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

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Governor

Carol S. Comer
Commissioner

NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

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

for Imagineering Enterprises, Inc. in St. Joseph County

Significant Permit Modification No.: 141-36832-00574

The Indiana Department of Environmental Management (IDEM) has received an application from Imagineering Enterprises, Inc., located at 3722 Foundation Court, South Bend, IN 46628, for a significant modification of its Part 70 Operating Permit issued on August 14, 2015. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow Imagineering Enterprises, Inc. to make certain changes at its existing source. Imagineering Enterprises, Inc. has applied to modify the total Hazardous Air Pollutant (HAPs) limit to include additional existing emission units. The total HAP limit of 24 tons per year will include emission units CARC coating line, spray booths, cleaning operations, dipping lines, and chem lines.

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

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

St. Joseph County Public Library
304 South Main Street
South Bend, IN 46601

and

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

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

How can you participate in this process?

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

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public

meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SPM 141-36832-00574 in all correspondence.

Comments should be sent to:

Monica Dick
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-1243
Or dial directly: (317) 234-1243
Fax: (317) 232-6749 attn: Monica Dick
E-mail: mdick@idem.IN.gov

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

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

What will happen after IDEM makes a decision?

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

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

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

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Eli Russi
Imagineering Enterprises, Inc.
1302 W. Sample Street
South Bend, IN 46619

Re: 141-36832-00574
Significant Permit Modification to
Part 70 Renewal No.: T141-35604-00574

Dear Eli Russi:

Imagineering Enterprises, Inc. was issued Part 70 Operating Permit Renewal No. T141-35604-00574 on August 14, 2015 for a metal fabrication facility and surface coating operation located at 3722 Foundation Court, South Bend, Indiana 46628. An application requesting changes to this permit was received on February 15, 2016. Pursuant to the provisions of 326 IAC 2-7-12, a Significant Permit Modification to this permit is hereby approved as described in the attached Technical Support Document.

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

Appendix A 40 CFR Part 63, Subpart HHHHHH (6H) - National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Operations at areas source

Appendix B 40 CFR 63, Subpart WWWWWW (6W) - National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Plating and Polishing Operations

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

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

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

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

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If you have any questions on this matter, please contact Monica Dick, of my staff, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251 at 317-234-1243 or 1-800-451-6027, and ask for extension 4-1243.

Sincerely,

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Modified Permit and Technical Support Document
cc: File - St. Joseph County
St. Joseph County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch
IDEM Northern Regional Office

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Part 70 Operating Permit Renewal
OFFICE OF AIR QUALITY

Imagineering Enterprises, Inc.
3722 Foundation Court
South Bend, Indiana 46628

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

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

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

Operation Permit No.: T141-35504-00574	
Issued by: Original Signed Iryn Calilung, Section Chief Permits Branch, Office of Air Quality	Issuance Date: August 14, 2015 Expiration Date: August 14, 2020

Significant Permit Modification No.: 141-36832-00574	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date: August 14, 2020

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Appendix B **40 CFR 63, Subpart WWWWWW (6W) - National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Plating and Polishing Operations**

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary metal treatment facility and surface coating operation.

Source Address:	3722 Foundation Court, South Bend, Indiana 46628
General Source Phone Number:	574-287-8742
SIC Code:	3479 (Metal Coating and Allied Services)
County Location:	St. Joseph
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

(a) One (1) Passivation Operation, identified as PS-1, constructed in 2011, consisting of eight (8) tanks, with a maximum volume of 400 gallons for each tank. The tanks are summarized as follows:

Tank ID	Maximum Capacity (lbs/yr)
One (1) acid bath (P1)/ Caustic cleaner	2,500
One (1) caustic bath (P2)/ Isoprep	5,994
One (1) acid bath (P3)/ Nitric acid 45	36,935
Two (2) solvent bath (P4)/ Isopropyl alcohol	3,586 total
Three (3) rinse tanks holding water	Not Applicable (N/A)

(b) One (1) Etching Operation, identified as ET-1, constructed in 2011, consisting of eight (8) tanks, with a maximum volume of 300 gallons for each tank, excluding one that has a maximum volume of 360 gallons. The tanks are summarized as follows:

Tank ID	Maximum Capacity (lbs/yr)
One (1) caustic bath (E1)/ soda ash 100	12779
One (1) acid bath (E2)/ sulfuric acid 25	40208
One (1) rust preventative bath (E3)	180511
One (1) alkaline cleaner (E4)	2,800
Four (4) rinse tanks holding water	N/A

(c) One (1) powder coating operation, identified as PP-1, approved in 2014 for construction, with a maximum capacity of 5.75 pounds of powder per hour, with emissions controlled by a baghouse, exhausting through stack PP-1.

(d) One (1) CARC coating line used to coat and plate metal parts, constructed in 2011, with particulate emissions controlled by dry filters, consisting of the following units:

(1) Four (4) spray booths, identified as (EU-01 through EU-04), with a maximum capacity of 50 units per hour each, exhausting to stacks EU-01 through EU-04, respectively;

(2) One (1) touch-up spray booth, identified as EU-05, with a maximum capacity of 10 units per hour, exhausting to stack EU-05, and

(3) One (1) burn-off oven, identified as BO-1, constructed in 2011, with a maximum heat input capacity of 0.80 mmBtu/hr, with emissions exhausting through stack B0-1.

(e) Two (2) natural gas-fired cure ovens, identified as CO-1 and CO-2, constructed in 2011, with maximum heat input capacities of 3.0 MMBtu/hr, each, with emissions exhausting through stacks CO-1 and CO-2, respectively.

(f) One (1) spray booth, identified as EU-6, constructed in 2014, utilizing a high volume, low pressure (HVLP) applicator, with a maximum capacity of 80 metal units per hour, using dry filters to control particulate overspray, and exhausting to stack EU6S.

The spray booth EU-6 is considered a new affected source under 40 CFR 63, Subpart HHHHHH (6H).

(g) One (1) spray booth, identified as EU-7, constructed in 2014, utilizing a high volume, low pressure (HVLP) applicator, with a maximum capacity of 80 metal units per hour, using dry filters to control particulate overspray, and exhausting to stack EU7S.

The spray booth EU-7 is considered a new affected source under 40 CFR 63, Subpart HHHHHH (6H).

(h) One (1) spray booth, identified as EU-8, constructed in 2014, utilizing a high volume, low pressure (HVLP) applicator, with a maximum capacity of 80 metal units per hour, using dry filters to control particulate overspray, and exhausting to stack EU8S.

The spray booth EU-8 is considered a new affected source under 40 CFR 63, Subpart HHHHHH (6H).

(i) One (1) spray booth, identified as EU-9, constructed in 2014, utilizing a high volume, low pressure (HVLP) applicator, with a maximum capacity of 80 metal units per hour, using dry filters to control particulate overspray, and exhausting to stack EU9S.

The spray booth EU-9 is considered a new affected source under 40 CFR 63, Subpart HHHHHH (6H).

(j) One (1) spray booth, identified as EU-10, approved in 2014 for construction, utilizing a high volume, low pressure (HVLP) applicator, with a maximum capacity of 80 metal units per hour, using dry filters to control particulate overspray, and exhausting to stack EU10S.

The spray booth EU-10 is considered a new affected source under 40 CFR 63, Subpart HHHHHH (6H).

(k) One (1) spray booth, identified as EU-11, approved in 2014 for construction, utilizing a high volume, low pressure (HVLP) applicator, with a maximum capacity of 80 metal units

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per hour, using dry filters to control particulate overspray, and exhausting to stack EU11S.

The spray booth EU-11 is considered a new affected source under 40 CFR 63, Subpart HHHHHH (6H).

(l) One (1) abrasive blasting operation, identified as AB-1, approved in 2014 for construction, with a maximum capacity of 500 pounds of blasting material (aluminum oxide) per hour, with emissions controlled by a dust collector, exhausting inside.

(m) One (1) natural gas-fired boiler, identified as B-1, constructed in 2011, used for process heat, with a maximum heat input capacity of 3.65 MMBtu/hr, with emissions exhausting through stack B-1.

(n) Seven (7) natural gas-fired space heaters, summarized as follows:

Heater ID	Maximum heat capacity (MMBtu/hr)	Stack ID
BH-2 (Comfort Heat)	0.22	Stack B-2
BH-4 (Comfort Heat)	0.20	Stack B-4
BH-5 (Comfort Heat)	0.32	Stack B-5
BH-6 (Comfort Heat)	0.20	Stack B-6
BH-7 (Comfort Heat)	0.20	Stack B-7
BH-8 (Comfort Heat)	2.00	Stack B-8
BH-9 (Comfort Heat)	0.20	Stack B-9

(o) One (1) parts cleaning operation, consisting of six (6) fifteen (15) gallon tubs, identified as C1 through C6, and one (1) one thousand seven hundred (1,700) gallon tank, identified as C7, constructed in 2014, utilizing a diluted hydrofluoric and nitric acid solution and rinse, exhausting indoors.

(p) One (1) blasting operation consisting of the following:

(1) One (1) blasting room, identified as BR, constructed in 2014, using glass, plastic bead, or aluminum oxide media, with a maximum abrasive usage of five hundred (500) pounds per hour and five hundred (500) pounds of metal per hour, for a combined process weight rate of 0.5 tons per hour, exhausting to a baghouse as control which exhausts indoors. The baghouse has a 1,200 cubic feet per minute capacity.

(2) Three (3) small cabinet blasters, identified as SCB1, SCB2, and SCB3, all approved in 2014 for construction, using glass, plastic bead, or aluminum oxide media, with a maximum abrasive usage of ten (10) pounds per hour, each, and ninety (90) pounds of metal per hour, each, for a combined process weight rate of 100 pounds per hour, each, exhausting to a dust collector, each, as control which exhaust indoors. Each dust collector has a 800 cubic feet per minute capacity.

(3) One (1) large cabinet blaster, identified as LCB1, approved in 2014 for construction, using glass, plastic bead, or aluminum oxide media, with a maximum abrasive usage of twenty-five (25) pounds per hour and seventy-five (75) pounds of metal per hour, for a combined process weight rate of 100 pounds per hour, exhausting to a dust collector as control which exhausts indoors. The dust collector has a 850 cubic feet per minute capacity.

(4) One (1) tumble blaster, identified as TB1, approved in 2014 for construction, using aluminum oxide media, with a maximum abrasive usage of ten (10) pounds per hour and ninety (90) pounds of metal per hour, for a combined process weight rate of 100 pounds per hour, exhausting to a dust collector as control which exhausts indoors. The dust collector has a 800 cubic feet per minute capacity.

(5) One (1) wet blaster, identified as WB1, approved in 2014 for construction, using vermiculite media, operating wet when in use, with a maximum abrasive usage of ten (10) pounds per hour and ninety (90) pounds of metal, for a combined process weight rate of 100 pounds per hour, exhausting to a baghouse as control which exhaust indoors.

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

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

(a) Degreasing operations that do not exceed 145 gallons per 12 consecutive months, except if subject to 325 IAC 20-6. [326 IAC 8-3-2][326 IAC 8-3-8]

(b) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

(c) One (1) natural gas-fired air makeup unit, identified as AM-1, with a 8.8 MMBtu/hr heat input rating, approved in 2014 for construction, exhausting outdoors. [326 IAC 6.5]

(d) One (1) manganese dipping line, constructed in 2015, with varying chemicals used in each tank, consisting of the following:

(1) Four (4) tanks, uncontrolled, and exhausting indoors.

(2) Ten (10) tanks, uncontrolled, and exhausting outdoors.

(3) Three (3) tanks, controlled by mist elimination devices, and exhausting outdoors.

The manganese dipping line is considered a new affected source under 40 CFR 63, Subpart WWWWWW (6W).

(e) Two (2) natural gas-fired air makeup units, identified as AM-2 and AM-3, with a 4.0 MMBtu/hr heat input rating, each, constructed in 2011 and exhausting indoors. [326 IAC 6.5]

(f) One (1) natural gas-fired boiler, identified as B-10, with a 8.65 MMBtu/hr heat input rating, constructed in 2015, exhausting to stack B-1. [326 IAC 6.5]

(g) One (1) Chem-film line, constructed in 2007, consisting of open tanks containing non-VOC rinse and three (3) open tanks A-1, A-3, and A-6 with a non-VOC HAP rinse.

(h) One (1) phosphate line, consisting of twelve (12) tanks, with varying chemicals used in each tank, consisting of the following:

(1) Four (4) tanks, constructed in 2012, uncontrolled, and exhausting indoors.

(2) Seven (7) tanks, constructed in 2012, uncontrolled, and exhausting outdoors.

(3) One (1) tank, approved in 2014 for construction, with a chromic acid seal,

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controlled by a mist elimination device, and exhausting outdoors.

The phosphate line is considered a new affected source under 40 CFR 63, Subpart WWWWWW (6W) resultant from the addition of the chromic acid seal.

Two (2) of the existing twelve (12) tanks actually have emissions.

(i) Four (4) electric ovens constructed in 2014.

(j) A solvent recovery system with batch capacity less than or equal to one hundred (100) gallons per 326 IAC 2-7-1((21)9G)(viii).

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

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

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

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

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SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, T141-35604-00574, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

and

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

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

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

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

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(A) A description of the emergency;

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

(C) Corrective actions taken.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

(a) All terms and conditions of permits established prior to T141-35604-00574 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

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

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

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

(1) That this permit contains a material mistake.

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

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

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

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

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

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

Request for renewal shall be submitted to:

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

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

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

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(4) The Permittee notifies the:

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

and

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

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

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

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

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

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

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

(3) Any change in emissions; and

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 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.2 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.3 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.4 Fugitive Dust Emissions [326 IAC 6-4]

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

C.5 Stack Height [326 IAC 1-7]

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

C.6 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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

C.7 Performance Testing [326 IAC 3-6]

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

Indiana Department of Environmental Management

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64][326 IAC 3-8]

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

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

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

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

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

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

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

C.10 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

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

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

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

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

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

(a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.

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

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

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

C.13 Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5][326 IAC 2-7-6]

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

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in

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accordance with good air pollution control practices for minimizing excess emissions.

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

(1) initial inspection and evaluation;

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

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

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

(1) monitoring results;

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

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

(II)

(a) CAM Response to excursions or exceedances.

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

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

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

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

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

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

(f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(a)(2) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:

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

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

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

(h) CAM recordkeeping requirements.

(1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to paragraph (II)(a)(2) of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

(2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks,

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or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

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

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

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

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

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

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

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

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33) (“Regulated pollutant, which is used only for purposes of Section 19 of this rule”) from the source, for purpose of fee assessment.

The statement must be submitted to:

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

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

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C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

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

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

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

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

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

(b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)][326 IAC 2-1.1-11] [40 CFR 64][326 IAC 3-8]

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

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

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

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

(2) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime

associated with zero and span or other daily calibration checks, if applicable); and

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

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

(b) The address for report submittal is:

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

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

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

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) Passivation Operation, identified as PS-1, constructed in 2011, consisting of eight (8) tanks, with a maximum volume of 400 gallons. The tanks are summarized as follows:

Tank ID	Maximum Capacity (lbs/yr)
One (1) acid bath (P1)/ Caustic cleaner	2,500
One (1) caustic bath (P2)/ Isoprep	5,994
One (1) acid bath (P3)/ Nitric acid 45	36,935
Two (2) solvent bath (P4)/ Isopropyl alcohol	3,586 total
Three (3) rinse tanks holding water	Not Applicable (N/A)

(b) One (1) Etching Operation, identified as ET-1, constructed in 2011, consisting of eight (8) tanks, with a maximum volume of 300 of gallons. The tanks are summarized as follows:

Tank ID	Maximum Capacity (lbs/yr)
One (1) caustic bath (E1)/ soda ash 100	12779
One (1) acid bath (E2)/ sulfuric acid 25	40208
One (1) rust preventative bath (E3)	180511
One (1) alkaline cleaner (E4)	2,800
Four (4) rinse tanks holding water	N/A

(c) One (1) powder coating operation, identified as PP-1, constructed in 2011, with a maximum capacity of 5.75 pounds of powder per hour, with emissions controlled by a baghouse, exhausting through stack PP-1.

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

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

D.1.1 Particulate Emission Limitations, Except Lake County [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2, the Permittee shall comply with the following:

(a) The particulate matter emissions from the passivation operation (PS-1) shall not exceed 0.03 gr/dscf.

(b) The particulate matter emissions from the etching operation (ET-1) shall not exceed 0.03 gr/dscf.

(c) The particulate matter emissions from the powder coating operation (PP-1) shall not exceed 0.03 gr/dscf.

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

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SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(d) One (1) CARC coating line, constructed in 2011, with particulate emissions controlled by dry filters, consisting of the following units:

(1) Four (4) spray booths, identified as (EU-01 through EU-04), with a maximum capacity of 50 units per hour each, exhausting to stacks EU-01 through EU-04, respectively;

(2) One (1) touch-up spray booth, identified as EU-05, with a maximum capacity of 10 units per hour, exhausting to stack EU-05 and

(3) One (1) burn-off oven, identified as BO-1, constructed in 2011, with a maximum heat input capacity of 0.80 mmBtu/hr, with emissions exhausting through stack B0-1.

(e) Two (2) natural gas-fired cure ovens, identified as CO-1 and CO-2, constructed in 2011, with maximum heat input capacities of 3.0 MMBtu/hr, each, with emissions exhausting through stacks CO-1 and CO-2, respectively.

(f) One (1) spray booth, identified as EU-6, constructed in 2014, utilizing a high volume, low pressure (HVLP) applicator, with a maximum capacity of 80 metal units per hour, using dry filters to control particulate overspray, and exhausting to stack EU6S.

The spray booth EU-6 is considered a new affected source under 40 CFR 63, Subpart HHHHHH (6H).

(g) One (1) spray booth, identified as EU-7, constructed in 2014, utilizing a high volume, low pressure (HVLP) applicator, with a maximum capacity of 80 metal units per hour, using dry filters to control particulate overspray, and exhausting to stack EU7S.

The spray booth EU-7 is considered a new affected source under 40 CFR 63, Subpart HHHHHH (6H).

(h) One (1) spray booth, identified as EU-8, constructed in 2014, utilizing a high volume, low pressure (HVLP) applicator, with a maximum capacity of 80 metal units per hour, using dry filters to control particulate overspray, and exhausting to stack EU8S.

The spray booth EU-8 is considered a new affected source under 40 CFR 63, Subpart HHHHHH (6H).

(i) One (1) spray booth, identified as EU-9, constructed in 2014, utilizing a high volume, low pressure (HVLP) applicator, with a maximum capacity of 80 metal units per hour, using dry filters to control particulate overspray, and exhausting to stack EU9S.

The spray booth EU-9 is considered a new affected source under 40 CFR 63, Subpart HHHHHH (6H).

(j) One (1) spray booth, identified as EU-10, approved in 2014 for construction, utilizing a high volume, low pressure (HVLP) applicator, with a maximum capacity of 80 metal units per hour, using dry filters to control particulate overspray, and exhausting to stack EU10S.

The spray booth EU-10 is considered a new affected source under 40 CFR 63, Subpart HHHHHH (6H).

(k) One (1) spray booth, identified as EU-11, approved in 2014 for construction, utilizing a high volume, low pressure (HVLP) applicator, with a maximum capacity of 80 metal units per hour, using dry filters to control particulate overspray, and exhausting to stack EU11S.

The spray booth EU-11 is considered a new affected source under 40 CFR 63, Subpart HHHHHH (6H).

Insignificant Activities:

(d) One (1) manganese dipping line, constructed in 2015, with varying chemicals used in each tank, consisting of the following:

(1) Four (4) tanks, uncontrolled, and exhausting indoors.

(2) Ten (10) tanks, uncontrolled, and exhausting outdoors.

(3) Three (3) tanks, controlled by mist elimination devices, and exhausting outdoors.

The manganese dipping line is considered a new affected source under 40 CFR 63, Subpart WWWWWW (6W).

(g) One (1) Chem-film line, constructed in 2007, consisting of open tanks containing non-VOC rinse and three (3) open tanks A-1, A-3, and A-6 with a non-VOC HAP rinse.

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

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

D.2.1 Particulate Emission Limitations, Except Lake County [326 IAC 6.5-1-2]

(a) Pursuant to 326 IAC 6.5-1-2(h), the CARC Line (EU-01 through EU-05) and the spray booths (EU-6 through EU-11), shall each be controlled by dry particulate filters and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

(b) Pursuant to 326 IAC 6.5-1-2(a), the particulate matter emissions from each cure oven (CO-1 and CO-2) shall not exceed 0.03 gr/dscf.

D.2.2 Miscellaneous Metals Coating [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations), when surface coating miscellaneous metal parts or products on the CARC Line (EU-01 through EU-05):

(a) The Permittee shall not cause, allow, or permit the discharge into the atmosphere of any VOC in excess of the following:

(1) Fifty-two hundredths (0.52) kilogram per liter (four and three-tenths (4.3) pounds per gallon) of coating, excluding water, delivered to a coating applicator that applies clear coatings.

(2) Forty-two hundredths (0.42) kilogram per liter (three and five-tenths (3.5) pounds per gallon) of coating, excluding water, delivered to a coating applicator in a coating application system that is air dried or forced warm air dried at temperatures up to ninety (90) degrees Celsius (one hundred ninety-four (194)

degrees Fahrenheit).

(3) Forty-two hundredths (0.42) kilogram per liter (three and five-tenths (3.5) pounds per gallon) of coating, excluding water, delivered to a coating applicator that applies extreme performance coatings.

(4) Thirty-six hundredths (0.36) kilogram per liter (three (3) pounds per gallon) of coating, excluding water, delivered to a coating applicator for all other coatings and coating application systems.

If more than one (1) of these emission limitations applies to a specific coating, then the least stringent emission limitation shall apply.

(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 be limited to, the following:

(1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.

(2) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.

(3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.

(4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.

(5) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

D.2.4 Hazardous Air Pollutant (HAP) Emissions Minor Limit [326 IAC 2-4.1]

In order to render the requirements of 326 IAC 2-4.1 not applicable, the Permittee shall comply with the following limits:

(a) The total single non-metal HAP input to the CARC coating line (EU-01 through EU-05) and spray booths (EU-6 through EU-11), and single metal HAP emissions from the CARC coating line (EU-01 through EU-05), shall not exceed nine and nine tenths (9.9) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

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(b) The total input of any combination of non-metal HAPs to the CARC coating line (EU-01 through EU-05), and spray booths (EU-6 through EU-11), dipping lines (zinc/phosphate and manganese dipping lines), chem-film line (tanks A-3, A-6, and A-1), and parts cleaning operations (C1 through C7) (Section D.5), plus the total emissions of any combination of metal HAPs from the CARC coating line (EU-01 through EU-05), shall not exceed twenty four (24.0) 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 HAPs from all other emission units at this source, shall limit the source-wide total potential to emit any single HAP to less than ten (10) tons per twelve (12) consecutive month period and total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-4.1 not applicable.

D.2.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-1(b)][326 IAC 2-2]

Pursuant to 326 IAC 8-1-1(b) (Volatile Organic Compounds), and in order to render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 8 (Volatile Organic Compounds) not applicable, the Permittee shall comply with the following:

The VOC input, including coatings, dilution solvents, and cleaning solvents, to each of the six (6) spray booths, identified as EU-6, EU-7, EU-8, EU-9, EU-10, and EU-11, shall be less than fifteen (15.0) pounds per day, each, with compliance determined at the end of each day.

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit VOC to less than 250 tons per 12 consecutive month period and shall render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 8 (Volatile Organic Compounds) not applicable.

D.2.6 Incinerators [326 IAC 4-2-2]

Pursuant to 326 IAC 4-2 (Incinerators), the burn-off oven, identified as BO-1, shall:

(a) Consist of primary and secondary chambers or the equivalent;

(b) Be equipped with a primary burner unless burning wood products;

(c) Comply with 326 IAC 5-1 and 326 IAC 2;

(d) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in 326 IAC 4-2-2(c); and

(e) Not emit particulate matter in excess of one (1) of the following:

(1) Three-tenths (0.3) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions correct to fifty percent (50%) excess air for incinerators with solid waste capacity of greater than or equal to two-hundred (200) pounds per hour.

(2) Five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators with solid waste capacity of less than two hundred (200) pounds per hour.

(f) If any of the requirements of (a) through (e) above are not met, the Permittee shall stop charging the incinerator until adjustments are made that address the underlying cause of

the deviation.

The Permittee operating the incinerator must make the manufacturer's specifications or the operation and maintenance plan available to the department upon request.

D.2.7 Carbon Monoxide Emission Limits [326 IAC 9-1-2]

Pursuant to 326 IAC 9-1-2 (Carbon Monoxide Emission Limits), the Permittee shall not operate the burn-off oven, identified as BO-1, unless the waste gas stream is burned in one of the following:

(a) Direct-flame afterburner; or

(b) Secondary chamber.

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

D.2.8 Control Requirements [326 IAC 2-7-6(6)] [326 IAC 6.5-1-2] [326 IAC 2-4.1]

In order to comply with Condition D.2.1 and D.2.4, dry filters must be in operation and controlling emissions at all times that the CARC line and spray booths, identified as EU-6 through EU-11, are in operation.

D.2.9 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-4][326 IAC 8-1-2(a)]

(a) Compliance with the VOC content limitation contained in Condition D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) Compliance with the VOC and HAPs emission limits contained in Conditions D.2.4 and D.2.5 shall be determined pursuant to 326 IAC 8-1-4 and 326 IAC 8-1-2(a), by preparing or obtaining from the manufacturer the copies of the VOC and HAP data sheets or Material Safety Data Sheets (MSDS). IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(c) Compliance with the metal HAPs emission limits contained in Conditions D.2.4 when emitting cobalt or chrome from the CARC coating line (EU-01 through EU-05), cobalt or chrome emissions shall be determined using the following equation:

Metal HAP Emissions = (gallons per month) x (pounds per gallon of metal HAP) x (1 - % transfer efficiency) x (1 - % particulate control efficiency)

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

D.2.10 Monitoring [326 IAC 2-7-5(1)] [326 IAC 6.5-1-2] [326 IAC 2-4.1]

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (EU-1 through EU-5) and from the six (6) spray booth stacks EU6S, EU7S, EU8S, EU9S, EU10S, and EU11S while one or more of the booths, EU-1 through EU-11, respectively, are in operation. Failure to take response steps shall be considered a deviation from this permit. If a condition exists which should result in a response, the Permittee shall take reasonable response. Failure to take response steps shall be considered a deviation from this permit. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to response steps.

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

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

D.2.11 Record Keeping Requirement [326 IAC 8-2-9] [326 IAC 2-4.1] [326 IAC 8-1-1(b)] [326 IAC 2-2] [326 IAC 2-7-5(1)]

(a) In order to document the compliance status with Condition D.2.2, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content limits established in Condition D.2.2. Records necessary to demonstrate compliance shall be available not later than thirty (30) days after the end of each compliance period.

(1) The VOC content of each coating material and solvent used.

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

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

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

(b) In order to document the compliance status with Condition D.2.4, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits and/or the HAP emission limits established in Condition D.2.4. Records necessary to demonstrate compliance shall be available not later than 30 days after the end of each compliance period.

(1) The HAP content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(3) The total HAP usage for each month.

(c) In order to document the compliance status with Condition D.2.5, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.2.5. Records necessary to demonstrate compliance shall be available not later than thirty (30) days after the end of each compliance period.

(1) The VOC content of each coating material and solvent used less water.

(2) The amount of coating material and solvent used on a daily basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(3) The total VOC usage for each day.

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

(d) In order to document the compliance status with Condition D.2.10, the Permittee shall maintain a log of weekly overspray observations and daily and monthly inspections. The Permittee shall include in its record when an inspection is not taken and the reason for the lack of inspection (e.g. the process did not operate that day).

(e) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to record keeping

D.2.12 Reporting Requirements [326 IAC 2-4.1] [326 IAC 8-1-1(b)] [326 IAC 2-2]

A quarterly summary of the information to document the compliance status with Conditions D.2.4 and D.2.5 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(l) One (1) abrasive blasting operation, identified as AB-1, approved in 2014 for construction, with a maximum capacity of 500 pounds of blasting material (aluminum oxide) per hour, with emissions controlled by a dust collector, exhausting indoors.

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

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

D.3.1 PSD Minor Limits [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable to the entire source, the Permittee shall comply with the following limits:

(a) PM emissions after control from the abrasive blasting operation (AB-1) shall not exceed 9.72 lb/hr.

(b) PM10 emissions after control from the abrasive blasting operation (AB-1) shall not exceed 9.72 lb/hr.

(c) The PM2.5 emissions after control from the abrasive blasting operation (AB-1) shall not exceed 9.72 pounds per hour.

Compliance with these limits, combined with the potential to emit PM, PM10, and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM, PM10, and PM2.5 to less than 250 tons per twelve (12) consecutive month period, each and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.3.2 Particulate Emission Limitations, Except Lake County [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(a), the particulate matter emissions from the abrasive blasting operation shall not exceed 0.03 gr/dscf.

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

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

D.3.4 Control Requirements [326 IAC 2-7-6(6)] [326 IAC 2-2] [326 IAC 6.5-1-2]

(a) In order to comply with Conditions D.3.1 and D.3.2, the dust collector must be in operation and controlling emissions at all times the abrasive blasting units are in operation.

(b) In the event that bag failure is observed in a 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 the IDEM, OAQ of the expected date the failed units will be repaired or replaced. 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.

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

D.3.5 Parametric Monitoring [326 IAC 2-2] [326 IAC 6.5-1-2]

The Permittee shall record the pressure drop across the dust collection system used in conjunction with the abrasive blasting operation AB-1, at least once per day when the abrasive blasting operation is in operation. When, for any one reading, the pressure drop across the baghouse is outside of the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 3.0 and 8.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.3.6 Broken or Failed Bag Detection [326 IAC 2-2] [326 IAC 6.5-1-2]

(a) For a single compartment baghouses 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 C- Response to Excursions or Exceedances).

(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 emissions unit. 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 C- Response to Excursions or Exceedances).

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.

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

D.3.7 Record Keeping Requirement [326 IAC 2-2] [326 IAC 6.5-1-2]

(a) To document the compliance status with Condition D.3.6, the Permittee shall maintain daily records of the daily pressure drop readings across the dust collection system controlling the abrasive blasting operation AB-1. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (i.e. the process did not operate that day).

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

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SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(m) One (1) natural gas-fired boiler, identified as B-1, constructed in 2011, used for process heat, with a maximum heat input capacity of 3.65 MMBtu/hr, with emissions exhausting through stack B-1.

(n) Seven (7) natural gas-fired space heaters, summarized as follows:

Heater ID	Maximum heat capacity (MMBtu/hr)	Stack ID
BH-2 (Comfort Heat)	0.22	Stack B-2
BH-4 (Comfort Heat)	0.20	Stack B-4
BH-5 (Comfort Heat)	0.32	Stack B-5
BH-6 (Comfort Heat)	0.20	Stack B-6
BH-7 (Comfort Heat)	0.20	Stack B-7
BH-8 (Comfort Heat)	2.00	Stack B-8
BH-9 (Comfort Heat)	0.20	Stack B-9

Insignificant Activity:

(c) One (1) natural gas-fired air makeup unit, identified as AM-1, with a 8.8 MMBtu/hr heat input rating, approved for construction in 2014, exhausting indoors. [326 IAC 6.5]

(e) Two (2) natural gas-fired air makeup units, identified as AM-2 and AM-3, with a 4.0 MMBtu/hr heat input rating, each, constructed in 2011 and exhausted indoors. [326 IAC 6.5]

(f) One (1) natural gas-fired boiler, identified as B-10, with a 8.65 MMBtu/hr heat input rating, constructed in 2015, exhausting to stack B-1. [326 IAC 6.5]

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

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

D.4.1 Particulate Emission Limitations, Except Lake County [326 IAC 6.5-1-2]

(a) Pursuant to 326 IAC 6.5-1-2(b)(3), the particulate matter emissions from the boilers (B-1 and B-10) each shall not exceed 0.01 gr/dscf.

(b) Pursuant to 326 IAC 6.5-1-2, the Permittee shall comply with the following:

(1) The particulate matter emissions from each space heater (B-2, B-4 through B-9) shall not exceed 0.03 gr/dscf.

(2) The particulate matter emissions from each natural gas-fired air makeup unit (AM-1 through AM-3) shall not exceed 0.03 gr/dscf.

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SECTION D.5 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(o) One (1) parts cleaning operation, consisting of six (6) fifteen (15) gallon tubs, identified as C1 through C6, and one (1) one thousand seven hundred (1,700) gallon tank, identified as C7, constructed in 2014, utilizing a diluted hydrofluoric and nitric acid solution and rinse, exhausting indoors.

Insignificant Activities:

(a) Degreasing operations that do not exceed 145 gallons per 12 consecutive months, except if subject to 325 IAC 20-6. [326 IAC 8-3-2][326 IAC 8-3-8]

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

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

D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operation), the owner or operator of a cold cleaning facility (the degreasing operations that do not exceed 145 gallons per 12 months) shall:

(a) equip the cleaner with a cover;

(b) equip the cleaner with a facility for draining cleaned parts;

(c) close the degreaser cover whenever parts are not being handled in the degreaser;

(d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) provide a permanent, conspicuous label summarizing the operation requirements in 326 IAC 8-3-2(a)(3), 326 IAC 8-3-2(a)(4), 326 IAC 8-3-2(a)(6), and 326 IAC 8-3-2(a)(7);

(f) store waste solvent only in closed containers;

(g) and prohibit the disposal or transfer of waste solvent in such a manner tha could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operation), the owner or operator of a cold cleaner degreaser shall ensure the following additional control equipment and operating requirements are met:

(a) 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):

(1) a freeboard that attains a freeboard ratio of seventy-five hundreths (0.75) or greater;

(2) a water cover when solvent used is insoluble in, and heavier than, water;

(3) a refrigerated chiller;

(4) carbon adsorption; or

(5) an alternative system of demonstrated equivalent or better control as those outlined in 326 IAC 8-3-2(b)(A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.

(b) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.

(c) If used, solvent spray:

(1) must be a solid, fluid stream; and
(2) shall be applied at a pressure that does not cause excessive splashing.

D.5.2 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), the Permittee shall not operate a cold cleaning degreaser with a solvent that has a VOC composite partial vapor pressure that 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 Requirement [326 IAC 2-7-5(3)][326 IAC 2-7-19]

D.5.3 Record Keeping Requirements [326 IAC 8-3-8] [326 IAC 2-4.1]

(a) To document the compliance status with Condition D.5.2, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

(1) The name and address of the solvent supplier.

(2) The date of purchase (or invoice/bill date 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 contains the Permittee's obligation with regard to the records required to be maintained by this condition.

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SECTION D.6 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(p) One (1) blasting operation consisting of the following:

(1) One (1) blasting room, identified as BR, constructed in 2014, using glass, plastic bead, or aluminum oxide media, with a maximum abrasive usage of five hundred (500) pounds per hour and five hundred (500) pounds of metal per hour, for a combined process weight rate of 0.5 tons per hour, exhausting to a baghouse as control which exhausts indoors. The baghouse has a 1,200 cubic feet per minute capacity.

(2) Three (3) small cabinet blasters, all approved in 2014 for construction, constructed in 2014, using glass, plastic bead, or aluminum oxide media, with a maximum abrasive usage of ten (10) pounds per hour, each, and ninety (90) pounds of metal per hour, each, for a combined process weight rate of 100 pounds per hour, each, exhausting to a dust collector, each, as control which exhaust indoors. The dust collectors have a 800 cubic feet per minute capacity.

(3) One (1) large cabinet blaster, identified as LCB1, approved in 2014 for construction, using glass, plastic bead, or aluminum oxide media, with a maximum abrasive usage of twenty-five (25) pounds per hour and seventy-five (75) pounds of metal per hour, for a combined process weight rate of 100 pounds per hour, exhausting to a dust collector as control which exhausts indoors. The dust collector has a 850 cubic feet per minute capacity.

(4) One (1) tumble blaster, identified as TB1, approved in 2014 for construction, using aluminum oxide media, with a maximum abrasive usage of ten (10) pounds per hour and ninety (90) pounds of metal per hour, for a combined process weight rate of 100 pounds per hour, exhausting to a dust collector as control which exhausts indoors. The dust collector has a 800 cubic feet per minute capacity.

(5) One (1) wet blaster, identified as WB1, approved in 2014 for construction, using vermiculite media, operating wet when in use, with a maximum abrasive usage of ten (10) pounds per hour and ninety (90) pounds of metal, for a combined process weight rate of 100 pounds per hour, exhausting to a baghouse as control which exhaust indoors.

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

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

D.6.1 Particulate Matter Limitations Except Lake County [326 IAC 6.5]

Pursuant to 326 IAC 6.5-1-2(a), the particulate matter (PM) emissions from the abrasive blasting operations, identified as BR, SCB1, SCB2, SCB3, LCB1, TB1, and WB1, shall not exceed 0.03 grains per dry standard cubic foot (dscf), each.

D.6.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

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

D.6.3 Particulate Control [326 IAC 6.5]

(a) In order to comply with Condition D.6.1, the control devices associated with the abrasive blasting operations BR, SCB1, SCB2, SCB3, LCB1, and TB1 shall be in operation at all times that BR, SCB1, SCB2, SCB3, LCB1, and TB1 are in operation, respectively.

(c) In the event that bag failure is observed in a 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 the IDEM, OAQ of the expected date the failed units will be repaired or replaced. 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 2-7-5(1)][326 IAC 2-7-6(1)]

D.6.4 Broken or Failed Bag Detection [326 IAC 6.5]

(a) For a single compartment baghouses 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 C- Response to Excursions or Exceedances).

(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 emissions unit. 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 C- Response to Excursions or Exceedances).

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.

D.6.5 Baghouse and Dust Collector Inspections [326 IAC 6.5]

(a) An inspection shall be performed semi-annually on the baghouse associated with the abrasive blasting room BR to verify that they are being operated and maintained in accordance with the manufacturer's specifications. All defective bags shall be replaced.

(b) An inspection shall be performed semi-annually on the dust collectors associated with SCB1, SCB2, SCB3, LCB1, and TB1 to verify that they are being operated and maintained in accordance with the manufacturer's specifications. All defective filters shall be replaced.

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

D.6.6 Record Keeping Requirements [326 IAC 6.5]

(a) To document the compliance status with Condition D.6.5, the Permittee shall maintain records of the results of the inspections required under Condition D.6.5.

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

SECTION E.1 **NESHAP**

Emission Unit Description:

(d) One (1) CARC coating line, constructed in 2011, with particulate emissions controlled by dry filters, consisting of the following units:

(1) Four (4) spray booths, identified as (EU-01 through EU-04), with a maximum capacity of 50 units per hour each, exhausting to stacks EU-01 through EU-04, respectively;

(2) One (1) touch-up spray booth, identified as EU-05, with a maximum capacity of 10 units per hour, exhausting to stack EU-05 and

(3) One (1) burn-off oven, identified as BO-1, constructed in 2011, with a maximum heat input capacity of 0.80 mmBtu/hr, with emissions exhausting through stack B0-1.

(e) Two (2) natural gas-fired cure ovens, identified as CO-1 and CO-2, constructed in 2011, with maximum heat input capacities of 3.0 MMBtu/hr, each, with emissions exhausting through stacks CO-1 and CO-2, respectively.

(f) One (1) spray booth, identified as EU-6, constructed in 2014, utilizing a high volume, low pressure (HVLP) applicator, with a maximum capacity of 80 metal units per hour, using dry filters to control particulate overspray, and exhausting to stack EU6S.

The spray booth EU-6 is considered a new affected source under 40 CFR 63, Subpart HHHHHH (6H).

(g) One (1) spray booth, identified as EU-7, constructed in 2014, utilizing a high volume, low pressure (HVLP) applicator, with a maximum capacity of 80 metal units per hour, using dry filters to control particulate overspray, and exhausting to stack EU7S.

The spray booth EU-7 is considered a new affected source under 40 CFR 63, Subpart HHHHHH (6H).

(h) One (1) spray booth, identified as EU-8, constructed in 2014, utilizing a high volume, low pressure (HVLP) applicator, with a maximum capacity of 80 metal units per hour, using dry filters to control particulate overspray, and exhausting to stack EU8S.

The spray booth EU-8 is considered a new affected source under 40 CFR 63, Subpart HHHHHH (6H).

(i) One (1) spray booth, identified as EU-9, constructed in 2014, utilizing a high volume, low pressure (HVLP) applicator, with a maximum capacity of 80 metal units per hour, using dry filters to control particulate overspray, and exhausting to stack EU9S.

The spray booth EU-9 is considered a new affected source under 40 CFR 63, Subpart HHHHHH (6H).

(j) One (1) spray booth, identified as EU-10, approved in 2014 for construction, utilizing a high volume, low pressure (HVLP) applicator, with a maximum capacity of 80 metal units per hour, using dry filters to control particulate overspray, and exhausting to stack EU10S.

The spray booth EU-10 is considered a new affected source under 40 CFR 63, Subpart HHHHHH (6H).

(k) One (1) spray booth, identified as EU-11, approved in 2014 for construction, utilizing a high volume, low pressure (HVLP) applicator, with a maximum capacity of 80 metal units per hour, using dry filters to control particulate overspray, and exhausting to stack EU11S.

The spray booth EU-11 is considered a new affected source under 40 CFR 63, Subpart HHHHHH (6H).

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

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

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

(a) Pursuant to 40 CFR 63.1, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1 for the emission unit(s) listed above, except as otherwise specified in 40 CFR 63 Subpart HHHHHH (6H).

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

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

E.1.2 National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Operations at areas source NESHAP [40 CFR Part 63, Subpart HHHHHH (6H)]

The Permittee shall comply with the following provisions of 40 CFR 63, Subpart HHHHHH (6H) (included as Attachment A, to the operating permit), for the emission units listed above:

(1) 40 CFR 63.11169(c)
(2) 40 CFR 63.11170(a)(3), (b)
(3) 40 CFR 63.11171(a), (b), (c)
(4) 40 CFR 63.11172(a)(2)
(5) 40 CFR 63.11173(f),(g(1), (g)(3)
(6) 40 CFR 63.11174(a)
(7) 40 CFR 63.11175(a)
(8) 40 CFR 63.11176(a)
(9) 40 CFR 63.11177
(10) 40 CFR 63.11178
(11) 40 CFR 63.11179
(12) 40 CFR 63.11180
(13) Table 1

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SECTION E.2 NESHAP

Emissions Unit Description:

Insignificant Activities:

(d) One (1) manganese dipping line, constructed in 2015, with varying chemicals used in each tank, consisting of the following:

(1) Four (4) tanks, uncontrolled, and exhausting indoors.

(2) Ten (10) tanks, uncontrolled, and exhausting outdoors.

(3) Three (3) tanks, controlled by mist elimination devices, and exhausting outdoors.

The manganese dipping line is considered a new affected source under 40 CFR 63, Subpart WWWWWW (6W).

(h) One (1) phosphate line, consisting of twelve (12) tanks, with varying chemicals used in each tank, consisting of the following:

(1) Four (4) tanks, constructed in 2012, uncontrolled, and exhausting indoors.

(2) Seven (7) tanks, constructed in 2012, uncontrolled, and exhausting outdoors.

(3) One (1) tank, approved in 2014 for construction, with a chromic acid seal, controlled by a mist elimination device, and exhausting outdoors.

The phosphate line is considered a new affected source under 40 CFR 63, Subpart WWWWWW (6W) resultant from the addition of the chromic acid seal.

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

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

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

(a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart WWWWWW (6W).

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:
Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

E.2.2 National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Plating and Polishing Operations NESHAP [40 CFR 63, Subpart WWWWWW (6W)]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart WWWWW

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(6W) (included as Attachment B to the operating permit), for the emission unit(s) listed above:

(1) 40 CFR 63.11504
(2) 40 CFR 63.11505(a)(1) and (c)
(3) 40 CFR 63.11506(c)
(4) 40 CFR 63.11507(g)
(5) 40 CFR 63.11508
(6) 40 CFR 63.11509
(7) 40 CFR 63.11510
(8) 40 CFR 63.11511
(9) 40 CFR 63.11512
(10) Table 1 to Subpart WWWWWW (6W)

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

Source Name: Imagineering Enterprises, Inc.
Source Address: 3722 Foundation Court, South Bend, Indiana 46628
Part 70 Permit No.: T141-35604-00574

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)

☐ Report (specify)

☐ Notification (specify)

☐ Affidavit (specify)

☐ Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Phone:
Date:

DRAFT

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

PART 70 OPERATING PERMIT

EMERGENCY OCCURRENCE REPORT

Source Name: Imagineering Enterprises, Inc.
Source Address: 3722 Foundation Court, South Bend, Indiana 46628
Part 70 Permit No.: T141-35604-00574

This form consists of 2 pages **Page 1 of 2**

☐ This is an emergency as defined in 326 IAC 2-7-1(12)

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

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

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

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

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

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

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

Part 70 Quarterly Report

Source Name: Imagineering Enterprises, Inc
Source Address: 3722 Foundation Court, South Bend, Indiana 46628
Part 70 Permit No.: 141-35604-00574
Facility: CARC Coating Line (EU-01 through EU-05) and Spray Booths (EU-6 through EU-11)
Parameter: Chrome Emissions (Single HAP)
Limit: Shall not exceed 9.9 tons per 12 consecutive month period with compliance determined at the end of each month

Metal HAP Emissions = (gallons per month) x (pounds per gallon of metal HAP) x (1 - % transfer efficiency) x (1 - % particulate control efficiency)

QUARTER:_____YEAR: _____

Month	This Month (tons)	Previous 11 Months (tons)	12-Month Period (tons)

☐ **No deviation occurred in this quarter.**

☐ **Deviations occurred in this quarter.**
Deviation has been reported on: _____

Submitted By: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

DRAFT

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

Part 70 Quarterly Report

Source Name: Imagineering Enterprises, Inc
Source Address: 3722 Foundation Court, South Bend, Indiana 46628
Part 70 Permit No.: 141-35604-00574
Facility: CARC Coating Line (EU-01 through EU-05) and Spray Booths (EU-6 through EU-11)
Parameter: Toluene Emissions (Single HAP)
Limit: Shall not exceed 9.9 tons per 12 consecutive month period with compliance determined at the end of each month

QUARTER:_____YEAR: _____

Month	This Month (tons)	Previous 11 Months (tons)	12-Month Period (tons)

☐ **No deviation occurred in this quarter.**

☐ **Deviations occurred in this quarter.**
Deviation has been reported on: _____

Submitted By: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

DRAFT

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

Part 70 Quarterly Report

Source Name: Imagineering Enterprises, Inc
Source Address: 3722 Foundation Court, South Bend, Indiana 46628
Part 70 Permit No.: 141-35604-00574
Facility: CARC Coating Line (EU-01 through EU-05) and Spray Booths (EU-6 through EU-11)
Parameter: Xylene Emissions (Single HAP)
Limit: Shall not exceed 9.9 tons per 12 consecutive month period with compliance determined at the end of each month

QUARTER:_____YEAR: _____

Month	This Month (tons)	Previous 11 Months (tons)	12-Month Period (tons)

☐ **No deviation occurred in this quarter.**

☐ **Deviations occurred in this quarter.**
Deviation has been reported on: _____

Submitted By: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

DRAFT

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

Part 70 Quarterly Report

Source Name: Imagineering Enterprises, Inc
Source Address: 3722 Foundation Court, South Bend, Indiana 46628
Part 70 Permit No.: 141-35604-00574
Facility: CARC Coating Line (EU-01 through EU-05) and Spray Booths (EU-6 through EU-11)
Parameter: Ethyl Benzene Emissions (Single HAP)
Limit: Shall not exceed 9.9 tons per 12 consecutive month period with compliance determined at the end of each month

QUARTER:_____YEAR: _____

Month	This Month (tons)	Previous 11 Months (tons)	12-Month Period (tons)

☐ **No deviation occurred in this quarter.**

☐ **Deviations occurred in this quarter.**
Deviation has been reported on: _____

Submitted By: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

DRAFT

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

Part 70 Quarterly Report

Source Name: Imagineering Enterprises, Inc
Source Address: 3722 Foundation Court, South Bend, Indiana 46628
Part 70 Permit No.: 141-35604-00574
Facility: CARC Coating Line (EU-01 through EU-05), Spray Booths (EU-6 through EU-11)
Parameter: Total HAPs emissions, parts cleaning operations (C1 through C7), dipping lines (zinc/phosphate and manganese dipping lines), and chem lines (Tanks A-3, A-6, and A-1)
Limit: Shall not exceed 24 tons per 12 consecutive month period with compliance determined at the end of each month

QUARTER:_____YEAR: _____

Month	This Month (tons)	Previous 11 Months (tons)	12-Month Period (tons)

☐ **No deviation occurred in this quarter.**

☐ **Deviations occurred in this quarter.**
Deviation has been reported on: _____

Submitted By: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

DRAFT

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

Part 70 Usage Report

(Submit Report Quarterly)

Source Name: Imagineering Enterprises, Inc
Source Address: 3722 Foundation Court, South Bend, Indiana 46628
Part 70 Permit No.: 141-35604-00574
Facility: Spray Booth EU-6
Parameter: Daily Total VOC Emissions
Limit: The total VOC input shall be less than fifteen (15.0) pounds per day, with compliance determined at the end of each day.

Month: _____ **Year:** _____

Day		Day	
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16			

☐ No deviation occurred in this quarter.

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

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

DRAFT

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

Part 70 Usage Report

(Submit Report Quarterly)

Source Name: Imagineering Enterprises, Inc
Source Address: 3722 Foundation Court, South Bend, Indiana 46628
Part 70 Permit No.: 141-35604-00574
Facility: Spray Booth EU-7
Parameter: Daily Total VOC Emissions
Limit: The total VOC input shall be less than fifteen (15.0) pounds per day, with compliance determined at the end of each day.

Month: _____ **Year:** _____

Day		Day	
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16			

☐ No deviation occurred in this quarter.

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

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

DRAFT

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

Part 70 Usage Report

(Submit Report Quarterly)

Source Name: Imagineering Enterprises, Inc
Source Address: 3722 Foundation Court, South Bend, Indiana 46628
Part 70 Permit No.: 141-35604-00574
Facility: Spray Booth EU-8
Parameter: Daily Total VOC Emissions
Limit: The total VOC input shall be less than fifteen (15.0) pounds per day, with compliance determined at the end of each day.

Month: _____ **Year:** _____

Day		Day	
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16			

☐ No deviation occurred in this quarter.

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

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

DRAFT

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

Part 70 Usage Report

(Submit Report Quarterly)

Source Name: Imagineering Enterprises, Inc
Source Address: 3722 Foundation Court, South Bend, Indiana 46628
Part 70 Permit No.: 141-35604-00574
Facility: Spray Booth EU-9
Parameter: Daily Total VOC Emissions
Limit: The total VOC input shall be less than fifteen (15.0) pounds per day, with compliance determined at the end of each day.

Month: _____ **Year:** _____

Day		Day	
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16			

☐ No deviation occurred in this quarter.

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

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

DRAFT

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

Part 70 Usage Report

(Submit Report Quarterly)

Source Name: Imagineering Enterprises, Inc
Source Address: 3722 Foundation Court, South Bend, Indiana 46628
Part 70 Permit No.: 141-35604-00574
Facility: Spray Booth EU-10
Parameter: Daily Total VOC Emissions
Limit: The total VOC input shall be less than fifteen (15.0) pounds per day, with compliance determined at the end of each day.

Month: _____ **Year:** _____

Day		Day	
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16			

☐ No deviation occurred in this quarter.

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

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

DRAFT

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

Part 70 Usage Report

(Submit Report Quarterly)

Source Name: Imagineering Enterprises, Inc
Source Address: 3722 Foundation Court, South Bend, Indiana 46628
Part 70 Permit No.: 141-35604-00574
Facility: Spray Booth EU-11
Parameter: Daily Total VOC Emissions
Limit: The total VOC input shall be less than fifteen (15.0) pounds per day, with compliance determined at the end of each day.

Month: _____ **Year:** _____

Day		Day	
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16			

☐ No deviation occurred in this quarter.

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

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

DRAFT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Imagineering Enterprises, Inc.
Source Address: 3722 Foundation Court, South Bend, Indiana 46628
Part 70 Permit No.: T141-35604-00574

Months: _____ to _____ Year: _____

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:	

DRAFT

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

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

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

Source Description and Location

Source Name:	Imagineering Enterprises, Inc.
Source Location:	3722 Foundation Court, South Bend, IN 46628
County:	St. Joseph
SIC Code:	3479 (Metal Coating and Allied Services)
Permit Renewal No.:	T141-35604-00574
Operation Permit Issuance Date:	August 14, 2015
Significant Permit Modification No.:	141-36832-00574
Permit Reviewer:	Monica Dick

On February 15, 2016 the Office of Air Quality (OAQ) received an application from Imagineering Enterprises, Inc. related to a modification to an existing stationary metal treatment facility and surface coating operation.

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. T141-35604-00574 on August 14, 2015. There have been no subsequent approvals issued.

County Attainment Status

The source is located in St. Joseph County.

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

[1]Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including St. Joseph County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 52 Subpart X. The 1-hour standard was revoked effective June 15, 2005.

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. St. Joseph County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) $PM_{2.5}$
St. Joseph County has been classified as attainment for $PM_{2.5}$. Therefore, direct $PM_{2.5}$, SO_2, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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

Fugitive Emissions

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

Source Status - Existing Source

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

This PTE table is from the TSD or Appendix A of T141-35604-00574, issued on August 14, 2015.

Process/ Emission Unit	Potential To Emit of the Entire Source Before the Modification (tons/year)								
	PM	PM10*	PM2.5*	SO2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Passivation and Etching Tanks	2.10	2.10	2.10	0	5.73	1.79	0	0	0
CARC Coating Line	5.97	5.97	5.97	0	0	202.25	0	<13.5[1]	<9.9 Chrome/ Toluene[2]
Blasting (AB-1)[4]	42.57	42.57	42.57	0	0	0	0	0	0
Powder Coating (PP-1)	3.75E-03	3.75E-03	3.75E-03	0	0	0	0	0	0
Cure Ovens	0.05	0.19	0.19	0.02	2.50	0.14	2.10	0.05	0.05 Hexane
Boiler (B-1)	0.03	0.12	0.12	0.01	1.52	0.08	1.28	0.03	0.03 Hexane
Space Heaters and Burn Off Oven	0.03	0.13	0.13	0.01	1.73	0.09	1.45	0.03	0.03 Hexane
Blasting Room and Cabinets	102.36	71.65	71.65	0	0	0	0	0	0
Paint Booths (EU-6 to EU-11)	1.04	1.04	1.04	0	0	16.43[3]	0	<13.5[1]	<9.9 Ethyl Benzene/Toluene/Xylene[2]
Cleaning Operations	0	0	0	0	3.12	25.53	0	5.47	5.47 HF
Air Makeup (AM-1 through AM-3) and Boiler B-10	0.20	0.81	0.81	0.06	10.62	0.58	8.92	0.19	0.20 Hexane
Dipping Lines	1.73	1.73	1.73	0	0	0.01	0	1.92	1.70 Manganese
Chem Line	0	0	0	0	0	0	0	3.33	2.33 Dipropylene Glycol monomethyl ether
Total PTE of Entire Source	**156.09**	**126.31**	**126.31**	**0.10**	**25.22**	**246.92**	**13.75**	**24.52**	**<10**
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA

*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".
[1]Combined total limit for CARC line and paint booths. Limited to render 326 IAC 2-4.1 (Major Sources of HAPs) not applicable.
[2]Limited to render 326 IAC 2-4.1 (Major Sources of HAPs) not applicable. CARC line and paint booths have a combined limit for Toluene and Ethyl Benzene.
[3]Limited to render 326 IAC 2-2 (PSD) and 326 IAC 8 (Volatile Organic Compounds) not applicable.
[4] Limited to render 326 IAC 2-2 (PSD) not applicable.

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant, excluding GHGs, is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

(c) On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a

memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

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

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Imagineeting Enterprises, Inc. on February 15, 2016, relating to the modification of the total Hazardous Air Pollutant (HAPs) limit to include additional existing emission units.

The existing total HAP limit of 13 tons/year for the CARC coating line and spray booths is restrictive and does not provide flexibility.

To provide flexibility, a total HAP limit of 24 tons per year will be specified and will include cleaning operations, dipping lines, and chem-film line, in addition to the CARC coating line and spray booths.

There is no new equipment associated with the modification.

Permit modification are listed in the proposed changes section of this document, see below.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

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

Permit Level Determination – Part 70 Modification to an Existing Source

There is no increase in the potential to emit of any regulated pollutants associated with this significant permit modification. This modification is not subject to the source modification requirements under 326 IAC 2-7-10.5. The changes will be incorporated into the permit as a Significant Permit Modification under 326 IAC 2-7-12(d), because the modification requires significant changes in existing Part 70 monitoring permit terms and conditions.

Permit Level Determination – PSD

There is no increase in the potential to emit of any regulated pollutants associated with this significant permit modification. There is no change in the status of this minor PSD stationary source. However, revisions have been made to the structure of the minor limit for total HAP emissions.

This PTE table is from the TSD T141-35604-00574, issued on August 14, 2015 updated emissions are shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

Process/ Emission Unit	Potential To Emit of the Entire Source After Modification (tons/year)								
	PM	PM10*	PM2.5*	SO2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Passivation and Etching Tanks	2.10	2.10	2.10	~~0~~ -	5.73	1.79	~~0~~ -	~~0~~ **Negl.**	~~0~~ **Negl.**
CARC Coating Line	5.97	5.97	5.97	~~0~~ -	~~0~~ -	202.25	~~0~~ -	~~<13.5~~[1]	~~<9.9~~ Chrome/ Toluene[2]
Blasting (AB-1)[4]	42.57	42.57	42.57	~~0~~ -	~~0~~ -	~~0~~ -	~~0~~ -	~~0~~ -	0 -
Powder Coating (PP-1)	~~3.75E-03~~ **Negl.**	~~3.75E-03~~ **Negl.**	~~3.75E-03~~ **Negl.**	~~0~~ -	~~0~~ -	~~0~~ -	~~0~~ -	~~0~~ -	0 -
Cure Ovens	0.05	0.19	0.19	0.02	2.50	0.14	2.10	**0.05**	0.05 Hexane
Boiler (B-1)	0.03	0.12	0.12	0.01	1.52	0.08	1.28	**0.03**	0.03 Hexane
Space Heaters and Burn Off Oven	0.03	0.13	0.13	0.01	1.73	0.09	1.45	**0.03**	0.03 Hexane
Blasting Room and Cabinets	102.36	71.65	71.65	~~0~~ -	~~0~~ -	~~0~~ -	~~0~~ -	~~0~~ -	0 -
Paint Booths (EU-6 to EU-11)	1.04	1.04	1.04	~~0~~ -	~~0~~ -	16.43[3]	~~0~~ -	~~<13.5~~[1]	~~<9.9~~ Ethyl Benzene/ Toluene/Xylene[2]
Cleaning Operations	~~0~~ -	~~0~~ -	~~0~~ -	~~0~~ -	3.12	25.53	~~0~~ -	~~5.47~~[1]	5.47 HF
Air Makeup (AM-1 through AM-3) and Boiler B-10	0.20	0.81	0.81	0.06	10.62	0.58	8.92	**0.19**	0.20 Hexane
Dipping Lines	1.73	1.73	1.73	~~0~~ -	~~0~~ -	0.01	~~0~~ -	~~1.92~~[1]	1.70 Manganese
Chem-**film** Line	~~0~~ -	~~0~~ -	~~0~~ -	~~0~~ -	~~0~~ -	~~0~~ -	~~0~~ -	~~3.33~~[1]	2.33 Dipropylene Glycol monomethyl ether
Total PTE of Entire Source	**156.09**	**126.31**	**126.31**	**0.10**	**25.22**	**246.92**	**13.75**	~~**24.52**~~ **24.3**	**<10**
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA

Negl. = Negligible
*$PM_{2.5}$ listed is direct $PM_{2.5}$.
*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".
[1]**Total HAP emission not to exceed 24.0 tons per year** ~~Combined total limit~~ for CARC line, paint booths**, parts cleaning operations, dipping lines, and chem-film line.** Limited to render 326 IAC 2-4.1 (Major Sources of HAPs) not applicable.
[2]**Single HAP emissions not to exceed 9.9 tons per year for CARC line and paint booths.** Limited to render 326 IAC 2-4.1 (Major Sources of HAPs) not applicable. ~~CARC line and paint booths have a combined limit for Toluene and Ethyl Benzene.~~
[3]Limited to render 326 IAC 2-2 (PSD) and 326 IAC 8 (Volatile Organic Compounds) not applicable.
[4] Limited to render 326 IAC 2-2 (PSD) not applicable.

The table below summarizes the potential to emit of the entire source after issuance of this permit modification, 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 Modification (tons/year)**								
	PM	PM10*	PM2.5*	SO2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Passivation and Etching Tanks	2.10	2.10	2.10	**-**	5.73	1.79	**-**	Negl.	Negl.
CARC Coating Line	5.97	5.97	5.97	-	-	202.25	-	[1]	Chrome/ Toluene[2]
Blasting (AB-1)[4]	42.57	42.57	42.57	-	-	-	-	-	-
Powder Coating (PP-1)	Negl.	Negl.	Negl.	-	-	-	-	-	-
Cure Ovens	0.05	0.19	0.19	0.02	2.50	0.14	2.10	0.05	0.05 Hexane
Boiler (B-1)	0.03	0.12	0.12	0.01	1.52	0.08	1.28	0.03	0.03 Hexane
Space Heaters and Burn Off Oven	0.03	0.13	0.13	0.01	1.73	0.09	1.45	0.03	0.03 Hexane
Blasting Room and Cabinets	102.36	71.65	71.65	-	-	-	-	-	-
Paint Booths (EU-6 to EU-11)	1.04	1.04	1.04	-	-	16.43[3]	**-**	[1]	Ethyl Benzene/ Toluene/Xylene[2]
Cleaning Operations	-	-	-	-	3.12	25.53	-	[1]	5.47 HF
Air Makeup (AM-1 through AM-3) and Boiler B-10	0.20	0.81	0.81	0.06	10.62	0.58	8.92	0.19	0.20 Hexane
Dipping Lines	1.73	1.73	1.73	-	-	0.01	-	[1]	1.70 Manganese
Chem-film Line	-	-	-	-	-	-	-	[1]	2.33 Dipropylene Glycol monomethyl ether
Total PTE of Entire Source	**156.09**	**126.31**	**126.31**	**0.10**	**25.22**	**246.92**	**13.75**	**24.3**	**<10**
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA

Negl. = Negligible
*$PM_{2.5}$ listed is direct $PM_{2.5}$.
*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".
[1]Total HAP emission not to exceed 24.0 tons per year for CARC line, paint booths, parts cleaning operations, dipping lines, and chem-film line. Limited to render 326 IAC 2-4.1 (Major Sources of HAPs) not applicable.
[2]Single HAP emissions not to exceed 9.9 tons per year for CARC line and paint booths. Limited to render 326 IAC 2-4.1 (Major Sources of HAPs) not applicable.
[3]Limited to render 326 IAC 2-2 (PSD) and 326 IAC 8 (Volatile Organic Compounds) not applicable.
[4] Limited to render 326 IAC 2-2 (PSD) not applicable.

In order to render 326 IAC 2-4.1 (Major Sources of HAPs) not applicable, total HAP emission shall not exceed 24.0 tons per year for CARC line, paint booths, parts cleaning operations, dipping lines, and chem-film line. The source wide total HAP emissions (including dilution and cleaning solvents) are limited to less than 25 tons per twelve (12) consecutive month period, with

compliance determined at the end of each month.

This is a modified emissions limit.

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

Federal Rule Applicability Determination

No new federal rules have become applicable due to the amendment.

State Rule Applicability Determination

No new state rules apply to the entire source or the individual emission units due to the amendment.

Compliance Determination and Monitoring Requirements

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

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

The Compliance Determination Requirements applicable to this modification are as follows:

(a) The CARC coating line has applicable compliance determination and compliance monitoring conditions as specified below:

(1) In order to comply with Condition D.2.1 **and D.2.4**, dry filters must be in operation and controlling emissions at all times that the CARC line and spray booths, identified as EU-6 through EU-11, are in operation.

(2)

Emission Unit/Control	Operating Parameters	Frequency
CARC Coating Line / Dry Filter	Filter Check	Once per day
	Overspray Observations	Once per week
	Stack Exhaust Observations	Once per month

The dry filters must operate properly to ensure compliance with 326 IAC 2-4.1 minor limit.

The compliance determination and compliance monitoring conditions are not new requirements. Operations of dry filter requirements are currently included in the permit to demonstrate

compliance with 326 IAC 6.5-1-2. Since dry filters control metal HAPs, compliance determination and compliance monitoring requirements for the dry filters are also required to ensure compliance with the 326 IAC 2-4.1 minor limits when reporting HAP emission after control.

(b) No testing is required for this modification.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T141-35604-00574. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

(1) The source requested a total HAP limit of 24 tons per year on emission units CARC coating line, spray booths, cleaning operations, dipping lines, and chem-film line rather than the 13.5 ton per year limits on the CARC line and spray booths.

No changes to the single HAP emissions limit is needed, since the PTE of single HAPs emitted at 10 tons per year or more (chrome, toluene, ethyl benzene, and xylene) are only emitted from the CARC coating line (EU-01 through EU-05) and spray booths(EU-6 through EU-11).

Additionally, compliance with the metal HAP limits has been clarified as emissions rather than input. Compliance with the 9.9 ton per year emissions limit associated with chrome emissions and the cobalt and chrome portion of the 24.0 ton per year emissions limit will be demonstrated after controls for the metal HAP emissions. For all other HAP emissions compliance is demonstrated by HAP usage. The permit has been revised as follows:

...

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

...

(g) One (1) Chem-film line, constructed in 2007**, consisting of open tanks containing non-VOC rinse and three (3) open tanks A-1, A-3, and A-6 with a non-VOC HAP rinse.**

...

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

...

Insignificant Activities:

(d) One (1) manganese dipping line, constructed in 2015, with varying chemicals used in each tank, consisting of the following:

(1) Four (4) tanks, uncontrolled, and exhausting indoors.

(2) Ten (10) tanks, uncontrolled, and exhausting outdoors.

(3) Three (3) tanks, controlled by mist elimination devices, and exhausting outdoors.

The manganese dipping line is considered a new affected source under 40 CFR 63, Subpart WWWWWW (6W).

(g) One (1) Chem-film line, constructed in 2007, consisting of open tanks containing non-VOC rinse and three (3) open tanks A-1, A-3, and A-6 with a non-VOC HAP rinse.

...

...

D.2.4 Hazardous Air Pollutant (HAP) Emissions Minor Limit [326 IAC 2-4.1]

In order to render the requirements of 326 IAC 2-4.1 not applicable, the Permittee shall comply with the following limits:

(a) The total single **non-metal** HAP input to the CARC coating line (EU-01 through EU-05) and spray booths (EU-6 through EU-11), **and single metal HAP emissions from the CARC coating line (EU-01 through EU-05),** shall not exceed nine and nine tenths (9.9) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The total input of any combination of **non-metal** HAPs to the CARC coating line (EU-01 through EU-05)**,** and spray booths (EU-6 through EU-11), **dipping lines (zinc/phosphate and manganese dipping lines), chem-film line (tanks A-3, A-6, and A-1), and parts cleaning operations (C1 through C7) (Section D.5), plus the total emissions of any combination of metal HAPs from the CARC coating line (EU-01 through EU-05),** shall not exceed ~~thirteen and five tenths (13.5)~~ **twenty four (24.0)** 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 HAPs from all other emission units at this source, shall limit the source-wide total potential to emit any single HAP to less than ten (10) tons per twelve (12) consecutive month period and total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-4.1 not applicable.

...

D.2.8 Control Requirements [326 IAC 2-7-6(6)] **[326 IAC 6.5-1-2] [326 IAC 2-4.1]**

In order to comply with Condition D.2.1 **and D.2.4**, dry filters must be in operation and controlling emissions at all times that the CARC line and spray booths, identified as EU-6 through EU-11, are in operation.

D.2.9 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-4][326 IAC 8-1-2(a)]

(a) Compliance with the VOC content limitation contained in Condition D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) Compliance with the VOC and HAPs emission limits contained in Conditions D.2.4 and D.2.5 shall be determined pursuant to 326 IAC 8-1-4 and 326 IAC 8-1-2(a), by preparing or obtaining from the manufacturer the copies of the VOC and HAP data sheets or Material Safety Data Sheets (MSDS). IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(c) Compliance with the metal HAPs emission limits contained in Conditions D.2.4 when emitting cobalt or chrome from the CARC coating line (EU-01 through EU-05), cobalt or chrome emissions shall be determined using the following equation:

Metal HAP Emissions = (gallons per month) x (pounds per gallon of metal HAP) x (1 - % transfer efficiency) x (1 - % particulate control

efficiency)

...

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

D.5.~~3~~**4** Record Keeping Requirements [326 IAC 8-3-8] **[326 IAC 2-4.1]**

...

(b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required to be maintained by this condition.

...

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

Part 70 Quarterly Report

Source Name:	Imagineering Enterprises, Inc
Source Address:	3722 Foundation Court, South Bend, Indiana 46628
Part 70 Permit No.:	141-35604-00574
Facility:	CARC Coating Line (EU-01 through EU-05) and Spray Booths (EU-6 through EU-11)
Parameter:	Chrome Emissions (Single HAP)
Limit:	Shall not exceed 9.9 tons per 12 consecutive month period with compliance determined at the end of each month

Metal HAP Emissions = (gallons per month) x (pounds per gallon of metal HAP) x (1 - % transfer efficiency) x (1 - % particulate control efficiency)

...

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

Part 70 Quarterly Report

Source Name:	Imagineering Enterprises, Inc
Source Address:	3722 Foundation Court, South Bend, Indiana 46628
Part 70 Permit No.:	141-35604-00574
Facility:	CARC Coating Line (EU-01 through EU-05)**,** ~~and~~ Spray Booths (EU-6 through EU-11)**, parts cleaning operations (C1 through C7), dipping lines (zinc/phosphate and manganese dipping lines), and chen-film lines (Tanks A-3, A-6, and A-1)**
Parameter:	Total HAPs emissions
Limit:	Shall not exceed ~~13.5~~ **24** tons per 12 consecutive month period with compliance determined at the end of each month

Additional Changes

IDEM, OAQ made additional modification 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.

(1) IDEM added the rule citation 326 IAC 2-7-5(1) to the Compliance Determination Requirements subsection title in Sections D. 2, D.3, and D.6 to clarify the authority of these conditions.

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

(2) IDEM added the rule citation to the following conditions to clarify the authority of these conditions.

D.2.10 Monitoring [326 IAC 2-7-5(1)] **[326 IAC 6.5-1-2] [326 IAC 2-4.1]**

...

D.2.11 Record Keeping Requirement **[326 IAC 8-2-9] [326 IAC 2-4.1] [326 IAC 8-1-1(b)] [326 IAC 2-2] [326 IAC 2-7-5(1)]**

...

D.2.12 Reporting Requirements **[326 IAC 2-4.1] [326 IAC 8-1-1(b)] [326 IAC 2-2]**

...

D.3.4 Control Requirements [326 IAC 2-7-6(6)] **[326 IAC 2-2] [326 IAC 6.5-1-2]**

D.3.5 Parametric Monitoring **[326 IAC 2-2] [326 IAC 6.5-1-2]**

...

D.3.6 Broken or Failed Bag Detection **[326 IAC 2-2] [326 IAC 6.5-1-2]**

...

D.3.7 Record Keeping Requirement **[326 IAC 2-2] [326 IAC 6.5-1-2]**

...

D.6.3 Particulate Control **[326 IAC 6.5]**

...

D.6.4 Broken or Failed Bag Detection **[326 IAC 6.5]**

...

D.6.5 Baghouse and Dust Collector Inspections **[326 IAC 6.5]**

...

D.6.6 Record Keeping Requirements **[326 IAC 6.5]**

...

(3) IDEM revised Sections E.1 and E.2 and added the rule citation 326 IAC 2-7-5(1) to the National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements subsection title for clarity.

SECTION E.1 ~~National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Operations at areas source [40 CFR Part 63, Subpart HHHHHH]~~ NESHAP

...

National Emission Standards for Hazardous Air Pollutants ~~[326 IAC 20][40 CFR Part 63]~~ [326 IAC 2-7-5(1)]

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

(a) Pursuant to 40 CFR 63.1~~1174~~, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1 for the ~~surface coating operations, spray booths EU-01 through EU-04, touch-up spray booth EU-05, and spray booths EU-6 through EU-11, as~~ **emission unit(s) listed above, except as otherwise** specified in ~~Table 1 of 40 CFR 63, Subpart HHHHHH in accordance with schedule in~~ 40 CFR 63 Subpart HHHHHH **(6H)**.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:
Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

E.1.2 National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Operations at areas source **NESHAP** [40 CFR Part 63, Subpart HHHHHH **(6H)**]

The Permittee shall comply with the following provisions of 40 CFR 63, Subpart HHHHHH **(6H)** ~~(National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Operations at areas source),~~**(**included as Attachment A, **to the operating permit), for the emission units listed above** ~~for the surface coating operation, spray booths EU-01 through EU-04, touch-up spray booth EU-05, and spray booths EU-6 through EU-11~~:

(1) 40 CFR 63.11169(c)
(2) 40 CFR 63.11170(a)(3), (b)
(3) 40 CFR 63.11171(a), (b), (c)
(4) 40 CFR 63.11172(a)(2)
(5) 40 CFR 63.11173(f),(g(1), (g)(3)
(6) 40 CFR 63.11174(a)
(7) 40 CFR 63.11175(a)
(8) 40 CFR 63.11176(a)
(9) 40 CFR 63.11177
(10) 40 CFR 63.11178
(11) 40 CFR 63.11179
(12) 40 CFR 63.11180
(13) Table 1

SECTION E.2 ~~EMISSIONS UNIT OPERATION CONDITIONS~~ NESHAP

...

National Emission Standards for Hazardous Air Pollutants ~~[326 IAC 20][40 CFR Part 63]~~ [326 IAC 2-7-5(1)]

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

(a) Pursuant to 40 CFR 63.1 the Permittee shall comply with t~~T~~he provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, **for the emission unit(s) listed above, except as** ~~apply to the facilities described in this section except when~~ otherwise specified in 40 CFR Part 63, Subpart WWWWWW**(6W)**.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:
Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

E.2.2 National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Plating and Polishing Operations **NESHAP** [40 CFR 63, Subpart WWWWWW **(6W)**]

The Permittee **shall comply** ~~which engages in plating which has emissions of compounds of one or more plating and polishing metal HAP shall comply~~ with the following provisions of 40 CFR Part 63, Subpart WWWWWW **(6W) (included as Attachment B to the operating permit), for the emission unit(s) listed above:**

(1) 40 CFR 63.11504
(2) 40 CFR 63.11505(a)(1) and (c)
(3) 40 CFR 63.11506(c)
(4) 40 CFR 63.11507(g)
(5) 40 CFR 63.11508
(6) 40 CFR 63.11509
(7) 40 CFR 63.11510
(8) 40 CFR 63.11511
(9) 40 CFR 63.11512
(10) Table 1 to Subpart WWWWWW **(6W)**

~~The entire text of 40 CFR 63, Subpart WWWWWW is included as Attachment B of this permit.~~

Conclusion and Recommendation

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 141-36832-00574. The staff recommend to the Commissioner that this Part 70 Significant Permit Modification be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Monica Dick 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) 234-1243 or toll free at 1-800-451-6027 extension 1243.

(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.

Indiana Department of Environmental Management
Office of Air Quality
Appendix A – Emission Calculations
Technical Support Document (TSD)

Company Name: Imagineering Enterprises
Address City IN Zip: 3722 Foundation Court, South Bend, IN 46628
Permit Renewal No: 141-36832-00574
Permit Reviewer: Monica Dick

	Uncontrolled Potential To Emit (ton/yr)													
Process / Emission Unit	**PM**	**PM_{10}**	**$PM_{2.5}$**	**SO_2**	**NO_X**	**VOC**	**CO**	**Cobalt**	**Chrome**	**Toluene**	**Ethyl Benzene**	**Xylene**	**HF**	**Total HAPs**
Passivation and Etching Tanks	2.10	2.10	2.10	-	5.73	1.79	-	-	-	-	-	-	0.00	0.00
CARC Coating Line	119.30	119.30	119.30	0	0	202.25	0	6.15	11.42	19.78	0.29	0	0.00	37.64
Blasting (AB-1)	135.15	135.15	135.15	-	-	-	-	-	-	-	-	-	-	-
Powder Coating (PP-1)	0.04	0.04	0.04	-	-	-	-	-	-	-	-	-	-	-
Cure Ovens	0.05	0.19	0.19	0.02	2.50	0.14	2.10	-	-	-	-	-	-	0.05
Boiler (B-1)	0.03	0.12	0.12	0.01	1.52	0.08	1.28	-	-	-	-	-	-	0.03
Space Heaters and Burn Off Oven	0.03	0.13	0.13	0.01	1.73	0.09	1.45	-	-	-	-	-	-	0.03
Blasting Room and Cabinets	102.36	71.65	71.65	-	-	-	-	-	-	-	-	-	-	-
Paint Booths (EU-6 to EU-11)	1.04	1.04	1.04	-	-	24.9	-	-	-	30.27	20.81	52.03	-	72.85
Cleaning operations	-	-	-	-	3.12	25.53	-	-	-	-	-	-	5.47	5.47
Air Makeup and B-10	0.20	0.81	0.81	0.06	10.62	0.58	8.92	-	0.00	-	-	-	-	0.20
Dipping Lines	1.73	1.73	1.73	-	-	0.01	-	-	0.00	0.00	0.00	-	-	1.92
Chem Line	-	-	-	-	-	-	-	-	-	-	-	-	1.01	3.33
Totals:	**362.04**	**332.27**	**332.27**	**0.10**	**25.22**	**255.39**	**13.75**	**6.15**	**11.43**	**50.05**	**21.10**	**52.03**	**6.48**	**121.52**

	Limited Potential To Emit (ton/yr)													
Process / Emission Unit	**PM**	**PM_{10}**	**$PM_{2.5}$**	**SO_2**	**NO_X**	**VOC**	**CO**	**Cobalt**	**Chrome**	**Toluene**	**Ethyl Benzene**	**Xylene**	**HF**	**Total HAPs**
Passivation and Etching Tanks	2.10	2.10	2.10	-	5.73	1.79	-	-	-	-	-	-	0.00	0.00
CARC Coating Line	5.97	5.97	5.97	0	0	202.25	0	6.15	[1]	[1]	[1]	[1]		[2]
Blasting (AB-1)	42.57	42.57	42.57	-	-	-	-	-	-	-	-	-	-	-
Powder Coating (PP-1)	0.00	0.00	0.00	-	-	-	-	-	-	-	-	-	-	-
Cure Ovens	0.05	0.19	0.19	0.02	2.50	0.14	2.10	-	-	-	-	-	-	0.05
Boiler (B-1)	0.03	0.12	0.12	0.01	1.52	0.08	1.28	-	-	-	-	-	-	0.03
Space Heaters and Burn Off Oven	0.03	0.13	0.13	0.01	1.73	0.09	1.45	-	-	-	-	-	-	0.03
Blasting Room and Cabinets	102.36	71.65	71.65	-	-	-	-	-	-	-	-	-	-	-
Paint Booths (EU-6 to EU-11)	1.04	1.04	1.04	-	-	16.43	-	-	[1]	[1]	[1]	[1]	-	[2]
Cleaning operations	-	-	-	-	3.12	25.53	-	-	-	-	-	-	5.47	
Air Makeup and B-10	0.20	0.81	0.81	0.06	10.62	0.58	8.92	-	0.0	-	-	-	-	0.20
Dipping Lines	1.73	1.73	1.73	0	0	0.01	0.00	-	0.0	0.0	0.0	-	-	[2]
Chem Line	-	-	-	-	-	-	-	-	-	-	-	-	1.01	
Totals:	**156.09**	**126.31**	**126.31**	**0.10**	**25.22**	**246.92**	**13.75**	**6.15**	**9.90**	**9.90**	**9.90**	**9.90**	**6.48**	**24.30**

[1] The CARC coating line and Paint Booths (EU-6 through EU-11) have a combined limit of less than 9.9 tons/year, for each HAP, compliance with these limits shall limit single HAP emissions to less than 10 tons per year.

[2] The combined CARC Coating Line, Paint Booths (EU-6 to EU-11), Cleaning operations, Dipping Lines, and Chem Line total HAP emission are limited to less than 25 tpy, compliance with these limits shall limit total HAP emission to less than 25 tons per year.

Appendix A: Emissions Calculations
PASSIVATION AND ETCH - MAXIMUM YEARLY THROUGHPUTS
Electroplating Potential To Emit

Company Name: Imagineering Enterprises
Address City IN Zip: 3722 Foundation Court, South Bend, IN 46628
Permit Renewal No: 141-36832-00574
Permit Reviewer: Monica Dick

EMISSION UNIT/PRODUCT	DENSITY LBS/GAL	THROUGHPUT GAL/DAY (24 hours)	THROUGHPUT LBS/HR	THROUGHPUT LBS/YR	AREA OF TANK
One (1) acid bath (P1)/ caustic cleaner	11.86	15.40	11.42	99,998	100
One (1) caustic bath (P2)/ Isoprep	11.90	0.92	0.68	5,994	100
One (1) acid bath (P3)/ Nitric acid 85	11.30	5.97	4.22	36,935	100
Two (2) solvent bath (P4)/ Isopropyl alcohol	6.55	1.00	0.41	3,586	100
One (1) caustic bath (E1)/ soda ash 100	11.67	2.00	1.46	12,779	100
One (1) acid bath (E2)/ sulfuric acid 25	15.30	4.80	4.59	40,208	100
One (1) rust preventative bath (E3)	9.42	35.00	20.61	180,511	100
One (1) alkaline cleaner (E4)	8.10	15.20	7.70	67,408	100

Key:

CN - Cyanide
Ni - Nickel
Cr - Chromium
HCl - Hydrochloric Acid
HNO_3 - Nitric Acid
H_2SO_4 - Sulfuric Acid
NOx - Nitrous Oxide
PM_{10} - Particulate Matter of Less than 10 Microns
SO_2 - Sulfur Dioxide
Conc. - concentration
HF - Hydrofluoric acid

PASSIVATION AND ETCH OPERATIONS - MATERIAL USAGES AND PERCENT CONCENTRATIONS
P = PASSIVATION TANK
E = ETCH TANK

	Max throughput lbs/yr	NITRIC ACID	CO	VOC	SULFURIC ACID	HYDROFLUORIC ACID	PM/PM_{10} EMISSIONS FACTOR (LBS/HR-FT^2)
P1 / caustic cleaner	99,998	0.00%	0.00%	0.00%	0.00%	0.00%	0.0006
P2 / Isoprep	5,994	0.00%	0.00%	0.00%	0.00%	0.00%	0.0006
P3 / Nitric acid 85	36,935	85.00%	0.00%	0.00%	0.00%	0.00%	0.0006
P4 / isopropyl alcohol	3,586	0.00%	0.00%	100.00%	0.00%	0.00%	0.0006
E1 / soda ash 100	12,779	0.00%	0.00%	0.00%	0.00%	0.00%	0.0006
E2 / sulfuric acid 25	40,208	0.00%	0.00%	0.00%	25.00%	0.00%	0.0006
E3 / rust preventative	180,511	0.00%	0.00%	0.00%	0.00%	0.00%	0.0006
E4/ Unikleen 88	67,408	0.00%	0.00%	0.00%	0.00%	0.00%	0.0006

PASSIVATION AND ETCH - POTENTIAL TO EMIT (PTE) (LBS/YR)

	NO_X	CO	VOC	SO_X	$PM/PM_{10\ (TONS)}$	$PM/PM_{10\ (LB/HR)}$	HF
P1 / caustic cleaner	0.00	0.00	0.00	0.00	525.60	0.26	0.00
P2 / Isoprep	0.00	0.00	0.00	0.00	525.60	0.26	0.00
P3 / Nitric acid 85	11,459.05	0.00	0.00	0.00	525.60	0.26	0.00
P4 / isopropyl alcohol	0.00	0.00	3,586.13	0.00	525.60	0.26	0.00
E1 / soda ash 100	0.00	0.00	0.00	0.00	525.60	0.26	0.00
E2 / sulfuric acid 25	0.00	0.00	0.00	0.00	525.60	0.26	0.00
E3 / rust preventative	0.00	0.00	0.00	0.00	525.60	0.26	0.00
E4/ Unikleen 88	0.00	0.00	0.00	0.00	525.60	0.26	0.00

PASSIVATION AND ETCH - POTENTIAL TO EMIT (PTE) (TONS/YR)

	NO_X	CO	VOC	SO_X	$PM/PM_{10\ (TONS)}$	HF
P1 / caustic cleaner	0.00	0.00	0.00	0.00	0.26	0.00
P2 / Isoprep	0.00	0.00	0.00	0.00	0.26	0.00
P3 / Nitric acid 85	5.73	0.00	0.00	0.00	0.26	0.00
P4 / isopropyl alcohol	0.00	0.00	1.79	0.00	0.26	0.00
E1 / soda ash 100	0.00	0.00	0.00	0.00	0.26	0.00
E2 / sulfuric acid 25	0.00	0.00	0.00	0.00	0.26	0.00
E3 / rust preventative	0.00	0.00	0.00	0.00	0.26	0.00
E4 / Unikleen 88	0.00	0.00	0.00	0.00	0.26	0.00
TOTALS - TPY	5.73	0.00	1.79	0.00	2.10	0.00

METHODOLOGY

*NO2 [lb/yr] = Usage [lb/yr] x Nitric acid [%] x 0.365 [lb NO2/lb HNO3]
NO2 [ton/yr] = NO2 [lb/yr] / 2000 [lb/ton]
**SO2 [lb/yr] = Usage [lb/yr] x Sulfuric acid [%] x 0.0 [lb SO2/lb H2SO4]
SO2 [ton/yr] = SO2 [lb/yr] / 2000 [lb/ton]
CO2 [ton/yr] = CO2 [lb/yr] / 2000 [lb/ton]
VOC [ton/yr] = VOC [lb/yr] / 2000 [lb/ton]
HF [ton/yr] = HF [lb/yr] / 2000 [lb/ton]
PM/PM_{10} [ton/yr] = Hours Operation (8760) [hr/yr] x Area [ft^2] x 0.0006 [lb PM/hr-ft^2] / 2000 [lb/ton]

PM/PM10 Emission factor is from AP-42 12.20-2 for Chrome Electroplating and Anodizing. Emission factors for aluminum Anodizing have not been determined.

*1 mol NO2 formed from 2 mol HNO3, therefore X lbs NO2 formed from 2*Y lb HNO3 -- X/Y = 0.365 lb NO2 per lb HNO3
** H2SO4 -->SO3 -->SO2 but only at high temperatures in gas phase (870 degrees Fahrenheit) therefore no SO2 emissions from H2SO4

Appendix A: Emissions Calculations
CARC Application
PM and VOC

Company Name: Imagineering Enterprises
Address City IN Zip: 3722 Foundation Court, South Bend, IN 46628
Permit Renewal No: 141-36832-00574
Permit Reviewer: Monica Dick

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC (ton/yr)	Particulate Potential (ton/yr)	Controlled Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	Overspray Control Efficiency
CARC Paint F93G105 (4 Total Spray Booths)	10.7	31.40%	0.0%	31.4%	51.7%	51.70%	0.07500	100.00	6.96	3.36	25.20	604.76	110.37	60.28	3.01	6.50	75%	95%
Primer E90H226	13.2	21.60%	0.0%	21.6%	0.0%	52.80%	0.05000	100.00	2.85	2.85	14.26	342.14	62.44	56.66	2.83	5.40	75%	95%
Primer Catalyst V93V5227 (Touch up Booth)	7.5	77.00%	0.0%	71.7%	19.5%	19.50%	0.01250	100.00	6.68	5.38	6.72	161.33	29.44	2.36	0.12	27.58	75%	95%
Cleaning Solvent	6.6	100.00%	100.0%	0.0%	100.0%	0.00%	0.00100	100.00	-	0.00	0.00	0.00	0.00	0.00	0.00	-	0%	95%
										Total Worst Case			**202.25**	**119.30**	**5.97**			

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: Emissions Calculations
CARC Application
HAP

Company Name: Imagineering Enterprises
Address City IN Zip: 3722 Foundation Court, South Bend, IN 46628
Permit Renewal No: 141-36832-00574
Permit Reviewer: Monica Dick

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Transfer Efficiency %	Weight % Toluene	Weight % Ethyl Benzene	Weight % Cobalt	Weight % Chrome	Toluene Emissions (ton/yr)	Ethyl Emissions (ton/yr)	Cobalt Emissions (ton/yr)	Chrome Emissions (ton/yr)
CARC Paint F93G105	10.7	0.075000	100.00	75%	0.00%	0.00%	7.00%	13.00%	0.00	0.00	6.15	11.42
Primer E90H226	13.2	0.050000	100.00	NA	4.00%	0.10%	0.00%	0.00%	11.56	0.29	0.00	0.00
Primer Catalyst V93V227	7.5	0.012500	100.00	NA	20.00%	0.00%	0.00%	0.00%	8.21	0.00	0.00	0.00
					0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
					Total State Potential Emissions				**19.78**	**0.29**	**6.15**	**11.42**
					Total HAPs				**37.64**			

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
Metal HAPs are controlled by dry filters in series. The pre-filter and second filter each have of a control efficiency of ≥ 98%.

Appendix A: Emissions Calculations
Units AB-1 and PP-1

Company Name: Imagineering Enterprises
Address City IN Zip: 3722 Foundation Court, South Bend, IN 46628
Permit Renewal No: 141-36832-00574
Permit Reviewer: Monica Dick

Potential to Emit (PTE) PM/PM2.5/PM10

BAGHOUSE ID	Baghouse Outlet Grain Loading (grains/acf)	Baghouse Outlet Air Flow Rate (acfm)	PTE of PM/PM10/PM2.5 BEFORE Controls* (lbs/hr)	PTE of PM/PM10/PM2.5 BEFORE Controls* (tons/yr)	Control Efficiency (%)	PTE of PM/PM10 After Controls* (lbs/hr)	PTE of PM/PM10 After Controls* (tons/yr)	Limited PTE of PM/PM2.5/PM10 (lbs/hr)	Limited PTE of PM/PM2.5/PM10 (tons/yr)
AB-1	0.003	1,200	30.86	135.15	99.9%	0.03	0.14	9.72	42.57
PP-1	0.0001	1,000	0.01	0.04	90.0%	0.00	0.00	N/A	N/A
Total			**30.87**	**135.19**		**0.03**	**0.14**		

METHODOLOGY
Potential to Emit PM/PM10/PM2.5 After Controls (lbs/hr) = [Baghouse Outlet Grain Loading (grains/acf)] * [Baghouse Outlet Air Flow Rate (acfm)] * [60
Potential to Emit PM/PM10/PM2.5 After Controls (tons/yr) = [Potential to Emit PM/PM10/PM2.5 After Controls (lbs/hr)] * [8760 hr/yr] * [ton/2000 lbs]
* Limited Control Efficiencies are calculated to establish the minimum control efficiency required to comply with applicable rules, not the maximum control
PM = Particulate Matter, PM-2.5 = Particulate Matter less than 2.5 micrometers, PM-10 = Particulate Matter less than 10 micrometers, PTE = Potential to Emit
PM/PM2.5/PM10 emissions from the Abrasive Blasting operation (AB-1) shall not exceed 9.72 lbs/hr in order to render 326 IAC 2-2 (PSD) not applicable.

Appendix A: Emissions Calculations
Natural Gas Combustion

Company Name: Imagineering Enterprises
Address City IN Zip: 3722 Foundation Court, South Bend, IN 46628
Permit Renewal No: 141-36832-00574
Permit Reviewer: Monica Dick

				Pollutant	**CO**	**NOx****	**PM***	**PM10***	**PM2.5***	**SO2**	**VOC**
				Emission Factor (lb/MMCF)	84.0	100	1.9	7.6	7.6	0.6	5.5
					Potential Emission tons/yr						
Emission Unit	**Number of Units**	**Heat Input Capacity MMBtu/hr**	**Potential Throughput MMCF/hr**	**Potential Throughput MMCF/yr**	**CO**	**NOx****	**PM***	**PM10***	**PM2.5***	**SO2**	**VOC**
CO-1 (CARC CURE OVEN)	1	3.00	0.00	25.03	1.05	1.25	0.02	0.10	0.10	0.01	0.07
CO-2 (PRIMER CURE OVEN)	1	3.00	0.00	25.03	1.05	1.25	0.02	0.10	0.10	0.01	0.07
B-1 (PROCESS BOILER)	1	3.65	0.00	30.45	1.28	1.52	0.03	0.12	0.12	0.01	0.08
BH-4 (COMFORT HEAT)	1	0.20	0.00	1.67	0.07	0.08	0.00	0.01	0.01	0.00	0.00
BH-2 (COMFORT HEAT)	1	0.22	0.00	1.84	0.08	0.09	0.00	0.01	0.01	0.00	0.01
BH-6 (COMFORT HEAT)	1	0.20	0.00	1.67	0.07	0.08	0.00	0.01	0.01	0.00	0.00
BH-5 (COMFORT HEAT)	1	0.32	0.00	2.67	0.11	0.13	0.00	0.01	0.01	0.00	0.01
BH-7 (COMFOR T HEAT)	1	0.20	0.00	1.67	0.07	0.08	0.00	0.01	0.01	0.00	0.00
BH-9 (COMFORT HEAT)	1	0.20	0.00	1.67	0.07	0.08	0.00	0.01	0.01	0.00	0.00
BH-8 (COMFORT HEAT)	1	2.00	0.00	16.69	0.70	0.83	0.02	0.06	0.06	0.01	0.05
BO-1 (BURN OFF OVEN)	1	0.80	0.00	6.67	0.28	0.33	0.01	0.03	0.03	0.00	0.02
AM-1 (AIR MAKEUP)	1	8.8	0.01	73.42	3.08	3.67	0.07	0.28	0.28	0.02	0.20
AM-2 (AIR MAKEUP)	1	4.0	0.00	33.37	1.40	1.67	0.03	0.13	0.13	0.01	0.09
AM-3 (AIR MAKEUP)	1	4.0	0.00	33.37	1.40	1.67	0.03	0.13	0.13	0.01	0.09
B-10 (BOILER)	1	8.65	0.01	72.17	3.03	3.61	0.07	0.27	0.27	0.02	0.20
Totals	**13.000**	**39.24**	**0.04**	**327.37**	**13.75**	**16.37**	**0.31**	**1.24**	**1.24**	**0.10**	**0.90**

Pollutant	**Benzene**	**DCB**	**Formaldehyde**	**Hexane**	**Toluene**	**Ni**	**Cr**	**Cd**	**Mn**	**Pb**	
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	2.1E-03	1.4E-03	1.1E-03	3.8E-04	5.0E-04	
	Potential Emission tons/yr										
Emission Unit	**Benzene**	**DCB**	**Formaldehyde**	**Hexane**	**Toluene**	**Ni**	**Cr**	**Cd**	**Mn**	**Pb**	**TOTAL**
CO-1 (CARC CURE OVEN)	0.00	0.00	0.00	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.02
CO-2 (PRIMER CURE OVEN)	0.00	0.00	0.00	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.02
B-1 (PROCESS BOILER)	0.00	0.00	0.00	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.03
BH-4 (COMFORT HEAT)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
BH-2 (COMFORT HEAT)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
BH-6 (COMFORT HEAT)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
BH-5 (COMFORT HEAT)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
BH-7 (COMFOR T HEAT)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
BH-9 (COMFORT HEAT)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
BH-8 (COMFORT HEAT)	0.00	0.00	0.00	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.02
BO-1 (BURN OFF OVEN)	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.01
AM-1 (AIR MAKEUP)	0.00	0.00	0.00	0.07	0.00	0.00	0.00	0.00	0.00	0.00	0.07
AM-1 (AIR MAKEUP)	0.00	0.00	0.00	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.03
AM-1 (AIR MAKEUP)	0.00	0.00	0.00	0.03	0.00	0.00	0.00	0.00	0.00	0.00	0.03
B-10 (BOILER)	0.00	0.00	0.00	0.06	0.00	0.00	0.00	0.00	0.00	0.00	0.07
Totals	**0.00**	**0.00**	**0.00**	**0.29**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.11**

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

Methodology
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) * 8,760 hrs/yr * 1 MMCF/1,050 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) * Emission Factor (lb/MMCF) / 2,000 lb/ton
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)
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu, MMCF = 1,000,000 Cubic Feet of Gas

Abbreviations

PM = Particulate Matter	NOx = Nitrous Oxides	DCB = Dichlorobenzene	Cr = Chromium
PM10 = Particulate Matter (<10 ι	VOC - Volatile Organic Compounds	Pb = Lead	Mn = Manganese
SO2 = Sulfur Dioxide	CO = Carbon Monoxide	Cd = Cadmium	Ni = Nickel

Appendix A: Emissions Calculations
Abrasive Blasting Room and Cabinets

Company Name: Imagineering Enterprises
Address City IN Zip: 3722 Foundation Court, South Bend, IN 46628
Permit Renewal No: 141-36832-00574
Permit Reviewer: Monica Dick

Description	Unit ID	Max. Abrasive Usage (lbs/hr)	*PM Emission Factor (lbs/lbs)	Fraction of time Wet Blasting (%)	PTE of PM Uncontrolled (lbs/hr)	PTE of PM Uncontrolled (tons/yr)	*PM10 Emission Factor (lbs/lbs PM)	PTE of PM10 Uncontrolled (lbs/hr)	PTE of PM10 Uncontrolled (tons/yr)
Small Cabinet Blaster: Glass Plastic Bead or Aluminum Oxide Media	**SCB1**	10.00	0.041	0	0.41	1.80	0.70	0.29	1.26
Large Dual Cabinet Blaster: Aluminum Oxide Media	**LCB1**	25.00	0.041	0	1.03	4.49	0.70	0.72	3.14
Small Cabinet Blaster: Glass Plastic Bead or Aluminum Oxide Media	**SCB2**	10.00	0.041	0	0.41	1.80	0.70	0.29	1.26
Wet Blaster: Vermiculite Media	**WB1**	10.00	0.041	100	0.21	0.90	0.70	0.14	0.63
Tumble Blaster: Aluminum Oxide Media	**TB1**	10.00	0.041	0	0.41	1.80	0.70	0.29	1.26
Small Cabinet Blaster: Glass, Plastic Beads or Aluminum Oxide	**SCB3**	10.00	0.041	0	0.41	1.80	0.70	0.29	1.26
Blasting Room; Glass, Plastic Beads, or Aluminum Oxide	**BR**	500.00	0.041	0	20.50	89.79	0.70	14.35	62.85
	Totals					**102.36**			**71.65**

*The emission factors are the ones for sand blasting from Air Quality Permits, Vol. 1, Section 3 "abrasive blasting" (1991 Edition)

Methodology

Assume PM2.5 is same as PM10

PTE = Potential To emit

PTE of PM/PM10 Uncontrolled (lbs/hr) = Max. Abrasive Usage (lbs/hr) x PM/PM10 Emission Factor (lbs/lbs) x (1 - fraction of wet blasting/200)

PTE of PM/PM10 Uncontrolled (tons/yr) = Max. Abrasive Usage (lbs/hr) x PM/PM10 Emission Factor (lbs/lbs) x 8760 hr/yr x 1 ton/2000 lbs

Appendix A: Emissions Calculations
Paint Booth EU-6 through EU-11

Company Name: Imagineering Enterprises
Address City IN Zip: 3722 Foundation Court, South Bend, IN 46628
Permit Renewal No: 141-36832-00574
Permit Reviewer: Monica Dick

Booth & Material	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Material Usage Rate (gal/unit)	Maximum Throughput (unit/hour)	Pounds VOC per Gallon of Coating less Water	Pounds VOC per Gallon of Coating	PTE of VOC (lbs/hour)	PTE of VOC (tons/year)	PTE of PM/PM10 (tons/year)	Transfer Efficiency
Booth (EU-6)								EU-6						
Paint	10.5	96.22%	3.78%	8.00%	2.00%	0.00%	0.00500	80.00	0.86	0.84	0.34	1.5	0.17	75%
Primer	12.9	100.00%	15.69%	14.80%	2.00%	0.00%	0.00400	80.00	1.95	1.91	0.61	2.7	0.00	75%
Booth (EU-7)								EU-7						
Paint	10.5	96.22%	3.78%	8.00%	2.00%	0.00%	0.00500	80.00	0.86	0.84	0.34	1.5	0.17	75%
Primer	12.9	100.00%	15.69%	14.80%	2.00%	0.00%	0.00400	80.00	1.95	1.91	0.61	2.7	0.00	75%
Booth (EU-8)								EU-8						
Paint	10.5	96.22%	3.78%	8.00%	2.00%	0.00%	0.00500	80.00	0.86	0.84	0.34	1.5	0.17	75%
Primer	12.9	100.00%	15.69%	14.80%	2.00%	0.00%	0.00400	80.00	1.95	1.91	0.61	2.7	0.00	75%
Booth (EU-9)								EU-9						
Paint	10.50	96.22%	3.78%	8.00%	2.00%	0.00%	0.0050	80.00	0.86	0.84	0.34	1.5	0.17	75%
Primer	12.90	100.00%	15.69%	14.80%	2.00%	0.00%	0.00400	80.00	1.95	1.91	0.61	2.7	0.00	75%
Booth (EU-10)								EU-10						
Paint	10.50	96.22%	3.78%	8.00%	2.00%	0.00%	0.0050	80.00	0.86	0.84	0.34	1.5	0.17	75%
Primer	12.90	100.00%	15.69%	14.80%	2.00%	0.00%	0.00400	80.00	1.95	1.91	0.61	2.7	0.00	75%
Booth (EU-11)								EU-11						
Paint	10.50	96.22%	3.78%	8.00%	2.00%	0.00%	0.0050	80.00	0.86	0.84	0.34	1.5	0.17	75%
Primer	12.90	100.00%	15.69%	14.80%	2.00%	0.00%	0.00400	80.00	1.95	1.91	0.61	2.7	0.00	75%
									PM Control Efficiency:	90%				
										Uncontrolled		**24.9**	**1.04**	

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

Limited VOC per Booth (lbs/day)	Limited VOC per Booth (tons/year)
15.00	**2.74**

Total Limited VOC	**16.43**

METHODOLOGY
Pounds of VOC per Gallon Coating less Water = Density (lbs/gal) * Weight % Organics *1/ (1-Volume % Water)
Pounds of VOC per Gallon Coating = Density (lbs/gal) * Weight % Organics
PTE of VOC (lbs/hour) = Pounds of VOC per Gallon Coating (lb/gal) * Material Usage Rate (gal/unit) * Maximum Throughput (units/hour)
PTE of VOC (tons/year) = Pounds of VOC per Gallon of Coating (lbs/gal) * Material Usage Rate (gal/unit) * Maximum Throughput (units/hour) * 8760 hours/year * 1 ton/2000 lbs
PTE of PM/PM10 (tons/year) = Maximum Throughput (units/hour) * Material Usage Rate (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer Efficiency %) * 8760 hours/year * 1 ton/2000 lbs
Assume PM2.5 and PM10 is same as PM
VOC is limited to less than 15 pounds per day to comply with 326 IAC 8-1-1(b) and to be exempt from all other 326 IAC 8 rules. The limit is also used to render 326 IAC 2-2 (PSD) not applicable.

Appendix A: Emissions Calculations
Paint Booth EU-6 through EU-11
HAP calculations

Company Name: Imagineering Enterprises
Address City IN Zip: 3722 Foundation Court, South Bend, IN 46628
Permit Renewal No: 141-36832-00574
Permit Reviewer: Monica Dick

Booth & Material	Density (lbs/gal)	Weight % Xylene	Weight % Toluene	Weight % Methyl isobutyl ketone	Weight % Ethyl Benzene	Weight % Lead Compounds	Material Usage Rate (gal/hour)	Xylene Emissions (tons/year)	Toluene Emissions (tons/year)	Methyl isobutyl ketone emissions (tons/year)	Ethyl Benzene Emissions (tons/year)	Lead Compounds Emissions (tons/year)
Booth (EU-6)							EU-6					
Lube-Lok 1000	9.90	50.00%	0.00%	0.00%	20.00%	0.00%	0.40	8.67	0.00	0.00	3.47	0.00
Ecoalube	9.60	0.00%	30.00%	5.00%	0.00%	5.00%	0.40	0.00	5.05	0.84	0.00	0.84
Booth (EU-7)							EU-7					
Lube-Lok 1000	9.9	50.00%	0.00%	0.00%	20.00%	0.00%	0.40	8.67	0	0	3.47	0
Ecoalube	9.6	0.00%	30.00%	5.00%	0.00%	5.00%	0.40	0	5.05	0.84	0	0.84
Booth (EU-8)							EU-8					
Lube-Lok 1000	9.9	50.00%	0.00%	0.00%	20.00%	0.00%	0.40	8.67	0	0	3.47	0
Ecoalube	9.6	0.00%	30.00%	5.00%	0.00%	5.00%	0.40	0	5.05	0.84	0	0.84
Booth (EU-9)							EU-9					
Lube-Lok 1000	9.9	50.00%	0.00%	0.00%	20.00%	0.00%	0.40	8.67	0	0	3.47	0
Ecoalube	9.6	0.00%	30.00%	5.00%	0.00%	5.00%	0.40	0	5.05	0.84	0	0.84
Booth (EU-10)							EU-10					
Lube-Lok 1000	9.9	50.00%	0.00%	0.00%	20.00%	0.00%	0.40	8.67	0	0	3.47	0
Ecoalube	9.6	0.00%	30.00%	5.00%	0.00%	5.00%	0.40	0	5.05	0.84	0	0.84
Booth (EU-11)							EU-11					
Lube-Lok 1000	9.9	50.00%	0.00%	0.00%	20.00%	0.00%	0.40	8.67	0	0	3.47	0
Ecoalube	9.6	0.00%	30.00%	5.00%	0.00%	5.00%	0.40	0	5.05	0.84	0	0.84
								52.03	30.27	5.05	20.81	5.05
											Total HAPs	**72.85**

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

METHODOLOGY

Individual HAP Emissions (tons/year) = density * Weight % HAP * Material Usage Rate * 8760 hours/year *1 ton/2000 lbs
Worst uncontrolled = sum of highest individual HAP per booth
Total HAP = Highest Sum of all Individual HAPs of all of the coatings

Appendix A: Emissions Calculations
Cleaning Tanks (C1 through C7)

Company Name: Imagineering Enterprises
Address City IN Zip: 3722 Foundation Court, South Bend, IN 46628
Permit Renewal No: 141-36832-00574
Permit Reviewer: Monica Dick

Material	Maximum Consumption (lbs/hr)	Weight % VOC	VOC Emissions (tons/yr)	NOx Emissions (tons/yr)
MEK[1]	2.63	100%	11.52	N/A
Hydrofluoric Acid[2]	1.25	49%	5.47	N/A
Nitric acid*	1.95	85%	8.54	3.12
	Total (tons/yr)		**25.53**	**3.12**

Methodology
VOC/HAPs emission rate (tons/yr) = Material Usage (lbs/hr) * 8760 hrs/yr *1ton/2000 lbs
*1 mol NO2 formed from 2 mol HNO3, therefore X lbs NO2 formed from 2*Y lb HNO3 -- X/Y = 0.365 lb NO2 per lb HNO3
[1]MEK is a VOC but has been delisted as a HAP.
[2]Hydrofluoric acid is both a VOC and a HAP.

Appendix A: Emissions Calculations
Dipping Lines (zinc/phosphate and manganese dipping lines)

Company Name: Imagineering Enterprises
Address City IN Zip: 3722 Foundation Court, South Bend, IN 46628
Permit Renewal No: 141-36832-00574
Permit Reviewer: Monica Dick

Line	Tank	Pollutant	Maximum Usage Solution	maximum usage units	density in lbs/gal	Weight % Pollutant	PTE (tons/yr)
Zinc/phosphate	7	Nickel	54	gallons per year	13.19	1	0.00
	12	Chrome	2,366	mL per year	12.60	40	0.00
	13	diethylene glycol monobutyl ether	132	gallons per year	7.76	10	0.05
Manganese (image tanks)	5	Manganese	140	gallons per year	11.10	40	0.31
	5	Nickel	140	gallons per year	11.10	1	0.01
	8	diethylene glycol monobutyl ether	30	gallons per year	7.76	10	0.01
	9	Chrome	2,250	mL per year	12.60	40	0.00
	10	Chrome	2,250	mL per year	12.60	40	0.00
Manganese (manganese tanks)	5	HCL	100	gallons per year	9.70	37	0.18
	6	Manganese	20	lbs per year	-	60	0.60
	7	Manganese	16	lbs per year	-	50	0.40
	8	Manganese	77	gallons per year	11.35	30	0.13
	8	Nickel	77	gallons per year	11.35	1	0.00
	9	Manganese	77	gallons per year	11.10	30	0.13
	9	Nickel	77	gallons per year	11.10	1	0.00
	12	Manganese	77	gallons per year	11.35	30	0.13
	12	Nickel	77	gallons per year	11.35	1	0.00

	(tons/yr)
Total Manganese	1.70
Total Nickel	0.02
Total Chrome	0.00
Total HCl	0.18
Total diethylene glycol monobutyl ether	0.01
Total HAPs	**1.92**

Methodology
Diethylene glycol monobutyl ether is also a VOC.
Manganese, Nickel, and Chrome are also potential sources of PM, PM10, and PM2.5
PTE (tons/year) = Maximum usage (gal/year) * Density (lbs/gal) * Weight % Pollutant *1 ton/2000 lbs
PTE (tons/year) = Maximum usage (mL/year) * 1 gal/ 3785.4mL* Density (lbs/gal) * Weight % Pollutant *1 ton/2000 lbs
PTE (tons/year) = Maximum usage (lbs/year) * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Chem-film Line

Company Name: Imagineering Enterprises
Address City IN Zip: 3722 Foundation Court, South Bend, IN 46628
Permit Renewal No: 141-36832-00574
Permit Reviewer: Monica Dick

Open Tank A-3
Sulfuric Acid and Hydrogen Fluoride

Flow Rate (acfm) = 100
Temp (R) = 560

Mol wt HF	Mol Wt H2SO4	HF Ef (ppmv)	H2SO4 Ef (ppmv)	HF Emissions (tpy)	H2SO4 Emission (tpy)
20.01	98	375.61	1.475	0.48	0.01

Open Tank A-6
Hydrogen Fluoride
Flow Rate (acfm) = 100
Temp (R) = 560

Mol wt HF	HF Ef (ppmv)	HF Emissions (tpy)
20.01	407.29	0.52

Open Tank A-1
Dipropylene glycol monomethyl ether
Flow Rate (acfm) = 100
Temp (R) = 600

Mol Wt	Ef (ppmv)	Emissions (tpy)
90	430.87	2.33

Emissions (tpy) = [flow rate (acfm) x Ef (ppmv)/1000,000] x [1 atm / R (0.07302 atm - cf/lb mole-R) * Temp (R)] * Mole weight * 60 (min/hr) * 8760 (hr/yr) * 1/2000 (ton/lb)
* H2SO4 -->SO3 -->SO2 but only at high temperatures in gas phase (870 degrees Fahrenheit) therefore no SO2 emissions from H2SO4

Indiana Department of Environmental Management
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

February 29, 2016

Mr. Eli Russi
Imagineering Enterprises, Inc.
1302 W. Sample Street
South Bend, Indiana 46619

Re: Public Notice
Imagineering Enterprises, Inc.
Permit Level: Significant Permit Modification
Permit Number: 141-35604-00574

Dear Mr. Russi:

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

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the South Bend Tribune in South Bend, Indiana publish the abbreviated version of the public notice no later than March 3, 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 St. Joseph County Public Library on, 304 S. Main Street in South Bend, 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 Monica Dick, 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 4-1243 or dial (317) 234-1243.

Sincerely,

Vicki Biddle

Vicki Biddle
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 2/17/2016

Indiana Department of Environmental Management
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Michael R. Pence
Governor

Carol S. Comer
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

February 29, 2016

South Bend Tribune
225 W. Colfax Avenue
South Bend, Indiana 46626

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Imagineering Enterprises, Inc., St. Joseph 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 March 3, 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 Vicki Biddle at 800-451-6027 and ask for extension 3-6867 or dial 317-233-6867.

Sincerely,

Vicki Biddle

Vicki Biddle
Permit Branch
Office of Air Quality

Permit Level: Title V – Significant Permit Modification
Permit Number: 141-36832-00574

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

Michael R. Pence
Governor

Carol S. Comer
Commissioner

February 29, 2016

To: St. Joseph Public Library

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

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

Applicant Name: Imagineering Enterprises, Inc
Permit Number: 141-36832-00574

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

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Notice of Public Comment

February 29, 2016
Imagineering Enterprises, Inc.
141-36832-00574

Dear Concerned Citizen(s):

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

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

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

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

Enclosure
PN AAA Cover.dot 2/17/2016

Mail Code 61-53

IDEM Staff	VBIDDLE 2/29/2016 Imagineering Enterprises, Inc 141-36832 -00574 DRAFT			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**	

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1		Eli Russi Imagineering Enterprises, Inc 1302 W Sample St South Bend IN 46619 (Source CAATS)									
2		Matthew Huff COO Imagineering Enterprises, Inc 1302 W Sample St South Bend IN 46619 *(RO CAATS)*									
3		Mr. Wayne Falda South Bend Tribune 255 W Colfax Ave South Bend IN 46626 *(Affected Party)*									
4		South Bend City Council / Mayors Office 227 W. Jefferson Blvd. South Bend IN 46601 *(Local Official)*									
5		St. Joseph County Board of Commissioners 227 West Jefferson Blvd, South Bend IN 46601 *(Local Official)*									
6		St. Joseph County Health Department 227 W Jefferson Blvd, Room 825 South Bend IN 46601-1870 *(Health Department)*									
7		St. Joseph County Public Library 304 South Main Street South Bend IN 46601 *(Library)*									
8		Ms. Kathy Moore KERAMIDA Inc. 401 N. College Avenue Indianapolis IN 46202 *(Consultant)*									
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