



# Indiana Department of Environmental Management

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

Michael R. Pence  
Governor

Carol S. Comer  
Commissioner

## NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a  
Federally Enforceable State Operating Permit (FESOP)

FESOP Renewal No.: F097-37251-00702

The Indiana Department of Environmental Management (IDEM) has received an application from Comlux America, LLC located at 2910 South High School Road, Indianapolis, Indiana 46241 for a renewal of its FESOP issued on October 16, 2012. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow Comlux America, LLC to continue to operate its existing source.

This draft FESOP Renewal 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. 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:

Indianapolis Public Library - Decatur Branch  
5301 Kentucky Avenue  
Indianapolis, IN 46221

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

### How can you participate in this process?

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

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

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number F097-37251-00702 in all correspondence.

**Comments should be sent to:**

Allen Reimer  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for extension 3-0863  
Or dial directly: (317) 233-0863  
Fax: (317) 232-6749 attn: Allen Reimer  
E-mail: acreimer@idem.IN.gov

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

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

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

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

If you have any questions, please contact Allen Reimer or my staff at the above address.



Nathan C. Bell, Section Chief  
Permits Branch  
Office of Air Quality



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Michael R. Pence  
Governor

DRAFT

Carol S. Comer  
Commissioner

## Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Comlux America, LLC  
2910 South High School Road  
Indianapolis, Indiana 46241**

(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. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

|  |                  |
|--|------------------|
| Operation Permit No. F097-37251-00702                                    |                  |
| Issued by:   | Issuance Date:   |
| Nathan C. Bell, Section Chief<br>Permits Branch<br>Office of Air Quality | Expiration Date: |

## TABLE OF CONTENTS

|                  |  |           |
|------------------|--|-----------|
| <b>SECTION A</b> | <b>SOURCE SUMMARY .....</b>  | <b>4</b>  |
| A.1              | General Information [326 IAC 2-8-3(b)]   |           |
| A.2              | Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]   |           |
| A.3              | Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]   |           |
| A.4              | FESOP Applicability [326 IAC 2-8-2]  |           |
| <b>SECTION B</b> | <b>GENERAL CONDITIONS .....</b>  | <b>6</b>  |
| B.1              | Definitions [326 IAC 2-8-1]  |           |
| B.2              | Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]   |           |
| B.3              | Term of Conditions [326 IAC 2-1.1-9.5]   |           |
| B.4              | Enforceability [326 IAC 2-8-6][IC 13-17-12]  |           |
| B.5              | Severability [326 IAC 2-8-4(4)]  |           |
| B.6              | Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]   |           |
| B.7              | Duty to Provide Information [326 IAC 2-8-4(5)(E)]  |           |
| B.8              | Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]   |           |
| B.9              | Annual Compliance Certification [326 IAC 2-8-5(a)(1)]  |           |
| B.10             | Compliance Order Issuance [326 IAC 2-8-5(b)]   |           |
| B.11             | Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]  |           |
| B.12             | Emergency Provisions [326 IAC 2-8-12]  |           |
| B.13             | Prior Permits Superseded [326 IAC 2-1.1-9.5]   |           |
| B.14             | Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]  |           |
| B.15             | Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8] |           |
| B.16             | Permit Renewal [326 IAC 2-8-3(h)]  |           |
| B.17             | Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]  |           |
| B.18             | Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]   |           |
| B.19             | Source Modification Requirement [326 IAC 2-8-11.1]   |           |
| B.20             | Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]   |           |
| B.21             | Transfer of Ownership or Operational Control [326 IAC 2-8-10]  |           |
| B.22             | Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-8-4(6)][326 IAC 2-8-16][326 IAC 2-1.1-7]   |           |
| B.23             | Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 1-1-6]   |           |
| <b>SECTION C</b> | <b>SOURCE OPERATION CONDITIONS.....</b>  | <b>15</b> |
|                  | <b>Emission Limitations and Standards [326 IAC 2-8-4(1)] .....</b>   | <b>15</b> |
| C.1              | Overall Source Limit [326 IAC 2-8]   |           |
| C.2              | Opacity [326 IAC 5-1]  |           |
| C.3              | Open Burning [326 IAC 4-1][IC 13-17-9]   |           |
| C.4              | Incineration [326 IAC 4-2][326 IAC 9-1-2]  |           |
| C.5              | Fugitive Dust Emissions [326 IAC 6-4]  |           |
| C.6              | Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]  |           |
|                  | <b>Testing Requirements [326 IAC 2-8-4(3)].....</b>  | <b>17</b> |
| C.7              | Performance Testing [326 IAC 3-6]  |           |
|                  | <b>Compliance Requirements [326 IAC 2-1.1-11] .....</b>  | <b>17</b> |
| C.8              | Compliance Requirements [326 IAC 2-1.1-11]   |           |
|                  | <b>Compliance Monitoring Requirements [326 IAC 2-8-4(1)][326 IAC 2-8-5(a)(1)] .....</b>  | <b>18</b> |
| C.9              | Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]  |           |
| C.10             | Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]   |           |
|                  | <b>Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)] .....</b>  | <b>18</b> |
| C.11             | Risk Management Plan [326 IAC 2-8-4][40 CFR 68]  |           |
| C.12             | Response to Excursions or Exceedances [326 IAC 2-8-4][326 IAC 2-8-5]   |           |

|  |   |           |
|--|---|-----------|
| C.13   | Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]  |           |
| <b>Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]</b>  |   | <b>19</b> |
| C.14   | General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]   |           |
| C.15   | General Reporting Requirements [326 IAC 2-8-4(3)(C)][326 IAC 2-1.1-11]  |           |
| <b>Stratospheric Ozone Protection</b>  |   | <b>20</b> |
| C.16   | Compliance with 40 CFR 82 and 326 IAC 22-1  |           |
| <b>SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS</b>   |   | <b>21</b> |
| <b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b>   |   | <b>21</b> |
| D.1.1  | Hazardous Air Pollutant Limitations [326 IAC 2-8][326 IAC 2-4.1]  |           |
| D.1.2  | Particulate Matter Limitations Except Lake County [326 IAC 6.5-1-2]   |           |
| D.1.3  | Volatile Organic Compounds (VOC) [326 IAC 8-2-10]   |           |
| D.1.4  | Volatile Organic Compounds (VOC) [326 IAC 8-2-12]   |           |
| D.1.5  | Preventive Maintenance Plan [326 IAC 2-8-4(9)]  |           |
| <b>Compliance Determination Requirements [326 IAC 2-8-4(1)]</b>  |   | <b>22</b> |
| D.1.6  | Volatile Organic Compounds (VOC)[326 IAC 8-1-2][326 IAC 8-1-4]  |           |
| <b>Compliance Monitoring Requirements [326 IAC 2-8-4(1)][326 IAC 2-8-5(a)(1)]</b>  |   | <b>22</b> |
| D.1.7  | Monitoring  |           |
| <b>Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]</b>  |   | <b>23</b> |
| D.1.8  | Record Keeping Requirements   |           |
| D.1.9  | Reporting Requirements  |           |
| <b>SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS</b>   |   | <b>25</b> |
| <b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b>   |   | <b>25</b> |
| D.2.1  | Particulate Matter Limitations Except Lake County [326 IAC 6.5-1-2]   |           |
| <b>Compliance Determination Requirements [326 IAC 2-8-4(1)]</b>  |   | <b>25</b> |
| D.2.2  | Particulate Control   |           |
| <b>SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS</b>   |   | <b>26</b> |
| <b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b>   |   | <b>26</b> |
| D.3.1  | Volatile Organic Compounds (VOC) [326 IAC 8-3-2]  |           |
| D.3.2  | Volatile Organic Compounds (VOC) [326 IAC 8-3-8]  |           |
| <b>Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]</b>  |   | <b>27</b> |
| D.3.3  | Record Keeping Requirements   |           |
| <b>SECTION E.1 NESHAP</b>  |   | <b>28</b> |
| <b>National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-8-4(1)]</b>   |   | <b>28</b> |
| E.1.1  | General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A] |           |
| E.1.2  | National Emission Standards for Hazardous Air Pollutants for Plating and Polishing Operations NESHAP [40 CFR Part 63, Subpart WWWWWW]                   |           |
| <b>Certification</b>   |   | <b>29</b> |
| <b>Emergency Occurrence Report</b>   |   | <b>30</b> |
| <b>FESOP Quarterly Report</b>  |   | <b>32</b> |
| <b>FESOP Quarterly Report</b>  |   | <b>33</b> |
| <b>Quarterly Deviation and Compliance Monitoring Report</b>  |   | <b>34</b> |
| <b>Attachment A: National Emission Standards for Hazardous Air Pollutants for Plating and Polishing Operations NESHAP [40 CFR Part 63, Subpart WWWWWW]</b> |   |           |

## SECTION A

## SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary aircraft part surface coating operation.

|                              |  |
|------------------------------|--|
| Source Address:              | 2910 South High School Road, Indianapolis, Indiana 46241   |
| General Source Phone Number: | 317-500-3387   |
| SIC Code:                    | 4581   |
| County Location:             | Marion Wayne Township  |
| Source Location Status:      | Nonattainment for SO <sub>2</sub> standard<br>Attainment for all other criteria pollutants   |
| Source Status:               | Federally Enforceable State Operating Permit Program<br>Minor Source, under PSD and Emission Offset Rules<br>Minor Source, Section 112 of the Clean Air Act<br>Not 1 of 28 Source Categories |

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

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

- (a) Two (2) HVLP paint spray booths, identified as 1 and 2, with a maximum capacity of two (2) cabinets per hour, each, constructed in 2012, utilizing dry filters for particulate control exhausting to stacks 1 and 2, respectively.
- (b) Two (2) glue air walls, identified as 3 and 4, with a maximum capacity of one (1) sheet of 4.8 veneer per hour, each, constructed in 2012, utilizing dry filters for particulate control, exhausting to stacks 3 and 4, respectively.

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

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This stationary source also includes the following insignificant activities:

- (a) Woodworking operations, controlled by a dust collector with a cyclone/dust bin for collection. [326 IAC-6.5-1-2]
- (b) Cold cleaner degreasing operations, consisting of three (3) tanks without remote solvent reservoirs, with a combined maximum usage of 6.7 gallons per month and not subject to 326 IAC 20-6. [326 IAC 8-3-2][326 IAC 8-3-8]
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: welding equipment and grinding operations. [326 IAC 6.5-1-2]
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour [326 IAC 6.5-1-2]:
  - (1) Roof Top Unit 1, with maximum heat input capacity of 0.98 MMBtu/hr.
  - (2) Roof Top Unit 2, with maximum heat input capacity of 0.22 MMBtu/hr.
  - (3) Roof Top Unit 3, with maximum heat input capacity of 0.31 MMBtu/hr.
  - (4) Roof Top Unit 4, with maximum heat input capacity of 0.22 MMBtu/hr.
  - (5) Roof Top Unit 5, with maximum heat input capacity of 0.24 MMBtu/hr.

- (6) Roof Top Unit 6, with maximum heat input capacity of 0.12 MMBtu/hr.
- (7) Roof Top Unit 7, with maximum heat input capacity of 0.07 MMBtu/hr.
- (8) Roof Top Unit 8, with maximum heat input capacity of 0.07 MMBtu/hr.
- (9) Roof Top Unit 9, with maximum heat input capacity of 0.24 MMBtu/hr.
- (10) Roof Top Unit 10, with maximum heat input capacity of 0.07 MMBtu/hr.
  
- (e) Cleaners and solvents characterized as having a vapor pressure equal to or less than: two (2.0) kilo Pascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pound per square inch) measured at thirty-eight (38) degrees Centigrade (one hundred (100) degrees Fahrenheit); or (bb) seven-tenths (0.7) kilo Pascal (five (5) millimeters of mercury or one-tenth (0.1) pound per square inch) measured at twenty (20) degrees Centigrade (sixty-eight (68) degrees Fahrenheit); the use of which, for all cleaners and solvents combined, does not exceed one hundred forty-five (145) gallons per twelve (12) months.
  
- (f) Dip tanks used at the metal etching operation, constructed in 2012, consisting of the following:
  - (1) One (1) dip tank, identified as Alumiprep Tank, using a cleaner containing no HAPs, with a maximum usage of 2.0 gallons per month; and
  - (2) One (1) dip tank, identified as Alodine Tank, with a maximum usage of 6.0 gallons per month, used to apply Alodine to aluminum parts in a non-electrolytic chromate conversion process.
  
- (g) Two (2) enclosed spray gun cleaners used to clean spray paint guns, each with a maximum tank capacity of 5 gallons, with a combined maximum usage of 5 gallons per month.
  
- (h) Miscellaneous Exterior Spray Painting used to perform touchup spray painting, with a maximum capacity of 0.0007 gallon per hour, uncontrolled.
  
- (i) One Touchup Booth, with a maximum capacity of 0.01 gallon per hour, utilizing HVLP spray method of application, using dry filters for particulate control, and exhausting through stack S-16.
  
- (j) Paved roads.

#### A.4 FESOP Applicability [326 IAC 2-8-2]

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

## SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, F097-37251-00702, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

### B.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 2-8-6][IC 13-17-12]

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

### B.5 Severability [326 IAC 2-8-4(4)]

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

### B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

### B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

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

### B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

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



- (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

**B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

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- (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 April 15 of each year to:

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

**B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]**

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

**B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]**

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

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

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ 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 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

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- (a) All terms and conditions of permits established prior to F097-37251-00702 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

**B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]**

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination**  
**[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.16 Permit Renewal [326 IAC 2-8-3(h)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

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

- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

**B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

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

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

**B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(1) and (c). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(1) and (c).

- (b) Emission Trades [326 IAC 2-8-15(b)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.19 Source Modification Requirement [326 IAC 2-8-11.1]**

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

**B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]**

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

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

**B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

**B.22 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-8-4(6)][326 IAC 2-8-16][326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

**B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 1-1-6]**

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



**SECTION C**

**SOURCE OPERATION CONDITIONS**

Entire Source

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

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

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

- (e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are

applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) Demolition and Renovation  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) Indiana Licensed Asbestos Inspector  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

#### C.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  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

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

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

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

**C.9 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]**

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

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

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

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

**C.10 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]**

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

**Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]**

**C.11 Risk Management Plan [326 IAC 2-8-4][40 CFR 68]**

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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.12 Response to Excursions or Exceedances [326 IAC 2-8-4][326 IAC 2-8-5]**

---

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

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

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

**C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]**

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

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

**C.14 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]**

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:
  - (AA) All calibration and maintenance records.
  - (BB) All original strip chart recordings for continuous monitoring instrumentation.
  - (CC) Copies of all reports required by the FESOP.Records of required monitoring information include the following, where applicable:

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

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

- (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.

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**C.15 General Reporting Requirements [326 IAC 2-8-4(3)(C)][326 IAC 2-1.1-11]**

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B -Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) 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**

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**C.16 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) Two (2) HVLP paint spray booths, identified as 1 and 2, with a maximum capacity of two (2) cabinets per hour, each, constructed in 2012, utilizing dry filters for particulate control exhausting to stacks 1 and 2, respectively.
- (b) Two (2) glue air walls, identified as 3 and 4, with a maximum capacity of one (1) sheet of 4.8 veneer per hour, each, constructed in 2012, utilizing dry filters for particulate control, exhausting to stacks 3 and 4, respectively.

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

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

#### D.1.1 Hazardous Air Pollutant Limitations [326 IAC 2-8][326 IAC 2-4.1]

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP) and render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable, the Permittee shall comply with the following:

- (a) The total input of each single HAP to the two (2) HVLP paint spray booths, identified as 1 and 2, and the two (2) glue air walls, identified as 3 and 4, shall be less than 9.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month; and
- (b) The total input of combined HAPs to the two (2) HVLP paint spray booths, identified as 1 and 2, and the two (2) glue air walls, identified as 3 and 4, shall be less than 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 of each single HAP to less than ten (10) tons per 12 consecutive month period and total HAPs to less than twenty-five (25) tons per 12 consecutive month period and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

#### D.1.2 Particulate Matter Limitations Except Lake County [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(h), particulate from the two (2) HVLP paint spray booths (1 and 2) shall be controlled by a dry particulate filter, and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

#### D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-10]

Pursuant to 326 IAC 8-2-10(d), the Permittee shall comply with the following for the two (2) HVLP paint spray booths (1 and 2), when coating flatwood panels:

- (a) VOC emissions from the two (2) HVLP paint spray booths (1 and 2) shall not exceed 6.0 pounds of VOC per 1,000 square feet of coated finished product from printed interior panels, regardless of the number of coats applied.
- (b) VOC emissions from the two (2) HVLP paint spray booths (1 and 2) shall not exceed 12.0 pounds of VOC per 1,000 square feet of coated finished product from natural finish hardwood plywood panels, regardless of the number of coats applied.

- (c) VOC emissions from the two (2) HVLP paint spray booths (1 and 2) shall not exceed 10.0 pounds of VOC per 1,000 feet of coated finished product from Class II finishes on hardboard panels, regardless of the number of coats applied.

**D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]**

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Pursuant to 326 IAC 8-2-12, the surface coating of wood furnishings and/or simulated wood furnishings, including cabinets, tables, beds chairs, sofas (non-upholstered), art objects, and other coated furnishings within the two (2) HVLP paint spray booths (1 and 2), with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, shall utilize one (1) or more of the following application systems:

Airless Spray Application System  
Air-Assisted Airless Spray Application System  
Electrostatic Spray Application System  
Electrostatic Bell or Disc Application System  
Heated Airless Spray Application System  
Roller Coating  
Brush or Wipe Application  
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

**D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

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

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

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

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

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

**D.1.7 Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the filters associated with the two (2) HVLP paint spray booths (1 and 2). To monitor the performance of the dry filters, weekly observations shall be made of the overspray while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.



- (b) Monthly inspections shall be performed of the coating emissions from the stacks associated with the two (2) HVLP paint spray booths (1 and 2) and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

### **D.1.8 Record Keeping Requirements**

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- (a) To document the compliance status with Conditions D.1.1 and D.1.3, the Permittee shall maintain records in accordance with (1) through (8) below. Records maintained for (1) through (8) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP limitations established in Conditions D.1.1 and D.1.3.
  - (1) The VOC and HAP content of each coating material and solvent used.
  - (2) The amount of coating material and solvent less water used on monthly basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The cleanup solvent usage for each month.
  - (4) The worst case single HAP and total combined HAP input for each month.
  - (5) The worst case single HAP and total combined HAP input for each compliance period.
  - (6) When coating printed interior panels in HVLP paint spray booth 1 and/or 2, the Permittee shall maintain records of the square feet of coated interior panels per booth and the VOC emissions per booth in units of pounds of VOC per 1,000 square feet of coated finished product.
  - (7) When coating natural finish hardwood plywood panels in HVLP paint spray booth 1 and/or 2, the Permittee shall maintain records of the square feet of coated natural finish hardwood plywood panels per booth and the VOC emissions per booth in units of pounds of VOC per 1,000 square feet of coated finished product.
  - (8) When applying Class II finishes on hardboard panels in HVLP paint spray booth 1 and/or 2, the Permittee shall maintain records of the square feet of coated hardboard panels per booth and the VOC emissions per booth in units of pounds of VOC per 1,000 square feet of coated finished product.
- (b) To document the compliance status with Condition D.1.4, the Permittee shall maintain records of the amount coating used for touch-up and repair operations per day.
- (c) To document the compliance status with Condition D.1.6, the Permittee shall maintain a log of weekly overspray observations and daily and monthly inspections.
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

#### D.1.9 Reporting Requirements

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

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description: Insignificant Activities

- (a) Woodworking operations, controlled by a dust collector with a cyclone/dust bin for collection. [326 IAC-6.5-1-2]
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: welding equipment and grinding operations. [326 IAC 6.5-1-2]
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour [326 IAC 6.5-1-2]:
  - (1) Roof Top Unit 1, with maximum heat input capacity of 0.98 MMBtu/hr.
  - (2) Roof Top Unit 2, with maximum heat input capacity of 0.22 MMBtu/hr.
  - (3) Roof Top Unit 3, with maximum heat input capacity of 0.31 MMBtu/hr.
  - (4) Roof Top Unit 4, with maximum heat input capacity of 0.22 MMBtu/hr.
  - (5) Roof Top Unit 5, with maximum heat input capacity of 0.24 MMBtu/hr.
  - (6) Roof Top Unit 6, with maximum heat input capacity of 0.12 MMBtu/hr.
  - (7) Roof Top Unit 7, with maximum heat input capacity of 0.07 MMBtu/hr.
  - (8) Roof Top Unit 8, with maximum heat input capacity of 0.07 MMBtu/hr.
  - (9) Roof Top Unit 9, with maximum heat input capacity of 0.24 MMBtu/hr.
  - (10) Roof Top Unit 10, with maximum heat input capacity of 0.07 MMBtu/hr.
- (j) Paved roads.

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

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

#### D.2.1 Particulate Matter 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 woodworking operations, welding equipment and grinding operations, the ten (10) natural gas-fired heaters, and paved roads shall each not exceed three-hundredths (0.03) grain per dry standard cubic foot (gr/dscf).

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

#### D.2.2 Particulate Control

In order to assure compliance with D.2.1, the dust collector with a cyclone/dust bin for particulate control shall be in operation and control emissions from each of the woodworking operations at all times that the corresponding woodworking operation is in operation.

## SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description: Insignificant Activities

- (b) Cold cleaner degreasing operations, consisting of three (3) tanks without remote solvent reservoirs, with a combined maximum usage of 6.7 gallons per month and not subject to 326 IAC 20-6. [326 IAC 8-3-2][326 IAC 8-3-8]
- (g) Two (2) enclosed spray gun cleaners used to clean spray paint guns, each with a maximum tank capacity of 5 gallons, with a combined maximum usage of 5 gallons per month.

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

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

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

Pursuant to 326 IAC 8-3-2(a) (Cold Cleaner Degreaser Control Equipment and Operating Requirements), for the cold cleaner degreasing operation and the two (2) enclosed spray gun cleaners, the Permittee shall:

- (1) Equip the degreaser with a cover;
- (2) Equip the degreaser with a facility for draining cleaned parts;
- (3) Close the degreaser cover whenever parts are not being handled in the degreaser;
- (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (5) Provide a permanent, conspicuous label that lists the operation requirements in subdivisions (3), (4), (6), and (7);
- (6) Store waste solvent only in closed containers; and
- (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

Pursuant to 326 IAC 8-3-2(b), for the cold cleaner degreasing operation and two (2) enclosed spray gun cleaners, the Permittee shall ensure the following additional control equipment and operating requirements are met:

- (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
  - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
  - (B) A water cover when solvent used is insoluble in, and heavier than, water.
  - (C) A refrigerated chiller.
  - (D) Carbon adsorption.
  - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.

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

**D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-8]**

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Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), on and after January 1, 2016, the Permittee shall not operate a cold cleaner 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 Requirements [326 IAC 2-8-4(3)]**

**D.3.3 Record Keeping Requirements**

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- (a) To document the compliance status with Condition D.3.2, on and after January 1, 2015, 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.
  - (3) The type of solvent purchased.
  - (4) The total volume of the solvent purchased.
  - (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

**SECTION E.1**

**NESHAP**

**Emissions Unit Description: Insignificant Activities**

- (f) Dip tanks used at the metal etching operation, constructed in 2012, consisting of the following:
- (2) One (1) dip tank, identified as Alodine Tank, with a maximum usage of 6.0 gallons per month, used to apply Alodine to aluminum parts in a non-electrolytic chromate conversion process.

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

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

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

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

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart WWWWWW (included as Attachment A to the operating permit), for the emission unit(s) listed above:

- (1) 40 CFR 63.11504(a)(1)(iii), (a)(2) and (3)  
(2) 40 CFR 63.11505(a)(1), (b), (c), and (e)  
(3) 40 CFR 63.11506(a) or (c)  
(4) 40 CFR 63.11507(g)  
(5) 40 CFR 63.11508(a), (b), (c), (d)(1), (2), and (8)  
(6) 40 CFR 63.11509(a), (b), (c)(6) and (7), (d), (e), and (f)  
(7) 40 CFR 63.11510  
(8) 40 CFR 63.11511  
(9) 40 CFR 63.11512

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

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

Source Name: Comlux America, LLC  
Source Address: 2910 South High School Road, Indianapolis, Indiana 46241  
FESOP Permit No.: F097-37251-00702

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

Please check what document is being certified:

- ☐ Annual Compliance Certification Letter
- ☐ Test Result (specify)\_\_\_\_\_
- ☐ Report (specify)\_\_\_\_\_
- ☐ Notification (specify)\_\_\_\_\_
- ☐ Affidavit (specify)\_\_\_\_\_
- ☐ Other (specify)\_\_\_\_\_

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Comlux America, LLC  
Source Address: 2910 South High School Road, Indianapolis, Indiana 46241  
FESOP Permit No.: F097-37251-00702

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>• 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</li><li>• 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 2-8-12</li></ul> |
|--|

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

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



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

Page 2 of 2

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

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

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

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

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

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

**FESOP Quarterly Report**

Source Name: Comlux America, LLC  
Source Address: 2910 South High School Road, Indianapolis, Indiana 46241  
FESOP Permit No.: F097-37251-00702  
Facility: HVLP paint spray booths (1 and 2) and glue air walls (3 and 4)  
Parameter: Worst Case Single HAP Input  
Limit: The total input of each single HAP to Paint Booths 1, 2 and 3 and Glue Air Walls 3, 4 and 5 shall be less than 9.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

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

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

Submitted by: \_\_\_\_\_

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

Signature: \_\_\_\_\_

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

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

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

**FESOP Quarterly Report**

Source Name: Comlux America, LLC  
Source Address: 2910 South High School Road, Indianapolis, Indiana 46241  
FESOP Permit No.: F097-37251-00702  
Facility: HVLP paint spray booths (1 and 2) and glue air walls (3 and 4)  
Parameter: Total Combined HAPs Input  
Limit: The total input of combined HAPs to Paint Booths 1, 2 and 3 and Glue Air Walls 3, 4 and 5 shall be less than 24.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

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

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

Submitted by: \_\_\_\_\_

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

Signature: \_\_\_\_\_

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

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Comlux America, LLC  
Source Address: 2910 South High School Road, Indianapolis, Indiana 46241  
FESOP Permit No.: F097-37251-00702

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

Page 1 of 2

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

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

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

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

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

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

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

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

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

## **Attachment A**

### **Federally Enforceable State Operating Permit (FESOP) No: F097-37251-00702**

[Downloaded from the eCFR on July 15, 2013]

#### **Electronic Code of Federal Regulations**

#### **Title 40: Protection of Environment**

#### **PART 63—NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES**

#### **Subpart W—National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations**

Source: 73 FR 37741, July 1, 2008, unless otherwise noted.

#### **Applicability and Compliance Dates**

#### **§ 63.11504 Am I subject to this subpart?**

(a) You are subject to this subpart if you own or operate a plating and polishing facility that is an area source of hazardous air pollutant (HAP) emissions and meets the criteria specified in paragraphs (a)(1) through (3) of this section.

(1) A plating and polishing facility is a plant site that is engaged in one or more of the processes listed in paragraphs (a)(1)(i) through (vi) of this section.

(i) Electroplating other than chromium electroplating (i.e., non-chromium electroplating).

(ii) Electroless or non-electrolytic plating.

(iii) Other non-electrolytic metal coating processes, such as chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating; and thermal spraying.

(iv) Dry mechanical polishing of finished metals and formed products after plating or thermal spraying.

(v) Electroforming.

(vi) Electropolishing.

(2) A plating or polishing facility is an area source of HAP emissions, where an area source is any stationary source or group of stationary sources within a contiguous area under common control that does not have the potential to emit any single HAP at a rate of 9.07 megagrams per year (Mg/yr) (10 tons per year (tpy)) or more and any combination of HAP at a rate of 22.68 Mg/yr (25 tpy) or more.

(3) Your plating and polishing facility uses or has emissions of compounds of one or more plating and polishing metal HAP, which means any compound of any of the following metals: cadmium, chromium, lead, manganese, and nickel, as defined in § 63.11511, "What definitions apply to this subpart?" With the exception of lead, plating and polishing metal HAP also include any of these metals in the elemental form.

(b) [Reserved]

[73 FR 37741, July 1, 2008, as amended at 76 FR 57919, Sept. 19, 2011]

**§ 63.11505 What parts of my plant does this subpart cover?**

(a) This subpart applies to each new or existing affected source, as specified in paragraphs (a)(1) through (3) of this section, at all times. A new source is defined in § 63.11511, "What definitions apply to this subpart?"

(1) Each tank that contains one or more of the plating and polishing metal HAP, as defined in § 63.11511, "What definitions apply to this subpart?", and is used for non-chromium electroplating; electroforming; electropolishing; electroless plating or other non-electrolytic metal coating operations, such as chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating.

(2) Each thermal spraying operation that applies one or more of the plating and polishing metal HAP, as defined in § 63.11511, "What definitions apply to this subpart?"

(3) Each dry mechanical polishing operation that emits one or more of the plating and polishing metal HAP, as defined in § 63.11511, "What definitions apply to this subpart?"

(b) An affected source is existing if you commenced construction or reconstruction of the affected source on or before March 14, 2008.

(c) An affected source is new if you commenced construction or reconstruction of the affected source after March 14, 2008.

(d) This subpart does not apply to any of the process units or operations described in paragraphs (d)(1) through (6) of this section.

(1) Process units that are subject to the requirements of 40 CFR part 63, subpart N (National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks).

(2) Research and development process units, as defined in § 63.11511, "What definitions apply to this subpart?"

(3) Process units that are used strictly for educational purposes.

(4) Plating, polishing, coating, or thermal spraying conducted to repair surfaces or equipment.

(5) Dry mechanical polishing conducted to restore the original finish to a surface.

(6) Any plating or polishing process that uses process materials that contain cadmium, chromium, lead, or nickel (as the metal) in amounts less than 0.1 percent by weight, or that contain manganese in amounts less than 1.0 percent by weight (as the metal), as used. Information used to determine the amount of plating and polishing metal HAP in materials used in the plating or polishing process may include information reported on the Material Safety Data Sheet for the material, but is not required. For plating or polishing tanks, the HAP content may be determined from the final bath contents "as used" to plate or to polish.

(e) You are exempt from the obligation to obtain a permit under 40 CFR part 70 or 40 CFR part 71, "Title V," provided you are not otherwise required to obtain a permit under 40 CFR 70.3(a) or 40 CFR 71.3(a) for a reason other than your status as an area source under this subpart. Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart applicable to area sources.

[73 FR 37741, July 1, 2008, as amended at 76 FR 57919, Sept. 19, 2011]

**§ 63.11506 What are my compliance dates?**

(a) If you own or operate an existing affected source, you must achieve compliance with the applicable provisions of this subpart no later than July 1, 2010.

(b) If you own or operate a new affected source for which the initial startup date is on or before July 1, 2008, you must achieve compliance with the provisions of this subpart no later than July 1, 2008.

(c) If you own or operate a new affected source for which the initial startup date is after July 1, 2008, you must achieve compliance with the provisions of this subpart upon initial startup of your affected source.

## **Standards and Compliance Requirements**

### **§ 63.11507 What are my standards and management practices?**

(a) If you own or operate an affected new or existing non-cyanide electroplating, electroforming, or electropolishing tank (hereafter referred to as an “electrolytic” process tank, as defined in § 63.11511, “What definitions apply to this subpart?”) that contains one or more of the plating and polishing metal HAP and operates at a pH of less than 12, you must comply with the requirements in paragraph (a)(1), (2), or (3) of this section, and implement the applicable management practices in paragraph (g) of this section, as practicable.

(1) You must use a wetting agent/fume suppressant in the bath of the affected tank, as defined in § 63.11511, “What definitions apply to this subpart?” and according to paragraphs (a)(1)(i) through (iii) of this section.

(i) You must initially add the wetting agent/fume suppressant in the amounts recommended by the manufacturer for the specific type of electrolytic process.

(ii) You must add wetting agent/fume suppressant in proportion to the other bath chemistry ingredients that are added to replenish the bath, as in the original make-up of the bath, or in proportions such that the bath contents are returned to that of the original make-up of the bath.

(iii) If a wetting agent/fume suppressant is included in the electrolytic process bath chemicals used in the affected tank according to the manufacturer's instructions, it is not necessary to add additional wetting agent/fume suppressants to the tank to comply with this rule.

(2) You must capture and exhaust emissions from the affected tank to any one of the following emission control devices: composite mesh pad, packed bed scrubber, or mesh pad mist eliminator, according to paragraphs (a)(2)(i) and (ii) of this section.

(i) You must operate all capture and control devices according to the manufacturer's specifications and operating instructions.

(ii) You must keep the manufacturer's specifications and operating instructions at the facility at all times in a location where they can be easily accessed by the operators.

(3) You must cover the tank surface according to paragraph (a)(3)(i) or (ii) of this section.

(i) For batch electrolytic process tanks, as defined in § 63.11511, “What definitions apply to this subpart?”, you must use a tank cover, as defined in § 63.11511, over all of the effective surface area of the tank for at least 95 percent of the electrolytic process operating time.

(ii) For continuous electrolytic process tanks, as defined in § 63.11511, “What definitions apply to this subpart?”, you must cover at least 75 percent of the surface of the tank, as defined in § 63.11511, whenever the electrolytic process tank is in operation.

(b) If you own or operate an affected new or existing “flash” or short-term electroplating tank, as defined in § 63.11511, “What definitions apply to this subpart?”, that uses or emits one or more of the plating and polishing metal HAP, you must comply with the requirements specified in paragraph (b)(1) or (b)(2), and implement the applicable management practices in paragraph (g) of this section, as practicable.



(1) You must limit short-term or “flash” electroplating to no more than 1 cumulative hour per day or 3 cumulative minutes per hour of plating time.

(2) You must use a tank cover, as defined in § 63.11511, “What definitions apply to this subpart?”, for at least 95 percent of the plating time.

(c) If you own or operate an affected new or existing process tank that is used both for short-term electroplating and for electrolytic processing of longer duration (i.e., processing that does not meet the definition of short-term or flash electroplating) and contains one or more of the plating and polishing metal HAP, you must meet the requirements specified in paragraph (a) or (b) of this section, whichever apply to the process operation, and implement the applicable management practices in paragraph (g) of this section, as practicable.

(d) If you own or operate an affected new or existing electroplating tank that uses cyanide in the plating bath, operates at pH greater than or equal to 12, and contains one or more of the plating and polishing metal HAP, you must comply with the requirements in paragraphs (d)(1) and (2) of this section:

(1) You must measure and record the pH of the bath upon startup of the bath, as defined in § 63.11511, “What definitions apply to this subpart?” No additional pH measurements are required.

(2) You must implement the applicable management practices in paragraph (g) of this section, as practicable.

(e) If you own or operate an affected new or existing dry mechanical polishing machine that emits one or more of the plating and polishing metal HAP, you must operate a capture system that captures particulate matter (PM) emissions from the dry mechanical polishing process and transports the emissions to a cartridge, fabric, or high efficiency particulate air (HEPA) filter, according to paragraphs (e)(1) and (2) of this section.

(1) You must operate all capture and control devices according to the manufacturer's specifications and operating instructions.

(2) You must keep the manufacturer's specifications and operating instructions at the facility at all times in a location where they can be easily accessed by the operators.

(f) If you own or operate an affected thermal spraying operation that applies one or more of the plating and polishing metal HAP, you must meet the applicable requirements specified in paragraphs (f)(1) through (3) of this section, and the applicable management practices in paragraph (g) of this section.

(1) For existing permanent thermal spraying operations, you must operate a capture system that collects PM emissions from the thermal spraying process and transports the emissions to a water curtain, fabric filter, cartridge, or HEPA filter, according to paragraphs (f)(1)(i) and (ii) of this section.

(2) For new permanent thermal spraying operations, you must operate a capture system that collects PM emissions from the thermal spraying process and transports the emissions to a fabric, cartridge, or HEPA filter, according to paragraphs (f)(2)(i) and (ii) of this section.

(3) For temporary thermal spraying operations, as defined in § 63.11511 “What definitions apply to this subpart?”, you must meet the applicable requirements specified in paragraphs (f)(3)(i) and (ii) of this section.

(i) You must document the amount of time the thermal spraying occurs each day, and where it is conducted.

(ii) You must implement the applicable management practices specified in paragraph (g) of this section, as practicable.

(g) If you own or operate an affected new or existing plating and polishing process unit that contains, applies, or emits one or more of the plating and polishing metal HAP, you must implement the applicable management practices in paragraphs (g)(1) through (12) of this section, as practicable.

- (1) Minimize bath agitation when removing any parts processed in the tank, as practicable except when necessary to meet part quality requirements.
- (2) Maximize the draining of bath solution back into the tank, as practicable, by extending drip time when removing parts from the tank; using drain boards (also known as drip shields); or withdrawing parts slowly from the tank, as practicable.
- (3) Optimize the design of barrels, racks, and parts to minimize dragout of bath solution (such as by using slotted barrels and tilted racks, or by designing parts with flow-through holes to allow the tank solution to drip back into the tank), as practicable.
- (4) Use tank covers, if already owned and available at the facility, whenever practicable.
- (5) Minimize or reduce heating of process tanks, as practicable (e.g., when doing so would not interrupt production or adversely affect part quality).
- (6) Perform regular repair, maintenance, and preventive maintenance of racks, barrels, and other equipment associated with affected sources, as practicable.
- (7) Minimize bath contamination, such as through the prevention or quick recovery of dropped parts, use of distilled/de-ionized water, water filtration, pre-cleaning of parts to be plated, and thorough rinsing of pre-treated parts to be plated, as practicable.
- (8) Maintain quality control of chemicals, and chemical and other bath ingredient concentrations in the tanks, as practicable.
- (9) Perform general good housekeeping, such as regular sweeping or vacuuming, if needed, and periodic washdowns, as practicable.
- (10) Minimize spills and overflow of tanks, as practicable.
- (11) Use squeegee rolls in continuous or reel-to-reel plating tanks, as practicable.
- (12) Perform regular inspections to identify leaks and other opportunities for pollution prevention.

[73 FR 37741, July 1, 2008, as amended at 76 FR 57920, Sept. 19, 2011]

**§ 63.11508 What are my compliance requirements?**

- (a) If you own or operate an affected source, you must submit a Notification of Compliance Status in accordance with § 63.11509(b) of "What are my notification, reporting, and recordkeeping requirements?"
- (b) You must be in compliance with the applicable management practices and equipment standards in this subpart at all times.
- (c) To demonstrate initial compliance, you must satisfy the requirements specified in paragraphs (c)(1) through (11) of this section.
  - (1) If you own or operate an affected electroplating, electroforming, or electropolishing tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in § 63.11507(a), "What are my standards and management practices?", and you use a wetting agent/fume suppressant to comply with this subpart, you must demonstrate initial compliance according to paragraphs (c)(1)(i) through (iv) of this section.
    - (i) You must add wetting agent/fume suppressant to the bath of each affected tank according to manufacturer's specifications and instructions.

(ii) You must state in your Notification of Compliance Status that you add wetting agent/fume suppressant to the bath according to manufacturer's specifications and instructions.

(iii) You must implement the applicable management practices specified in § 63.11507(g), "What are my standards and management practices?", as practicable.

(iv) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in § 63.11507(g), "What are my standards and management practices?", as practicable.

(2) If you own or operate an affected electroplating, electroforming, or electropolishing tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in § 63.11507(a), "What are my standards and management practices?", and you use a control system, as defined in § 63.11511, "What definitions apply to this subpart?", to comply with this subpart, you must demonstrate initial compliance according to paragraphs (c)(2)(i) through (v) of this section.

(i) You must install a control system designed to capture emissions from the affected tank and exhaust them to a composite mesh pad, packed bed scrubber, or mesh pad mist eliminator.

(ii) You must state in your Notification of Compliance Status that you have installed the control system according to the manufacturer's specifications and instructions.

(iii) You must implement the applicable management practices specified in § 63.11507(g), "What are my standards and management practices?", as practicable.

(iv) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in § 63.11507(g), "What are my standards and management practices?", as practicable.

(v) You must follow the manufacturer's specifications and operating instructions for the control systems at all times.

(3) If you own or operate an affected batch electrolytic process tank, as defined in § 63.11511, "What definitions apply to this subpart?" that contains one or more of the plating and polishing metal HAP and which is subject to the requirements in § 63.11507(a), "What are my standards and management practices?" and you use a tank cover, as defined in § 63.11511, to comply with § 11507(a), (b) or (c) of this subpart, you must demonstrate initial compliance according to paragraphs (c)(3)(i) through (iv) of this section.

(i) You must install a tank cover on the affected tank.

(ii) You must state in your Notification of Compliance Status that you operate the tank with the cover in place at least 95 percent of the electrolytic process operating time.

(iii) You must implement the applicable management practices specified in § 63.11507(g), "What are my standards and management practices?", as practicable.

(iv) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in § 63.11507(g), "What are my standards and management practices?", as practicable.

(4) If you own or operate an affected continuous electrolytic process tank, as defined in § 63.11511, "What definitions apply to this subpart?" that contains one or more of the plating and polishing metal HAP and is subject to the requirements in § 63.11507(a), "What are my standards and management practices?" and you cover the tank surface to comply with § 11507(a), (b) or (c) of this subpart, you must demonstrate initial compliance according to paragraphs (c)(4)(i) through (iv) of this section.

(i) You must cover at least 75 percent of the surface area of the affected tank.

(ii) You must state in your Notification of Compliance Status that you operate the tank with the surface cover in place whenever the continuous electrolytic process is in operation.

(iii) You must implement the applicable management practices specified in § 63.11507(g), "What are my standards and management practices?", as practicable.

(iv) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in § 63.11507(g), "What are my standards and management practices?", as practicable.

(5) If you own or operate an affected flash or short-term electroplating tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in § 63.11507(b), "What are my standards and management practices?" and you comply with § 11507(a), (b) or (c) of this subpart by limiting the plating time of the affected tank, you must demonstrate initial compliance according to paragraphs (c)(5)(i) through (iii) of this section.

(i) You must state in your Notification of Compliance Status that you limit short-term or flash electroplating to no more than 1 cumulative hour per day, or 3 cumulative minutes per hour of plating time.

(ii) You must implement the applicable management practices specified in § 63.11507(g), "What are my standards and management practices?", as practicable.

(iii) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in § 63.11507(g), "What are my standards and management practices?", as practicable.

(6) If you own or operate an affected flash or short-term electroplating tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in § 63.11507(b), "What are my standards and management practices?" and you comply with § 11507(a), (b) or (c) of this subpart by operating the affected tank with a cover, you must demonstrate initial compliance according to paragraphs (c)(6)(i) through (iv) of this section.

(i) You must install a tank cover on the affected tank.

(ii) You must state in your Notification of Compliance Status that you operate the tank with the cover in place at least 95 percent of the plating time.

(iii) You must implement the applicable management practices specified in § 63.11507(g), "What are my standards and management practices?", as practicable.

(iv) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in § 63.11507(g), "What are my standards and management practices?", as practicable.

(7) If you own or operate an affected tank that contains one or more of the plating and polishing metal HAP, uses cyanide in the bath, and is subject to the management practices specified in § 63.11507(d), "What are my standards and management practices?", you must demonstrate initial compliance according to paragraphs (c)(7)(i) through (iii) of this section.

(i) You must report in your Notification of Compliance Status the pH of the bath solution that was measured at startup, as defined in § 63.11511, according to the requirements of § 63.11507(d)(1).

(ii) You must implement the applicable management practices specified in § 63.11507(g), "What are my standards and management practices?", as practicable.

(iii) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in § 63.11490(g), "What are my standards and management practices?", as practicable.

(8) If you own or operate an affected dry mechanical polishing operation that emits one or more of the plating and polishing metal HAP and is subject to the requirements in § 63.11507(e), "What are my standards and management practices?", you must demonstrate initial compliance according to paragraphs (c)(8)(i) through (iii) of this section.

(i) You must install a control system that is designed to capture PM emissions from the polishing operation and exhaust them to a cartridge, fabric, or HEPA filter.

(ii) You must state in your Notification of Compliance Status that you have installed the control system according to the manufacturer's specifications and instructions.

(iii) You must keep the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators.

(9) If you own or operate an existing affected permanent thermal spraying operation that applies one or more of the plating and polishing metal HAP and is subject to the requirements in § 63.11507(f)(1), "What are my standards and management practices?", you must demonstrate initial compliance according to paragraphs (c)(9)(i) through (iii) of this section.

(i) You must install a control system that is designed to capture PM emissions from the thermal spraying operation and exhaust them to a water curtain, or a cartridge, fabric, or HEPA filter.

(ii) You must state in your Notification of Compliance Status that you have installed and are operating the control system according to the manufacturer's specifications and instructions.

(iii) You must keep the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators.

(10) If you own or operate a new affected permanent thermal spraying operation that applies one or more of the plating and polishing metal HAP and is subject to the requirements in § 63.11507(f)(2), "What are my standards and management practices?", you must demonstrate initial compliance according to paragraphs (c)(10)(i) through (iii) of this section.

(i) You must install and operate a control system that is designed to capture PM emissions from the thermal spraying operation and exhaust them to a cartridge, fabric, or HEPA filter.

(ii) You must state in your Notification of Compliance Status that you have installed and operate the control system according to the manufacturer's specifications and instructions.

(iii) You must keep the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators.

(11) If you own or operate an affected temporary thermal spraying operation that applies one or more of the plating and polishing metal HAP and is subject to the requirements in § 63.11507(f)(3), "What are my standards and management practices?", you must demonstrate initial compliance according to paragraphs (c)(11)(i) and (ii) of this section.

(i) You must implement the applicable management practices specified in § 63.11507(g), "What are my standards and management practices?", as practicable.

(ii) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in § 63.11507(g), "What are my standards and management practices?", as practicable.

(d) To demonstrate continuous compliance with the applicable management practices and equipment standards specified in this subpart, you must satisfy the requirements specified in paragraphs (d)(1) through (8) of this section.

(1) You must always operate and maintain your affected source, including air pollution control equipment.

(2) You must prepare an annual compliance certification according to the requirements specified in § 63.11509(c), "Notification, Reporting, and Recordkeeping," and keep it in a readily-accessible location for inspector review.

(3) If you own or operate an affected electroplating, electroforming, or electropolishing tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in § 63.11507(a), "What are my standards

and management practices?”, and you use a wetting agent/fume suppressant to comply with this subpart, you must demonstrate continuous compliance according to paragraphs (d)(3)(i) through (iii) of this section.

(i) You must record that you have added the wetting agent/fume suppressant to the tank bath in the original make-up of the tank.

(ii) For tanks where the wetting agent/fume suppressant is a separate ingredient from the other tank additives, you must demonstrate continuous compliance according to paragraphs (d)(3)(ii) (A) and (B) this section.

(A) You must add wetting agent/fume suppressant in proportion to the other bath chemistry ingredients that are added to replenish the tank bath, as in the original make-up of the tank; or in proportion such that the bath is brought back to the original make-up of the tank.

(B) You must record each addition of wetting agent/fume suppressant to the tank bath.

(iii) You must state in your annual compliance certification that you have added wetting agent/fume suppressant to the bath according to the manufacturer's specifications and instructions.

(4) If you own or operate an affected electroplating, electroforming, or electropolishing tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in § 63.11507(a), “What are my standards and management practices?”, and you use a control system to comply with this subpart; an affected dry mechanical polishing operation that is subject to § 63.11507(e); or an affected thermal spraying operation that is subject to § 63.11507(f)(1) or (2), you must demonstrate continuous compliance according to paragraphs (d)(4)(i) through (v) of this section.

(i) You must operate and maintain the control system according to the manufacturer's specifications and instructions.

(ii) Following any malfunction or failure of the capture or control devices to operate properly, you must take immediate corrective action to return the equipment to normal operation according to the manufacturer's specifications and operating instructions.

(iii) You must state in your annual certification that you have operated and maintained the control system according to the manufacturer's specifications and instructions.

(iv) You must record the results of all control system inspections, deviations from proper operation, and any corrective action taken.

(v) You must keep the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators.

(5) If you own or operate an affected flash or short-term electroplating tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in § 63.11507(b), “What are my standards and management practices?” and you comply with § 11507(a), (b) or (c) of this subpart by limiting the plating time for the affected tank, you must demonstrate continuous compliance according to paragraphs (d)(5)(i) through (iii) of this section.

(i) You must limit short-term or flash electroplating to no more than 1 cumulative hour per day or 3 cumulative minutes per hour of plating time.

(ii) You must record the times that the affected tank is operated each day.

(iii) You must state in your annual compliance certification that you have limited short-term or flash electroplating to no more than 1 cumulative hour per day or 3 cumulative minutes per hour of plating time.

(6) If you own or operate an affected batch electrolytic process tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements of § 63.11507(a), “What are my standards and management

practices?" or a flash or short-term electroplating tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in § 63.11507(b), and you comply with § 11507(a), (b) or (c) of this section by operating the affected tank with a cover, you must demonstrate continuous compliance according to paragraphs (d)(6)(i) through (iii) of this section.

(i) You must operate the tank with the cover in place at least 95 percent of the electrolytic process operating time.

(ii) You must record the times that the tank is operated and the times that the tank is covered on a daily basis.

(iii) You must state in your annual certification that you have operated the tank with the cover in place at least 95 percent of the electrolytic process time.

(7) If you own or operate an affected continuous electrolytic process tank that contains one or more of the plating and polishing metal HAP and is subject to the requirements in § 63.11507(a), "What are my standards and management practices?" and you comply with § 11507(a), (b) or (c) of this subpart by operating the affected tank with a cover, you must demonstrate continuous compliance according to paragraphs (d)(7)(i) and (ii) of this section.

(i) You must operate the tank with at least 75 percent of the surface covered during all periods of electrolytic process operation.

(ii) You must state in your annual certification that you have operated the tank with 75 percent of the surface covered during all periods of electrolytic process operation.

(8) If you own or operate an affected tank or other operation that is subject to the management practices specified in § 63.11507(g), "What are my standards and management practices?", you must demonstrate continuous compliance according to paragraphs (d)(8)(i) and (ii) of this section.

(i) You must implement the applicable management practices during all times that the affected tank or process is in operation.

(ii) You must state in your annual compliance certification that you have implemented the applicable management practices, as practicable.

[73 FR 37741, July 1, 2008, as amended at 76 FR 57920, Sept. 19, 2011]

**§ 63.11509 What are my notification, reporting, and recordkeeping requirements?**

(a) If you own or operate an affected source, as defined in § 63.11505(a), "What parts of my plant does this subpart cover?", you must submit an Initial Notification in accordance with paragraphs (a)(1) through (4) of this section by the dates specified.

(1) The Initial Notification must include the information specified in § 63.9(b)(2)(i) through (iv) of the General Provisions of this part.

(2) The Initial Notification must include a description of the compliance method (e.g., use of wetting agent/fume suppressant) for each affected source.

(3) If you start up your affected source on or before July 1, 2008, you must submit an Initial Notification not later than 120 calendar days after July 1, 2008.

(4) If you startup your new affected source after July 1, 2008, you must submit an Initial Notification when you become subject to this subpart.

(b) If you own or operate an affected source, you must submit a Notification of Compliance Status in accordance with paragraphs (b)(1) through (3) of this section.

(1) The Notification of Compliance Status must be submitted before the close of business on the compliance date specified in § 63.11506, "What are my compliance dates?"

(2) The Notification of Compliance Status must include the items specified in paragraphs (b)(2)(i) through (iv) of this section.

(i) List of affected sources and the plating and polishing metal HAP used in, or emitted by, those sources.

(ii) Methods used to comply with the applicable management practices and equipment standards.

(iii) Description of the capture and emission control systems used to comply with the applicable equipment standards.

(iv) Statement by the owner or operator of the affected source as to whether the source is in compliance with the applicable standards or other requirements.

(3) If a facility makes a change to any items in (b)(2)(i), iii, and (iv) of this section that does not result in a deviation, an amended Notification of Compliance Status should be submitted within 30 days of the change.

(c) If you own or operate an affected source, you must prepare an annual certification of compliance report according to paragraphs (c)(1) through (7) of this section. These reports do not need to be submitted unless a deviation from the requirements of this subpart has occurred during the reporting year, in which case, the annual compliance report must be submitted along with the deviation report.

(1) If you own or operate an affected electroplating, electroforming, or electropolishing tank that is subject to the requirements in § 63.11507(a)(1), "What are my standards and management practices?", you must state in your annual compliance certification that you have added wetting agent/fume suppressant to the bath according to the manufacturer's specifications and instructions.

(2) If you own or operate any one of the affected sources listed in paragraphs (c)(2)(i) through (iii) of this section, you must state in your annual certification that you have operated and maintained the control system according to the manufacturer's specifications and instructions.

(i) Electroplating, electroforming, or electropolishing tank that is subject to the requirements in § 63.11507(a), "What are my standards and management practices?", and you use a control system to comply with this subpart;

(ii) Dry mechanical polishing operation that is subject to § 63.11507(e); or

(iii) Permanent thermal spraying operation that is subject to § 63.11507(f)(1) or (2).

(3) If you own or operate an affected flash or short-term electroplating tank that is subject to the requirements in § 63.11507(b), "What are my standards and management practices?" and you comply with § 11507(a), (b) or (c) of this subpart by limiting the plating time of the affected tank, you must state in your annual compliance certification that you have limited short-term or flash electroplating to no more than 1 cumulative hour per day or 3 cumulative minutes per hour of plating time.

(4) If you own or operate an affected batch electrolytic process tank that is subject to the requirements of § 63.11507(a) or a flash or short-term electroplating tank that is subject to the requirements in § 63.11507(b), "What are my standards and management practices?" and you comply with § 11507(a), (b) or (c) of this subpart by operating the affected tank with a cover, you must state in your annual certification that you have operated the tank with the cover in place at least 95 percent of the electrolytic process time.

(5) If you own or operate an affected continuous electrolytic process tank that is subject to the requirements of § 63.11507(a), "What are my standards and management practices?" and you comply with § 11507(a), (b) or (c) of this subpart by operating the affected tank with a cover, you must state in your annual certification that you have covered at least 75 percent of the surface area of the tank during all periods of electrolytic process operation.



(6) If you own or operate an affected tank or other affected plating and polishing operation that is subject to the management practices specified in § 63.11507(g), "What are my standards and management practices?" you must state in your annual compliance certification that you have implemented the applicable management practices, as practicable.

(7) Each annual compliance report must be prepared no later than January 31 of the year immediately following the reporting period and kept in a readily-accessible location for inspector review. If a deviation has occurred during the year, each annual compliance report must be submitted along with the deviation report, and postmarked or delivered no later than January 31 of the year immediately following the reporting period.

(d) If you own or operate an affected source, and any deviations from the compliance requirements specified in this subpart occurred during the year, you must report the deviations, along with the corrective action taken, and submit this report to the delegated authority.

(e) You must keep the records specified in paragraphs (e)(1) through (3) of this section.

(1) A copy of any Initial Notification and Notification of Compliance Status that you submitted and all documentation supporting those notifications.

(2) The records specified in § 63.10(b)(2)(i) through (iii) and (xiv) of the General Provisions of this part.

(3) The records required to show continuous compliance with each management practice and equipment standard that applies to you, as specified in § 63.11508(d), "What are my compliance requirements?"

(f) You must keep each record for a minimum of 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. You must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to § 63.10(b)(1) of the General Provisions to part 63. You may keep the records offsite for the remaining 3 years.

[73 FR 37741, July 1, 2008, as amended at 76 FR 57920, Sept. 19, 2011]

#### **Other Requirements and Information**

##### **§ 63.11510 What General Provisions apply to this subpart?**

If you own or operate a new or existing affected source, you must comply with the requirements of the General Provisions (40 CFR part 63, subpart A) according to Table 1 of this subpart.

##### **§ 63.11511 What definitions apply to this subpart?**

Terms used in this subpart are defined in this section.

*Batch electrolytic process tank* means a tank used for an electrolytic process in which a part or group of parts, typically mounted on racks or placed in barrels, is placed in the tank and immersed in an electrolytic process solution as a single unit (i.e., as a batch) for a predetermined period of time, during which none of the parts are removed from the tank and no other parts are added to the tank, and after which the part or parts are removed from the tank as a unit.

*Bath* means the liquid contents of a tank, as defined in this section, which is used for electroplating, electroforming, electropolishing, or other metal coating processes at a plating and polishing facility.

*Bench-scale* means any operation that is small enough to be performed on a bench, table, or similar structure so that the equipment is not directly contacting the floor.

*Capture system* means the collection of components used to capture gases and fumes released from one or more emissions points and then convey the captured gas stream to a control device, as part of a complete control system.

A capture system may include, but is not limited to, the following components as applicable to a given capture system design: duct intake devices, hoods, enclosures, ductwork, dampers, manifolds, plenums, and fans.

*Cartridge filter* means a type of control device that uses perforated metal cartridges containing a pleated paper or non-woven fibrous filter media to remove PM from a gas stream by sieving and other mechanisms. Cartridge filters can be designed with single use cartridges, which are removed and disposed after reaching capacity, or continuous use cartridges, which typically are cleaned by means of a pulse-jet mechanism.

*Composite mesh pad* means a type of control device similar to a mesh pad mist eliminator except that the device is designed with multiple pads in series that are woven with layers of material with varying fiber diameters, which produce a coalescing effect on the droplets or PM that impinge upon the pads.

*Continuous electrolytic process tank* means a tank that uses an electrolytic process and in which a continuous metal strip or other type of continuous substrate is fed into and removed from the tank continuously. This process is also called reel-to-reel electrolytic plating.

*Control device* means equipment that is part of a control system that collects and/or reduces the quantity of a pollutant that is emitted to the air. The control device receives emissions that are transported from the process by the capture system.

*Control system* means the combination of a capture system and a control device. The capture system is designed to collect and transport air emissions from the affected source to the control device. The overall control efficiency of any control system is a combination of the ability of the system to capture the air emissions (i.e., the capture efficiency) and the control device efficiency. Consequently, it is important to achieve good capture to ensure good overall control efficiency. Capture devices that are known to provide high capture efficiencies include hoods, enclosures, or any other duct intake devices with ductwork, dampers, manifolds, plenums, or fans.

*Conversion coatings* are coatings that form a hard metal finish on an object when the object is submerged in a tank bath or solution that contains the conversion coatings. Conversion coatings for the purposes of this rule include coatings composed of chromium, as well as the other plating and polishing metal HAP, where no electrical current is used.

*Cyanide plating* means plating processes performed in tanks that use cyanide as a major bath ingredient and that operate at pH of 12 or more, and use or emit any of the plating and polishing metal HAP, as defined in this section. Electroplating and electroforming are performed with or without cyanide. The cyanide in the bath works to dissolve the HAP metal added as a cyanide compound (e.g., cadmium cyanide) and creates free cyanide in solution, which helps to corrode the anode. These tanks are self-regulating to a pH of 12 due to the caustic nature of the cyanide bath chemistry. The cyanide in the bath is a major bath constituent and not an additive; however, the self-regulating chemistry of the bath causes the bath to act as if wetting agents/fume suppressants are being used and to ensure an optimum plating process. All cyanide plating baths at pH greater than or equal to 12 have cyanide-metal complexes in solution. The metal HAP to be plated is not emitted because it is either bound in the metal-cyanide complex or reduced at the cathode to elemental metal, and plated onto the immersed parts. Cyanide baths are not intentionally operated at pH less 12 since unfavorable plating conditions would occur in the tank, among other negative effects.

*Deviation* means any instance in which an affected source or an owner or operator of such an affected source:

- (1) Fails to meet any requirement or obligation established by this rule including, but not limited to, any equipment standard (including emissions and operating limits), management practice, or operation and maintenance requirement;
- (2) Fails to meet any term or condition that is adopted to implement an applicable requirement in this rule and that is included in the operating permit for any affected facility required to obtain such a permit; or
- (3) Fails to meet any equipment standard (including emission and operating limits), management standard, or operation and maintenance requirement in this rule during startup, shutdown, or malfunction.

*Dry mechanical polishing* means a process used for removing defects from and smoothing the surface of finished metals and formed products after plating or thermal spraying with any of the plating and polishing metal HAP, as

defined in this section, using automatic or manually-operated machines that have hard-faced abrasive wheels or belts and where no liquids or fluids are used to trap the removed metal particles. The affected process does not include polishing with use of pastes, liquids, lubricants, or any other added materials.

*Electroforming* means an electrolytic process using or emitting any of the plating and polishing metal HAP, as defined in this section, that is used for fabricating metal parts. This process is essentially the same as electroplating except that the plated substrate (mandrel) is removed, leaving only the metal plate. In electroforming, the metal plate is self-supporting and generally thicker than in electroplating.

*Electroless plating* means a non-electrolytic process that uses or emits any of the plating and polishing metal HAP, as defined in this section, in which metallic ions in a plating bath or solution are reduced to form a metal coating at the surface of a catalytic substrate without the use of external electrical energy. Electroless plating is also called non-electrolytic plating. Examples include, but are not limited to, chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating.

*Electrolytic plating processes* means electroplating and electroforming that use or emit any of the plating and polishing metal HAP, as defined in this section, where metallic ions in a plating bath or solution are reduced to form a metal coating on the surface of parts and products using electrical energy.

*Electroplating* means an electrolytic process that uses or emits any of the plating and polishing metal HAP, as defined in this section, in which metal ions in solution are reduced onto the surface of the work piece (the cathode) via an electrical current. The metal ions in the solution are usually replenished by the dissolution of metal from solid metal anodes fabricated of the same metal being plated, or by direct replenishment of the solution with metal salts or oxides; electroplating is also called electrolytic plating.

*Electropolishing* means an electrolytic process performed in a tank after plating that uses or emits any of the plating and polishing metal HAP, as defined in this section, in which a work piece is attached to an anode immersed in a bath, and the metal substrate is dissolved electrolytically, thereby removing the surface contaminant; electropolishing is also called electrolytic polishing. For the purposes of this subpart, electropolishing does not include bench-scale operations.

*Fabric filter* means a type of control device used for collecting PM by filtering a process exhaust stream through a filter or filter media. A fabric filter is also known as a baghouse.

*Filters*, for the purposes of this part, include cartridge, fabric, or HEPA filters, as defined in this section.

*Flash electroplating* means an electrolytic process performed in a tank that uses or emits any of the plating and polishing metal HAP, as defined in this section, and that is used no more than 3 cumulative minutes per hour or no more than 1 cumulative hour per day.

*General Provisions of this part (40 CFR part 63, subpart A)* means the section of the Code of Federal Regulations (CFR) that addresses air pollution rules that apply to all HAP sources addressed in part 63, which includes the National Emission Standards for Hazardous Air Pollutants (NESHAP).

*HAP* means hazardous air pollutant as defined from the list of 188 chemicals and compounds specified in the CAA Amendments of 1990; HAP are also called "air toxics." The five plating and polishing metal HAP, as defined in this section, are on this list of 188 chemicals.

*High efficiency particulate air (HEPA) filter* means a type of control device that uses a filter composed of a mat of randomly arranged fibers and is designed to remove at least 99.97 percent of airborne particles that are 0.3 micrometers or larger in diameter.

*Maintenance* is any process at a plating and polishing facility that is performed to keep the process equipment or the facility operating properly and is not performed on items to be sold as products.

*Major facility for HAP* is any facility that emits greater than 10 tpy of any HAP, or that emits a combined total of all HAP of over 25 tpy, where the HAP used to determine the total facility emissions are not restricted to only plating and polishing metal HAP or from only plating and polishing operations.

*Mesh pad mist eliminator* means a type of control device, consisting of layers of interlocked filaments densely packed between two supporting grids that remove liquid droplets and PM from the gas stream through inertial impaction and direct interception.

*Metal coating operation* means any process performed either in a tank that contains liquids or as part of a thermal spraying operation, that applies one or more plating and polishing metal HAP, as defined in this section, to the surface of parts and products used in manufacturing. These processes include but are not limited to: non-chromium electroplating; electroforming; electropolishing; non-electrolytic metal coating processes, such as chromate conversion coating, electroless nickel plating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating; and thermal or flame spraying.

*Metal HAP content of material used in plating and polishing* is the HAP content as determined from an analysis or engineering estimate of the HAP contents of the tank bath or solution, in the case of plating, metal coating, or electropolishing; or the HAP content of the metal coating being applied in the case of thermal spraying. Safety data sheet (SDS) information may be used in lieu of testing or engineering estimates but is not required to be used.

*New source* means any affected source for which you commenced construction or reconstruction after March 14, 2008.

*Non-cyanide electrolytic plating and electropolishing processes* means electroplating, electroforming, and electropolishing that uses or emits any of the plating and polishing metal HAP, as defined in this section, performed without cyanide in the tank. These processes do not use cyanide in the tank and operate at pH values less than 12. These processes use electricity and add or remove metals such as metal HAP from parts and products used in manufacturing. Both electroplating and electroforming can be performed with cyanide as well.

*Non-electrolytic plating* means a process that uses or emits any of the plating and polishing metal HAP, as defined in this section, in which metallic ions in a plating bath or solution are reduced to form a metal coating at the surface of a catalytic substrate without the use of external electrical energy. Non-electrolytic plating is also called electroless plating. Examples include chromate conversion coating, nickel acetate sealing, electroless nickel plating, sodium dichromate sealing, and manganese phosphate coating.

*Packed-bed scrubber* means a type of control device that includes a single or double packed bed that contains packing media on which PM and droplets impinge and are removed from the gas stream. The packed-bed section of the scrubber is followed by a mist eliminator to remove any water entrained from the packed-bed section.

*Plating and polishing facility* means a facility engaged in one or more of the following processes that uses or emits any of the plating and polishing metal HAP, as defined in this section: electroplating processes other than chromium electroplating (i.e., non-chromium electroplating); electroless plating; other non-electrolytic metal coating processes performed in a tank, such as chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating; thermal spraying; and the dry mechanical polishing of finished metals and formed products after plating or thermal spraying. Plating is performed in a tank or thermally sprayed so that a metal coating is irreversibly applied to an object. Plating and polishing does not include any bench-scale processes.

*Plating and polishing metal HAP* means any compound of any of the following metals: cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form, with the exception of lead. Any material that does not contain cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (as the metal), and does not contain manganese in amounts greater than or equal to 1.0 percent by weight (as the metal), as reported on the Material Safety Data Sheet for the material, is not considered to be a plating and polishing metal HAP.

*Plating and polishing process tanks* means any tank in which a process is performed at an affected plating and polishing facility that uses or has the potential to emit any of the plating and polishing metal HAP, as defined in this section. The processes performed in plating and polishing tanks include the following: electroplating processes other than chromium electroplating (i.e., non-chromium electroplating) performed in a tank; electroless plating; and non-electrolytic metal coating processes, such as chromate conversion coating, nickel acetate sealing, sodium dichromate sealing, and manganese phosphate coating; and electropolishing. This term does not include tanks containing solutions that are used to clean, rinse or wash parts prior to placing the parts in a plating and polishing process tank, or subsequent to removing the parts from a plating and polishing process tank. This term also does not include any bench-scale operations.

*PM* means solid or particulate matter that is emitted into the air.

*Repair* means any process used to return a finished object or tool back to its original function or shape.

*Research and development process unit* means any process unit that is used for conducting research and development for new processes and products and is not used to manufacture products for commercial sale, except in a *de minimis* manner.

*Short-term plating* means an electroplating process that uses or emits any of the plating and polishing metal HAP, as defined in this section, and that is used no more than 3 cumulative minutes per hour or 1 hour cumulative per day.

*Startup of the tank bath* is when the components or relative proportions of the various components in the bath have been altered from the most recent operating period. Startup of the bath does not include events where only the tank's heating or agitation and other mechanical operations are turned back on after being turned off for a period of time.

*Tank cover* for batch process units means a solid structure made of an impervious material that is designed to cover the entire open surface of a tank or process unit that is used for plating or other metal coating processes.

*Tank cover* for continuous process units, means a solid structure or combination of structures, made of an impervious material that is designed to cover at least 75 percent of the open surface of the tank or process unit that is used for continuous plating or other continuous metal coating processes.

*Temporary thermal spraying* means a thermal spraying operation that uses or emits any of the plating and polishing metal HAP, as defined in this section, and that lasts no more than 1 hour in duration during any one day and is conducted in situ. Thermal spraying that is conducted in a dedicated thermal spray booth or structure is not considered to be temporary thermal spraying.

*Thermal spraying* (also referred to as metal spraying or flame spraying) is a process that uses or emits any of the plating and polishing metal HAP, as defined in this section, in which a metallic coating is applied by projecting heated, molten, or semi-molten metal particles onto a substrate. Commonly-used thermal spraying methods include high velocity oxy-fuel (HVOF) spraying, flame spraying, electric arc spraying, plasma arc spraying, and detonation gun spraying. This operation does not include spray painting at ambient temperatures.

*Water curtain* means a type of control device that draws the exhaust stream through a continuous curtain of moving water to scrub out suspended PM.

*Wetting agent/fume suppressant* means any chemical agent that reduces or suppresses fumes or mists from a plating and polishing tank by reducing the surface tension of the tank bath.

[73 FR 37741, July 1, 2008, as amended at 76 FR 57921, Sept. 19, 2011]

#### **§ 63.11512 Who implements and enforces this subpart?**

(a) This subpart can be implemented and enforced by EPA or a delegated authority such as your State, local, or tribal agency. If the EPA Administrator has delegated authority to your State, local, or tribal agency, then that agency, in addition to EPA, has the authority to implement and enforce this subpart. You should contact your EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to your State, local, or tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or tribal agency under 40 CFR part 63, subpart E, the authorities contained in paragraph (c) of this section are retained by the EPA Administrator and are not transferred to the State, local, or tribal agency.

(c) The authorities that cannot be delegated to State, local, or tribal agencies are specified in paragraphs (c)(1) through (5) of this section.

(1) Approval of an alternative non-opacity emissions standard under 40 CFR 63.6(g), of the General Provisions of this part.

(2) Approval of an alternative opacity emissions standard under § 63.6(h)(9), of the General Provisions of this part.

(3) Approval of a major change to test methods under § 63.7(e)(2)(ii) and (f), of the General Provisions of this part. A “major change to test method” is defined in § 63.90.

(4) Approval of a major change to monitoring under § 63.8(f), of the General Provisions of this part. A “major change to monitoring” is defined in § 63.90.

(5) Approval of a major change to recordkeeping and reporting under § 63.10(f), of the General Provisions of this part. A “major change to recordkeeping/reporting” is defined in § 63.90.

**§ 63.11513 [Reserved]**

**Table 1 to Subpart W of Part 63—Applicability of General Provisions to Plating and Polishing Area Sources**

As required in § 63.11510, “What General Provisions apply to this subpart?”, you must meet each requirement in the following table that applies to you.

| Citation  | Subject   |
|---|---|
| 63.1 <sup>1</sup>   | Applicability.  |
| 63.2  | Definitions.  |
| 63.3  | Units and abbreviations.  |
| 63.4  | Prohibited activities.  |
| 63.6(a), (b)(1)-(b)(5), (c)(1), (c)(2), (c)(5), and (j)       | Compliance with standards and maintenance requirements.                     |
| 63.10(a), (b)(1), (b)(2)(i)-(iii), (xiv), (b)(3), (d)(1), (f) | Recordkeeping and reporting.  |
| 63.12   | State authority and delegations.  |
| 63.13   | Addresses of State air pollution control agencies and EPA regional offices. |
| 63.14   | Incorporation by reference.   |
| 63.15   | Availability of information and confidentiality.                            |

<sup>1</sup> Section 63.11505(e), “What parts of my plant does this subpart cover?”, exempts affected sources from the obligation to obtain title V operating permits.

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

Technical Support Document (TSD) for a  
Federally Enforceable State Operating Permit Renewal

|  |
|--|
| <b>Source Background and Description</b> |
|--|

|   |  |
|---|--|
| <b>Source Name:</b><br><b>Source Location:</b><br><b>County:</b><br><b>SIC Code:</b><br><br><b>Permit Renewal No.:</b><br><b>Permit Reviewer:</b> | <b>Comlux America, LLC</b><br><b>2910 South High School Road, Indianapolis, IN 46241</b><br><b>Marion - Wayne Township</b><br><b>4581 (Airports, Flying Fields, and Airport Terminal Services)</b><br><b>F097-37251-00702</b><br><b>Allen Reimer</b> |
|---|--|

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Comlux America, LLC relating to the operation of an aircraft part surface coating operation. On May 31, 2016, Comlux America, LLC submitted an application to the OAQ requesting to renew its operating permit. Comlux America, LLC was issued its FESOP F097-32140-00702 on October 16, 2012.

|   |
|---|
| <b>Permitted Emission Units and Pollution Control Equipment</b> |
|---|

The source consists of the following permitted emission units:

- (a) Two (2) HVLP paint spray booths, identified as 1 and 2, with a maximum capacity of two (2) cabinets per hour, each, constructed in 2012, utilizing dry filters for particulate control exhausting to stacks 1 and 2, respectively.
- (b) Two (2) glue air walls, identified as 3 and 4, with a maximum capacity of one (1) sheet of 4.8 veneer per hour, each, constructed in 2012, utilizing dry filters for particulate control, exhausting to stacks 3 and 4, respectively.

|   |
|---|
| <b>Emission Units and Pollution Control Equipment Removed From the Source</b> |
|---|

The source has removed the following emission units:

- (a) One (1) HVLP Paint Booth, identified as Paint Booth 3, constructed in 2013, with a maximum capacity of 2 cabinets per hour, using dry filters as control, and exhausting to stack S-18.
- (b) One (1) Air Wall, identified as Glue Air Wall 5, constructed in 2013, with a maximum capacity of one (1) unit per hour using HVLP spray, using dry filters as control, and exhausting to stack S-17.

|                                 |
|---------------------------------|
| <b>Insignificant Activities</b> |
|---------------------------------|

The source also consists of the following insignificant activities:

- (a) Woodworking operations, controlled by a dust collector with a cyclone/dust bin for collection. [326 IAC 6.5-1-2]
- (b) Cold cleaner degreasing operations, consisting of three (3) tanks without remote solvent reservoirs, with a combined maximum usage of 6.67 gallons per month and not subject to 326 IAC 20-6. [326 IAC 8-3-2][326 IAC 8-3-8]

- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: welding equipment and grinding operations. [326 IAC 6.5-1-2]
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour [326 IAC 6.5-1-2]:
  - (1) Roof Top Unit 1, with maximum heat input capacity of 0.98 MMBtu/hr.
  - (2) Roof Top Unit 2, with maximum heat input capacity of 0.22 MMBtu/hr.
  - (3) Roof Top Unit 3, with maximum heat input capacity of 0.31 MMBtu/hr.
  - (4) Roof Top Unit 4, with maximum heat input capacity of 0.22 MMBtu/hr.
  - (5) Roof Top Unit 5, with maximum heat input capacity of 0.24 MMBtu/hr.
  - (6) Roof Top Unit 6, with maximum heat input capacity of 0.12 MMBtu/hr.
  - (7) Roof Top Unit 7, with maximum heat input capacity of 0.07 MMBtu/hr.
  - (8) Roof Top Unit 8, with maximum heat input capacity of 0.07 MMBtu/hr.
  - (9) Roof Top Unit 9, with maximum heat input capacity of 0.24 MMBtu/hr.
  - (10) Roof Top Unit 10, with maximum heat input capacity of 0.07 MMBtu/hr.
- (e) Cleaners and solvents characterized as having a vapor pressure equal to or less than: two (2.0) kilo Pascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pound per square inch) measured at thirty-eight (38) degrees Centigrade (one hundred (100) degrees Fahrenheit); or (bb) seven-tenths (0.7) kilo Pascal (five (5) millimeters of mercury or one-tenth (0.1) pound per square inch) measured at twenty (20) degrees Centigrade (sixty-eight (68) degrees Fahrenheit); the use of which, for all cleaners and solvents combined, does not exceed one hundred forty-five (145) gallons per twelve (12) months.
- (f) Dip tanks used at the metal etching operation, constructed in 2012, consisting of the following:
  - (1) One (1) dip tank, identified as Alumiprep Tank, using a cleaner containing no HAPs, with a maximum usage of 2.0 gallons per month; and
  - (2) One (1) dip tank, identified as Alodine Tank, with a maximum usage of 6.0 gallons per month, used to apply Alodine to aluminum parts in a non-electrolytic chromate conversion process.
- (g) Two (2) enclosed spray gun cleaners used to clean spray paint guns, each with a maximum tank capacity of 5 gallons, with a combined maximum usage of 5 gallons per month.
- (h) Miscellaneous Exterior Spray Painting used to perform touchup spray painting, with a maximum capacity of 0.0007 gallon per hour, uncontrolled.
- (i) One Touchup Booth, with a maximum capacity of 0.01 gallon per hour, utilizing HVLP spray method of application, using dry filters for particulate control, and exhausting through stack S-16.
- (j) Paved roads.

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|---------------------------|
| <b>Existing Approvals</b> |
|---------------------------|

Since the issuance of the FESOP F097-32140-00702 on October 16, 2012, the source has constructed or has been operating under the following additional approvals:

- (a) Minor Permit Modification No. 097-33301-00702 issued on July 22, 2013; and
- (b) Administrative Amendment No. 097-35681-00702 issued on April 22, 2015.



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

### Air Pollution Control Justification as an Integral Part of the Process

In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge ("ALJ") Garrettson resolving an appeal filed by Kimball Hospitality Furniture Inc. (Cause Nos. 92-A-J-730 and 92-A-J-833) related to the method by which IDEM calculated potential emissions from woodworking operations. In his findings, the ALJ determined that particulate controls are necessary for the facility to produce its normal product and are integral to the normal operation of the facility, and therefore, potential emissions should be calculated after controls. Based on this ruling, the potential to emit particulate matter from the woodworking operations were calculated after consideration of the controls for determining operating permit level and for determining the applicability of 326 IAC 6.5 (Particulate Matter Limitations Except Lake County) and Prevention of Significant Deterioration (PSD).

### Enforcement Issue

There are no enforcement actions pending.

### Emission Calculations

See Appendix A of this document for detailed emission calculations.

### County Attainment Status

The source is located in Marion County (Wayne Township).

| Pollutant  | Designation  |
|--|--|
| SO <sub>2</sub>  | Non-attainment effective October 4, 2013, for the Center Township, Perry Township, and Wayne Township. Better than national standards for the remainder of the county.   |
| CO   | Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 <sup>th</sup> Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County. |
| O <sub>3</sub>   | Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. <sup>1</sup>   |
| PM <sub>2.5</sub>  | Attainment effective July 11, 2013, for the annual PM <sub>2.5</sub> standard.   |
| PM <sub>2.5</sub>  | Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM <sub>2.5</sub> standard.  |
| PM <sub>10</sub>   | Unclassifiable effective November 15, 1990.  |
| NO <sub>2</sub>  | Cannot be classified or better than national standards.  |
| Pb   | Unclassifiable or attainment effective December 31, 2011.  |
| <sup>1</sup> Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005. |  |

- (a) **Ozone Standards**  
 Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM<sub>2.5</sub>**  
Marion County has been classified as attainment for PM<sub>2.5</sub>. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **SO<sub>2</sub>**  
U.S. EPA, in the Federal Register Notice 78 FR 47191 dated August 5, 2013, has designated Marion County (Wayne Township) as nonattainment for SO<sub>2</sub>. Therefore, SO<sub>2</sub> emissions were reviewed pursuant to the requirements of Emission Offset, 326 IAC 2-3.
- (e) **Other Criteria Pollutants**  
Marion County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

#### **Fugitive Emissions**

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

#### **Unrestricted Potential Emissions**

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

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

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

- (a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of all criteria pollutants are less than 100 tons per year.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of total HAPs is less than twenty-five (25) tons per year and any single HAP is equal to or greater than ten (10) tons per year. However, the Permittee has agreed to limit the source's single HAP emissions below Title V levels. Therefore, the Permittee will be issued a FESOP Renewal.

#### **Potential to Emit After Issuance**

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

| Process/<br>Emission Unit  | Potential To Emit of the Entire Source After Issuance of Renewal (tons/year) |                    |                      |                 |                 |              |             |                |                                |
|--|--|--------------------|----------------------|-----------------|-----------------|--------------|-------------|----------------|--------------------------------|
|  | PM   | PM <sub>10</sub> * | PM <sub>2.5</sub> ** | SO <sub>2</sub> | NO <sub>x</sub> | VOC          | CO          | Total HAPs     | Worst Single HAP               |
| Paint Booth 1  | 10.74  | 10.74              | 10.74                | 0.00            | 0.00            | 15.88        | 0.00        | < 24.0         | < 9.5                          |
| Paint Booth 2  | 10.74  | 10.74              | 10.74                | 0.00            | 0.00            | 15.88        | 0.00        |                |                                |
| Glue Air Wall 3  | 0.37   | 0.37               | 0.37                 | 0.00            | 0.00            | 2.46         | 0.00        |                |                                |
| Glue Air Wall 4  | 0.37   | 0.37               | 0.37                 | 0.00            | 0.00            | 2.46         | 0.00        |                |                                |
| Insignificant Touchup Booth  | 0.00   | 0.00               | 0.00                 | 0.00            | 0.00            | 0.25         | 0.00        | 0.00           | 0.00                           |
| Insignificant Clean-Up Solvent   | 0.00   | 0.00               | 0.00                 | 0.00            | 0.00            | 0.11         | 0.00        | 0.01           | 0.01<br>(Toluene)              |
| Insignificant Combustion Units   | 0.02   | 0.08               | 0.08                 | 0.01            | 1.09            | 0.06         | 0.92        | 0.02           | 0.02<br>(Hexane)               |
| Other Insignificant Activities   | 6.61   | 6.57               | 6.57                 | 0.00            | 0.00            | 1.95         | 0.00        | 0.01           | 0.003<br>(HF and Chromic Acid) |
| Paved Roads  | 0.09   | 0.02               | 0.00                 | 0.00            | 0.00            | 0.00         | 0.00        | 0.00           | 0.00                           |
| <b>Total PTE of Entire Source</b>  | <b>28.85</b>   | <b>28.87</b>       | <b>28.87</b>         | <b>0.01</b>     | <b>1.09</b>     | <b>39.05</b> | <b>0.92</b> | <b>&lt; 25</b> | <b>&lt; 10</b>                 |
| Title V Major Source Thresholds  | NA   | 100                | 100                  | 100             | 100             | 100          | 100         | 25             | 10                             |
| PSD Major Source Thresholds  | 250  | 250                | 250                  | NA              | 250             | 250          | 250         | NA             | NA                             |
| Emission Offset/<br>Major Source Thresholds  | NA   | NA                 | NA                   | 100             | NA              | NA           | NA          | 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".<br>**PM <sub>2.5</sub> listed is direct PM <sub>2.5</sub> . |  |                    |                      |                 |                 |              |             |                |                                |

(a) Source Status

This existing source is not a Title V major stationary source, because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1). This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs will be limited to less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA). Additionally, this existing source is not a major stationary source under Emission Offset (326 IAC 2-3), because no non-attainment regulated pollutant is emitted at a rate of 100 tons per year or more. Therefore, this source is subject to the provisions of 326 IAC 2-8 (FESOP).

Note; Comlux America, LLC has requested to include a limit for the total input of combined HAPs to the two (2) HVLP paint spray booths, identified as 1 and 2, and the two (2) glue air walls, identified as 3 and 4, of less than twenty-four (24.0) tons per twelve (12) consecutive month period.

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP) and to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) not applicable, the Permittee shall comply with the following:

- (1) The total input of each single HAP to the two (2) HVLP paint spray booths, identified as 1 and 2, and the two (2) glue air walls, identified as 3 and 4, shall be less than 9.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month; and

- (2) The total input of combined HAPs to the two (2) HVLP paint spray booths, identified as 1 and 2, and the two (2) glue air walls, identified as 3 and 4, shall be less than 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 of each 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 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) not applicable.

(b) Greenhouse Gases

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](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.

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| <b>Federal Rule Applicability</b> |
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Compliance Assurance Monitoring (CAM)

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

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standards for Surface Coating of Metal Furniture, 40 CFR 60, Subpart EE (326 IAC 12), are not included in the permit, since this source does not coat metal furniture.
- (b) The requirements of the New Source Performance Standards for Industrial Surface Coating: Large Appliances, 40 CFR 60, Subpart SS (326 IAC 12), are not included in the permit, since this source does not coat large appliances as defined in 40 CFR 60.451(a).
- (c) The requirements of the New Source Performance Standards for Polymeric Coating of Supporting Substrates Facilities, 40 CFR 60, Subpart VVV (326 IAC 12), are not included in the permit, since this source does not perform polymeric coating of supporting substrates, as defined in 40 CFR 60.741(a).
- (d) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Chromium Emissions From Hard and Decorative Chromium Electroplated and Chromium Anodizing Tanks, 40 CFR 63, Subpart N (326 IAC 14 and 326 IAC 20-8), are not included in the permit for the dip tank associated with the metal etching operation, because tanks that contain a chromium solution, but in which no electrolytic process occurs, are specifically exempted under §63.340(c). This source does not engage in any type of electroplating or anodizing.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning, 40 CFR 63, Subpart T (326 IAC 20-6), are not included in the permit, since this source does not use halogenated solvents as defined in §63.461.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Aerospace Manufacturing and Rework Facilities, 40 CFR 63, Subpart GG (326 IAC 20-15), are not included in this permit, since although this existing source manufactures and coats metal aircraft parts and components, it is not a major source of HAP as defined in §63.2.
- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wood Furniture Manufacturing Operations, 40 CFR 63, Subpart JJ (326 IAC 20-14), are not included in the permit, since, while items coated at this source could be considered wood furniture components, this source is not a major source of HAP as defined in §63.2. This source will limit HAP emissions to below major source levels.
- (i) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Plywood and Composite Wood Products, 40 CFR 63, Subpart DDDD, are not included in the permit, since this source does not manufacture plywood or composite wood products as defined in §63.2292.
- (j) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR 63, Subpart IIII (326 IAC 20-85), are not included in the permit, since this source does not coat automobiles or light-duty trucks as defined in §63.3081.
- (k) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart MMMM (326 IAC 20-80), are not included in the permit, since this source is not a major source of HAPs as defined in §63.2. This source will limit HAP emissions to below major source levels.
- (l) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Plastic Parts and Products, 40 CFR 63, Subpart PPPP (326 IAC 20-81), are not included in the permit, since this source is not a major source of HAPs as defined in §63.2. This source will limit HAP emissions to below major source levels.
- (m) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Wood Building Products, 40 CFR 63, Subpart QQQQ (326 IAC 20-79), are not included in the permit, since the items coated at this source are not used in the construction of residential, commercial, or institutional buildings as defined in §63.4781.
- (n) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Metal Furniture, 40 CFR 63, Subpart RRRR (326 IAC

20-78), are not included in the permit, since this source does not coat metal furniture as defined in §63.4981.

- (o) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH are not included in the permit, since, although this source is located at an area source of HAPs as defined in §63.2, this source does not conduct a paint stripping operation, an automotive body refinishing operation, or use spray application coatings that contain compounds of chromium, lead, manganese, nickel, or cadmium. The dip tanks associated with the metal etching process use coatings that contain chromic acid, but it is applied using dip method of application.
- (p) The one (1) dip tank used at the metal etching operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Plating and Polishing Operations, 40 CFR 63, Subpart WWWWWW, since this existing source meets the definition of an area source, as defined in §63.11504(a)(2), is engaged in non-electrolytic metal coating processes, such as chromate conversion coating, and contains plating and polishing metal HAPs, as defined in §63.11511, in the bath solution(s).

The facilities subject to this rule include the following:

- (f) Dip tanks used at the metal etching operation, constructed in 2012, consisting of the following:
  - (2) One (1) dip tank, identified as Alodine Tank, with a maximum usage of 6.0 gallons per month, used to apply Alodine to aluminum parts in a non-electrolytic chromate conversion process.

Nonapplicable portions of the NESHAP will not be included in the permit. The entire rule is included as Attachment A of the permit. The one (1) dip tank, identified as Alodine Tank, is subject to the following portions of Subpart WWWWWW:

- (1) 40 CFR 63.11504(a)(1)(iii), (a)(2) and (3)
- (2) 40 CFR 63.11505(a)(1), (b), (c), and (e)
- (3) 40 CFR 63.11506(a) or (c)
- (4) 40 CFR 63.11507(g)
- (5) 40 CFR 63.11508(a), (b), (c), (d)(1), (2), and (8)
- (6) 40 CFR 63.11509(a), (b), (c)(6) and (7), (d), (e), and (f)
- (7) 40 CFR 63.11510
- (8) 40 CFR 63.11511
- (9) 40 CFR 63.11512

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

- (q) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

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| <b>State Rule Applicability - Entire Source</b> |
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The following state rules are applicable to the source:

- (a) 326 IAC 2-8-4 (FESOP)  
FESOP applicability is discussed under the Potential to Emit After Issuance section above.

- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))  
PSD applicability is discussed under the Potential to Emit After Issuance section above.
- (c) 326 IAC 2-3 (Emission Offset)  
Emission Offset applicability is discussed under the Potential to Emit After Issuance section above.
- (d) 326 IAC 2-6 (Emission Reporting)  
This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, or LaPorte County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.
- (e) 326 IAC 5-1 (Opacity Limitations)  
This source is subject to the opacity limitations specified in 326 IAC 5-1-2(2)
- (f) 326 IAC 6.5 (PM Limitations Except Lake County)  
Pursuant to 326 IAC 6.5-1-1, this rule applies to sources located in Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo, or Wayne Counties that have potential particulate emissions greater than ten (10) tons per year that have not limited particulate emissions to less than ten (10) tons per year. This source is located in Marion County, has not limited particulate emissions to less than ten (10) tons per year, and is not specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10. Pursuant to 326 IAC 6.5-1-1, each of the emission units at this source that has the potential to emit particulate matter is subject to the requirements of 326 IAC 6.5-1-2, because the source is located in Marion county, has not limited particulate emissions to less than ten (10) tons per year, and is not specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10. See State Rule Applicability -- Individual Facilities section below for the requirements of this rule.
- (g) 326 IAC 6.8 (PM Limitations for Lake County)  
This source is not subject to 326 IAC 6.8 because it is not located in Lake County.
- (h) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)  
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (i) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)  
The source is not subject to the requirements of 326 IAC 6-5, because it does not have potential fugitive particulate emissions greater than 25 tons per year.
- (j) 326 IAC 12 (New Source Performance Standards)  
See Federal Rule Applicability Section of this TSD.
- (k) 326 IAC 20 (Hazardous Air Pollutants)  
See Federal Rule Applicability Section of this TSD.

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| <b>State Rule Applicability – Individual Facilities</b> |
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Surface Coating, Touchup Booth, and Miscellaneous Exterior Spray Painting

- (a) 326 IAC 6.5 (PM Limitations Except Lake County)
  - (1) Pursuant to 326 IAC 6.5-1-1(c)(5), the two (2) HVLP paint spray booths (1 and 2) are subject to the requirements of 326 IAC 6.5, since each uses greater than five (5) gallons of coating per day. Therefore, pursuant to 326 IAC 6.5-1-2(h), the Permittee shall comply with the following:

- Pursuant to 326 IAC 6.5-1-2(h), particulate from the two (2) HVLP paint spray booths (1 and 2) shall be controlled by a dry particulate filter, and the Permittee shall operate the control devices in accordance with manufacturer's specifications.
- (2) Pursuant to 326 IAC 6.5-1-1(c)(5), the two (2) glue air walls (3 and 4), touchup booth, and miscellaneous exterior spray painting are each not subject to the requirements of 326 IAC 6.5, since each unit has the potential to use less than five (5) gallons of surface coatings per day.
- (b) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
- (1) Pursuant to 326 IAC 6-3-1(c)(3), this rule does not apply if a particulate limitation established in 326 IAC 6.5 is more stringent than the particulate limitation established in 326 IAC 6-3-2. Since the particulate limitations established in 326 IAC 6.5-1-2 is more stringent than the particulate limitations that would be established by 326 IAC 6-3-2, the two (2) HVLP paint spray booths (1 and 2) are each not subject to the requirements of 326 IAC 6-3-2.
- (2) Pursuant to 326 IAC 6-3-1(b)(15), the requirements of 326 IAC 6-3-2 are not applicable to the two (2) glue air walls (3 and 4), touchup booth, and miscellaneous exterior spray painting, since each unit has the potential to use less than five (5) gallons of surface coatings per day.
- (c) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
- (1) Pursuant to 326 IAC 8-1-6(3)(A), the requirement to reduce VOC emissions using the Best Available Control Technology (BACT) does not apply to the two (2) HVLP paint spray booths (1 and 2), since they are each subject to the requirements of 326 IAC 8-2-10 and 326 IAC 8-2-12.
- (2) Pursuant to 326 IAC 8-1-6(3)(A), the requirement to reduce VOC emissions using the Best Available Control Technology (BACT) does not apply to the two (2) glue air walls (3 and 4), touchup booth, and miscellaneous exterior spray painting, because they each do not have potential VOC emissions of greater than twenty-five (25) tons per year, each.
- (d) 326 IAC 8-2-6 (VOC Rules: Metal Furniture Coating Operations)
- Pursuant to 326 IAC 8-2-6(a), the requirements of 326 IAC 8-2-6 are not applicable to the two (2) HVLP paint spray booths (1 and 2), two (2) glue air walls (3 and 4), touchup booth, and miscellaneous exterior spray painting, since each is not surface coating metal furniture. This source applies coatings to various aircraft parts, comprised primarily of wood veneer, including overhead bins, cabinets, drawers, and small dressers.
- (e) 326 IAC 8-2-9 (VOC Rules: Miscellaneous Metal and Plastic Parts Coating Operations)
- Pursuant to 326 IAC 8-2-9(a), the requirements of 326 IAC 8-2-9 are not applicable to the two (2) HVLP paint spray booths (1 and 2), two (2) glue air walls (3 and 4), touchup booth, and miscellaneous exterior spray painting, since the source does not perform plastic parts coating in Lake or Porter Counties and the source does not perform metal surface coating of the types of items listed in 326 IAC 8-2-9(a)(1). This source applies coatings to various aircraft parts, comprised primarily of wood veneer, including overhead bins, cabinets, drawers, and small dressers under SIC Code 4581.
- (f) 326 IAC 8-2-10 (VOC Rules: Flat Wood Panels; Manufacturing Operations)
- (1) The two (2) HVLP paint spray booths (1 and 2) are subject to the requirements of 326 IAC 8-2-10 when coating flatwood panels, including printed interior panels, natural finish hardwood plywood panels and/or hardboard panels, as defined in 326 IAC 8-2-10(a), because each spray booth was constructed after July 1,



1990, and each has potential VOC emissions of greater than fifteen (15) pounds per day before add-on controls.

Pursuant to 326 IAC 8-2-10(d), the Permittee shall comply with the following for the two (2) HVLP paint spray booths (1 and 2), when coating flatwood panels:

- (A) VOC emissions from the two (2) HVLP paint spray booths (1 and 2) shall not exceed 6.0 pounds of VOC per 1,000 square feet of coated finished product from printed interior panels, regardless of the number of coats applied.
  - (B) VOC emissions from the two (2) HVLP paint spray booths (1 and 2) shall not exceed 12.0 pounds of VOC per 1,000 square feet of coated finished product from natural finish hardwood plywood panels, regardless of the number of coats applied.
  - (C) VOC emissions from the two (2) HVLP paint spray booths (1 and 2) shall not exceed 10.0 pounds of VOC per 1,000 feet of coated finished product from Class II finishes on hardboard panels, regardless of the number of coats applied.
- (2) The two (2) glue air walls (3 and 4), touchup booth, and miscellaneous exterior spray painting are each not subject to the requirements of 326 IAC 8-2-10, since, although they were constructed after July 1, 1990, they each have potential VOC emissions of less than fifteen (15) pounds per day before add-on controls.
- (g) 326 IAC 8-2-12 (VOC Rules: Wood Furniture and Cabinet Coating)
- (1) The two (2) HVLP paint spray booths, (1 and 2), are subject to the requirements of 326 IAC 8-2-12 when coating wood furnishings and/or simulated wood furnishings, including cabinets, tables, beds chairs, sofas (non-upholstered), art objects, and other coated furnishings, because each spray booth was constructed after July 1, 1990, and each has potential VOC emissions of greater than 15 pounds per day before add-on controls.

Pursuant to 326 IAC 8-2-12, the surface coating of wood furnishings and/or simulated wood furnishings, including cabinets, tables, beds chairs, sofas (non-upholstered), art objects, and other coated furnishings within the two (2) HVLP paint spray booths (1 and 2), with the exception of no more than ten (10) gallons of coating per day used for touch-up and repair operations, shall utilize one (1) or more of the following application systems:

Airless Spray Application System  
Air-Assisted Airless Spray Application System  
Electrostatic Spray Application System  
Electrostatic Bell or Disc Application System  
Heated Airless Spray Application System  
Roller Coating  
Brush or Wipe Application  
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

The two (2) HVLP paint spray booths, (1 and 2), utilize HVLP spray application. Therefore, the two spray booths will comply with this rule.

- (2) Pursuant to 326 IAC 8-2-1(4), the requirements of 326 IAC 8-2-12 are not applicable to the two (2) glue air walls (3 and 4), touchup booth, and miscellaneous exterior spray painting, since, although they were each constructed after July 1, 1990, they each do not have potential VOC emissions of greater than fifteen (15) pounds per day before add-on controls.
- (h) 326 IAC 8-11 (VOC Rules: Wood Furniture Coating)  
Pursuant to 326 IAC 8-11(1), the two (2) HVLP paint spray booths (1 and 2), two (2) glue air walls (3 and 4), touchup booth, and miscellaneous exterior spray painting are each not subject to the requirements of 326 IAC 8-11, since the source is not located in Lake, Porter, Clark, or Floyd Counties. This source is located in Marion County.
- (i) There are no other 326 IAC 8 Rules that are applicable to the two (2) HVLP paint spray booths (1 and 2), two (2) glue air walls (3 and 4), touchup booth, and miscellaneous exterior spray painting.

#### Woodworking Operations

- (j) 326 IAC 6.5 (PM Limitations Except Lake County)  
Pursuant to 326 IAC 6.5-1-1, the requirements of 326 IAC 6.5 are applicable to the woodworking operations, because this source is located in Marion County, is not specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10, and has potential particulate matter emissions greater than ten (10) tons per year.  
  
Pursuant to 326 IAC 6.5-1-2(a), the particulate matter emissions from the woodworking operations shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (gr/dscf).
- (k) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-1(c)(3), this rule does not apply if a particulate limitation established in 326 IAC 6.5 is more stringent than the particulate limitation established in 326 IAC 6-3-2. Since the particulate limitations established in 326 IAC 6.5-1-2 is more stringent than the particulate limitations that would be established by 326 IAC 6-3-2, the woodworking operation is not subject to the requirements of 326 IAC 6-3-2.

#### Parts Washing Tank and Spray Gun Cleaners

- (l) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
Pursuant to 326 IAC 8-1-6(1), the requirement to reduce VOC emissions using the Best Available Control Technology (BACT) does not apply to the cold cleaner degreasing operation and the two (2) enclosed spray gun cleaners, since the unlimited potential VOC emissions from each are less than twenty-five (25) tons per year and each is subject to the requirements of 326 IAC 8-3-2 (Cold Cleaner Operations) and 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers).
- (m) 326 IAC 8-3-2 (Cold Cleaner Operations)  
Pursuant to 326 IAC 8-3-1(a)(1), the cold cleaner degreasing operation and the two (2) enclosed spray gun cleaners are each subject to the requirements of 326 IAC 8-3-2, since each was constructed after July 1, 1990, performs organic solvent degreasing, and do not have a remote solvent reservoirs.

Pursuant to 326 IAC 8-3-2(a) (Cold Cleaner Degreaser Control Equipment and Operating Requirements), for the cold cleaner degreasing operation and the two (2) enclosed spray gun cleaners, the Permittee shall:

- (1) Equip the degreaser with a cover;
- (2) Equip the degreaser with a facility for draining cleaned parts;
- (3) Close the degreaser cover whenever parts are not being handled in the degreaser;
- (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (5) Provide a permanent, conspicuous label that lists the operation requirements in subdivisions (3), (4), (6), and (7);
- (6) Store waste solvent only in closed containers; and
- (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

Pursuant to 326 IAC 8-3-2(b), for the cold cleaner degreasing operation and two (2) enclosed spray gun cleaners, the Permittee shall ensure the following additional control equipment and operating requirements are met:

- (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
  - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
  - (B) A water cover when solvent used is insoluble in, and heavier than, water.
  - (C) A refrigerated chiller.
  - (D) Carbon adsorption.
  - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
- (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
- (3) If used, solvent spray:
  - (A) must be a solid, fluid stream; and
  - (B) shall be applied at a pressure that does not cause excessive splashing.
- (n) 326 IAC 8-3-5 (Cold Cleaner Degreaser)  
On January 30, 2013, the Indiana Environmental Control Board repealed 326 IAC 8-3-5 (Cold Cleaner Degreaser). Therefore, the source is not subject to this rule.
- (o) 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers)  
Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), on and after January 1, 2016, the Permittee shall not operate a cold cleaner 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).

#### Natural Gas-Fired Heaters

- (p) 326 IAC 6.5 (PM Limitations Except Lake County)  
Pursuant to 326 IAC 6.5-1-1(a), the requirements of 326 IAC 6.5-1-2 are applicable to the ten (10) natural gas-fired heaters, because this source is located in Marion County, is not specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10, and has potential particulate matter emissions greater than ten (10) tons per year.

Pursuant to 326 IAC 6.5-1-2(a), the particulate matter emissions from each of the ten (10) natural gas-fired heaters shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

- (q) 326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)  
Pursuant to 326 IAC 6-2-1(a), the requirements of 326 IAC 6-2 are not applicable to the ten (10) natural gas-fired heaters, since each is not a source of direct heat. They are direct sources of heat.
- (r) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Operations)  
Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are not applicable to the ten (10) natural gas-fired heaters, since each is not considered a "manufacturing process" as defined in 326 IAC 6-3-1.5.
- (s) 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)  
The ten (10) natural gas-fired heaters are each not subject to the requirements of 326 IAC 7-1.1 because each unit's SO<sub>2</sub> PTE is less than twenty-five (25) tons per year or ten (10) pounds per hour.
- (t) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
Pursuant to 326 IAC 8-1-6(1), the requirement to reduce VOC emissions using the Best Available Control Technology (BACT) does not apply to the ten (10) natural gas-fired heaters, since the potential unlimited VOC emissions from each unit is less than twenty-five (25) tons per year.

#### Welding and Grinding

- (u) 326 IAC 6.5 (PM Limitations Except Lake County)  
Pursuant to 326 IAC 6.5-1-1(a), the requirements of 326 IAC 6.5-1-2 are applicable to the welding equipment and grinding operations, because this source is located in Marion County, is not specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10, and has potential particulate matter emissions greater than ten (10) tons per year.

Pursuant to 326 IAC 6.5-1-2(a), the particulate matter emissions from the welding equipment and grinding operations shall each not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

- (v) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-1(c)(3), this rule does not apply if a particulate limitation established in 326 IAC 6.5 is more stringent than the particulate limitation established in 326 IAC 6-3-2. Since the particulate limitations established in 326 IAC 6.5-1-2 is more stringent than the particulate limitations that would be established by 326 IAC 6-3-2, the welding equipment and grinding operations are not subject to the requirements of 326 IAC 6-3-2.

#### Metal Etching

- (w) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
Pursuant to 326 IAC 8-1-6(1), the requirement to reduce VOC emissions using the Best Available Control Technology (BACT) does not apply to the dip tank associated with the metal etching operation, since the potential unlimited VOC emissions from the unit is less than twenty-five (25) tons per year.
- (x) 326 IAC 8-2-9 (VOC Rules: Miscellaneous Metal and Plastic Parts Coating Operations)  
Pursuant to 326 IAC 8-2-1(a)(2), the requirements of 326 IAC 8-2-9 are not applicable to the dip tank associated with the metal etching operation, since the unit does not have potential emissions of twenty-five (25) tons or greater per year of VOC.

### Cleaners and Solvents

- (y) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
Pursuant to 326 IAC 8-1-6(1), the requirement to reduce VOC emissions using the Best Available Control Technology (BACT) does not apply to cleaners and solvents, since the potential unlimited VOC emissions from the operation is less than twenty-five (25) tons per year.
- (z) 326 IAC 8-3 (Organic Solvent Degreasing Operations)  
Pursuant to 326 IAC 8-3-1(a)(1), the requirements of 326 IAC 8-3 are not applicable to the cleaners and solvents, since they are not operations of the types listed in 326 IAC 8-3-1(a)(1). The cleaners and solvents are applied using hand application.

### Paved Roads

- (aa) 326 IAC 6.5 (PM Limitations Except Lake County)  
Pursuant to 326 IAC 6.5-1-1(a), the requirements of 326 IAC 6.5-1-2 are applicable to the paved roads, because this source is located in Marion County, is not specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10, and has potential particulate matter emissions greater than ten (10) tons per year.  
  
Pursuant to 326 IAC 6.5-1-2(a), the particulate matter emissions from the paved roads shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).
- (bb) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-1(c)(3), this rule does not apply if a particulate limitation established in 326 IAC 6.5 is more stringent than the particulate limitation established in 326 IAC 6-3-2. Since the particulate limitations established in 326 IAC 6.5-1-2 is more stringent than the particulate limitations that would be established by 326 IAC 6-3-2, the paved roads are not subject to the requirements of 326 IAC 6-3-2. Additionally, pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3 are not applicable to the paved roads, since they are not considered a "manufacturing process" as defined in 326 IAC 6-3-1.5.

|   |
|---|
| <b>Compliance Determination and Monitoring Requirements</b> |
|---|

Permits issued under 326 IAC 2-8 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 2-8-4. 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.

- (a) The compliance monitoring requirements applicable to the two (2) HVLP paint spray booths (1 and 2) are as follows:

| Emission Unit/Control                                       | Operating Parameters  | Frequency      |
|---|---|----------------|
| Dry Filters associated with HVLP Paint Spray Booths 1 and 2 | Inspections to verify the placement, integrity, and particle loading of filters   | Once per day   |
|   | Observations of the overspray when one or more of the booths are in operation   | Once per week  |
|   | Inspections of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground | Once per month |

These monitoring conditions are necessary, because the dry filters for the HVLP Spray Booths 1 and 2 must operate properly to assure compliance with the 326 IAC 6.5 particulate matter (PM) limitations in the permit.

- (b) The compliance determination requirements applicable to the woodworking operations are as follows:

In order to assure compliance with D.2.1, the dust collector with a cyclone/dust bin for particulate control shall be in operation and control emissions from each of the woodworking operations at all times that the corresponding woodworking operation is in operation.

This compliance determination condition is necessary, because the dust collector with a cyclone/dust bin must be in operation to assure compliance with the 326 IAC 6.5 particulate matter (PM) limitations in the permit.

#### Recommendation

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

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on May 31, 2016. Additional information was received on August 26, 2016, September 1, 2016, September 16, 2016, September 19, 2016, and September 21, 2016.

#### Conclusion

The operation of this aircraft part surface coating operation shall be subject to the conditions of the attached FESOP Renewal No. F097-37251-00702.

#### IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Allen Reimer at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-0863 or toll free at 1-800-451-6027 extension 3-0863.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emissions Calculations  
Summary**

Page 1 of 7 TSD App A

Company Name: Comlux America, LLC  
Source Address: 2910 South High School Road, Indianapolis IN 46241  
Permit Number: F097-37251-00702  
Reviewer: Allen Reimer

**Uncontrolled/Unlimited Potential to Emit (tons/year)**

| Emission Unit                  | PM           | PM <sub>10</sub> | PM <sub>2.5</sub> | SO <sub>2</sub> | NO <sub>x</sub> | VOC          | CO          | Total HAPs   | Highest Single HAP |                     |
|--------------------------------|--------------|------------------|-------------------|-----------------|-----------------|--------------|-------------|--------------|--------------------|---------------------|
| Paint Booth 1                  | 10.74        | 10.74            | 10.74             | 0.00            | 0.00            | 15.88        | 0.00        | 8.06         | 8.02               | Styrene             |
| Paint Booth 2                  | 10.74        | 10.74            | 10.74             | 0.00            | 0.00            | 15.88        | 0.00        | 8.06         | 8.02               | Styrene             |
| Glue Air Wall 3                | 0.37         | 0.37             | 0.37              | 0.00            | 0.00            | 2.46         | 0.00        | 1.01         | 0.74               | Hexane              |
| Glue Air Wall 4                | 0.37         | 0.37             | 0.37              | 0.00            | 0.00            | 2.46         | 0.00        | 1.01         | 0.74               | Hexane              |
| Insignificant Touchup Booth    | 0.00         | 0.00             | 0.00              | 0.00            | 0.00            | 0.25         | 0.00        | 0.00         | 0.00               | NA                  |
| Insignificant Clean-Up Solvent | 0.00         | 0.00             | 0.00              | 0.00            | 0.00            | 0.11         | 0.00        | 0.01         | 0.01               | Toluene             |
| Insignificant Combustion Units | 0.02         | 0.08             | 0.08              | 0.01            | 1.09            | 0.06         | 0.92        | 0.02         | 0.02               | Hexane              |
| Other Insignificant Activities | 6.61         | 6.57             | 6.57              | 0.00            | 0.00            | 1.95         | 0.00        | 0.01         | 0.003              | HF and Chromic Acid |
| Paved Roads                    | 0.09         | 0.02             | 0.00              | 0.00            | 0.00            | 0.00         | 0.00        | 0.00         | 0.00               | NA                  |
| <b>Total</b>                   | <b>28.85</b> | <b>28.87</b>     | <b>28.87</b>      | <b>0.01</b>     | <b>1.09</b>     | <b>39.05</b> | <b>0.92</b> | <b>18.16</b> | <b>17.55</b>       | <b>Styrene</b>      |

**Limited Potential to Emit (PTE) After Issuance (tons/year)**

| Emission Unit                  | PM           | PM <sub>10</sub> | PM <sub>2.5</sub> | SO <sub>2</sub> | NO <sub>x</sub> | VOC          | CO          | Total HAPs     | Highest Single HAP |                     |
|--------------------------------|--------------|------------------|-------------------|-----------------|-----------------|--------------|-------------|----------------|--------------------|---------------------|
| Paint Booth 1                  | 10.74        | 10.74            | 10.74             | 0.00            | 0.00            | 15.88        | 0.00        | < 24.0         | < 9.5              | Styrene             |
| Paint Booth 2                  | 10.74        | 10.74            | 10.74             | 0.00            | 0.00            | 15.88        | 0.00        |                |                    |                     |
| Glue Air Wall 3                | 0.37         | 0.37             | 0.37              | 0.00            | 0.00            | 2.46         | 0.00        |                |                    |                     |
| Glue Air Wall 4                | 0.37         | 0.37             | 0.37              | 0.00            | 0.00            | 2.46         | 0.00        |                |                    |                     |
| Insignificant Touchup Booth    | 0.00         | 0.00             | 0.00              | 0.00            | 0.00            | 0.25         | 0.00        | 0.00           | 0.00               | NA                  |
| Insignificant Clean-Up Solvent | 0.00         | 0.00             | 0.00              | 0.00            | 0.00            | 0.11         | 0.00        | 0.01           | 0.01               | Toluene             |
| Insignificant Combustion Units | 0.02         | 0.08             | 0.08              | 0.01            | 1.09            | 0.06         | 0.92        | 0.02           | 0.02               | Hexane              |
| Other Insignificant Activities | 6.61         | 6.57             | 6.57              | 0.00            | 0.00            | 1.95         | 0.00        | 0.01           | 0.003              | HF and Chromic Acid |
| Paved Roads                    | 0.09         | 0.02             | 0.00              | 0.00            | 0.00            | 0.00         | 0.00        | 0.00           | 0.00               | NA                  |
| <b>Total</b>                   | <b>28.85</b> | <b>28.87</b>     | <b>28.87</b>      | <b>0.01</b>     | <b>1.09</b>     | <b>39.05</b> | <b>0.92</b> | <b>&lt; 25</b> | <b>&lt; 10</b>     | <b>Styrene</b>      |

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations  
Paint Booths 1 and 2 and Glue Air Walls 3 and 4  
and Clean-Up Solvent**

Page 2 of 7 TSD App A

Company Name: Comlux America, LLC  
Source Address: 2910 South High School Road, Indianapolis IN 46241  
Permit Number: F097-37251-00702  
Reviewer: Allen Reimer

| Material  | Density<br>(Lb/Gal) | Weight %<br>Volatile (H2O<br>& Organics) | Weight %<br>Water | Weight %<br>Organics | Volume %<br>Water | Volume % Non-<br>Volatiles (solids) | Gal of Mat.<br>(gal/unit) | Maximum<br>(unit/hour) | Maximum<br>(gal/day) | Pounds VOC per<br>gallon of coating<br>less water | Pounds VOC<br>per gallon of<br>coating | Potential<br>VOC pounds<br>per hour | Potential<br>VOC pounds<br>per day | Potential<br>VOC tons<br>per year | Particulate<br>Potential<br>(ton/yr) | lb VOC/gal<br>solids | Transfer<br>Efficiency |
|---|---------------------|--|-------------------|----------------------|-------------------|-------------------------------------|---------------------------|------------------------|----------------------|---|--|-------------------------------------|------------------------------------|-----------------------------------|--------------------------------------|----------------------|------------------------|
| Paint Booths 1 and 2 (per booth)  |                     |  |                   |                      |                   |                                     |                           |                        |                      |   |  |                                     |                                    |                                   |                                      |                      |                        |
| Insulator "A"   | 7.36                | 68.00%                                   | 0.0%              | 68.0%                | 0.0%              | 32.00%                              | 0.25                      | 2.00                   | 12.00                | 5.00  | 5.00                                   | 2.50                                | 60.06                              | 10.96                             | 2.58                                 | 15.64                | 50%                    |
| Insulator "B"   | 7.48                | 76.00%                                   | 0.0%              | 76.0%                | 0.0%              | 24.00%                              | 0.25                      | 2.00                   | 12.00                | 5.68  | 5.68                                   | 2.84                                | 68.22                              | 12.45                             | 1.97                                 | 23.69                | 50%                    |
| Flex Polyester Topcoat  | 9.15                | 36.00%                                   | 0.0%              | 36.0%                | 0.0%              | 74.00%                              | 0.25                      | 2.00                   | 12.00                | 3.29  | 3.29                                   | 1.65                                | 39.53                              | 7.21                              | 6.41                                 | 4.45                 | 50%                    |
| Nauticoat XP  | 8.64                | 46.00%                                   | 0.0%              | 46.0%                | 0.0%              | 54.00%                              | 0.25                      | 2.00                   | 12.00                | 3.97  | 3.97                                   | 1.99                                | 47.69                              | 8.70                              | 5.11                                 | 7.36                 | 50%                    |
| 530-2153  | 7.25                | 100.00%                                  | 0.0%              | 100.0%               | 0.0%              | 0.00%                               | 0.25                      | 2.00                   | 12.00                | 7.25  | 7.25                                   | 3.63                                | 87.00                              | 15.88                             | 0.00                                 | n/a                  | 50%                    |
| Polane T Polyurethane<br>Enamel, Carbide Black                          | 8.51                | 73.00%                                   | 0.0%              | 73.0%                | 0.0%              | 27.00%                              | 0.25                      | 2.00                   | 12.00                | 6.21  | 6.21                                   | 3.11                                | 74.55                              | 13.60                             | 2.52                                 | 23.01                | 50%                    |
| Polane T60 Polyurethane<br>Enamel, Blending White                       | 15.32               | 36.00%                                   | 0.0%              | 36.0%                | 0.0%              | 64.00%                              | 0.25                      | 2.00                   | 12.00                | 5.52  | 5.52                                   | 2.76                                | 66.18                              | 12.08                             | 10.74                                | 8.62                 | 50%                    |
| High Solids Polyurethane<br>Clear                                       | 7.93                | 62.00%                                   | 0.0%              | 62.0%                | 0.0%              | 28.00%                              | 0.25                      | 2.00                   | 12.00                | 4.92  | 4.92                                   | 2.46                                | 59.00                              | 10.77                             | 3.30                                 | 17.56                | 50%                    |
| Corrosion Protective<br>Epoxy Primer, Green                             | 10.85               | 26.00%                                   | 0.0%              | 26.0%                | 0.0%              | 74.00%                              | 0.25                      | 2.00                   | 12.00                | 2.82  | 2.82                                   | 1.41                                | 33.85                              | 6.18                              | 8.79                                 | 3.81                 | 50%                    |
| Worst Case Coating (Paint Booths 1 and 2, each)                         |                     |  |                   |                      |                   |                                     |                           |                        | 12.00                |   |  |                                     | 3.63                               | 87.00                             | 15.88                                | 10.74                |                        |
| Glue Air Walls 3 and 4 (per air wall)                                   |                     |  |                   |                      |                   |                                     |                           |                        |                      |   |  |                                     |                                    |                                   |                                      |                      |                        |
| 3M Scotch-Weld<br>Neoprene High<br>Performance Contact<br>Adhesive 1357 | 6.8                 | 80.00%                                   | 14.0%             | 66.0%                | 14.0%             | 20.00%                              | 0.125                     | 1.00                   | 3.00                 | 5.22  | 4.49                                   | 0.56                                | 13.46                              | 2.46                              | 0.37                                 | 22.44                | 50%                    |

**Total PTE (Paint Booths 1 and 2 and Glue Air Walls 3 and 4)**      **8.37**      **200.93**      **36.67**      **22.22**

**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 = Sum of worst case coating for each booth  
Note: VOC from catalysts is assumed not to volatilize. Therefore, catalyst materials are not included in these calculations.

**Potential to Emit VOC and HAPs**

|                          | Density<br>(lb/gal) | Usage<br>(gal/month) | VOC<br>content<br>(lb/gal) | Potential<br>VOC<br>(lb/year) | Potential VOC<br>(tons/year) | Weight %<br>Toluene | Potential<br>Toluene<br>(tons/year) |
|--------------------------|---------------------|----------------------|----------------------------|-------------------------------|------------------------------|---------------------|-------------------------------------|
| Clean-Up Solvent (DX330) | 6.37                | 3.0                  | 6.3634                     | 229.08                        | <b>0.11</b>                  | 5%                  | <b>0.01</b>                         |

**Methodology**

Potential VOC (lb/year) = Usage (gal/month) \* VOC content (lb/gal) \* 12 months/year  
Potential VOC (tons/year) = Potential VOC (lb/year) \* 1 ton/2000 lbs  
Potential Methylbenzene (tons/year) = Density (lb/gal) \* Usage (gal/month) \* Weight % Methylbenzene \* 12 months/year \* 1 ton/2000 lbs



**Appendix A: Emission Calculations**  
**HAP Emission Calculations**  
**From Surface Coating Operations**  
**Paint Booths 1 and 2 and Glue Air Walls 3 and 4**

Page 3 of 7 TSD App A

Company Name: Comlux America, LLC  
Source Address: 2910 South High School Road, Indianapolis IN 46241  
Permit Number: F097-37251-00702  
Reviewer: Allen Reimer

|  |                     |                                      |                        | Weight % |         |         |        |                        |        | Potential to Emit (PTE) (tons/year) |         |         |        |                        |        |           |
|--|---------------------|--------------------------------------|------------------------|----------|---------|---------|--------|------------------------|--------|-------------------------------------|---------|---------|--------|------------------------|--------|-----------|
| Material   | Density<br>(Lb/Gal) | Gallons of<br>Material<br>(gal/unit) | Maximum<br>(unit/hour) | MIBK     | Toluene | Styrene | Xylene | Methyl<br>Methacrylate | Hexane | MIBK                                | Toluene | Styrene | Xylene | Methyl<br>Methacrylate | Hexane | Total HAP |
| Paint Booths 1 and 2 (per booth)                               |                     |                                      |                        |          |         |         |        |                        |        |                                     |         |         |        |                        |        |           |
| Insulator "A"  | 7.36                | 0.25                                 | 2.00                   | 25.00%   | 25.00%  | 0.00%   | 0.00%  | 0.00%                  | 0.00%  | 4.03                                | 4.03    | 0.00    | 0.00   | 0.00                   | 0.00   | 8.06      |
| Insulator "B"  | 7.48                | 0.25                                 | 2.00                   | 0.00%    | 0.00%   | 0.00%   | 0.00%  | 0.00%                  | 0.00%  | 0.00                                | 0.00    | 0.00    | 0.00   | 0.00                   | 0.00   | 0.00      |
| Flex Polyester Topcoat   | 9.15                | 0.25                                 | 2.00                   | 0.00%    | 0.00%   | 40.00%  | 0.00%  | 0.00%                  | 0.00%  | 0.00                                | 0.00    | 8.02    | 0.00   | 0.00                   | 0.00   | 8.02      |
| Nauticoat XP   | 8.64                | 0.25                                 | 2.00                   | 1.00%    | 0.00%   | 0.00%   | 10.00% | 0.00%                  | 0.00%  | 0.19                                | 0.00    | 0.00    | 1.89   | 0.00                   | 0.00   | 2.08      |
| 530-2153   | 7.25                | 0.25                                 | 2.00                   | 0.00%    | 20.00%  | 0.00%   | 0.00%  | 0.00%                  | 0.00%  | 0.00                                | 3.18    | 0.00    | 0.00   | 0.00                   | 0.00   | 3.18      |
| Polane T Polyurethane Enamel, Carbide Black                    | 8.51                | 0.25                                 | 2.00                   | 0.00%    | 8.00%   | 0.00%   | 4.00%  | 0.00%                  | 0.00%  | 0.00                                | 1.49    | 0.00    | 0.75   | 0.00                   | 0.00   | 2.24      |
| Polane T60 Polyurethane Enamel, Blending White                 | 15.32               | 0.25                                 | 2.00                   |          |         |         |        |                        |        |                                     |         |         |        |                        |        |           |
|  |                     |                                      |                        | 10.00%   | 0.00%   | 0.00%   | 1.00%  | 0.00%                  | 0.00%  | 3.36                                | 0.00    | 0.00    | 0.34   | 0.00                   | 0.00   | 3.69      |
| High Solids Polyurethane Clear                                 | 7.93                | 0.25                                 | 2.00                   | 0.00%    | 0.00%   | 1.00%   | 40.00% | 1.00%                  | 0.00%  | 0.00                                | 0.00    | 0.17    | 6.95   | 0.17                   | 0.00   | 7.29      |
| Corrosion Protective Epoxy Primer, Green                       | 10.85               | 0.25                                 | 2.00                   | 0.00%    | 6.00%   | 0.00%   | 0.00%  | 0.00%                  | 0.00%  | 0.00                                | 1.43    | 0.00    | 0.00   | 0.00                   | 0.00   | 1.43      |
| Worst Case Coating (Paint Booths 1 and 2, each)                |                     |                                      |                        |          |         |         |        |                        |        | 4.03                                | 4.03    | 8.02    | 6.95   | 0.17                   | 0.00   | 8.06      |
| Glue Air Walls 3 and 4 (per air wall)                          |                     |                                      |                        |          |         |         |        |                        |        |                                     |         |         |        |                        |        |           |
| 3M Scotch-Weld Neoprene High Performance Contact Adhesive 1357 | 6.8                 | 0.125                                | 1.00                   |          |         |         |        |                        |        |                                     |         |         |        |                        |        |           |
|  |                     |                                      |                        | 0.00%    | 7.00%   | 0.00%   | 0.00%  | 0.00%                  | 20.00% | 0.00                                | 0.26    | 0.00    | 0.00   | 0.00                   | 0.74   | 1.01      |
| Total PTE (Paint Booths 1 and 2 and Glue Air Walls 3 and 4)    |                     |                                      |                        |          |         |         |        |                        |        | 8.06                                | 8.58    | 16.03   | 13.89  | 0.35                   | 1.49   | 18.13     |

**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

**Appendix A: Emissions Calculations  
Insignificant Activities**

Page 4 of 7 TSD App A

Company Name: Comlux America, LLC  
Source Address: 2910 South High School Road, Indianapolis IN 46241  
Permit Number: F097-37251-00702  
Reviewer: Allen Reimer

**Touch up Booth (TB)**

| Material                        | Density<br>(lb/gal) | Weight %<br>Volatile<br>(H2O &<br>Organics) | VOC<br>content<br>(lb/gal) | Usage<br>(gal/hr) | Usage<br>(gal/day) | Potential<br>VOC<br>(ton/yr) | HAP (ton/yr) | Particulate<br>Potential<br>(ton/yr) | Transfer<br>Efficiency |
|---------------------------------|---------------------|---|----------------------------|-------------------|--------------------|------------------------------|--------------|--------------------------------------|------------------------|
| AxonHentzen ISB-910 Insulator B | 7.48                | 76%   | 5.68                       | 0.01              | 0.2400             | 0.25                         | Negl.        | 0.04                                 | 50%                    |

Methodology

Potential VOC (ton/yr) = Usage (gal/hr) \* VOC content (lb/gal) \* 8760 hr/yr \* 1 ton/2000 lbs

Particulate Potential (ton/yr) = Usage (gal/hr) \* Density (lb/gal) \* (1 - Weight % Volatile) \* (1 - Transfer Efficiency) \* 8760 hours/yr / 2000 lb/ton

**Clean-Up Solvents (CS)**

| Material                 | Density<br>(lb/gal) | Usage<br>(gal/month) | VOC<br>content<br>(lb/gal) | Potential<br>VOC<br>(lb/year) | Potential<br>VOC<br>(tons/year) |
|--------------------------|---------------------|----------------------|----------------------------|-------------------------------|---------------------------------|
| 1000 Isopropyl Alcohol   | 6.55                | 15.0                 | 6.55                       | 1179.00                       | 0.59                            |
| 1100 Methyl Ethyl Ketone | 6.71                | 15.0                 | 6.71                       | 1207.80                       | 0.60                            |

**Totals: 1.19**

Methodology

Potential VOC (lb/year) = Usage (gal/month) \* VOC content (lb/gal) \* 12 months/year

Potential VOC (tons/year) = Potential VOC (lb/year) \* 1 ton/2000 lbs

Potential Methylbenzene (tons/year) = Density (lb/gal) \* Usage (gal/month) \* Weight % Methylbenzene \* 12 months/year \* 1 ton/2000 lbs

**Metal Etching (ME) Dip Tank**

| Material  | Density<br>(lb/gal) | Usage<br>(gal/month) | % VOC | Potential<br>VOC<br>(tons/yr) | Weight %<br>Hydrofluoric<br>Acid | Potential HF<br>(tons/yr) | Weight %<br>Chromic<br>Acid | Potential<br>Chromic<br>Acid<br>(tons/yr) |
|-----------|---------------------|----------------------|-------|-------------------------------|----------------------------------|---------------------------|-----------------------------|---|
| Alumiprep | 9.68                | 2.0                  | 14%   | 0.02                          | 0%                               | 0.00                      | 0%                          | 0.00                                      |
| Alodine   | 9.18                | 6.0                  | 0%    | 0.00                          | 1%                               | 0.003                     | 1%                          | 0.003                                     |

**Totals: 0.02**

**0.003**

**0.003**

Methodology

Potential VOC (ton/yr) = Density (lb/gal) \* Usage (gal/month) \* % VOC \* 12 months/year \* 1 ton/2000 lb

Potential HAP (tons/year) = Density (lb/gal) \* Usage (gal/month) \* Weight % HAP \* 12 months/year \* 1 ton/2000 lbs

**Appendix A: Emissions Calculations  
Insignificant Activities**

Page 5 of 7 TSD App A

Company Name: Comlux America, LLC  
Source Address: 2910 South High School Road, Indianapolis IN 46241  
Permit Number: F097-37251-00702  
Reviewer: Allen Reimer

**Woodshop**

| Unit     | Dust Collected (lb/hr) | Control Efficiency % | Uncontrolled PM (lb/hr) | Uncontrolled PM (ton/yr) | Controlled PM (ton/yr) |
|----------|------------------------|----------------------|-------------------------|--------------------------|------------------------|
| Woodshop | 1.5                    | 99%                  | 1.5                     | 6.6                      | 0.07                   |

PM = PM10 = PM2.5

Methodology

Uncontrolled PTE (ton/yr) = Dust collected (lb/hr) \* 8760 hr/yr \* 1 ton/2000 lb

Controlled (ton/yr) = Uncontrolled PTE \* (1-Control Efficiency)

**Parts Washer (PW)**

| Material | Density (lb/gal) | Usage (gal/month) | % VOC | Potential VOC (tons/year) |
|----------|------------------|-------------------|-------|---------------------------|
| Solvent  | 6.7              | 6.67              | 100%  | 0.27                      |

Methodology

PTE (ton/yr) = Solvent Usage (gal/month) x 12 months/yr x Density (lbs./gal) x %Volatile x 1 ton/2000 lbs

The solvent used in this unit does not contain HAP.

**Spray Gun Cleaner (SGC)**

| Material | Density (lb/gal) | Usage (gal/month) | % VOC | Potential VOC (tons/year) |
|----------|------------------|-------------------|-------|---------------------------|
| Solvent  | 7                | 5                 | 100%  | 0.21                      |

Methodology

PTE (ton/yr) = Solvent Usage (gal/month) x 12 months/yr x Density (lbs./gal) x %Volatile x 1 ton/2000 lbs

The solvent used in this unit does not contain HAP.

**Miscellaneous Exterior Spray Painting (MESP)**

| Material                        | Density (lb/gal) | Weight % Volatile (H2O & Organics) | VOC content (lb/gal) | Usage (gal/hr) | Usage (gal/day) | Potential VOC (ton/yr) | HAP (ton/yr) | Particulate Potential (ton/yr) | Transfer Efficiency |
|---------------------------------|------------------|------------------------------------|----------------------|----------------|-----------------|------------------------|--------------|--------------------------------|---------------------|
| AxonHentzen ISB-910 Insulator B | 7.48             | 76%                                | 5.68                 | 0.0007         | 0.0168          | 0.02                   | Negl.        | 5.50E-04                       | 90%                 |

Methodology

PTE (ton/yr) = Usage (gal/hr) x VOC content (lb/gal) x 8760 hr/yr x 1 ton/2000 lb

Particulate Potential (ton/yr) = Usage (gal/hr) \* Density (lb/gal) \* (1 - Weight % Volatile) \* (1 - Transfer Efficiency) \* 8760 hours/yr / 2000 lb/ton

**Metal Grinding (MG)**

| Unit     | Max Throughput (ft <sup>3</sup> /hr) | Density (lb/ft <sup>3</sup> ) | PM EF (lb/ton) | PM10 EF (lb/ton) | Uncontrolled PM (ton/yr) | Uncontrolled PM10 (ton/yr) | HAP (ton/yr) |
|----------|--------------------------------------|-------------------------------|----------------|------------------|--------------------------|----------------------------|--------------|
| Grinding | 0.08                                 | 499.50                        | 0.01           | 0.0045           | 0.001                    | 0.0004                     | Negl.        |

Methodology

Emission factors from FIRE volume II, Ch. 14 (SCC 3-04-003-60) for Casting Finishing at Grey Iron Foundries

PTE (ton/yr) = Max Throughput (ft<sup>3</sup>/hr) x Density (lb/ft<sup>3</sup>) x Emission factor (lb/ton) x 1 ton/2000 lb x 8760 hr/yr x 1 ton/2000 lb

**Welding Operations**

Emissions from the welding shop are negligible based on using stick electrode 6010 at a rate of 0.006 lb/hr.

|                                      |             |             |             |             |             | Single HAPs  |              |
|--------------------------------------|-------------|-------------|-------------|-------------|-------------|--------------|--------------|
|                                      | PM          | PM10        | PM2.5       | VOC         | Total HAPs  | HF           | Chromic Acid |
| <b>Total Insignificant (tons/yr)</b> | <b>6.61</b> | <b>6.57</b> | <b>6.57</b> | <b>1.95</b> | <b>0.01</b> | <b>0.003</b> | <b>0.003</b> |

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

Page 6 of 7 TSD App A

Company Name: Comlux America, LLC  
Source Address: 2910 South High School Road, Indianapolis IN 46241  
Permit Number: F097-37251-00702  
Reviewer: Allen Reimer

| Emission Source  | Heat Input Capacity (MMBtu/Hr) | Potential Throughput (MMBtu/yr) |
|------------------|--------------------------------|---------------------------------|
| Roof Top Unit 1  | 0.98                           | 8584.80                         |
| Roof Top Unit 2  | 0.22                           | 1927.20                         |
| Roof Top Unit 3  | 0.31                           | 2715.60                         |
| Roof Top Unit 4  | 0.22                           | 1927.20                         |
| Roof Top Unit 5  | 0.24                           | 2102.40                         |
| Roof Top Unit 6  | 0.12                           | 1007.40                         |
| Roof Top Unit 7  | 0.07                           | 613.20                          |
| Roof Top Unit 8  | 0.07                           | 630.72                          |
| Roof Top Unit 9  | 0.24                           | 2102.40                         |
| Roof Top Unit 10 | 0.07                           | 630.72                          |
| <b>Total</b>     | <b>2.54</b>                    | <b>22241.64</b>                 |

| HHV<br>mmBtu<br>mmscf | Potential Throughput<br>MMCF/yr |
|-----------------------|---------------------------------|
| <b>1020</b>           | <b>21.81</b>                    |

|                               | Pollutant |       |               |      |      |      |      |
|-------------------------------|-----------|-------|---------------|------|------|------|------|
|                               | PM*       | PM10* | direct PM2.5* | SO2  | NOx  | VOC  | CO   |
| Emission Factor in lb/MMCF    | 1.9       | 7.6   | 7.6           | 0.6  | 100  | 5.5  | 84   |
| Potential Emission in tons/yr | 0.02      | 0.08  | 0.08          | 0.01 | 1.09 | 0.06 | 0.92 |

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

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

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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

| Hazardous Air Pollutants (HAPs) | HAPs - Organics |                 |              |          |          |
|---------------------------------|-----------------|-----------------|--------------|----------|----------|
|                                 | Benzene         | Dichlorobenzene | Formaldehyde | Hexane   | Toluene  |
| Emission Factor in lb/MMcf      | 2.10E-03        | 1.20E-03        | 7.50E-02     | 1.80E+00 | 3.40E-03 |
| Potential Emission in tons/yr   | 2.3E-05         | 1.3E-05         | 8.2E-04      | 2.0E-02  | 3.7E-05  |

|                               | HAPs - Metals |          |          |           |          |
|-------------------------------|---------------|----------|----------|-----------|----------|
|                               | Lead          | Cadmium  | Chromium | Manganese | Nickel   |
| Emission Factor in lb/MMcf    | 5.00E-04      | 1.10E-03 | 1.40E-03 | 3.80E-04  | 2.10E-03 |
| Potential Emission in tons/yr | 5.5E-06       | 1.2E-05  | 1.5E-05  | 4.1E-06   | 2.3E-05  |

Methodology is the same as previous page.

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

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

|              |             |
|--------------|-------------|
| <b>Total</b> | <b>0.02</b> |
|--------------|-------------|

**Appendix A: Emission Calculations**  
**Fugitive Dust Emissions - Paved Roads**

Page 7 of 7 TSD App A

**Company Name:** Comlux America, LLC  
**Address City IN Zip:** 2910 South High School Road, Indianapolis, IN 46241  
**Permit Number:** F097-37251-00702  
**Reviewer:** Allen Reimer

**Paved Roads at Industrial Site**

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

**Vehicle Information (provided by source)**

| Type                                    | Maximum number of vehicles per day | Number of one-way trips per day per vehicle | Maximum trips per day (trip/day) | Maximum Weight Loaded (tons/trip) | Total Weight driven per day (ton/day) | Maximum one-way distance (feet/trip) | Maximum one-way distance (mi/trip) | Maximum one-way miles (miles/day) | Maximum one-way miles (miles/yr) |
|---|------------------------------------|---|----------------------------------|-----------------------------------|---------------------------------------|--------------------------------------|------------------------------------|-----------------------------------|----------------------------------|
| Vehicle (entering plant) (one-way trip) | 7.0                                | 7.0   | 49.0                             | 1.0                               | 49.0                                  | 350                                  | 0.066                              | 3.2                               | 1185.6                           |
| Vehicle (leaving plant) (one-way trip)  | 7.0                                | 7.0   | 49.0                             | 1.0                               | 49.0                                  | 350                                  | 0.066                              | 3.2                               | 1185.6                           |
| <b>Totals</b>                           |                                    |   | <b>98.0</b>                      |                                   | <b>98.0</b>                           |                                      |                                    | <b>6.5</b>                        | <b>2371.1</b>                    |

Average Vehicle Weight Per Trip = 

|     |
|-----|
| 1.0 |
|-----|

 tons/trip  
Average Miles Per Trip = 

|      |
|------|
| 0.07 |
|------|

 miles/trip

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

|           | PM    | PM10   | PM2.5   |   |
|-----------|-------|--------|---------|---|
| where k = | 0.011 | 0.0022 | 0.00054 | lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)  |
| W =       | 1.0   | 1.0    | 1.0     | tons = average vehicle weight (provided by source)  |
| sL =      | 9.7   | 9.7    | 9.7     | g/m <sup>2</sup> = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3) |

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

Mitigated Emission Factor, Eext =  $Ef * [1 - (p/4N)]$

where p = 

|     |
|-----|
| 125 |
|-----|

 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)  
N = 

|     |
|-----|
| 365 |
|-----|

 days per year

|                                   | PM    | PM10  | PM2.5  |         |
|-----------------------------------|-------|-------|--------|---------|
| Unmitigated Emission Factor, Ef = | 0.087 | 0.017 | 0.0043 | lb/mile |
| Mitigated Emission Factor, Eext = | 0.080 | 0.016 | 0.0039 | lb/mile |

| Process                                 | Unmitigated PTE of PM (tons/yr) | Unmitigated PTE of PM10 (tons/yr) | Unmitigated PTE of PM2.5 (tons/yr) | Mitigated PTE of PM (tons/yr) | Mitigated PTE of PM10 (tons/yr) | Mitigated PTE of PM2.5 (tons/yr) |
|---|---------------------------------|-----------------------------------|------------------------------------|-------------------------------|---------------------------------|----------------------------------|
| Vehicle (entering plant) (one-way trip) | 0.05                            | 0.01                              | 0.00                               | 0.05                          | 0.01                            | 0.00                             |
| Vehicle (leaving plant) (one-way trip)  | 0.05                            | 0.01                              | 0.00                               | 0.05                          | 0.01                            | 0.00                             |
| <b>Totals</b>                           | <b>0.10</b>                     | <b>0.02</b>                       | <b>0.01</b>                        | <b>0.09</b>                   | <b>0.02</b>                     | <b>0.00</b>                      |

**Methodology**

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

**Abbreviations**

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



# Indiana Department of Environmental Management

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

September 23, 2016

Mr. Wally Turner  
Comlux America, LLC  
2910 South High School Road  
Indianapolis, IN 46241

Re: Public Notice  
Comlux America, LLC  
Permit Level: Federally Enforceable State  
Operating Permit (FESOP) Renewal  
Permit Number: 097-37251-00702

Dear Mr. Turner:

Enclosed is a copy of your draft Federally Enforceable State Operating Permit (FESOP) Renewal, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Indianapolis Star in Indianapolis, Indiana publish the abbreviated version of the public notice no later than September 26, 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 Indianapolis Public Library – Decatur Branch, 5301 Kentucky Avenue in Indianapolis, 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 Allen Reimer, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-0863 or dial (317) 233-0863.

Sincerely,

*Vivian Haun*

Vivian Haun  
Permits Branch  
Office of Air Quality

Enclosures  
PN Applicant Cover letter 2/17/2016



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Commissioner

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

September 22, 2016

Indianapolis Star  
130 South Meridian Street  
Indianapolis, IN 46225

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Comlux America, LLC, Marion 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 September 26, 2016.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

**To ensure proper payment, please reference account # 100174737.**

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Vivian Haun at 800-451-6027 and ask for extension 3-6878 or dial 317-233-6878.

Sincerely,

*Vivian Haun*

Vivian Haun  
Permit Branch  
Office of Air Quality

Permit Level: Federally Enforceable State Operating Permit (FESOP) Renewal  
Permit Number: 097-37251-00702

Enclosure  
PN Newspaper.dot 8/27/2015



# Indiana Department of Environmental Management

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Michael R. Pence  
Governor

Carol S. Comer  
Commissioner

September 23, 2016

To: Indianapolis Public Library – Decatur Branch

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: Comlux America, LLC**  
**Permit Number: 097-37251-00702**

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

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

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

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

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

Enclosures  
PN Library.dot 2/16/2016





# Indiana Department of Environmental Management

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(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

## Notice of Public Comment

**September 23, 2016**  
**Comlux America, LLC**  
**097-37251-00702**

Dear Concerned Citizen(s):

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


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

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

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

Enclosure  
PN AAA Cover.dot 2/17/2016


# Mail Code 61-53

|                            |   |   |   |  |
|----------------------------|---|---|---|--|
| IDEM Staff                 | VHAUN 9/23/2016<br>Comlux America LLC 097-37251-00702 DRAFT                       |   |   | AFFIX STAMP<br>HERE IF<br>USED AS<br>CERTIFICATE<br>OF MAILING |
| Name and address of Sender |  | Indiana Department of Environmental Management<br>Office of Air Quality – Permits Branch<br>100 N. Senate<br>Indianapolis, IN 46204 | Type of Mail:<br><br><b>CERTIFICATE OF MAILING ONLY</b> |  |

| Line | Article Number | Name, Address, Street and Post Office Address  | Postage | Handling Charges | Act. Value (If Registered) | Insured Value | Due Send if COD | R.R. Fee | S.D. Fee | S.H. Fee | Rest. Del. Fee |
|------|----------------|--|---------|------------------|----------------------------|---------------|-----------------|----------|----------|----------|----------------|
|      |                |  |         |                  |                            |               |                 |          |          |          | Remarks        |
| 1    |                | Wally Turner Comlux America LLC 2910 S High School Rd Indianapolis IN 46241 (Source CAATS)                                 |         |                  |                            |               |                 |          |          |          |                |
| 2    |                | Harold Balcerak Head of Quality Comlux America LLC 2910 S High School Rd Indianapolis IN 46241 (RO CAATS)                  |         |                  |                            |               |                 |          |          |          |                |
| 3    |                | Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 (Health Department)                            |         |                  |                            |               |                 |          |          |          |                |
| 4    |                | Decatur Township Public Library 5301 Kentucky Avenue Indianapolis IN 46221 (Library)                                       |         |                  |                            |               |                 |          |          |          |                |
| 5    |                | Indianapolis City Council and Mayors office 200 East Washington Street, Room E Indianapolis IN 46204 (Local Official)      |         |                  |                            |               |                 |          |          |          |                |
| 6    |                | Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 (Local Official)      |         |                  |                            |               |                 |          |          |          |                |
| 7    |                | Crows Nest Town Council 700 W 56th Street Indianapolis IN 46228 (Local Official)   |         |                  |                            |               |                 |          |          |          |                |
| 8    |                | Homecroft Town Council PO Box 47123 Indianapolis IN 47123 (Local Official)   |         |                  |                            |               |                 |          |          |          |                |
| 9    |                | Meridian Hills Town Council P.O. Box 40437 Indianapolis IN 45240 (Local Official)  |         |                  |                            |               |                 |          |          |          |                |
| 10   |                | Rocky Ripple Town Council 930 West 54th Street Indianapolis IN 46208 (Local Official)                                      |         |                  |                            |               |                 |          |          |          |                |
| 11   |                | Williams Creek Town Council 620 Forest Blvd. Indianapolis IN 46240 (Local Official)  |         |                  |                            |               |                 |          |          |          |                |
| 12   |                | Wynnedale Town Council 4265 Knollton Road Indianapolis IN 46228 (Local Official)   |         |                  |                            |               |                 |          |          |          |                |
| 13   |                | Mr. Alic Bent August Mack Environmental, Inc. 1302 N Meridian St, Suite 300 Indianapolis IN 46202 (Consultant)             |         |                  |                            |               |                 |          |          |          |                |
| 14   |                | Matt Mosier Office of Sustainability City-County Bldg/200 E Washington St. Rm# 2460 Indianapolis IN 46204 (Local Official) |         |                  |                            |               |                 |          |          |          |                |
| 15   |                | Johan & Susan Van Den Heuvel 4409 Blue Creek Drive Carmel IN 46033 (Affected Party)  |         |                  |                            |               |                 |          |          |          |                |

|  |  |  |  |
|--|--|--|--|
| Total number of pieces Listed by Sender<br><br><b>15</b> | Total number of Pieces Received at Post Office | Postmaster, Per (Name of Receiving employee) | The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels. |
|--|--|--|--|

# Mail Code 61-53

|                            |   |   |   |  |
|----------------------------|---|---|---|--|
| IDEM Staff                 | VHAUN 9/23/2016<br>Comlux America LLC 097-37251-00702 DRAFT                       |   |   | AFFIX STAMP<br>HERE IF<br>USED AS<br>CERTIFICATE<br>OF MAILING |
| Name and address of Sender |  | Indiana Department of Environmental Management<br>Office of Air Quality – Permits Branch<br>100 N. Senate<br>Indianapolis, IN 46204 | Type of Mail:<br><br><b>CERTIFICATE OF MAILING ONLY</b> |  |

| Line | Article Number | Name, Address, Street and Post Office Address   | Postage | Handling Charges | Act. Value (If Registered) | Insured Value | Due Send if COD | R.R. Fee | S.D. Fee | S.H. Fee | Rest. Del. Fee |
|------|----------------|---|---------|------------------|----------------------------|---------------|-----------------|----------|----------|----------|----------------|
|      |                |   |         |                  |                            |               |                 |          |          |          | Remarks        |
| 1    |                | Indiana Members Credit Union 5103 Madison Avenue Indianapolis IN 46227 (Affected Party) |         |                  |                            |               |                 |          |          |          |                |
| 2    |                | TGM Autumn Woods, Inc. 500 North Dearboen, Suite 400 Chicago IL 60654 (Affected Party)  |         |                  |                            |               |                 |          |          |          |                |
| 3    |                |   |         |                  |                            |               |                 |          |          |          |                |
| 4    |                |   |         |                  |                            |               |                 |          |          |          |                |
| 5    |                |   |         |                  |                            |               |                 |          |          |          |                |
| 6    |                |   |         |                  |                            |               |                 |          |          |          |                |
| 7    |                |   |         |                  |                            |               |                 |          |          |          |                |
| 8    |                |   |         |                  |                            |               |                 |          |          |          |                |
| 9    |                |   |         |                  |                            |               |                 |          |          |          |                |
| 10   |                |   |         |                  |                            |               |                 |          |          |          |                |
| 11   |                |   |         |                  |                            |               |                 |          |          |          |                |
| 12   |                |   |         |                  |                            |               |                 |          |          |          |                |
| 13   |                |   |         |                  |                            |               |                 |          |          |          |                |
| 14   |                |   |         |                  |                            |               |                 |          |          |          |                |
| 15   |                |   |         |                  |                            |               |                 |          |          |          |                |

|   |  |  |  |
|---|--|--|--|
| Total number of pieces Listed by Sender<br><br><b>2</b> | Total number of Pieces Received at Post Office | Postmaster, Per (Name of Receiving employee) | The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels. |
|---|--|--|--|