Nathphalene	Methyl Isobutyl Ketone	Xylene	Ethyl Benzene	Cumene	Methanol	Toluene	Nathphalene	Methyl Isobutyl Ketone	
AAA1422	DURASPAR 440 F/D RAL7040 GRAY REPAIR	9.66	0.01	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
AAA1436	DURASPAR 440 F/D RAL 9005 BLACK REPAIR	8.23	0.01	0.00%	1.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.0000	0.0041	0.0000	0.0000	0.0000	0.0000
AAA1453	RAL 7012 BASALT GRAY DURASPAR 440 F/D	6.87	0.01	5.00%	1.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.0172	0.0034	0.0000	0.0000	0.0000	0.0000
AAA1488	DURASPAR 440 F/D RAL 7015 DAIMLER SILVER REPAIR	8.83	0.01	0.79%	0.14%	0.00%	0.00%	0.29%	0.00%	0.00%	0.00%	0.0035	0.0006	0.0000	0.0000	0.0013	0.0000
AAA1572	DURASPAR 440 F/D RAL 7021 BLACK GRAY REPAIR	8.52	0.01	0.00%	1.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.0000	0.0043	0.0000	0.0000	0.0000	0.0000
AAA1579	DURASPAR 440 F/D SP-12207-2 PARK PLACE GRAY	8.84	0.01	0.00%	1.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.0000	0.0044	0.0000	0.0000	0.0000	0.0000
AAA1580	DURASPAR 440 F/D BM BLACK MERCEDES	8.54	0.01	0.00%	1.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.0000	0.0043	0.0000	0.0000	0.0000	0.0000
AAA1588	RAL 7021 BLACK GRAY DURASPAR 440 F/D	6.88	0.01	5.00%	1.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.0172	0.0034	0.0000	0.0000	0.0000	0.0000
AAB0062	RAL 8017 CHOCOLATE BROWN DURA 440 F/D	6.79	0.01	0.70%	0.12%	0.00%	0.00%	0.26%	0.00%	0.00%	0.00%	0.0024	0.0004	0.0000	0.0000	0.0009	0.0000
AAE0004	DURASPAR 440 R/D RAL 2004 ORANGE	8.72	0.01	0.85%	0.15%	0.00%	0.00%	0.31%	0.00%	0.00%	0.00%	0.0037	0.0007	0.0000	0.0000	0.0014	0.0000
AAE0232	DURASPAR 440 RAL2013 ORANGE N/M REPAIR	8.94	0.01	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
AAG1037	SP 12561 JAGUAR LANDROVER BILLIARD GREEN	6.84	0.01	0.00%	1.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.0000	0.0034	0.0000	0.0000	0.0000	0.0000
AAG1063	DURASPAR 440 F/D SP-11406 HUNTER GREEN	8.64	0.01	0.71%	0.12%	0.00%	0.00%	0.26%	0.00%	0.00%	0.00%	0.0031	0.0005	0.0000	0.0000	0.0011	0.0000
AAG1068	DURASPAR 440 F/D SP-13002 S/G DIRECT LIFT GREEN CC	8.8	0.01	0.00%	1.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.0000	0.0044	0.0000	0.0000	0.0000	0.0000
AAL0874, 4GU1	DURASPAR 440 F/D RAL 5005 SIGNAL BLUE	8.78	0.01	0.00%	1.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.0000	0.0044	0.0000	0.0000	0.0000	0.0000
AAL0921	DURASPAR 440 F/D RAL 5026 NIGHT BLUE N/P	8.59	0.01	0.00%	1.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.0000	0.0043	0.0000	0.0000	0.0000	0.0000
AAR0764	DURASPAR 440 F/D RAL 3002 CARMINE RED	8.71	0.01	0.00%	1.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.0000	0.0044	0.0000	0.0000	0.0000	0.0000
AA5070	DURASPAR 440 F/D RAL 1003 SIGNAL YELLOW	10.74	0.01	0.00%	1.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.0000	0.0054	0.0000	0.0000	0.0000	0.0000

Potential Emissions 0.047 0.052 0.000 0.000 0.005 0.000 0.000

**Total HAPs 0.10**

**Appendix A: Emission Calculations**  
**Vehicle Service Group**  
**NG Reciprocating Internal Combustion Engines - One (1) NG 60 kW EG, and One (1) NG 45 kW EG**  
**4-Stroke Rich-Burn (4SRB) Engines**

**Company Name: Vehicle Service Group**  
**Source Address: 2700 Lanier Drive, Madison, IN 47250**  
**Permit Number: 077-36812-00011**  
**Reviewer: Kendra Sutherland**

Maximum Heat Input Capacity (MMBtu/hr)	0.36	***
Maximum Hours Operated per Year (hr/yr)	500	
Potential Fuel Usage (MMBtu/yr)	180	
High Heat Value (MMBtu/MMscf)	1020	
Potential Fuel Usage (MMcf/yr)	0.18	

Criteria Pollutants	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
Emission Factor (lb/MMBtu)	9.50E-03	1.94E-02	1.94E-02	5.88E-04	2.21E+00	2.96E-02	3.72E+00
Potential Emissions (tons/yr)	0.00	0.00	0.00	0.000	0.20	0.00	0.33

\*PM emission factor is for filterable PM-10. PM10 emission factor is filterable PM10 + condensable PM.

PM2.5 emission factor is filterable PM2.5 + condensable PM.

\*\*\* 105 kW = 0.36 MMBtu/hr

**Hazardous Air Pollutants (HAPs)**

Pollutant	Emission Factor (lb/MMBtu)	Potential Emissions (tons/yr)
Acetaldehyde	2.79E-03	0.000
Acrolein	2.63E-03	0.000
Benzene	1.58E-03	0.000
1,3-Butadiene	6.63E-04	0.000
Formaldehyde	2.05E-02	0.002
Methanol	3.06E-03	0.000
Total PAH**	1.41E-04	0.000
Toluene	5.58E-04	0.000
Xylene	1.95E-04	0.000

**Total      0.003**

HAP pollutants consist of the nine highest HAPs included in AP-42 Table 3.2-3.

\*\*PAH = Polycyclic Aromatic Hydrocarbon (PAHs are considered HAPs, since they are considered Polycyclic Organic Matter)

**Methodology**

Emission Factors are from AP-42 (Supplement F, July 2000), Table 3.2-3

Potential Fuel Usage (MMBtu/yr) = [Maximum Heat Input Capacity (MMBtu/hr)] \* [Maximum Hours Operating per Year (hr/yr)]

Potential Emissions (tons/yr) = [Potential Fuel Usage (MMBtu/yr)] \* [Emission Factor (lb/MMBtu)] / [2000 lb/ton]

**Appendix A: Emissions Calculations**  
**NG Combustion Units Including Fifty (50) Heaters and Two (3) Curing/Drying Ovens**  
**Natural Gas Combustion Only**  
**MM BTU/HR <100**

**Company Name:** Vehicle Service Group  
**Address City IN Zip:** 2700 Lanier Drive, Madison, IN 47250  
**Permit Number:** 077-36812-00011  
**Reviewer:** Kendra Sutherland

Heaters MMBtu/hr	amount	total MMBtu/hr	Curing Oven MMBtu/hr
0.06	1	0.06	4
0.074	2	0.148	3.2
0.075	1	0.075	1.6
0.1	2	0.2	8.8
0.08	15	1.2	<b>total</b>
0.115	1	0.115	
0.12	1	0.12	
0.125	3	0.375	
0.145	2	0.29	
0.18	4	0.72	
0.205	2	0.41	
0.25	1	0.25	
0.26	1	0.26	
0.95	3	2.85	
1.25	1	1.25	
1.5	1	1.5	
2.5	2	5	
3.4	4	13.6	
0.25	1	0.25	
5	2	10	
	50	38.673	<b>total</b>

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
47.473	1020	407.7

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	0.39	1.55	1.55	0.12	20.39	1.12	17.12

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.  
 PM2.5 emission factor is filterable and condensable PM2.5 combined.  
 \*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.  
 MMBtu = 1,000,000 Btu  
 MMCF = 1,000,000 Cubic Feet of Gas  
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03  
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu  
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See Page 20 for HAPs Calculations

**HAPS Calculations**

Emission Factor in lb/MMcf	HAPs - Organics					Total - Organics
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	4.281E-04	2.446E-04	1.529E-02	3.669E-01	6.931E-04	<b>3.836E-01</b>

Emission Factor in lb/MMcf	HAPs - Metals					Total - Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	1.019E-04	2.242E-04	2.854E-04	7.746E-05	4.281E-04	<b>1.117E-03</b>
					<b>Total HAPs</b>	<b>3.847E-01</b>
					<b>Worst HAP</b>	<b>3.669E-01</b>

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above.  
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations**  
**Combustion Units Using Propane as a Back-Up Fuel Including Fifty (50) Heaters and Two (3) Curing/Drying Ovens**

**Company Name:** Vehicle Service Group  
**Source Address:** 2700 Lanier Drive, Madison, IN 47250  
**Permit Number:** 077-36812-00011  
**Reviewer:** Kendra Sutherland

Heaters MMBtu/hr	Number of Units	total MMBtu/hr	Curing Oven MMBtu/hr
0.06	1	0.06	4
0.074	2	0.148	3.2
0.075	1	0.075	1.6
0.08	15	1.2	8.8
0.1	2	0.2	<b>total</b>
0.115	1	0.115	
0.12	1	0.12	
0.125	3	0.375	
0.145	2	0.29	
0.18	4	0.72	
0.205	2	0.41	
0.25	1	0.25	
0.26	1	0.26	
0.95	3	2.85	
1.25	1	1.25	
1.5	1	1.5	
2.5	2	5	
3.4	4	13.6	
0.25	1	0.25	
5	2	10	
	<b>50</b>	<b>38.673</b>	

Propane is used as a back-up fuel in heaters. \*\*

Heat Input Capacity MMBtu/hr	Potential Throughput Kgals/yr
47.473	#####

Emission Factor in lb/kgal	Pollutant						
	PM*	PM10	PM2.5	SO2	NOx	VOC *	CO
	0.2	0.7	0.7	0.00	13.0	0.8	7.5
Potential Emission in tons/yr	0.45	1.59	1.59	0.00	29.54	1.82	17.0

\* TOC Emission Factor is 1.0, Methane Emission Factor is 0.2; therefore VOC Emission Factor is 1.0 - 0.2 = 0.8.

\*\* No HAP Emission Factors for Propane available in AP-42.

**Methodology**

1 gallon of propane has a heating value of 91,500 Btu. Source: AP-42 (Supplement B 10/96) page 1.5-1

Potential throughput (kgals/yr) = Heat Input Capacity (MMBtu/hr) x (8760 hrs/yr) x (1 kgal/1,000 gal) x (1 gal/91500 Btu) x (1000000 Btu/1 MMBtu)

Emissions Factors from AP-42 (7/08), Table 1.5-1 (SCC #1-02-010-02)

**Appendix A: Emission Calculations  
Plant 1 Welding and Thermal Cutting**

<b>Company Name:</b>	Vehicle Service Group
<b>Source Address:</b>	2700 Lanier Drive, Madison, IN 47250
<b>Permit Number:</b>	077-36812-00011
<b>Reviewer:</b>	Kendra Sutherland

PROCESS	Number of Stations	Max. electrode consumption per station	EMISSION FACTORS * (lb pollutant / lb electrode)				EMISSIONS (lb/hr)					
			PM, PM10, PM2.5	Mn	Ni	Cr	PM, PM10, PM2.5	Mn	Ni	Cr	Total HAPs	
WELDING		(lbs/hr)										
Submerged Arc	1	0.97	0.036	0.011			0.035	0.01067				0.0107
Metal Inert Gas (MIG)(ER5154)	61	0.98	0.0055	0.0005	0.00001	0.00001	0.329	0.02989	0.001	0.0005978		0.0311
Tungsten Inert Gas (TIG)(carbon steel)	1	0.97	0.0055	0.0005			0.005	0.000485				0.0005
<b>Total for Welding (lb/hr)</b>							0.369	0.0410	0.0006	0.0006		0.0422
<b>Total for Welding (tons/yr)</b>							<b>1.616</b>	<b>0.1798</b>	<b>0.0026</b>	<b>0.0026</b>		<b>0.1850</b>
BURNER CUTTING	Number of Stations	Max. Metal Thickness Cut	Max. Metal Cutting Rate	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick) <sup>#</sup>				EMISSIONS (lbs/hr)				
				PM, PM10, PM2.5	Mn	Ni	Cr	PM, PM10, PM2.5	Mn	Ni	Cr	Total HAPs
CL840 #3031	1	0.75	34	0.1622	0.0005	0.0001	0.0003	0.248	0.00077	0.00015	0.00046	0.00138
CL7 #3029	1	0.5	48	0.1622	0.0005	0.0001	0.0003	0.234	0.00072	0.00014	0.00043	0.00130
Plasma Burner	1	2.25	25	0.1622	0.0005	0.0001	0.0003	0.547	0.00169	0.00034	0.00101	0.00304
CL7 #3030	1	0.5	48	0.1622	0.0005	0.0001	0.0003	0.234	0.00072	0.00014	0.00043	0.00130
<b>Total for Cutting (lbs/hr)</b>								1.26273	0.00389	0.00078	0.00234	0.00701
<b>Total for Cutting (tons/yr)</b>								<b>5.531</b>	<b>0.0170</b>	<b>0.0034</b>	<b>0.0102</b>	<b>0.0307</b>

**METHODOLGY**

\*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column. Consult AP-42 or other reference for different electrode types.

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.

Plasma cutting emission factors are from the American Welding Society study published in Sweden (March 1994).

Welding and other flame cutting emission factors are from an internal training session document.

See AP-42, Chapter 12.19 for additional emission factors for welding.

<sup>#</sup> Data supplied by the source. Emission factors based upon the maximum possible metal removal rate (from Manufacturer's Specifications for each unit)

and the Air Pollution Engineering Manual emission factor for scarfing ( a very similar operation). Emission factor is 0.0015lb of particulate per pound of metal removed.

This is found on page 640 of the Air Pollution Engineering Manual, Copyright 1992, Van Nostrand Reinhold, New York, NY.

Maximum Emission Capacity = totals of max for each machine 2.047 ton

Alt calculation AP-42 Scarfing 0.1 lb/ton of material produced 1.007 ton

**Appendix A: Emission Calculations  
Plant 2 Welding and Thermal Cutting**

**Company Name:** Vehicle Service Group  
**Source Address:** 2700 Lanier Drive, Madison, IN 47250  
**Permit Number:** 077-36812-00011  
**Reviewer:** Kendra Sutherland

PROCESS	Number of Stations	Max. electrode consumption per station		EMISSION FACTORS * (lb pollutant / lb electrode)				EMISSIONS (lb/hr)				
				PM, PM10, PM2.5	Mn	Ni	Cr	PM, PM10, PM2.5	Mn	Ni	Cr	Total HAPs
WELDING		(lbs/hr)		PM, PM10, PM2.5	Mn	Ni	Cr	PM, PM10, PM2.5	Mn	Ni	Cr	Total HAPs
Metal Inert Gas (MIG)(ER5154)	45	0.84		0.0055	0.0005	0.00001	0.00001	0.208	0.0189	0.0004	0.000378	0.0197
Total for Welding (lb/hr)								0.208	0.019	0.0004	0.000	0.0197
Total for Welding (tons/yr)								<b>0.9106</b>	<b>0.0828</b>	<b>0.0017</b>	<b>0.0017</b>	<b>0.0861</b>
	Number of Stations	Max. Metal Thickness Cut	Max. Metal Cutting Rate	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick) <sup>#</sup>				EMISSIONS (lbs/hr)				
BURNER CUTTING		(in.)	(in./minute)	PM, PM10, PM2.5	Mn	Ni	Cr	PM, PM10, PM2.5	Mn	Ni	Cr	TOTAL HAPS
Plasma Burner	1	2.25	25.00	0.16	0.00050	0.00010	0.00030	0.54743	0.00169	0.00034	0.00101	0.00304
Buggo #3061	1	0.5	62	0.1622	0.0005	0.0001	0.0003	0.302	0.00093	0.00019	0.00056	0.00167
Total for Cutting (lbs/hr)								0.84912	0.00262	0.00052	0.00157	0.00471
Total for Cutting (tons/yr)								<b>3.719</b>	<b>0.0115</b>	<b>0.0023</b>	<b>0.0069</b>	<b>0.0206</b>

**METHODOLGY**

\*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column. Consult AP-42 or other reference for different electrode types.

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.

Plasma cutting emission factors are from the American Welding Society study published in Sweden (March 1994).

Welding and other flame cutting emission factors are from an internal training session document.

See AP-42, Chapter 12.19 for additional emission factors for welding.

<sup>#</sup> Data supplied by the source. Emission factors based upon the maximum possible metal removal rate (from Manufacturer's Specifications for each unit)

and the Air Pollution Engineering Manual emission factor for scarfing ( a very similar operation). Emission factor is 0.0015lb of particulate per pound of metal removed.



**Appendix A: Emission Calculations**  
**Abrasive Blasting - Confined - Shot Blaster EU 2-1 w/ Integral Baghouse**

**Company Name:** Vehicle Service Group  
**Source Address:** 2700 Lanier Drive, Madison, IN 47250  
**Permit Number:** 077-36812-00011  
**Reviewer:** Kendra Sutherland

**Table 1 - Emission Factors for Abrasives**

Abrasive	Emission Factor (EF)	
	lb PM / lb abrasive	lb PM10 /lb PM2.5/ lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	

Potential to Emit Before Control		
FR = Flow rate of actual abrasive (lb/hr) =	50.0	lb/hr (per nozzle)
w = fraction of time of wet blasting =	0	%
N = number of nozzles =	1	
EF = PM emission factor for actual abrasive from Table 1 =	0.004	lb PM/ lb abrasive
PM10/PM2.5 emission factor ratio for actual abrasive from Table 1 =	0.86	lb PM10 / lb PM
	<b>PM</b>	<b>PM10/PM2.5</b>
Potential to Emit (before control) =	0.20	0.17 lb/hr
=	4.80	4.13 lb/day
=	0.88	0.75 ton/yr

Potential to Emit After Control		
Emission Control Device Efficiency =	0.97	0.97
Potential to Emit (after control) =	0.01	0.01 lb/hr
=	0.14	0.12 lb/day
=	0.03	0.02 ton/yr

**METHODOLOGY**

Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)  
 Potential to Emit (before control) = EF x FR x (1 - w/200) x N (where w should be entered in as a whole number (if w is 50%, enter 50))  
 Potential to Emit (after control) = [Potential to Emit (before control)] \* [1 - control efficiency]  
 Potential to Emit (tons/year) = [Potential to Emit (lbs/hour)] x [8760 hours/year] x [ton/2000 lbs]  
 Assume PM10 = PM2.5.

**Appendix A: Emission Calculations**  
**Abrasive Blasting - Confined - Grit Blaster EU 2-6 w/ Dust Collector**

Company Name: Vehicle Service Group  
 Source Address: 2700 Lanier Drive, Madison, IN 47250  
 Permit Number: 077-36812-00011  
 Reviewer: Kendra Sutherland

**Table 1 - Emission Factors for Abrasives**

Abrasive	Emission Factor (EF)	
	lb PM / lb abrasive	lb PM10 /lb PM2.5/ lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	

Potential to Emit Before Control			
FR = Flow rate of actual abrasive (lb/hr) =	50	lb/hr (per nozzle)	
w = fraction of time of wet blasting =	0	%	
N = number of nozzles =	1		
EF = PM emission factor for actual abrasive from Table 1 =	0.010	lb PM/ lb abrasive	
PM10/PM2.5 emission factor ratio for actual abrasive from Table 1 =	0.70	lb PM10 / lb PM	
	<b>PM</b>	<b>PM10/PM2.5</b>	
Potential to Emit (before control) =	0.50	0.35	lb/hr
=	12.00	8.40	lb/day
=	2.19	1.53	ton/yr

Potential to Emit After Control			
	<b>PM</b>	<b>PM10/PM2.5</b>	
Emission Control Device Efficiency =	0.97	0.97	
Potential to Emit (after control) =	0.02	0.01	lb/hr
=	0.36	0.25	lb/day
=	0.07	0.05	ton/yr

**METHODOLOGY**

Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)  
 Potential to Emit (before control) = EF x FR x (1 - w/200) x N (where w should be entered in as a whole number (if w is 50%, enter 50))  
 Potential to Emit (after control) = [Potential to Emit (before control)] \* [1 - control efficiency]  
 Potential to Emit (tons/year) = [Potential to Emit (lbs/hour)] x [8760 hours/year] x [ton/2000 lbs]  
 Assume PM10 = PM2.5.

**Appendix A: Emission Calculations  
Paved Roads - PTE**

**Company Name:** Vehicle Service Group  
**Source Address:** 2700 Lanier Drive, Madison, IN 47250  
**Permit Number:** 077-36812-00011  
**Reviewer:** Kendra Sutherland

PTE calculations provided by source and approved by IDEM.

**Paved Roads at Industrial Site**

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

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	20.0	20.0	400.0	40.0	16000.0	1000	0.189	75.8	27651.5
Vehicle (leaving plant) (one-way trip)	20.0	20.0	400.0	40.0	16000.0	1000	0.189	75.8	27651.5
<b>Total</b>			<b>800.0</b>		<b>32,000.00</b>			<b>151.5</b>	<b>55,303.03</b>

Average Vehicle Weight Per Trip =  $\frac{40.0}{1}$  tons/trip  
 Average Miles Per Trip =  $\frac{0.19}{1}$  miles/trip

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

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	40.0	40.0	40.0	tons = average vehicle weight (provided by source)
sL =	0.6	0.6	0.6	g/m <sup>2</sup> = silt loading value: Ubiquitous Baseline Value - Table 13.2.1-2)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor,  $E_{ext} = E_f * [1 - (p/4N)]$  (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor,  $E_{ext} = E_f * [1 - (p/4N)]$   
 where p =  $\frac{125}{365}$  days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)  
 N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f =$	0.298	0.060	0.0146	lb/mile
Mitigated Emission Factor, $E_{ext} =$	0.272	0.054	0.0134	lb/mile
Dust Control Efficiency =	0%	0%	0%	

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	4.11	0.82	0.20	3.76	0.75	0.18	3.76	0.75	0.18
Vehicle (leaving plant) (one-way trip)	4.11	0.82	0.20	3.76	0.75	0.18	3.76	0.75	0.18
	<b>8.23</b>	<b>1.65</b>	<b>0.40</b>	<b>7.52</b>	<b>1.50</b>	<b>0.37</b>	<b>7.52</b>	<b>1.50</b>	<b>0.37</b>

**Methodology**

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] \* [Maximum trips per day (trip/day)]  
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]  
 Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] \* [Maximum one-way distance (mi/trip)]  
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]  
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]  
 Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Unmitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)  
 Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Mitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)  
 Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] \* [1 - Dust Control Efficiency]

**Appendix A: Emission Calculations  
UnPaved Roads - PTE**

**Company Name:** Vehicle Service Group  
**Source Address:** 2700 Lanier Drive, Madison, IN 47250  
**Permit Number:** 077-36812-00011  
**Reviewer:** Kendra Sutherland

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	1.0	1.0	1.0	40.0	40.0	500	0.095	0.1	34.6
Vehicle (leaving plant) (one-way trip)	1.0	1.0	1.0	40.0	40.0	500	0.095	0.1	34.6
Vehicle (must go through automatic tarping system)	25.0	1.0	25.0	40.0	1000.0	500	0.095	2.4	864.1
<b>Total</b>			<b>27.0</b>		<b>1080.0</b>			<b>2.6</b>	<b>933.2</b>

Average Vehicle Weight Per Trip = 

40.0	tons/trip
------	-----------

  
Average Miles Per Trip = 

0.09	miles/trip
------	------------

Unmitigated Emission Factor,  $E_f = k \cdot [(s/12)^a] \cdot [(W/3)^b]$  (Equation 1a from AP-42 13.2.2)

	PM	PM10	PM2.5	
where k =	4.9	1.5	1.5	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	4.8	4.8	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Sand/Gravel Processing Plant)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)
W =	40.0	40.0	40.0	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor,  $E_{ext} = E \cdot [(365 - P)/365]$  (Equation 2 from AP-42 13.2.2)

Mitigated Emission Factor,  $E_{ext} = E \cdot [(365 - P)/365]$   
where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f$ =	8.28	2.11	2.11	lb/mile
Mitigated Emission Factor, $E_{ext}$ =	5.44	1.39	1.39	lb/mile
Dust Control Efficiency =	0%	0%	0%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.14	0.04	0.04	0.09	0.02	0.02	0.09	0.02	0.02
Vehicle (leaving plant) (one-way trip)	3.58	0.91	0.91	2.35	0.60	0.60	2.35	0.60	0.60
Vehicle (must go through automatic tarping system)	<b>3.72</b>	<b>0.95</b>	<b>0.95</b>	<b>2.45</b>	<b>0.62</b>	<b>0.62</b>	<b>2.45</b>	<b>0.62</b>	<b>0.62</b>

**Methodology**

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] \* [Maximum trips per day (trip/day)]  
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]  
 Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] \* [Maximum one-way distance (mi/trip)]  
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]  
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]  
 Unmitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) \* (Unmitigated Emission Factor (lb/mile)) \* (ton/2000 lbs)  
 Mitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) \* (Mitigated Emission Factor (lb/mile)) \* (ton/2000 lbs)  
 Controlled PTE (tons/yr) = (Mitigated PTE (tons/yr)) \* (1 - Dust Control Efficiency)

Two (2) Natural Gas Fired New Air Makeup Units  
 Company Name: Vehicle Service Group  
 Address City IN Zip: 2700 Lanier Drive, Madison, IN 47250  
 Permit Number: 077-36812-00011  
 Reviewer: Kendra Sutherland

Emission Unit	Heat Input Capacity(MMBtu)
Plant 1 AMU	4.19
Plant 2 AMU	4.19
Total	8.38

Heat Input Capacity  
 MMBtu/hr  
 8.38  
 New Air Makeup Unit

Potential Throughput  
 MMCF/yr  
 73.4

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.07	0.28	0.02	3.67	0.20	3.1

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.  
 \*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.  
 MMBtu = 1,000,000 Btu  
 MMCF = 1,000,000 Cubic Feet of Gas  
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu  
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)  
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	0.0021000	0.0012000	0.0750000	1.8000000	0.0034000
Potential Emission in tons/yr	0.0000771	0.0000440	0.0027528	0.0660679	0.0001248

  

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	0.0005000	0.0011000	0.0014000	0.0003800	0.0021000
Potential Emission in tons/yr	0.0000184	0.0000404	0.0000514	0.0000139	0.0000771

The five highest organic and metal HAPs emission factors are provided above.  
 Additional HAPs emission factors are available in AP-42, Chapter 1.4. total HAPs 0.0692678

**Propane Combustion - Two (2) Air Makeup Units**  
**Company Name: Vehicle Service Group**  
**Address City IN Zip: 2700 Lanier Drive, Madison, IN 47250**  
**Permit Number: 077-36812-00011**  
**Reviewer: Kendra Sutherland**

Emission Unit	Heat Input Capacity(MMBtu)
Plant 1 AMU	4.19
Plant 2 AMU	4.19
Total	8.38

Note: Propane is used as a back-up fuel in heaters.

Heat Input Capacity  
MMBtu/hr

8.38

from new Air Makeup Unit

Potential Throughput  
Kgals/yr

802.28

Emission Factor in lb/kgal	Pollutant					
	PM*	PM10/PM2.5	SO2	NOx	VOC	CO
	0.2	0.7	0.0	13.0	0.8	7.5
				**see below		
Potential Emission in tons/yr	0.08	0.28	0.00	5.21	0.32	3.0

TOC Emission Factor is 1.0, Methane Emission Factor is 0.2; therefore VOC Emission Factor is 1.0 - 0.2 = 0.8.

**Methodology**

1 gallon of propane has a heating value of 91,500 Btu. Source: AP-42 (Supplement B 10/96) page 1.5-1

Potential throughput (kgals/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 kgal per 1,000 gallons x 1 gal per 0.0915 MMBtu.

Emissions Factors from AP-42 (7/08), Table 1.5-1 (SCC #1-02-010-02)



# 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](http://www.idem.IN.gov)

**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

April 15, 2016

Mr. Jim Torline  
Vehicle Service Group  
2700 Lanier Drive  
Madison, IN 47250

Re: Public Notice  
Vehicle Service Group  
Permit Level: Federally Enforceable State  
Operating Permit (FESOP) Significant Permit  
Revision  
Permit Number: 077-36812-00011

Dear Mr. Torline:

Enclosed is a copy of your draft Federally Enforceable State Operating Permit (FESOP) Significant Permit Revision, 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 Madison Courier in Madison, Indiana publish the abbreviated version of the public notice no later than April 19, 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 Madison-Jefferson County Local Library, 420 West Main Street in Madison, 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 Kendra Sutherland, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-5401 or dial (317) 234-5401.

Sincerely,

*Vivian Haun*

Vivian Haun  
Permits Branch  
Office of Air Quality

Enclosures  
PN Applicant Cover letter 2/17/2016



# 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](http://www.idem.IN.gov)

**Michael R. Pence**  
*Governor*

**Carol S. Comer**  
*Commissioner*

## **ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING**

April 14, 2016

Madison Courier  
310 Courier Square  
Madison, IN 47250

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Vehicle Service Group, Jefferson 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 April 19, 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: Federally Enforceable State Operating Permit (FESOP)  
Significant Permit Revision  
Permit Number: 077-36812-00011

Enclosure

PN Newspaper.dot 2/17/2016



# 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](http://www.idem.IN.gov)

**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

April 15, 2016

To: Madison-Jefferson County Local 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: Vehicle Service Group**  
**Permit Number: 077-36812-00011**

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

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

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

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

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

Enclosures  
PN Library.dot 2/17/2016



# 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](http://www.idem.IN.gov)

**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

## Notice of Public Comment

**April 15, 2016**  
**Vehicle Service Group**  
**077-36812-00011**

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](mailto:PPEAR@IDEM.IN.GOV). If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure  
PN AAA Cover.dot 2/17/2016

# Mail Code 61-53

IDEM Staff	VHAUN 4/15/2016 Vehicle Service Group 077-36812-00011 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:  <b>CERTIFICATE OF MAILING ONLY</b>	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	
											Remarks	
1		Jim Torline Vehicle Service Group 2700 Lanier Dr Madison IN 47250 (Source CAATS)										
2		Lee Sneed VP - Operations Vehicle Service Group 2700 Lanier Dr Madison IN 47250 (RO CAATS)										
3		Jefferson County Health Department 715 Green Rd Madison IN 47250-2143 (Health Department)										
4		Madison Jefferson Co Public Library 420 W Main St Madison IN 47250-3796 (Library)										
5		Madison City Council and Mayors Office 101 W. Main St. Madison IN 47250 (Local Official)										
6		Jefferson County Commissioners & Planning Board 300 E Main Street Madison IN 47250 (Local Official)										
7		Nisha Sizemore Environmental Management Solutions, Inc. 1442 Bark Ln. Shelbyville IN 46176 (Consultant)										
8												
9												
10												
11												
12												
13												
14												
15												

Total number of pieces Listed by Sender  <div style="font-size: 2em; font-weight: bold; text-align: center;">7</div>	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 <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
--	--	--	--