Indiana Department of Environmental Management
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Significant Revision to a
Federally Enforceable State Operating Permit (FESOP)

for Greenville Technology, Inc. - Anderson in Madison County

Significant Permit Revision No.: 095-37334-00136

The Indiana Department of Environmental Management (IDEM) has received an application from Greenville Technology, Inc. - Anderson, located at 3511 West 73rd Street, Anderson, Indiana 46013, for a significant revision of its FESOP issued on January 3, 2013. If approved by IDEM's Office of Air Quality (OAQ), this proposed revision would allow Greenville Technology, Inc. - Anderson to make certain changes at its existing source. Greenville Technology, Inc. - Anderson has applied to construct and operate a new plastic parts surface coating line.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes. The potential to emit regulated air pollutants will continue to be limited to less than the Title V and PSD major threshold levels. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

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

Anderson Public Library
111 East 12th St.
Anderson, IN 46016

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

How can you participate in this process?

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

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

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so

that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SPR No. 095-37334-00136 in all correspondence.

Comments should be sent to:

Brian Wright
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-6544
Or dial directly: (317) 234-6544
Fax: (317) 232-6749 attn: Brian Wright
E-mail: Bwright1@idem.IN.gov

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

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

What will happen after IDEM makes a decision?

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

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

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

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DRAFT

Les Siegler
Greenville Technology, Inc. - Anderson
5755 State Route 571 East
Greenville, OH 45331

Re: 095-37334-00136
Significant Revision to
F095-32281-00136

Dear Mr. Siegler:

Greenville Technology, Inc. - Anderson was issued a Federally Enforceable State Operating Permit (FESOP) No. F095-32281-00136 on January 3, 2013 for a stationary plastic automobile parts manufacturing plant located at 3511 West 73rd Street, Anderson, Indiana 46013. On June 30, 2016, the Office of Air Quality (OAQ) received an application from the source requesting to construct and operate a new plastic parts surface coating line. The attached Technical Support Document (TSD) provides additional explanation of the changes to the source/permit. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

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

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

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

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire FESOP as revised.

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Brian Wright of my staff at 317-234-6544 or 1-800-451-6027, and ask for extension 4-6544.

Sincerely,

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

Attachments: Technical Support Document and revised permit

NB/BW

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

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DRAFT

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

Greenville Technology, Inc. - Anderson
3511 West 73rd Street
Anderson, Indiana 46013

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

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

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

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

Operation Permit No. F095-32281-00136	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: January 3, 2013 Expiration Date: January 3, 2018

Significant Permit Revision No. 095-37334-00136	
Issued by: Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date: January 3, 2018

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary plastic automobile parts manufacturing plant.

Source Address:	3511 West 73rd Street, Anderson, Indiana 46013
General Source Phone Number:	(937) 548-1471
SIC Code:	3714 (Motor Vehicle Parts and Accessories)
County Location:	Madison
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

(a) One (1) plastic parts surface coating line, identified as EU01, approved for construction in 2012, and consisting of the following:

(1) One (1) conveyor system;

(2) One (1) deionization booth;

(3) One (1) paint booth, consisting of two (2) robotic HVLP spray guns, with a maximum coating usage of 8.3 gallons per hour and maximum clean up solvent usage of 1.0 gallons per hour, using a water wash curtain to control particulate emissions, identified as CE02, and exhausting to one (1) stack, identified as EP01;

(4) One (1) flash off tunnel; and

(5) One (1) natural gas-fired cure oven, with a maximum heat input capacity of 0.80 MMBtu per hour.

Note: The paint booth, flash off tunnel, and natural gas-fired cure oven are contained within a permanent total enclosure, use a natural gas-fired regenerative thermal oxidizer (RTO) for VOC control, identified as CE01, which has a maximum heat input of 5.24 MMBtu per hour, and exhausting to one (1) stack, identified as EP01;

(b) One (1) plastic parts surface coating line, identified as EU08, approved in 2016 for construction, and consisting of the following:

(1) Three (3) paint booths, utilizing HVLP spray guns for application, with a total maximum coating usage of 52 gallons per hour and maximum clean up solvent usage of 5.0 gallons per hour, using a regenerative thermal oxidizer for VOC control and Venturi scrubber for particulate control, and exhausting to stack EP02;

(2) Three (3) flash off tunnels;

(3) One (1) natural gas-fired regenerative thermal oxidizer (RTO), identified as CE03, with a maximum heat input capacity of 7.0 MMBtu/hr;

(4) One (1) natural gas-fired cure oven, with a maximum heat input capacity of 3.5 MMBtu per hour; and

(5) One (1) natural gas-fired fresh air supply house, with a maximum heat input capacity of 5.0 MMBtu per hour.

Note: The paint booth, flash off tunnel, and natural gas-fired cure oven are contained within a permanent total enclosure, and exhausting to one (1) stack, identified as EP02;

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

This stationary source also includes the following insignificant activities:

(a) Twenty-two (22) automated plastic injection molding machines, identified as EU02, approved for construction in 2012, each with a maximum capacity of 100 pounds of polypropylene per hour, using 1 gallon of mold releaser per day, and exhausting to the indoors.

(b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:

(1) One (1) natural gas-fired heater, identified as EU03, approved for construction in 2012, with a maximum heat input capacity of 0.40 MMBtu per hour, and exhausting to one (1) stack, identified as EP03.

(2) Six (6) natural gas-fired heaters, identified as EU04, approved for construction in 2012, each with a maximum heat input capacity of 0.40 MMBtu per hour, and exhausting to one (1) stack, identified as EP04.

(3) One (1) natural gas-fired heater, identified as EU05, approved for construction in 2012, with a maximum heat input capacity of 0.15 MMBtu per hour, and exhausting to one (1) stack, identified as EP05.

(4) One (1) natural gas-fired heater, identified as EU06, approved for construction in 2012, with a maximum heat input capacity of 0.23 MMBtu per hour, and exhausting to one (1) stack, identified as EP06.

(5) One (1) natural gas-fired heater, identified as EU07, approved for construction in 2012, with a maximum heat input capacity of 0.24 MMBtu per hour, and exhausting to one (1) stack, identified as EP07.

(6) One (1) natural gas-fired water heater, identified as EU09, approved in 2016 for construction, with a maximum heat input capacity of 4.0 MMBtu/hr, and exhausting to one (1) stack, identified as EP09.

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

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

SECTION B GENERAL CONDITIONS

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

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

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

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

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

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

(a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.

(b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.

(c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

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

(a) This permit, F095-32281-00136, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

B.5 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

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

B.6 Enforceability [326 IAC 2-8-6][IC 13-17-12]

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

B.7 Severability [326 IAC 2-8-4(4)]

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

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

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

B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

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

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

B.10 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

(1) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and

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

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

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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

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

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

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

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

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

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

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

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

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

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The

PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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

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

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

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

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, 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.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to F095-32281-00136 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

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

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

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

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

(1) That this permit contains a material mistake.

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

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

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

(4) The Permittee notifies the:

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

and

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

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

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

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

(b) Emission Trades [326 IAC 2-8-15(b)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.

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

B.21 Source Modification Requirement [326 IAC 2-8-11.1]

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

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

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

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

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

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

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

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

B.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

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

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

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

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

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

(a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action or revocation of this permit.

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

B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 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) and greenhouse gases (GHGs), 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.

(4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO_2 equivalent emissions (CO_2e) 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.3 Opacity [326 IAC 5-1]

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

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

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A,

Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 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.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]

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

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

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

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

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

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

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(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.9 Performance Testing [326 IAC 3-6]

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(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.10 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

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

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

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

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

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

C.12 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

(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.13 Risk Management Plan [326 IAC 2-8-4][40 CFR 68]

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

C.14 Response to Excursions or Exceedances [326 IAC 2-8-4][326 IAC 2-8-5]

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

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

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

(1) initial inspection and evaluation;

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

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

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

(1) monitoring results;

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

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

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

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

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

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

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

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

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

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

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

(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:

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

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

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

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)][326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:

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

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

(d) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) plastic parts surface coating line, identified as EU01, approved for construction in 2012, and consisting of the following:

(1) One (1) conveyor system;

(2) One (1) deionization booth;

(3) One (1) paint booth, consisting of two (2) robotic HVLP spray guns, with a maximum coating usage of 8.3 gallons per hour and maximum clean up solvent usage of 1.0 gallons per hour, using a water wash curtain to control particulate emissions, identified as CE02, and exhausting to one (1) stack, identified as EP01;

(4) One (1) flash off tunnel; and

(5) One (1) natural gas-fired cure oven, with a maximum heat input capacity of 0.80 MMBtu per hour.

Note: The paint booth, flash off tunnel, and natural gas-fired cure oven are contained within a permanent total enclosure, use a natural gas-fired regenerative thermal oxidizer (RTO) for VOC control, identified as CE01, which has a maximum heat input of 5.24 MMBtu per hour, and exhaust to one (1) stack, identified as EP01;

(b) One (1) plastic parts surface coating line, identified as EU08, approved in 2016 for construction, and consisting of the following:

(1) Three (3) paint booths, utilizing HVLP spray guns for application, with a total maximum coating usage of 52 gallons per hour and maximum clean up solvent usage of 5.0 gallons per hour, using a regenerative thermal oxidizer for VOC control and Venturi scrubber for particulate control, and exhausting to stack EP02;

(2) Three (3) flash off tunnels;

(3) One (1) natural gas-fired regenerative thermal oxidizer (RTO), identified as CE03, with a maximum heat input capacity of 7.0 MMBtu/hr;

(4) One (1) natural gas-fired cure oven, with a maximum heat input capacity of 3.5 MMBtu per hour; and

(5) One (1) natural gas-fired fresh air supply house, with a maximum heat input capacity of 5.0 MMBtu per hour.

Note: The paint booth, flash off tunnel, and natural gas-fired cure oven are contained within a permanent total enclosure, and exhausting to one (1) stack, identified as EP02;

(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 Volatile Organic Compounds (VOC) [326 IAC 2-8-4][326 IAC 2-2]

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render 326 IAC 2-2 not applicable, the source shall comply with the following:

(a) The VOC emissions from the regenerative thermal oxidizer (CE01), which is used to control the emissions from the paint booth, flash off tunnel, and natural gas-fired cure oven of the plastic parts surface coating line (EU01) shall not exceed 2.93 pounds per hour.

(b) The VOC emissions from the regenerative thermal oxidizer (CE03), which is used to control the emissions from the paint booth, flash off tunnel, and natural gas-fired cure oven of the plastic parts surface coating line (EU08) shall not exceed 15.126 pounds per hour.

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

D.1.2 Hazardous Air Pollutants (HAP) [326 IAC 2-7][326 IAC 2-4.1]

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

(a) Emissions of any single HAP from the regenerative thermal oxidizer (CE03), which is used to control the emissions from the paint booth, flash off tunnel, and natural gas-fired cure oven of the plastic parts surface coating line (EU08) shall not exceed 1.94 pounds per hour.

(b) Total HAP emissions from the regenerative thermal oxidizer (CE03), which is used to control the emissions from the paint booth, flash off tunnel, and natural gas-fired cure oven of the plastic parts surface coating line (EU08) shall not exceed 5.25 pounds per hour.

Compliance with these limits, combined with the potential to emit HAP from all other emission units at this source, shall limit the source-wide total potential to emit of any single HAP to less than ten (10) tons per twelve (12) consecutive month period, total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period 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.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

(a) Pursuant to 326 IAC 8-1-6 (BACT), the Permittee shall control the VOC emissions from the paint booth, flash off tunnel, and natural gas-fired cure oven of the plastic parts surface coating line (EU01) using Best Available Control Technology (BACT). The BACT for the plastic parts surface coating line (EU01) has been determined to be the following:

(1) The VOC emissions from the paint booth, flash off tunnel, and natural gas-fired cure oven of the plastic parts surface coating line (EU01) shall be controlled by a combination of a permanent total enclosure and a regenerative thermal oxidizer (CE01).

(2) The overall control efficiency (including the capture efficiency and destruction efficiency) of the permanent total enclosure and regenerative thermal oxidizer (CE01) shall be equal to or greater than 95% or the VOC outlet concentration shall not exceed 12 ppmv as VOC.

(3) The regenerative thermal oxidizer (CE01) shall operate at all times when the paint booth, flash off tunnel, and natural gas-fired cure oven of the plastic parts surface coating line (EU01) is in operation.

(b) Pursuant to 326 IAC 8-1-6 (BACT), the Permittee shall control the VOC emissions from the paint booths, flash off tunnel, and natural gas-fired cure oven of the plastic parts surface coating line (EU08) using Best Available Control Technology (BACT). The BACT for the plastic parts surface coating line (EU01) has been determined to be the following:

(1) The VOC emissions from the plastic parts surface coating line (EU08) shall be controlled by regenerative thermal oxidizer (CE03) at all times that the surface coating line is in operation.

(2) The Permittee shall comply with the following:

(A) The VOC capture efficiency for the regenerative thermal oxidizer (CE03) shall be no less than 100% and the VOC destruction efficiency for the regenerative thermal oxidizer shall be at least 95%; or

(B) The VOC capture efficiency for the regenerative thermal oxidizer (CE03) shall be no less than 100% and the VOC outlet concentration shall not exceed 10 ppmv.

(3) The VOC emissions (including after control emissions and uncaptured emissions) from the regenerative thermal oxidizer (CE03), which is used to control the emissions from the paint booth, flash off tunnel, and natural gas-fired cure oven of the plastic parts surface coating line (EU08), shall not exceed 15.126 pounds per hour.

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

Pursuant to 326 IAC 6-3-2(d), particulate from the paint booths of the plastic parts surface coating lines (EU01 and EU08) shall be controlled by dry particulate filters, waterwash, or an equivalent control device, and the Permittee shall operate each control device in accordance with manufacturer's specifications.

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

A Preventive Maintenance Plan is required for the plastic parts surface coating lines (EU01 and EU08) and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

D.1.6 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

(a) In order to demonstrate compliance with Conditions D.1.1(a) and D.1.3(a)(1) the Permittee shall perform VOC (including emission rate, destruction efficiency, and capture efficiency) testing for the plastic parts surface coating line (EU01) regenerative thermal oxidizer (CE01) no later than sixty (60) days after achieving maximum capacity, but not later than one hundred and eighty (180) days after initial startup. This testing shall be conducted utilizing methods approved by the Commissioner and shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

(b) In order to demonstrate compliance with Conditions D.1.1(b), D.1.3(b)(2), and D.1.3(b)(3), the Permittee shall perform VOC (including emission rate, destruction efficiency, and capture efficiency) testing for the plastic parts surface coating line (EU08) regenerative thermal oxidizer (CE03) no later than sixty (60) days after achieving

maximum capacity, but not later than one hundred and eighty (180) days after initial startup. This testing shall be conducted utilizing methods approved by the Commissioner and shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

(c) In order to demonstrate compliance with Condition D.1.2(a) the Permittee shall perform toluene (including emission rate, destruction efficiency, and capture efficiency) testing for the plastic parts surface coating line (EU08) regenerative thermal oxidizer (CE03) no later than sixty (60) days after achieving maximum capacity, but not later than one hundred and eighty (180) days after initial startup. This testing shall be conducted utilizing methods approved by the Commissioner and shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

D.1.7 VOC, HAP, and Particulate Control

(a) In order to comply with Conditions D.1.1(a) and D.1.3(a), the regenerative thermal oxidizer (CE01) for VOC control shall be in operation at all times when the paint booth, flash off tunnel, and natural gas-fired cure oven of the plastic parts surface coating line (EU01) is in operation.

(b) In order to comply with Condition D.1.4, the water wash curtain (CE02) for particulate control shall be in operation at all times when the paint booth of the plastic parts surface coating line (EU01) is in operation.

(c) In order to comply with Conditions D.1.1(b), D.1.2, and D.1.3(b), the regenerative thermal oxidizer (CE03) for VOC and HAP control shall be in operation at all times when the paint booth, flash off tunnel, and natural gas-fired cure oven of the plastic parts surface coating line (EU08) is in operation.

(d) In order to comply with Condition D.1.4, the Venturi scrubber (CE04) for particulate control shall be in operation at all times when the paint booth of the plastic parts surface coating line (EU08) is in operation.

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

D.1.8 Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the regenerative thermal oxidizers (CE01 and CE03) for measuring operating temperature. For the purpose of this condition, continuous means no less than once per fifteen (15) minutes. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature of 1,550°F.

(b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.1(a), D.1.1(b), D.1.2, D.1.3(a)(1), D.1.3(b)(2), and D.1.3(b)(3).

(c) On and after the date the stack test results are available, the Permittee shall operate the regenerative thermal oxidizers (CE01 and CE03) at or above the 3-hour average temperature as observed during the compliant stack test.

D.1.9 Parametric Monitoring

(a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.1(a), D.1.1(b), D.1.2, D.1.3(a)(1), D.1.3(b)(2), and D.1.3(b)(3).

(b) The duct pressure or fan amperage shall be observed at least once per day when the regenerative thermal oxidizers (CE01 and CE03) are in operation. On and after the date the stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

D.1.10 Monitoring

(a) Daily inspections shall be performed to verify that the water level of the water pans of the water wash curtain (CE02) meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer.

(b) The Permittee shall record the pressure drop and flow rate of the Venturi scrubber associated with the surface coating line (EU08), at least once per day. When for any one reading, the pressure drop and/or the flow rate across the scrubber is below the minimum pressure drop and/or flow rate, the Permittee shall take a reasonable response. The minimum pressure drop for this unit is 10 inches of water unless a different minimum value is determined during the latest stack test. The minimum flow rate for this unit is 9 gallons per minute unless a different minimum value is determined during the latest stack test. Section C – Response to Excursions and Exceedances contains the Permittee’s obligation with regard to the reasonable response required by this condition. Failure to take a reasonable response shall be considered a deviation from this permit.

(c) Weekly observations shall be made of the overspray from the plastic parts surface coating lines stacks (EP01 and EP02) while the plastic parts surface coating lines are in operation. If a condition exists which should result in a response, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response required by this condition. Failure to take a reasonable response shall be considered a deviation from this permit.

(d) Monthly inspections shall be performed of the coating emissions from the stacks (EP01 and EP02) and the presence of overspray on the rooftops and the nearby ground. If a condition exists which should result in a response, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response required by this condition. Failure to take a reasonable response shall be considered a deviation from this permit.

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

D.1.11 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.8, the Permittee shall maintain continuous temperature records for the regenerative thermal oxidizers (CE01 and CE03) and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.

(b) To document the compliance status with Condition D.1.9, the Permittee shall maintain daily records of the duct pressure or fan amperage for the regenerative thermal oxidizers (CE01 and CE03). The Permittee shall include in its daily record when a duct pressure or

fan amperage reading is not taken and the reason for the lack of a duct pressure or fan amperage reading (e.g., the process did not operate that day).

(c) To document the compliance status with Condition D.1.10(a), the Permittee shall maintain a log of the daily inspections and weekly observations of the water level in the pans.

(d) To document the compliance status with Condition D.1.10(b), the Permittee shall maintain daily records of the pressure drop and flow rate of the Venturi scrubber controlling the surface coating line (EU08). The Permittee shall include in its daily record when a pressure drop and/or flow rate reading is not taken and the reason for the lack of a pressure drop and/or flow rate reading (e.g., the process did not operate that day).

(e) To document the compliance status with Conditions D.1.10(c) and (d), the Permittee shall maintain a log of weekly overspray observations, monthly inspections.

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

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities:

(b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:

(6) One (1) natural gas-fired water heater, identified as EU09, approved in 2016 for construction, with a maximum heat input capacity of 4.0 MMBtu/hr, and exhausting to one (1) stack, identified as EP09.

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

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating: Emission limitations for facilities specified in 326 IAC 6-2-1(d)), the particulate emissions from the natural gas-fired water heater shall not exceed 0.6 pound per million British thermal units heat input (lb/MMBtu).

DRAFT

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION

Source Name: Greenville Technology, Inc. - Anderson
Source Address: 3511 West 73rd Street, Anderson, Indiana 46013
FESOP Permit No.: F095-32281-00136

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:

DRAFT

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)

EMERGENCY OCCURRENCE REPORT

Source Name: Greenville Technology, Inc. - Anderson
Source Address: 3511 West 73rd Street, Anderson, Indiana 46013
FESOP Permit No.: F095-32281-00136

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

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

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

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

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

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

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

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

Source Name: Greenville Technology, Inc. - Anderson
Source Address: 3511 West 73rd Street, Anderson, Indiana 46013
FESOP Permit No.: F095-32281-00136

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

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

□ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

□ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

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

Greenville Technology, Inc. - Anderson
3511 West 73rd Street
Anderson, Indiana 46013

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of _____ for _____.
(Title) (Company Name)

3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)

4. I hereby certify that Greenville Technology, Inc. - Anderson 3511 West 73rd Street, Anderson, Indiana 46013, completed construction of the plastic automobile parts manufacturing plant on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on September 7, 2012 and as permitted pursuant to New Source Construction Permit and Federally Enforceable State Operating Permit No. F095-32281-00136, Plant ID No. 095-00136 issued on _____.

5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature_____
Date_____

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana

on this _____ day of _____, 20 _____. My Commission expires: _____.

Signature_____
Name_____ (typed or printed)

Indiana Department of Environmental Management
Office of Air Quality

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

Source Description and Location

Source Name:	**Greenville Technology, Inc. - Anderson**
Source Location:	**3511 West 73rd Street, Anderson, IN 46013**
County:	**Madison**
SIC Code:	**3714 (Motor Vehicle Parts and Accessories)**
Operation Permit No.:	**F095-32281-00136**
Operation Permit Issuance Date:	**January 3, 2013**
Significant Permit Revision No.:	**095-37334-00136**
Permit Reviewer:	**Brian Wright**

On June 30, 2016, the Office of Air Quality (OAQ) received an application from Greenville Technology, Inc. - Anderson related to the construction and operation of a new plastic parts surface coating line at an existing stationary plastic automobile parts manufacturing plant.

Existing Approvals

The source was issued FESOP No. F095-32281-00136 on January 3, 2013. There have been no subsequent approvals issued.

County Attainment Status

The source is located in Parke County.

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

[1]Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.

(a) Ozone Standards

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

(b) $PM_{2.5}$

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

(c) Other Criteria Pollutants

Parke 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.

Status of the Existing Source

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

This PTE table is from the TSD or Appendix A of FESOP No. F095-32281-00136, issued on January 3, 2016.

	Potential To Emit of the Entire Source Prior to Revision (tons/year)									
Process/ Emission Unit	PM[1]	PM10[1]	PM2.5[1]	SO_2	NOx	VOC	CO	GHGs as CO_2e	Total HAPs	Worst Single HAP
Plastic Parts Surface Coating Line (EU01)[2,3]	2.14	2.31	2.31	0.02	2.94	36.62	2.47	3,553.53	0.64	0.26 Xylene
Plastic Injection Molding (EU02)	0.29	0.29	0.29	0	0	2.28	0	0	0.56	0.55, Xylene
Natural Gas Heater (EU03)	0.003	0.01	0.01	0.001	0.18	0.01	0.15	211.52	0.003	0.003, Hexane
Natural Gas Heater (EU04)	0.020	0.08	0.08	0.01	1.05	0.06	0.88	1,269.12	0.020	0.019, Hexane
Natural Gas Heater (EU05)	0.001	0.005	0.005	0.0004	0.07	0.00	0.06	79.32	0.001	0.001, Hexane
Natural Gas Heater (EU06)	0.002	0.01	0.01	0.001	0.10	0.01	0.08	118.98	0.002	0.002, Hexane
Natural Gas Heater (EU07)	0.002	0.01	0.01	0.001	0.11	0.01	0.09	126.91	0.002	0.002, Hexane
Total PTE of Entire Source	**2.46**	**2.72**	**2.72**	**0.03**	**4.44**	**38.98**	**3.73**	**5,359.37**	**1.23**	**0.81 Xylene**
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000	NA	NA

[1]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". $PM_{2.5}$ listed is direct $PM_{2.5}$.
[2] Pursuant to 326 IAC 6-3-2(d), the source is required to control particulate matter emissions using a water wash curtain. Therefore, the limited potential to emit PM, PM10, and PM2.5 is after control.
[3] Source has limited VOC emissions to render 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70 Permits) not applicable.

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

(b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the unlimited potential to emit HAPs is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Greenville Technology, Inc. - Anderson on June 30, 2016, relating to the construction and operation of a new plastic parts surface coating line.

The following is a list of the new emission units and pollution control devices:

(a) One (1) plastic parts surface coating line, identified as EU08, approved in 2016 for construction, and consisting of the following:

(1) Three (3) paint booths, utilizing HVLP spray guns for application, with a total maximum coating usage of 52 gallons per hour and maximum clean up solvent usage of 5.0 gallons per hour, using a regenerative thermal oxidizer for VOC control and Venturi scrubber for particulate control, and exhausting to stack EP02;

(2) Three (3) flash off tunnels;

(3) One (1) natural gas-fired regenerative thermal oxidizer (RTO), identified as CE03, with a maximum heat input capacity of 7.0 MMBtu/hr;

(4) One (1) natural gas-fired cure oven, with a maximum heat input capacity of 3.5 MMBtu per hour; and

(5) One (1) natural gas-fired fresh air supply house, with a maximum heat input capacity of 5.0 MMBtu per hour.

Note: The paint booth, flash off tunnel, and natural gas-fired cure oven are contained within a permanent total enclosure, and exhausting to one (1) stack, identified as EP02;

(b) One (1) natural gas-fired water heater, identified as EU09, approved in 2016 for construction, with a maximum heat input capacity of 4.0 MMBtu/hr, and exhausting to one (1) stack, identified as EP09.

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – FESOP Revision

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

	PTE of Proposed Revision (tons/year)								
Process/ Emission Unit	PM*	PM10*	PM2.5*	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Plastic Parts Surface Coating Line (EU08)*	317.92	318.31	318.31	0.04	6.79	1321.47	5.70	85.36	34.57 Xylene
Water Heater EU09	0.03	0.13	0.13	0.01	1.75	0.10	1.47	0.03	0.03 Hexane
Total PTE	**317.96**	**318.28**	**318.28**	**0.05**	**8.54**	**1321.6**	**7.17**	**85.63**	**34.57 Xylene**

*Includes emissions from all equipment associated with the coating line operations (spray coating booth, cure oven and RTO)

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

(b) Pursuant to 326 IAC 2-8-11.1(f)(1)(G), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit revision and the proposed revision has a potential to emit greater than or equal to ten (10) tons per year of a single HAP and twenty-five (25) tons per year of any combination of HAPs.

PTE of the Entire Source After Issuance of the FESOP Revision

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

Process/ Emission Unit	**Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)**								
	PM[1]	PM10[1]	PM2.5[1]	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Plastic Parts Surface Coating Line (EU01)[2,3]	2.14	~~2.31~~ 2.29	~~2.31~~ 2.29	~~0.02~~ 0.02	~~2.94~~2. 65	~~36.62~~ **12.82**	~~2.47~~ 2.22	0.64	0.26 Xylene
Plastic Parts Surface Coating Line (EU01)[2,3]	**16.02**	**16.41**	**16.41**	**0.04**	**6.79**	**66.25**	**5.70**	**23.00**	**8.50 Xylene**
Plastic Injection Molding (EU02)	0.29	0.29	0.29	0	0	2.28	0	0.56	0.55 Xylene
Natural Gas Heater (EU03)	0.003	0.01	0.01	0.001	0.18	0.01	0.15	0.003	0.003 Hexane
Natural Gas Heater (EU04)	0.020	0.08	0.08	0.01	1.05	0.06	0.88	0.020	0.019 Hexane
Natural Gas Heater (EU05)	0.001	0.005	0.005	0.0004	0.07	0.00	0.06	0.001	0.001 Hexane
Natural Gas Heater (EU06)	0.002	0.01	0.01	0.001	0.10	0.01	0.08	0.002	0.002 Hexane
Natural Gas Heater (EU07)	0.002	0.01	0.01	0.001	0.11	0.01	0.09	0.002	0.002 Hexane
Natural Gas Heater (EU09)	**0.03**	**0.13**	**0.13**	**0.01**	**1.75**	**0.10**	**1.47**	**0.08**	**0.08 Hexane**
Total PTE of Entire Source	~~2.46~~ **18.48**	~~2.72~~ **19.10**	~~2.72~~ **19.10**	~~0.03~~ **0.07**	~~4.44~~ **10.93**	~~38.98~~ **81.45**	~~3.73~~ **9.18**	~~1.23~~ **24.22**	~~0.81~~ **9.31 Xylene**
Title V Major Source Thresholds	-	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	-	-

[1]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". $PM_{2.5}$ listed is direct $PM_{2.5}$.
[2] Pursuant to 326 IAC 6-3-2(d) the particulate emissions from the paint booths of the plastic parts surface coating lines (EU01 and EU08) shall be controlled by dry particulate filters, waterwash, or an equivalent control device and the Permittee shall operate the control devices in accordance with the manufacturer's specifications. Compliance with this standard, in conjunction with a conservative assumption of 95% capture and control, shall limit PM, PM10, and PM2.5 emissions from the the paint booths of the plastic parts surface coating lines (EU01 and EU08) to the values shown..
[3] Source has limited VOC and HAP emissions to render 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70 Permits) not applicable.

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

Process/ Emission Unit	PTE of the Entire Source After Issuance of the FESOP Revision (tons/year)								
	PM[1]	PM10[1]	PM2.5[1]	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Plastic Parts Surface Coating Line (EU01)[2,3]	2.14	2.29	2.29	0.02	2.65	12.82	2.22	0.64	0.26 Xylene
Plastic Parts Surface Coating Line (EU01) [2,3]	16.02	16.41	16.41	0.04	6.79	66.25	5.70	23.00	8.50 Xylene
Plastic Injection Molding (EU02)	0.29	0.29	0.29	0	0	2.28	0	0.56	0.55 Xylene
Natural Gas Heater (EU03)	0.003	0.01	0.01	0.001	0.18	0.01	0.15	0.003	0.003 Hexane
Natural Gas Heater (EU04)	0.020	0.08	0.08	0.01	1.05	0.06	0.88	0.020	0.019 Hexane
Natural Gas Heater (EU05)	0.001	0.005	0.005	0.0004	0.07	0.00	0.06	0.001	0.001 Hexane
Natural Gas Heater (EU06)	0.002	0.01	0.01	0.001	0.10	0.01	0.08	0.002	0.002 Hexane
Natural Gas Heater (EU07)	0.002	0.01	0.01	0.001	0.11	0.01	0.09	0.002	0.002 Hexane
Natural Gas Heater (EU09)	0.03	0.13	0.13	0.01	1.75	0.10	1.47	0.08	0.080 Hexane
Total PTE of Entire Source	**18.48**	**19.10**	**19.10**	**0.07**	**10.93**	**81.45**	**9.18**	**24.22**	**9.31 Xylene**
Title V Major Source Thresholds	-	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	-	-

[1]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". $PM_{2.5}$ listed is direct $PM_{2.5}$.
[2] Pursuant to 326 IAC 6-3-2(d) the particulate emissions from the paint booths of the plastic parts surface coating lines (EU01 and EU08) shall be controlled by dry particulate filters, waterwash, or an equivalent control device and the Permittee shall operate the control devices in accordance with the manufacturer's specifications. Compliance with this standard, in conjunction with a conservative assumption of 95% capture and control, shall limit PM, PM10, and PM2.5 emissions from the the paint booths of the plastic parts surface coating lines (EU01 and EU08) to the values shown..
[3] Source has limited VOC and HAP emissions to render 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70 Permits) not applicable.

(a) FESOP Status

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

(1) Criteria Pollutants

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

(1) The VOC emissions from the regenerative thermal oxidizer (CE01), which is used to control the emissions from the paint booth, flash off tunnel, and natural gas-fired cure oven of the plastic parts surface coating line (EU01) shall not exceed 2.93 pounds per hour.

(2) The VOC emissions from the regenerative thermal oxidizer (CE03), which is used to control the emissions from the paint booth, flash off tunnel, and natural gas-fired cure oven of the plastic parts surface coating line (EU08) shall not exceed 15.126 pounds per hour.

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 100 tons per twelve (12) consecutive month period, and shall render the

requirements of 326 IAC 2-7 (Part 70 Permits) and *326* IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

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

(1) Emissions of any single HAP from the regenerative thermal oxidizer (CE03), which is used to control the emissions from the paint booth, flash off tunnel, and natural gas-fired cure oven of the plastic parts surface coating line (EU08) shall not exceed 1.94 pounds per hour.

(2) Total HAP emissions from the regenerative thermal oxidizer (CE03), which is used to control the emissions from the paint booth, flash off tunnel, and natural gas-fired cure oven of the plastic parts surface coating line (EU08) shall not exceed 5.25 pounds per hour.

Compliance with these limits, combined with the potential to emit HAP from all other emission units at this source, shall limit the source-wide total potential to emit of any single HAP to less than ten (10) tons per twelve (12) consecutive month period, total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period 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.

Federal Rule Applicability Determination

(a) New Source Performance Standards (NSPS)

(1) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in this proposed revision, since the natural gas-fire water heater (EU09) has a maximum heat input capacity of less than 10 MMBtu/hr.

(2) The requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM (326 IAC 12), are not included for this proposed revision, since the source is not an automobile or light-duty truck assembly operation as defined by 40 CFR 60.391.

(3) The requirements of the New Source Performance Standard for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines, 40 CFR 60, Subpart TTT (326 IAC 12), are not included for this proposed revision, since the facility does not coat plastic parts for business machines as defined by 40 CFR 60.721. The facility coats plastic parts for automobiles.

(3) There are no New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included for this proposed revision.

(b) National Emission Standards for Hazardous Air Pollutants (NESHAP)

(1) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning, 40 CFR 63.460, Subpart T (326 IAC 20-6), are not included in this proposed revision, since the proposed surface coating line is not located at a major source of HAP emissions, and only non-halogenated solvents are used for these operations.

(2) 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 this proposed revision, since the facility is not a major source and is not an automobile and light-duty truck assembly plant as defined by 40 CFR 63.3176.

(3) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63.3880, Subpart MMMM (326 IAC 20-80), are not included in this proposed revision, this source is not a major source of HAP emissions.

(4) 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), since the facility is not a major source of HAP emissions.

(5) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD (326 IAC 20-95), are not included in this proposed revision, since the facility is not a major source of HAP emissions.

(6) 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 this proposed revision, since the source does not use chemical strippers that contain methylene chloride, does not contain automobile refinishing operations, and does not apply coatings that contain the target HAPs.

(7) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ (326 IAC 20), are not included in this proposed revision, since the natural gas-fired water heater (EU09) is a gas-fired boiler as defined by 40 CFR 63.11237.

(8) There are no new National Emission Standards for Hazardous Air Pollutants (40 CFR Part 63), 326 IAC 14 and 326 IAC 20 included for this proposed revision.

(c) Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

(a) 326 IAC 2-8-4 (FESOP)
This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

(b) 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

(c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The unlimited potential to emit of HAPs from the new plastic parts surface coating line (EU08) is greater than ten (10) tons per year for any single HAP and/or greater than twenty-five (25) tons per year of a combination of HAPs. However, the source shall limit the potential to emit HAPs from the new plastic parts surface coating line (EU08) to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, the proposed revision is not subject to the requirements of 326 IAC 2-4.1. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.

(d) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

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

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

(2) 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.

(f) 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.

(g) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the proposed revision has potential fugitive particulate emissions less than 25 tons per year.

(h) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.

(i) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

<u>Plastic Parts Surface Coating Line (EU08)</u>

(j) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heat)
The natural gas-fired cure oven and regenerative thermal oxidizer are not subject to the requirements of 326 IAC 6-2 since they are not sources of indirect heat.

(k) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
(1) Pursuant to 326 IAC 6-3-2(d)(1), particulate from the paint booth of the plastic parts surface coating line (EU08), shall be controlled by particulate filters, waterwash, or an equivalent control device, and the Permittee shall operate each control device in accordance with manufacturer's specifications.

(2) The natural gas-fired cure oven and regenerative thermal oxidizer are exempt from the requirements of 326 IAC 6-3-2, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight.

(l) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The plastic parts surface coating line (EU08) will be constructed after January 1, 1980 and has potential VOC emissions greater than twenty-five (25) tons per year. Therefore, the three (3) paint booths and natural gas-fired cure oven of the plastic parts surface coating line (EU08) is subject to 326 IAC 8-1-6 and the Permittee is required to control the VOC emissions using the Best Available Control Technology (BACT).

According to the BACT analysis contained in Appendix B, IDEM, OAQ has determined that the following requirements represent BACT for the plastic parts surface coating line (EU08):

(1) The VOC emissions from the plastic parts surface coating line (EU08) shall be controlled by regenerative thermal oxidizer (CE03) at all times that the surface coating line is in operation.

(2) The Permittee shall comply with the following:

(A) The VOC capture efficiency for the regenerative thermal oxidizer (CE03) shall be no less than 100% and the VOC destruction efficiency for the regenerative thermal oxidizer (CE03) shall be at least 95%; or

(B) The VOC capture efficiency for the regenerative thermal oxidizer (CE03) shall be no less than 100% and the VOC outlet concentration shall not exceed 10 ppmv.

(3) The VOC emissions (including after control emissions and uncaptured emissions) from the regenerative thermal oxidizer (CE03), which is used to control the emissions from the paint booth, flash off tunnel, and natural gas-fired cure oven of the plastic parts surface coating line (EU08), shall not exceed 15.126 pounds per hour.

(c) 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts)
Pursuant to 326 IAC 8-2-9(a)(2), the plastic parts surface coating line (EU08) is not subject to the requirements of 326 IAC 8-2-9, since the line does not coat metal and is not located in Lake or Porter County. The line only coats plastic parts.

Natural Gas Combustion

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)
Pursuant to 326 IAC 6-2-1(d), the natural gas-fired water heater (EU08) is subject to the requirements of 326 IAC 6-2-4 since it is a source of indirect heat constructed after September 21, 1983.

Pursuant to 326 IAC 6-2-4(a), the particulate emissions the natural gas-fired water heater (EU08) shall not exceed 0.6 pounds per million British thermal units heat input, because the total heat input from all the indirect heating units at this source is less than 10 MMBtu per hour.

Based on the AP-42, Chapter 1.5, uncontrolled combustion particulate emission factor of 1.9 pounds per million cubic feet (lb/MMCF) of natural gas, the natural gas-fired water heater is able to comply with the particulate emission limitation under 326 IAC 6-2-4 without the use of a control device.

(1.2 lb PM/MMCF) * (MMCF/1020 MMBtu) = 0.001 lb PM/MMBtu

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

The natural gas-fired water heater is not subject to the requirements of 326 IAC 6-3, since it is not a "manufacturing process" as defined by 326 IAC 6-3-1.5.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Pursuant to 326 IAC 7-1.1-1, the natural gas-fired water heater is not subject to the requirements of 326 IAC 7-1, since it has unlimited sulfur dioxide (SO_2) emissions less than twenty-five (25) tons per year and ten (10) pounds per hour, respectively.

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

The natural gas-fired water heater is not subject to the requirements of 326 IAC 8-1-6, since it has unlimited VOC potential emissions of less than twenty-five (25) tons per year.

Compliance Determination, Monitoring and Testing Requirements

(a) The compliance determination and monitoring requirements applicable to this proposed revision are as follows:

(1) Particulate

Emission Unit	Operating Parameters	Frequency	Range
Surface Coating Line (EU08)	Pressure Drop	Once per day	Minimum of 10 Inches of Water
	Flow Rate	Once per day	9 Gallons per Minute
	Overspray	Once per week	Normal/Abnormal
	Stack Exhaust Observations	Once per month	Normal/Abnormal

The Venturi scrubber associated with the surface coating line (EU08) must operate properly to assure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

(2) VOC

Control	**Parameter**	**Frequency**	**Range**	**Excursions and Exceedances**
Regenerative Thermal Oxidizer	Temperature	Continuous	3-hour average temperature of 1550°F	Response steps
Regenerative Thermal Oxidizer	Duct Pressure or Fan Amperage	Daily	Normal Range	Response steps

The temperature and duct pressure monitoring is necessary when the thermal oxidizer is in operation because the regenerative thermal oxidizer associated with the surface coating line (EU08) must operate properly to ensure compliance with 326 IAC 8-1-6 and the limits that render 326 IAC 2-7 (Part 70) and 326 IAC 2-2 (PSD) not applicable.

(b) The testing requirements applicable to this proposed revision are as follows:

Testing Requirements				
Emission Unit	**Control Device**	**Pollutant**	**Timeframe for Testing**	**Frequency of Testing**
Paint Booth of the Plastic Parts Surface Coating Line (EU08)	Regenerative Thermal Oxidizer (CE03)	VOC	No later than 60 days after achieving maximum capacity or 180 days after initial startup	Once every five (5) years
Paint Booth of the Plastic Parts Surface Coating Line (EU08)	Regenerative Thermal Oxidizer (CE03)	Toluene	No later than 60 days after achieving maximum capacity or 180 days after initial startup	Once every five (5) years

The testing of VOC and toluene is necessary to document compliance with the 326 IAC 8-1-6 and the limits that render 326 IAC 2-7 (Part 70), 326 IAC 2-2 (PSD), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) not applicable. IDEM is not requiring Xylene testing at this time, since Toluene is the worst case HAP emitted from application of the Primer Blend in the Paint Booth of the Plastic Parts Surface Coating Line (EU08), and Toluene has the highest autoignition temperature (hardest to oxidize).

Proposed Changes

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

(1) Section A.2 and A.3 have been modified as follows in order to incorporate the new units:

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

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

******

(b) One (1) plastic parts surface coating line, identified as EU08, approved in 2016 for construction, and consisting of the following:

(1) Three (3) paint booths, utilizing HVLP spray guns for application, with a total maximum coating usage of 52 gallons per hour and maximum clean up solvent usage of 5.0 gallons per hour, using a regenerative thermal oxidizer for VOC control and Venturi scrubber for particulate control, and exhausting to stack EP02;

(2) Three (3) flash off tunnels;

(3) One (1) natural gas-fired regenerative thermal oxidizer (RTO), identified as CE03, with a maximum heat input capacity of 7.0 MMBtu/hr; and

(4) One (1) natural gas-fired cure oven, with a maximum heat input capacity of 3.5 MMBtu per hour; and

(5) One (1) natural gas-fired fresh air supply house, with a maximum heat input capacity of 5.0 MMBtu per hour.

Note: The paint booth, flash off tunnel, and natural gas-fired cure oven are contained within a permanent total enclosure, and exhausting to one (1) stack, identified as EP02;

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

This stationary source also includes the following insignificant activities:

******

(b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:

******

(6) One (1) natural gas-fired water heater, identified as EU09, approved in 2016 for construction, with a maximum heat input capacity of 4.0 MMBtu/hr, and exhausting to one (1) stack, identified as EP09.

(2) Section D.1 has been amended as follows in order to incorporate the new units and applicable requirements. In addition IDEM OAQ has revised the BACT requirements of Condition D.1.3(a) to provide clarification regarding these requirements.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

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(b) One (1) plastic parts surface coating line, identified as EU08, approved in 2016 for construction, and consisting of the following:

(1) Three (3) paint booths, utilizing HVLP spray guns for application, with a total maximum coating usage of 52 gallons per hour and maximum clean up solvent usage of 5.0 gallons per hour, using a regenerative thermal oxidizer for VOC control and Venturi scrubber for particulate control, and exhausting to stack EP02;

(2) Three (3) flash off tunnels;

(3) One (1) natural gas-fired regenerative thermal oxidizer (RTO), identified as CE03, with a maximum heat input capacity of 7.0 MMBtu/hr;

(4) One (1) natural gas-fired cure oven, with a maximum heat input capacity of 3.5 MMBtu per hour; and

(5) One (1) natural gas-fired fresh air supply house, with a maximum heat input capacity of 5.0 MMBtu per hour.

Note: The paint booth, flash off tunnel, and natural gas-fired cure oven are contained within a permanent total enclosure, and exhausting to one (1) stack, identified as EP02.

(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 Volatile Organic Compounds (VOC) [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render 326 IAC 2-2 not applicable, **the source shall comply with the following:**

(a) The VOC emissions from the regenerative thermal oxidizer (CE01), which is used to control the emissions from the paint booth, flash off tunnel, and natural gas-fired cure oven of the plastic parts surface coating line (EU01) shall not exceed ~~8.36~~ **2.93** pounds per hour.

(b) The VOC emissions from the regenerative thermal oxidizer (CE03), which is used to control the emissions from the paint booth, flash off tunnel, and natural gas-fired cure oven of the plastic parts surface coating line (EU08) shall not exceed 15.126 pounds per hour.

Compliance with ~~this~~ **these** limit**s**, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 100 tons per **twelve (**12**)** consecutive month period, and shall render **the requirements of** 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.2 Hazardous Air Pollutants (HAP) [326 IAC 2-7] [326 IAC 2-4.1]

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

(a) Emissions of any single HAP from the regenerative thermal oxidizer (CE03), which is used to control the emissions from the paint booth, flash off tunnel, and natural gas-fired cure oven of the plastic parts surface coating line (EU08) shall not exceed 1.94 pounds per hour.

(b) Total HAP emissions from the regenerative thermal oxidizer (CE03), which is used to control the emissions from the paint booth, flash off tunnel, and natural gas-fired cure oven of the plastic parts surface coating line (EU08) shall not exceed 5.25 pounds per hour.

Compliance with these limits, combined with the potential to emit HAP from all other emission units at this source, shall limit the source-wide total potential to emit of any single HAP to less than ten (10) tons per twelve (12) consecutive month period, total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period 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~~**3** Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

(a) Pursuant to 326 IAC 8-1-6 (BACT), the Permittee shall control the VOC emissions from the paint booth, flash off tunnel, and natural gas-fired cure oven of the plastic parts surface coating line (EU01) using Best Available Control Technology (BACT). The BACT for the plastic parts surface coating line (EU01) has been determined to be the following:

(~~a~~**1**) The VOC emissions from the paint booth, flash off tunnel, and natural gas-fired cure oven of the plastic parts surface coating line (EU01) shall be controlled by a combination of a permanent total enclosure and a regenerative thermal oxidizer **(CE01).**

(2) ~~with an~~ **The** overall control efficiency (including the capture efficiency and destruction efficiency) **of the permanent total enclosure and regenerative thermal oxidizer (CE01) shall be** equal to or greater than 95% or the VOC outlet concentration shall not exceed 12 ppmv as VOC.

(~~b~~**3**) The regenerative thermal oxidizer **(CE01)** shall operate at all times when the paint booth, flash off tunnel, and natural gas-fired cure oven of the plastic parts surface coating line (EU01) is in operation.

(b) Pursuant to 326 IAC 8-1-6 (BACT), the Permittee shall control the VOC emissions from the paint booths, flash off tunnel, and natural gas-fired cure oven of the plastic parts surface coating line (EU08) using Best Available Control Technology (BACT). The BACT for the plastic parts surface coating line (EU01) has been determined to be the following:

(1) The VOC emissions from the plastic parts surface coating line (EU08) shall be controlled by regenerative thermal oxidizer (CE03) at all times that the surface coating line is in operation.

(2) The Permittee shall comply with the following:

(A) The VOC capture efficiency for the regenerative thermal oxidizer (CE03) shall be no less than 100% and the VOC destruction efficiency for the regenerative thermal oxidizer shall be at least 95%; or

(B) The VOC capture efficiency for the regenerative thermal oxidizer (CE03) shall be no less than 100% and the VOC outlet concentration shall not exceed 10 ppmv.

(3) The VOC emissions (including after control emissions and uncaptured emissions) from the regenerative thermal oxidizer (CE03), which is used to control the emissions from the paint booth, flash off tunnel, and natural gas-fired cure oven of the plastic parts surface coating line (EU08), shall not exceed 15.126 pounds per hour.

D.1.~~3~~**4** Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), particulate from the paint booth**s** of the plastic parts surface coating line**s** (EU01 **and EU08**) shall be controlled by dry particulate filters, waterwash, or an equivalent control device, and the Permittee shall operate each control device in accordance with manufacturer's specifications.

D.1.~~4~~**5** Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for the plastic parts surface coating line**s** (EU01 **and EU08**) and ~~its~~ **their** control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

D.1.~~5~~**6** Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

(a) In order to demonstrate compliance with Conditions D.1.1**(a)** and D.1.~~2~~**3**(a)**(1)** the Permittee shall perform VOC (including emission rate, destruction efficiency, and capture efficiency) testing for the plastic parts surface coating line (EU01) regenerative thermal oxidizer (CE01) no later than sixty (60) days after achieving maximum capacity, but not later than one hundred and eighty (180) days after initial startup. This testing shall be conducted utilizing methods approved by the Commissioner and shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

(b) In order to demonstrate compliance with Conditions D.1.1(b), D.1.3(b)(2), and D.1.3(b)(3), the Permittee shall perform VOC (including emission rate, destruction efficiency, and capture efficiency) testing for the plastic parts surface coating line (EU08) regenerative thermal oxidizer (CE03) no later than sixty (60) days after achieving maximum capacity, but not later than one hundred and eighty (180) days after initial startup. This testing shall be conducted utilizing methods approved by the Commissioner and shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling

Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

(c) In order to demonstrate compliance with Condition D.1.2(a) the Permittee shall perform toluene (including emission rate, destruction efficiency, and capture efficiency) testing for the plastic parts surface coating line (EU08) regenerative thermal oxidizer (CE03) no later than sixty (60) days after achieving maximum capacity, but not later than one hundred and eighty (180) days after initial startup. This testing shall be conducted utilizing methods approved by the Commissioner and shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

D.1.~~6~~**7** VOC**, HAP,** and Particulate Control

(a) In order to comply with Conditions D.1.1**(a)** and D.1.~~2~~**3(a)**, the regenerative thermal oxidizer (CE01) for VOC control shall be in operation at all times when the paint booth, flash off tunnel, and natural gas-fired cure oven of the plastic parts surface coating line (EU01) is in operation.

(b) In order to comply with Condition D.1.~~3~~**4**, the water wash curtain (CE02) for particulate control shall be in operation at all times when the paint booth of the plastic parts surface coating line (EU01) is in operation.

(c) In order to comply with Conditions D.1.1(b), D.1.2, and D.1.3(b), the regenerative thermal oxidizer (CE03) for VOC and HAP control shall be in operation at all times when the paint booth, flash off tunnel, and natural gas-fired cure oven of the plastic parts surface coating line (EU08) is in operation.

(d) In order to comply with Condition D.1.4, the Venturi scrubber (CE04) for particulate control shall be in operation at all times when the paint booth of the plastic parts surface coating line (EU08) is in operation.

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

D.1.~~7~~**8** Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the regenerative thermal oxidizer**s** (CE01 **and CE03**) for measuring operating temperature. For the purpose of this condition, continuous means no less than once per fifteen (15) minutes. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the stack test results are available, the Permittee shall operate the thermal oxidizer at or above the 3-hour average temperature of 1,550°F.

(b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.1**(a), D.1.1(b), D.1.2,** ~~and~~ D.1.~~2~~**3**(a)**(1), D.1.3(b)(2), and D.1.3(b)(3)**.

(c) On and after the date the stack test results are available, the Permittee shall operate the regenerative thermal oxidizer**s** (CE01 **and CE03**) at or above the 3-hour average temperature as observed during the compliant stack test.

D.1.~~8~~**9** Parametric Monitoring

(a) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits in Conditions D.1.1**(a), D.1.1(b), D.1.2,** ~~and~~ D.1.~~2~~**3**(a)**(1), D.1.3(b)(2), and D.1.3(b)(3)**.

(b) The duct pressure or fan amperage shall be observed at least once per day when the regenerative thermal oxidizer**s** (CE01 **and CE03**) ~~is~~ **are** in operation. On and after the date the stack test results are available, the duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

D.1.~~9~~**10** Monitoring

(a) Daily inspections shall be performed to verify that the water level of the water pans **of the water wash curtain (CE02)** meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer.

(b) The Permittee shall record the pressure drop and flow rate of the Venturi scrubber associated with the surface coating line (EU08), at least once per day. When for any one reading, the pressure drop and/or the flow rate across the scrubber is below the minimum pressure drop and/or flow rate, the Permittee shall take a reasonable response. The minimum pressure drop for this unit is 10 inches of water unless a different minimum value is determined during the latest stack test. The minimum flow rate for this unit is 9 gallons per minute unless a different minimum value is determined during the latest stack test. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response required by this condition. Failure to take a reasonable response shall be considered a deviation from this permit.

(c) ~~In addition, w~~**Weekly** observations shall be made of the overspray from the plastic parts surface coating line**s** stack**s** (EP01 **and EP02**) while the plastic parts surface coating line**s** ~~is~~ **are** in operation. If a condition exists which should result in a response, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response required by this condition. Failure to take a reasonable response shall be considered a deviation from this permit.

(~~b~~**d**) Monthly inspections shall be performed of the coating emissions from the stack**s (EP01 and EP02)** and the presence of overspray on the rooftops and the nearby ground. If a condition exists which should result in a response, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response required by this condition. Failure to take a reasonable response shall be considered a deviation from this permit.

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

D.1.~~10~~**11** Record Keeping Requirements

(a) To document the compliance status with Condition D.1.~~7~~**8**, the Permittee shall maintain continuous temperature records for the regenerative thermal oxidizer**s** (CE01 **and CE03**) and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.

(b) To document the compliance status with Condition D.1.~~8~~**9**, the Permittee shall maintain daily records of the duct pressure or fan amperage for the regenerative thermal oxidizer**s** (CE01 **and CE03**). The Permittee shall include in its daily record when a duct pressure or fan amperage reading is not taken and the reason for the lack of a duct pressure or fan amperage reading (e.g., the process did not operate that day).

(c) To document the compliance status with Condition D.1.~~9~~**10(a)**, the Permittee shall maintain a log of the **daily inspections and** weekly observations of the water level in the pans~~, weekly overspray observations, weekly observations of the water level in the pans, and the daily, weekly, and monthly inspections~~.

(d) To document the compliance status with Condition D.1.10(b), the Permittee shall maintain daily records of the pressure drop and flow rate of the Venturi scrubber controlling the surface coating line (EU08). The Permittee shall include in its daily record when a pressure drop and/or flow rate reading is not taken and the reason for the lack of a pressure drop and/or flow rate reading (e.g., the process did not operate that day).

(e) To document the compliance status with Conditions D.1.10(c) and (d), the Permittee shall maintain a log of weekly overspray observations, monthly inspections.

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

(3) Section D.2 has been added as follows in order to incorporate the new water heater:

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities:

(b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:

(6) One (1) natural gas-fired water heater, identified as EU09, approved in 2016 for construction, with a maximum heat input capacity of 4.0 MMBtu/hr, and exhausting to one (1) stack, identified as EP09.

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

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating: Emission limitations for facilities specified in 326 IAC 6-2-1(d)), the particulate emissions from the natural gas-fired water heater shall not exceed 0.6 pound per million British thermal units heat input (lb/MMBtu).

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on June 30, 2015.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 095-37334-00136. The staff recommends to the Commissioner that this FESOP Significant Permit Revision be approved.

IDEM Contact

(a) Questions regarding this proposed permit can be directed to Brian Wright at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-6544 or toll free at 1-800-451-6027 extension 4-6544.

(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 of Emissions

Company Name: Greenville Technology, Inc. - Anderson
Source Address: 3511 West 73rd Street, Anderson, IN 46013
FESOP SPR No.: 095-37334-00136
Permit Reviewer: Brian Wright

Unlimited/Uncontrolled Potential to Emit (tons/year)										
Process	**PM**	**PM10**	**PM2.5**	**SO2**	**NOx**	**VOC**	**CO**	**Total HAPs**	**Highest Single HAP (Xylene)**	
Plastic Parts Surface Coating Line (EU01)*	41.80	41.95	41.95	0.02	2.65	253.56	2.22	0.64	0.26	Xylene
Plastic Parts Surface Coating Line (EU08)*	317.92	318.31	318.31	0.04	6.79	1321.47	5.70	85.42	34.57	Xylene
Plastic Injection Molding (EU02)	0.29	0.29	0.29	0	0	2.28	0	0.56	0.55	Xylene
Natural Gas Heater (EU03)	0.003	0.01	0.01	0.001	0.18	0.01	0.15	0.003	0.003	Hexane
Natural Gas Heater (EU04)	0.020	0.08	0.08	0.01	1.05	0.06	0.88	0.02	0.02	Hexane
Natural Gas Heater (EU05)	0.001	0.005	0.005	0.0004	0.07	0.004	0.06	0.001	0.001	Hexane
Natural Gas Heater (EU06)	0.002	0.01	0.01	0.001	0.10	0.01	0.08	0.002	0.002	Hexane
Natural Gas Heater (EU07)	0.002	0.01	0.01	0.001	0.11	0.01	0.09	0.002	0.002	Hexane
Natural Gas Heater (EU09)	0.03	0.13	0.13	0.01	1.75	0.10	1.47	0.24	0.23	Hexane
Total	**360.04**	**360.67**	**360.67**	**0.07**	**10.93**	**1577.4**	**9.18**	**86.65**	**35.38**	**Xylene**

Unlimited/Controlled Potential to Emit (tons/year)										
Process	**PM**	**PM10**	**PM2.5**	**SO2**	**NOx**	**VOC**	**CO**	**Total HAPs**	**Highest Single HAP (Xylene)**	
Plastic Parts Surface Coating Line (EU01)*	2.14	2.29	2.29	0.02	2.65	12.82	2.22	0.08	0.01	Xylene
Plastic Parts Surface Coating Line (EU08)*	16.02	16.41	16.41	0.04	6.79	66.43	5.70	4.39	1.73	Xylene
Plastic Injection Molding (EU02)	0.29	0.29	0.29	0.00	0.00	2.28	0.00	0.56	0.55	Xylene
Natural Gas Heater (EU03)	0.003	0.01	0.01	0.001	0.18	0.01	0.15	0.003	0.003	Hexane
Natural Gas Heater (EU04)	0.020	0.08	0.08	0.01	1.05	0.06	0.88	0.02	0.02	Hexane
Natural Gas Heater (EU05)	0.001	0.005	0.005	0.0004	0.07	0.004	0.06	0.001	0.001	Hexane
Natural Gas Heater (EU06)	0.002	0.01	0.01	0.001	0.10	0.01	0.08	0.002	0.002	Hexane
Natural Gas Heater (EU07)	0.002	0.01	0.01	0.001	0.11	0.01	0.09	0.002	0.002	Hexane
Natural Gas Heater (EU09)	0.03	0.13	0.13	0.01	1.75	0.10	1.47	0.24	0.23	Hexane
Total	**18.48**	**19.10**	**19.10**	**0.07**	**10.93**	**81.61**	**9.18**	**5.06**	**2.29**	**Xylene**

Limited Potential to Emit (tons/year)										
Process	**PM****	**PM10****	**PM2.5****	**SO2**	**NOx**	**VOC*****	**CO**	**Total HAPs**	**Highest Single HAP**	
Plastic Parts Surface Coating Line (EU01)*	2.14	2.29	2.29	0.02	2.65	12.83	2.22	0.64	0.26	Xylene
Plastic Parts Surface Coating Line (EU08)*	16.02	16.41	16.41	0.04	6.79	66.25	5.70	23.00	8.50	Xylene and Toluene (each)
Plastic Injection Molding (EU02)	0.29	0.29	0.29	0.00	0.00	2.28	0.00	0.56	0.55	Xylene
Natural Gas Heater (EU03)	0.003	0.01	0.01	0.001	0.18	0.01	0.15	0.003	0.003	Hexane
Natural Gas Heater (EU04)	0.020	0.08	0.08	0.01	1.05	0.06	0.88	0.02	0.02	Hexane
Natural Gas Heater (EU05)	0.001	0.005	0.005	0.0004	0.07	0.004	0.06	0.001	0.001	Hexane
Natural Gas Heater (EU06)	0.002	0.01	0.01	0.001	0.10	0.01	0.08	0.002	0.002	Hexane
Natural Gas Heater (EU07)	0.002	0.01	0.01	0.001	0.11	0.01	0.09	0.002	0.002	Hexane
Natural Gas Heater (EU09)	0.03	0.13	0.13	0.01	1.75	0.10	1.47	0.24	0.23	Hexane
Total	**18.48**	**19.10**	**19.10**	**0.07**	**10.93**	**81.45**	**9.18**	**24.22**	**9.31**	**Xylene**

*Includes emissions from all equipment associated with the coating line operations (spray coating booth, cure oven and RTO)

**Pursuant to 326 IAC 6-3-2(d) the particulate emissions from the paint booths of the plastic parts surface coating lines (EU01 and EU08) shall be controlled by dry particulate filters, waterwash, or an equivalent control device and the Permittee shall operate the control devices in accordance with the manufacturer's specifications. Compliance with this standard, in conjunction with a conservative assumption of 95% capture and control, shall limit PM, PM10, and PM2.5 emissions from the the paint booths of the plastic parts surface coating lines (EU01 and EU08) to the values shown..

***Source has limited VOC and HAP emissions to render 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70 Permits) not applicable.

Appendix A: Emissions Calculations
Summary of Revision Emissions

Company Name: Greenville Technology, Inc. - Anderson
Source Address: 3511 West 73rd Street, Anderson, IN 46013
FESOP SPR No.: 095-37334-00136
Permit Reviewer: Brian Wright

Unlimited Potential to Emit (tons/year)										
Process	**PM**	**PM10**	**PM2.5**	**SO2**	**NOx**	**VOC**	**CO**	**Total HAPs**	**Single HAP**	
Plastic Parts Surface Coating Line (EU08), including RTO (CE03), Cure Oven, Fresh Air Supply House*	317.92	318.14	318.14	0.04	6.79	1321.5	5.70	85.60	34.57	Xylene
Natural Gas Heater (EU09)	0.03	0.13	0.13	0.01	1.75	0.10	1.47	0.03	0.03	Hexane
Total	**317.96**	**318.28**	**318.28**	**0.05**	**8.54**	**1321.6**	**7.17**	**85.63**	**34.57**	**Xylene**

*Includes emissions from all equipment associated with the coating line operations (spray coating booth, cure oven and RTO)

Appendix A: Emissions Calculations
Surface Coating Operations
Plastic Parts Surface Coating Line EU01

Company Name: Greenville Technology, Inc. - Anderson
Source Address: 3511 West 73rd Street, Anderson, IN 46013
FESOP SPR No.: 095-37334-00136
Permit Reviewer: Brian Wright

PTE of PM/PM10/PM2.5 and VOC

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water and VOC Exempt Solvents	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Coatings															
R-1280 Black	8.04	71.50%	0.0%	71.5%	0.0%	19.60%	8.32	5.75	5.75	47.83	1,147.88	209.49	41.75	29.33	50%
NH-861	7.52	85.90%	0.0%	85.9%	0.0%	9.00%	8.32	6.46	6.46	53.74	1,289.87	235.40	19.32	71.77	50%
									Subtotal	**53.74**	**1,289.87**	**235.40**	**41.75**		
Solvents															
Clean Up Solvent**	7.09	100.00%	42.0%	58.0%	0.0%	0.00%	1.00	4.11	4.11	4.11	98.68	18.01	0.00	NA	100%

Uncontrolled Potential Emissions	**57.86**	**1,388.55**	**253.41**	**41.75**
Control Efficiency of Water Wash Curtain:				**95.00%**
VOC Control Efficiency RTO:	**95.00%**	**95.00%**	**95.00%**	
Controlled Potential Emissions* **	**2.89**	**69.43**	**12.67**	**2.09**
Limited Emisisons** **	**2.93**		**12.83**	**2.09**

Notes
* Per the application the spray coating booths can only operate 18 hours per day (6,570 hours per year) due to the need to clean the booth each day for proper operation. However, IDEM has conservatively assumed the booth can
** Per the MSDS the clean up solvent contains 42% acetone, which is an exempt VOC per 40 CFR 51.1
*** Per the source and manufacturer the RTO will have an overall control efficiency of 95%. IDEM has also conservatively assumed the water wash curtain will achieve an overall control efficiency of 95% for particulate matter emissions.
**** VOC emissions are limited in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable

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/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (gal/hr) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used
Controlled Potential Emissions = Uncontrolled Potential Emissions * (1 - % Control Efficiency)
Limited VOC (lb/hr) = [2,700,000 Flowrate (scfh) * 20 PPMV as Propane * (3 carbons in propane / 5.07 Weighted Average of Carbon in Coating) * 91.67 (As Applied Molecular Weight of NH-861)] / [385.23 * 10^6 (scf/lb-mol)] * 110% (10% Safety Factor)
Limited VOC Emissions (ton/yr) = Limited VOC (lb/hr) * 8760 (hr/yr) * 1 ton/2000 lbs)

PTE of Hazardous Air Pollutants (HAPs)

Material	Density (Lb/Gal)	Maximum (gal/hr)	Weight % Xylene	Weight % Naphthalene	Weight % Hexamethylene Diisocyanate	Potential Xylene (ton/yr)	Potential Naphthalene (ton/yr)	Potential Hexamethylene Diisocyanate (ton/yr)	Total HAPs (ton/yr)
Coatings									
R-1280 Black	8.04	8.32	0.09%	0.20%	0%	0.26	0.59	0	0.59
NH-861	7.52	8.32	0.004%	0%	0.005%	0.01	0	0.01	0.01
					Subtotal	**0.26**	**0.59**	**0.01**	**0.59**
Solvents									
Clean Up Solvent	7.09	1.00	0%	0%	0%	0	0	0	0
				Total Uncontrolled Potential Emissions		**0.26**	**0.59**	**0.01**	**0.59**
					HAP Control Efficiency of RTO:	**95.00%**	**95.00%**	**95.00%**	**95.00%**
					Controlled Potential Emissions	**0.013**	**0.029**	**0.001**	**0.029**

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

Appendix A: Emissions Calculations
VOC and Particulate
Plastic Parts Surface Coating Line EU08

Company Name: Greenville Technology, Inc. - Anderson
Source Address: 3511 West 73rd Street, Anderson, IN 46013
FESOP SPR No.: 095-37334-00136
Permit Reviewer: Brian Wright

EU08

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water & Exempt Solvents	Weight % Non Exempt Organics	Volume % Water & Exempt Solvents	Volume % Non-Volatiles (solids)	Maximum (gallons/hr)	Gal of Mat. (gal/day)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Primer																
Primer Blend	7.88	76.70%	0.0%	76.7%	0.0%	15.30%	12	288.0	6.04	6.04	72.53	1740.66	317.67	38.60	39.50	60%
Base Coat																
Base Coat Blend 1	7.99	63.12%	2.1%	61.1%	2.1%	30.70%	22	528.0	4.98	4.88	107.33	2575.95	470.11	113.58	15.89	60%
Base Coat Blend 2	8.09	60.32%	2.0%	58.3%	2.1%	32.90%	22	528.0	4.82	4.72	103.76	2490.30	454.48	123.73	14.34	60%
Base Coat Blend 3	7.95	62.67%	2.1%	60.6%	2.1%	31.10%	22	528.0	4.92	4.82	105.99	2543.75	464.23	114.39	15.49	60%
Base Coat Blend 4	8.01	58.18%	2.1%	56.1%	2.1%	35.90%	22	528.0	4.59	4.49	98.86	2372.63	433.00	129.11	12.52	60%
Base Coat Blend 5	7.94	67.83%	1.7%	66.1%	2.1%	24.40%	22	528.0	5.36	5.25	115.46	2771.12	505.73	98.45	21.51	60%
Base Coat Blend 6	8.09	51.05%	7.5%	43.6%	2.1%	47.10%	22	528.0	3.60	3.53	77.60	1862.38	339.88	152.64	7.49	60%
Base Coat Blend 7	8.09	56.40%	0.0%	56.4%	0.0%	36.10%	22	528.0	4.56	4.56	100.38	2409.1	439.67	135.95	12.64	60%
Base Coat Blend 8	7.90	63.03%	1.9%	61.1%	1.9%	31.30%	22	528.0	4.92	4.83	106.19	2548.6	465.12	112.57	15.42	60%
Base Coat Blend 9	8.34	64.07%	7.9%	56.2%	7.9%	28.50%	22	528.0	5.09	4.69	103.12	2474.8	451.65	115.50	16.45	60%
								Worst Case Coating PTE			**115.46**	**2771.12**	**505.73**	**152.64**		
Clear Coat																
Clear Coat Blend	8.08	55.30%	0.0%	55.3%	0.0%	39.10%	20	480.0	4.47	4.47	89.36	2144.8	391.42	126.56	11.43	60%
Solvent Cleaning																
Solvent Cleaning	6.74	100.00%	20.0%	80.0%	0.0%	0.00%	5	108.0	5.39	5.39	24.26	582.3	106.28	0.00	0.00	60%

Total Uncontrolled PTE:	**301.62**	**7238.88**	**1321.09**	**317.79**
VOC Control Efficiency RTO:	**95.00%**	**95.00%**	**95.00%**	
PM/PM10/PM2.5 Control Efficiency Scrubber*:				**95.00%**
Total Controlled PTE:	**15.08**	**361.94**	**66.05**	**15.89**
Limited Emisisons**	**15.126**		**66.25**	

* Per the source and manufacturer the RTO will have an overall control efficiency of 95%. IDEM has also conservatively assumed the water wash curtain will achieve an overall control efficiency of 95% for particulate matter emissions.
** VOC emissions are limited in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable

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/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (gal/hr) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used
Controlled Potential Emissions = Uncontrolled Potential Emissions * (1 - % Control Efficiency)
Limited VOC (lb/hr) = [2,700,000 Flowrate (scfh) * 20 PPMV as Propane * (3 carbons in propane / 5.07 Weighted Average of Carbon in Coating) * 91.67 (As Applied Molecular Weight of NH-861)] / [385.23 * 10^6 (scf/lb-mol)] * 110% (10% Safety Factor)
Limited VOC Emissions (ton/yr) = Limited VOC (lb/hr) * 8760 (hr/yr) * 1 ton/2000 lbs)

Appendix A: Emissions Calculations
Hazardous Air Pollutants (HAPs)
Plastic Parts Surface Coating Line EU08

Company Name: Greenville Technology, Inc. - Anderson
Source Address: 3511 West 73rd Street, Anderson, IN 46013
FESOP SPR No.: 095-37334-00136
Permit Reviewer: Brian Wright

EU08

Material	Density (Lb/Gal)	Maximum (gallons/hr)	Weight % Cumene	Weight % Ethyl Benzene	Weight % Methyl Alcohol	Weight % Toluene	Weight % Chloroform	Weight % Xylene	Cumene Emissions (tons/yr)	Ethyl Benzene Emissions (tons/yr)	Methyl Alcohol Emissions (tons/yr)	Toluene Emissions (tons/yr)	Cholorform Emissions (tons/yr)	Xylene Emissions (tons/yr)	Total HAP Emissions (tons/yr)
Primer															
Primer Blend	7.88	12	0.0%	3.1%	0.0%	7.52%	0.06%	3.48%	0.00	13.03	0.18	31.15	0.27	14.41	59.04
Base Coat															
Base Coat Blend 1	7.99	22	0.0%	0.3%	0.1%	0.11%	0.00%	0.35%	0.00	2.08	0.38	0.85	0.00	2.69	6.01
Base Coat Blend 2	8.09	22	0.0%	0.3%	0.1%	0.11%	0.00%	0.37%	0.00	2.18	0.39	0.86	0.00	2.88	6.31
Base Coat Blend 3	7.95	22	0.0%	0.3%	0.1%	0.11%	0.00%	0.37%	0.00	2.14	0.38	0.84	0.00	2.83	6.21
Base Coat Blend 4	8.01	22	0.1%	0.3%	0.0%	0.10%	0.00%	0.41%	0.46	2.08	0.31	0.77	0.00	3.16	6.79
Base Coat Blend 5	7.94	22	0.0%	0.3%	0.0%	0.10%	0.00%	0.42%	0.00	2.07	0.31	0.77	0.00	3.21	6.35
Base Coat Blend 6	8.09	22	0.0%	0.1%	0.0%	0.00%	0.00%	0.01%	0.00	0.47	0.00	0.00	0.00	0.08	0.55
Base Coat Blend 7	8.09	22	0.0%	0.1%	0.0%	0.16%	0.00%	0.57%	0.00	1.09	0.00	1.25	0.00	4.44	6.78
Base Coat Blend 8	7.90	22	0.0%	0.3%	0.0%	0.10%	0.00%	0.45%	0.00	2.21	0.30	0.76	0.00	3.43	6.70
Base Coat Blend 9	8.34	22	0.0%	0.1%	0.0%	0.00%	0.00%	0.01%	0.00	0.80	0.00	0.00	0.00	0.08	0.89
				Worst Case Coating PTE					**0.46**	**2.21**	**0.39**	**1.25**	**0.00**	**4.44**	**6.79**
Clear Coat															
Clear Coat Blend	8.08	20	0.0%	0.5%	0.0%	0.00%	0.00%	2.22%	0.00	3.75	0.00	0.00	0.00	15.71	19.47
Solvent Cleaning															
Solvent Cleaning	6.74	5	0.0%	0.0%	0.0%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Total Uncontrolled PTE:	**0.46**	**18.99**	**0.57**	**32.39**	**0.27**	**34.57**	**85.29**
HAP Control Efficiency of RTO:	**95.00%**	**95.00%**	**95.00%**	**95.00%**	**95.00%**	**95.00%**	**95.00%**
Total Controlled PTE:	**0.02**	**0.95**	**0.03**	**1.62**	**0.01**	**1.73**	**4.26**

	(lbs/hour)	(tons/year)
Each Single HAP Limit*	**1.94**	**8.50**
Total HAP Limit*	**5.25**	**23.00**

* HAP emissions are limited in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable

Methodology:
Potential HAPs Tons per Year = Density (lb/gal) * Gal of Material (gal/hr) * Weight % HAP * (8760 hr/yr) * (1 ton/2000lbs)
Controlled PTE= Uncontrolled PTE (tons/yr) * (1 - Controll Efficiency (%))

Appendix A: Emissions Calculations
Plastic Injection Molding

Company Name: Greenville Technology, Inc. - Anderson
Source Address: 3511 West 73rd Street, Anderson, IN 46013
FESOP SPR No.: 095-37334-00136
Permit Reviewer: Brian Wright

Plastic Injection Molding - Process

Maximum Throughput Per Unit lb/hr	Total Number of Units	Potential Throughput lb/hr
100	22	2200

	Pollutant							
	PM	VOC	Formaldehyde	Acrolein	Acetaldehyde	Propionaldehyde	Acrylic Acid	Total HAPs
Emission Factor in lb/million lb	30.30	104.00	0.74	0.01	0.46	0.05	0.08	
Potential Emission in tons/yr	0.29	1.00	0.007	9.64E-05	0.004	4.82E-04	0.001	0.013

Methodology

Emission factors are from Air & Waste Management Association Journal, Volume 49, Jan 1999, "Development of Emission Factors for Polypropylene Processing", Table 5 for extrusion of controlled rheology homopolymer at melt temp of 400°F.
Potential Throughput (lb/hr) = Maximum Throughput Per Unit (lb/hr) x Total Number of Units
Potential Emission (tons/yr) = Potential Throughput (lb/hr) x Emission Factor (lb/million lb) x 1/1,000,000 x 8,760 (hr/yr) x 1/2,000 (ton/lb)

Plastic Injection Molding - Mold Release

Material	Density (Lb/Gal)	Weight % VOC	Maximum Usage (Gal/Day)	Potential VOC Emissions (ton/yr)	Weight % Xylene	Potential Xylene Emissions (ton/yr)
Non Chlorinated Cleaner	6.7	95.00%	1.00	1.16	45.0%	**0.55**
Biodegradable Mold Cleaner	7.0	100.00%	1.00	**1.28**	0.0%	0.00
Potential Emissions				**1.28**		**0.55**

Methodology

Potential Emissions (ton/yr) = Density (lb/gal) x Maximum Usage (gal/day) x Weight % VOC/Xylene x 365 (day/yr) x 1/2,000 (ton/lb)
Bold = "Worst Case Solvent for each pollutant"

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

Company Name: Greenville Technology, Inc. - Anderson
Source Address: 3511 West 73rd Street, Anderson, IN 46013
FESOP SPR No.: 095-37334-00136
Permit Reviewer: Brian Wright

1. Process Description

	Emission Unit ID	Heat Input Capacity (MMBtu/hr)	New or Existing Unit
Existing	RTO (CE01) - Line EU01	5.24	Existing
	Cure Oven - Line EU01	0.80	Existing
	EU03 Heater	0.40	Existing
	Six (6) 0.4 MMBtu/hr Heaters (EU04)	2.40	Existing
	EU05 Heater	0.15	Existing
	EU06 Heater	0.23	Existing
	EU07 Heater	0.24	Existing
New	RTO (CE03) - Line EU08	7.00	New
	Cure Oven - Line EU08	3.50	New
	Fresh Air Supply - Line EU08	5.00	New
	EU09 Water Heater	4.00	New
	Total	**28.96**	

2. Combustion Emissions - Criteria Pollutants

		Emission Factor (lbs/MMCF)						
NOx Burner Type	**Fuel Heat Value (MMBtu/MMCF)**	**PM***	**PM10***	**direct PM2.5**	**SO_2**	**NOx****	**VOC**	**CO**
Ordinary Burners	1,000	1.9	7.6	7.6	0.6	100	5.5	84.0

* PM emission factor is for filterable PM only. PM10 emission factor is for condensable PM10 and filterable PM combined.
** Emission factors for NOx: Uncontrolled = 100 lbs/MMCF, Low NOx Burners = 50 lbs/MMCF
Emission factors are from AP 42, Chapter 1.4, Tables 1.4-1, and 1.4-2, SCC 1-01-006-02, 1-02-006-02, 1-03-006-02, 1-03-006-03. (7/98)

		Potential To Emit (tons/yr)						
Emission Unit ID	**Potential Throughput (MMCF/yr)**	**PM**	**PM10**	**direct PM2.5**	**SO_2**	**NOx**	**VOC**	**CO**
RTO (CE01) - Line EU01	45.90	0.04	0.17	0.17	0.01	2.30	0.13	1.93
Cure Oven - Line EU01	7.01	0.01	0.03	0.03	0.002	0.35	0.02	0.29
EU03 Heater	3.50	0.003	0.01	0.01	0.001	0.18	0.01	0.15
Six (6) 0.4 MMBtu/hr Heaters (EU04)	21.02	0.02	0.08	0.08	0.01	1.05	0.06	0.88
EU05 Heater	1.31	0.001	0.005	0.005	0.0004	0.07	0.004	0.06
EU06 Heater	1.97	0.002	0.01	0.01	0.001	0.10	0.01	0.08
EU07 Heater	2.10	0.002	0.01	0.01	0.001	0.11	0.01	0.09
RTO (CE03) - Line EU08	61.32	0.06	0.23	0.23	0.02	3.07	0.17	2.58
Cure Oven - Line EU08	30.66	0.03	0.12	0.12	0.01	1.53	0.08	1.29
Fresh Air Supply - Line EU08	43.80	0.04	0.17	0.17	0.01	2.19	0.12	1.84
EU09 Water Heater	35.04	0.03	0.13	0.13	0.01	1.75	0.10	1.47
Total (All Units)	**253.65**	**0.24**	**0.96**	**0.96**	**0.08**	**12.68**	**0.70**	**10.65**
Total (New Units)	**170.82**	**0.16**	**0.65**	**0.65**	**0.05**	**8.54**	**0.47**	**7.17**

Methodology
Maximum Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 (hrs/yr) x 1 MMCF/1,020 MMBtu
Potential To Emit (tons/year) = Throughput (MMCF/yr) x Emission Factor (lbs/MMCF) x 1 ton/2,000 lbs

3. Combustion Emissions - HAP Pollutants

	Emission Factor (lbs/MMCF)									
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Cadmium	Chromium	Manganese	Mercury	Nickel
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	1.1E-03	1.4E-03	3.8E-04	2.6E-04	2.1E-03

	Potential To Emit (tons/yr)									
Emission Unit ID	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Cadmium	Chromium	Manganese	Mercury	Nickel
RTO (CE01) - Line EU01	4.82E-05	2.75E-05	1.72E-03	0.04	7.80E-05	2.52E-05	3.21E-05	8.72E-06	5.97E-06	4.82E-05
Cure Oven - Line EU01	7.36E-06	4.20E-06	2.63E-04	6.31E-03	1.19E-05	3.85E-06	4.91E-06	1.33E-06	9.11E-07	7.36E-06
EU03 Heater	3.68E-06	2.10E-06	1.31E-04	3.15E-03	5.96E-06	1.93E-06	2.45E-06	6.66E-07	4.56E-07	3.68E-06
Six (6) 0.4 MMBtu/hr Heaters (EU04)	2.21E-05	1.26E-05	7.88E-04	0.02	3.57E-05	1.16E-05	1.47E-05	3.99E-06	2.73E-06	2.21E-05
EU05 Heater	1.38E-06	7.88E-07	4.93E-05	1.18E-03	2.23E-06	7.23E-07	9.20E-07	2.50E-07	1.71E-07	1.38E-06
EU06 Heater	2.07E-06	1.18E-06	7.39E-05	1.77E-03	3.35E-06	1.08E-06	1.38E-06	3.74E-07	2.56E-07	2.07E-06
EU07 Heater	2.21E-06	1.26E-06	7.88E-05	1.89E-03	3.57E-06	1.16E-06	1.47E-06	3.99E-07	2.73E-07	2.21E-06
RTO (CE03) - Line EU08	6.44E-05	3.68E-05	2.30E-03	0.06	1.04E-04	3.37E-05	4.29E-05	1.17E-05	7.97E-06	6.44E-05
Cure Oven - Line EU08	3.22E-05	1.84E-05	1.15E-03	0.03	5.21E-05	1.69E-05	2.15E-05	5.83E-06	3.99E-06	3.22E-05
Fresh Air Supply - Line EU08	4.60E-05	2.63E-05	1.64E-03	0.04	7.45E-05	2.41E-05	3.07E-05	8.32E-06	5.69E-06	4.60E-05
EU09 Water Heater	3.68E-05	2.10E-05	1.31E-03	0.03	5.96E-05	1.93E-05	2.45E-05	6.66E-06	4.56E-06	3.68E-05
Total (All Units)	**2.66E-04**	**1.52E-04**	**9.51E-03**	**0.23**	**4.31E-04**	**1.40E-04**	**1.78E-04**	**4.82E-05**	**3.30E-05**	**2.66E-04**

HAP emission factors are from AP 42, Chapter 1.4, Tables 1.4-3 and 1.4-4. (7/98)

	All Units	New Units
Total HAP =	**0.24**	**0.16**
Highest Single HAP =	**0.23**	**0.15**
	Hexane	**Hexane**

Methodology
Potential To Emit (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lbs/MMCF) x 1 ton/2,000 lbs

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) Appendix B
Best Available Control Technology (BACT) Analysis Determination

Technical Support Document (TSD) for a
Registration Transitioning to a Federally Enforceable State Operating Permit (FESOP)

Source Description and Location

Source Name:	Greenville Technology, Inc. - Anderson
Source Location:	3511 West 73rd Street, Anderson, IN 46013
County:	Madison
SIC Code:	3714 (Motor Vehicle Parts and Accessories)
Operation Permit No.:	F095-32281-00136
FESOP SPR No.:	095-37334-00136
Permit Reviewer:	Brian Wright

Background Information

The Office of Air Quality (OAQ) has performed a Best Available Control Technology (BACT) review relating to the operation of a stationary plastic automobile parts manufacturing plant, located at 3511 West 73rd Street, Anderson, IN 46013, owned and operated by Greenville Technology, Inc. - Anderson.

The Office of Air Quality (OAQ) has received an application from Greenville Technology, Inc. - Anderson related to the construction and operation of a new plastic parts surface coating line (EU08). The operation of the plastic parts surface coatingline (EU08) is subject to the requirements of 326 IAC 8-1-6 (VOC BACT), since the potential emissions of volatile organic compounds (VOC) from the surface coating line are greater than twenty-five (25) tons per year, and the line is not otherwise regulated by another provision of 326 IAC 8, 326 IAC 20-48, or 328 IAC 20-56.

Summary of Best Available Control Technology (BACT) Process

BACT is an emission limitation or equipment standard based on the maximum degree of pollution reduction of emissions, which is determined to be achievable on a case-by-case basis. BACT analysis takes into account the energy, environmental, and economic impacts on the source. These reductions may be determined through the application of available control techniques, process design, work practices, and operational limitations.

Federal guidance on BACT requires an evaluation that follows a “top down” process. In this approach, the applicant identifies the best-controlled similar source on the basis of controls required by regulation or permit, or controls achieved in practice. The highest level of control is then evaluated for technical feasibility.

The five (5) basic steps of a top-down BACT analysis used by the Office of Air quality (OAQ) to make BACT determination are listed below:

Step 1: Identify Potential Control Technologies

The first step is to identify potentially “available” control options for each emission unit and for each pollutant under review. Available options should consist of a comprehensive list of those technologies with a potentially practical application to the emissions unit in question. The list should include lowest achievable emission rate (LAER) technologies, innovative technologies, and controls applied to similar source categories.

Step 2: Eliminate Technically Infeasible Options

The second step is to eliminate technically infeasible options from further consideration. To be considered feasible, a technology must be both available and applicable. It is important in this step that any presentation of a technical argument for eliminating a technology from further consideration be clearly documented based on physical, chemical, engineering, and source-specific factors related to safe and successful use of the controls. Innovative control means a control that has not been demonstrated in a commercial application on similar units. Only available and proven control technologies are evaluated. A control technology is considered available when there are sufficient data indicating that the technology results in a reduction in emissions of regulated pollutants.

Step 3: Rank the Remaining Control Technologies by Control Effectiveness

The third step is to rank the technologies not eliminated in Step 2 in order of descending control effectiveness for each pollutant of concern. The ranked alternatives are reviewed in terms of environmental, energy, and economic impacts specific to the proposed modification. If the analysis determines that the evaluated alternative is not appropriate as BACT due to any of the impacts, then the next most effective is evaluated. This process is repeated until a control alternative is chosen as BACT. If the highest ranked technology is proposed as BACT, it is not necessary to perform any further technical or economic evaluation, except for the environmental analyses.

Step 4: Evaluate the Most Effective Controls and Document the Results

The fourth step begins with an evaluation of the remaining technologies under consideration for each pollutant of concern in regards to energy, environmental, and economic impacts for determining a final control technology. The highest ranked alternative is evaluated for environmental, energy and economic impacts specific to the proposed modification. If the analysis determines that the highest ranked control is not appropriate as BACT, due to any of the energy, environmental, and economic impacts, then the next most effective control is evaluated. The evaluation continues until a technology under consideration cannot be eliminated based on adverse energy, environmental, or economic impacts. If the highest ranked technology is proposed as BACT, it is not necessary to perform any further technical, economic or environmental analysis for a pollutant BACT.

Step 5: Select BACT

The most effective option not eliminated in step 4 is BACT.

Volatile Organic Compounds (VOC) BACT - Surface Coating Line

The requirements of 326 IAC 8-1-6 (New Facilities, General Reduction Requirements) applies to facilities located anywhere in the state that are constructed on or after January 1, 1980, which have potential volatile organic compounds (VOC) emissions greater than 25 tons per year, and which are not otherwise regulated by other provisions of 326 IAC 8 rule, and requires the reduction of VOC emissions using Best Available Control Technology (BACT). Operation of the plastic parts surface coating line would result in potential emissions of VOC for the surface coating line (EU08) greater than 25 tons per year.

326 IAC 8-1-6 requires a BACT review to be performed on the following emission unit:

(a) One (1) plastic parts surface coating line, identified as EU08, approved in 2016 for construction, and consisting of the following:

(1) Three (3) paint booths, utilizing HVLP spray guns for application, with a total maximum coating usage of 52 gallons per hour and maximum clean up solvent usage of 5.0 gallons per hour, using a regenerative thermal oxidizer for VOC control and Venturi scrubber for particulate control, and exhausting to stack EP02;

(2) One (1) flash off tunnel;

(3) One (1) regenerative thermal oxidizer (RTO), with a maximum heat input capacity of 6.20 MMBtu/hr; and

(5) One (1) natural gas-fired cure oven, with a maximum heat input capacity of 2.0 MMBtu per hour.

Note: The paint booth, flash off tunnel, and natural gas-fired cure oven are contained within a permanent total enclosure, and exhausting to one (1) stack, identified as EP02;

Emission Calculations

See Appendix A – Emission Calculations – of this TSD for detailed Potential to Emit (PTE) calculations.

The uncontrolled PTE of VOC from the plastic parts surface coating line (EU08) is summarized in Table 1 below:

Table 1. Uncontrolled PTE of VOC (tons/year)

Emission Unit	Uncontrolled PTE (tons/yr)
Paint Booths	1321.09
RTO	0.15
Cure Oven	0.05
Total Uncontrolled PTE (tons/yr)	**1321.29**

VOC BACT Analysis

Step 1 – Identify All Potentially Available Control Options

The following control technologies were evaluated in regards to controlling VOC emissions from the plastic parts surface coating line (EU08):

(a) Regenerative Thermal Oxidizer (RTO)

Thermal oxidation is the process of oxidizing VOC in a waste gas stream by raising the temperature above the VOC's autoignition point in the presence of oxygen for sufficient time to completely oxidize the organic contaminants to carbon dioxide and water. The residence time, temperature, flow velocity and mixing, and the oxygen concentration in the combustion chamber affect the oxidation rate and destruction efficiency. Thermal oxidizers operating costs are relatively high, since they typically require combustion of an auxiliary fuel (e.g., natural gas) to maintain combustion chamber temperature high enough to completely oxidize the contaminant gases. In general, thermal oxidizers are less efficient at treating waste gas streams with highly variable flowrates, since the variable flowrate results in varying residence times, combustion chamber temperature, and poor mixing. In addition, thermal oxidizers are also not generally cost-effective for low-concentration, high-flow organic vapor streams.

Thermal oxidizers can achieve 95-99.99+% VOC control efficiency and can be used over a wide range of organic vapor concentrations, but perform best at inlet concentrations of around 1,500-3,000 ppmv. Thermal oxidizers are typically designed to have a residence time of 0.3 to 1.0 second and combustion chamber temperatures between 1,200 and 2,000°F. In order to meet 98% or greater control or a 20 parts per million by volume (ppmv) compound exit concentration of non-halogenated organics, thermal oxidizers should typically be operated at a residence time of at least 0.75 seconds, a combustion chamber temperature of at least 1600°F, and with proper mixing. While thermal oxidation provides efficient VOC control, other pollutants such as nitrogen oxides and carbon monoxide are formed from the combustion process.

A regenerative thermal oxidizer typically consists of a set of 2 or 3 packed ceramic beds that are used to recover heat from hot combustion gases that are generated during combustion of the VOC gas stream and auxiliary fuel, resulting in improved oxidizer efficiency and reduced auxiliary fuel usage. An "inlet" bed is used to pre-heat the untreated VOC gas stream, an "outlet" bed is used to recover heat from the treated gas stream, and one bed is in a purge cycle. The purge cycle is needed to prevent emission spikes each time the gas flow is redirected. The oxidizer is

operated on a rotating schedule, where the gas flow through the ceramic beds is redirected periodically using a set of gas flow dampers. Once the heat energy of the "inlet" ceramic bed has been depleted, the flow through the system is redirected so that the untreated VOC gas stream entering the oxidizer is directed through the previously heated "outlet" ceramic bed. Regenerative thermal oxidizers have much higher heat recovery efficiencies than recuperative thermal oxidizers, recovering 85 to 95% of the heat from the treated gas stream, and therefore have lower auxiliary fuel requirements. However, compared to direct flame and recuperative thermal oxidizers, regenerative thermal oxidizers typically have higher capital (equipment and installation) costs, are larger and heavier, and have higher maintenance costs.

(b) Carbon Adsorption

Carbon adsorption is a process where VOCs are removed from a waste gas stream when it is passed through a bed containing activated carbon particles, which have a highly porous structure with a large surface-to-volume ratio. Carbon adsorption systems usually operate in two phases: adsorption and desorption. During adsorption, the majority of the VOC molecules migrate from the gas stream to the surface of the activated carbon (through the activated carbon pores) where it is lightly held to the surface by weak intermolecular forces known as van der Waals' forces. As the activated carbon bed approaches saturation with VOC, its control efficiency drops, and the bed must be taken offline to be replaced or regenerated. Typically, two activated carbon beds are utilized on a rotating schedule, where a second bed (containing fresh or previously regenerated activated carbon) is brought online to continue controlling the VOC gas stream while the first bed is being replaced or regenerated. In regenerative systems, most VOC gases can be desorbed and removed from the activated carbon bed by heating the bed to a sufficiently high temperature, usually via steam or hot air, or by reducing the pressure within the bed to a sufficiently low value (vacuum desorption). The regenerated activated carbon can be reused and the VOCs that are removed from the bed can be reclaimed or destroyed.

Carbon adsorber size and purchase cost depend primarily on the gas stream volumetric flow rate, temperature, pressure, VOC composition, VOC mass loading, and moisture and particulate contents. The adsorptive capacity of an activated carbon bed for a VOC gas tends to increase with the VOC gas phase concentration, molecular weight, diffusivity, polarity, and boiling point. Carbon adsorption systems can be used for VOC gas concentrations from less than 10 ppm to approximately 10,000 ppm. Carbon adsorption systems (in general) are usually limited to waste gas streams with VOC compounds having a molecular weight of more than 50 and less than approximately 200 lb/lb-mole, since low molecular weight organics usually do not adsorb sufficiently and high molecular weight compounds are difficult to desorb and remove during the desorption cycle. Industrial applications of adsorption systems include control for dry cleaning, degreasing, paint spraying, solvent extraction, metal foil coating, paper coating, plastic film coating, printing, pharmaceuticals, rubber, linoleum, and transparent wrapping.

Carbon adsorption systems can achieve 95-99% VOC control efficiency. Carbon adsorption system control efficiency increases with reduced VOC gas stream temperatures. Therefore, high temperature VOC gas streams are typically cooled prior to entry into the activated carbon bed. Particulate matter and high moisture concentrations present in the gas stream compete with the VOC for pore space within the activated carbon and thereby reduce the VOC adsorptive capacity and control efficiency of the carbon adsorption systems. In addition, particulate matter and moisture can become entrained within the carbon bed, causing operating problems such as increased pressure drop across the bed.

(c) Recuperative and Regenerative Catalytic Oxidation

Catalytic incinerators are add-on control devices used to control VOC emissions by using a bed of catalyst that facilitates the oxidation of the combustible gases. The catalyst increases the reaction rate and allows the conversion of VOC at lower temperatures than thermal incinerators. Catalytic oxidation can be used for low-concentration VOC waste streams; however, certain compounds present in waste stream gas may foul the catalyst. It may also be necessary to remove particulate prior to catalytic oxidation as well.

(d) Zeolite VOC Concentrator
Zeolite VOC concentrators are not control devices in and of themselves. Instead, these devices concentrate VOC in high volume, low concentration streams prior to directing them to a control device, thereby reducing capital and operating costs associated with the control device. Concentrators use temperature swing adsorption where the VOCs are adsorbed from the high volume stream onto the concentrator media (e.g., zeolite) at close to ambient temperatures. The VOC are then desorbed from the media to a low volume air stream at high temperatures. This low volume, concentrated stream is then directed to the final control device.

Review of U.S. EPA RACT/BACT/LAER Clearinghouse (RBLC) Database
The U.S. EPA RACT/BACT/LAER Clearinghouse (RBLC) database was reviewed to identify control requirements and limitations for facilities that coat plastic parts. Table 2 below contains a brief summary of search results obtained from the U.S. EPA RACT/BACT/LAER Clearinghouse (RBLC) database for processes similar to the plastic parts surface coating line (EU08) at this source. The RBLC search included determinations between January 2001 and August 2016.

Table 2. RBLC Database Search

Plant	RBLC ID or Permit #	Date Issued and State	Facility	BACT Determination
Greenville Technology, Inc. - Anderson	095-37334-00136	Proposed IN	Plastice Parts Surface Coating Line (EU08)	(a) The VOC capture efficiency for the regenerative thermal oxidizer (CE03) shall be no less than 100% and the VOC destruction efficiency for the regenerative thermal oxidizer (CE03) shall be at least 95%; or (b) The VOC capture efficiency for the regenerative thermal oxidizer (CE03) shall be no less than 100% and the VOC outlet concentration shall not exceed 10 ppmv. (c) The VOC emissions from the plastic parts surface coating line (EU08), shall not exceed 15.126 pounds per hour. No cost analysis necessary, since the source chose to use a RTO, which was the most stringent BACT requirement) (BACT-State).
Ashley Industrial Molding, Inc.	113-34068-00092	05/14/2014 IN	Plastic Parts Surface Coating Line	(a) VOC delivered to the applicators including cleanup solvents shall be limited to 154.25 tons per twelve consecutive month period; (b) Wipe application in the tack wipe booth; (c) Use of HVLP or electrostatic spray applicators in prime and topcoat booths; (d) VOC content limit of 4.0 lbs/gal of primer and topcoat; (e) Good management and work practices Add on control not cost effective ($15,663.14/ton of VOC removed) (BACT-State)

Table 2. RBLC Database Search				
Plant	**RBLC ID or Permit #**	**Date Issued and State**	**Facility**	**BACT Determination**
Ashley Industrial Molding, Inc.	033-32518-00017	06/11/2013 IN	High-Pressure Fiberglass Reinforced Plastic Parts Surface Coating Line	(a) VOC delivered to the applicators including cleanup solvents shall be limited to 207 tons per twelve consecutive month period; (b) Use of HVLP or electrostatic spray applicators; (c) VOC content limit of 4.0 lbs/gal of primer and top coat; (d) Good management and work practices; Add on control not cost effective ($11,317.90/ton of VOC removed) (BACT-State)
Greenville Technology, Inc. - Anderson	095-32281-00136	01/03/2013 IN	Plastic Parts Surface Coating Line	Regenerative Thermal Oxidizer with Permanent Total Enclosure 95% overall control efficiency or VOC outlet concentration less than 12 ppmv as VOC No cost analysis since the source chose to use a RTO, which was the most stringent BACT requirement) (BACT-State)
Creative Coatings	113-29007-00017	07/06/2010 IN	Paint Line 2	VOC input limited to less than 249 tpy; Use of HVLP spray guns, electrostatic spray guns, and electrostatic rotary atomizers for spray coating operations; Good work practices to minimize leaks, spills, and evaporative losses; A maximum organic solvent content of 5.9 pounds per gallon of coating, less water; Add on control not cost effective ($7,100/ton of VOC removed) (BACT-State)
Heartland Automotive, LLC	133-15489-00027	06/11/2002 IN	Plastic Automotive Parts Surface Coating Booths	The total VOC delivered to the applicators, including coatings, dilution and cleaning solvents shall be limited to less than 49.0 tpy; Use of HVLP or equivalent for spray coating; Good management and work practices; Add on control not cost effective ($5,258/ton of VOC removed) (BACT - State)
Magna Composites LLC - SMC	003-5942-00059	03/26/2002 IN	High Pressure Fiberglass Reinforced-Thermoset Spray Booths	The VOC input delivered to the applicators including cleanup solvents shall be limited to less than 66 tpy; Use electrostatic applicators and low (25-40%) and medium (41-50%) solid content coatings; Management and work practices; Add on control not cost effective ($10,838/ton of VOC removed) (BACT-State)

Table 2. RBLC Database Search				
Plant	**RBLC ID or Permit #**	**Date Issued and State**	**Facility**	**BACT Determination**
Venture Industries, Inc.	MI-0260	01/17/2001 MI	Painting Plastic Automotive Parts	Permanent Total Enclosure, Carbon Concentrators, and Regenerative Thermal Oxidizer 95% overall control efficiency; VOC emission limits: 2,500 lb/day and 228.30 tpy; Cost Effectiveness $4,000/ton of VOC removed (BACT - State)

Based on the summary table above, RBLC facilities were found that conduct surface coating of plastic parts including facilities that coat plastic vehicle parts. These facilities utilized VOC input limits, work practices, or destruction through RTO in order to reduce VOC emissions.

Step 2 − Eliminate Technically Infeasible Control Options

A control technology must either be successfully demonstrated on a unit, or if not demonstrated, then be "available and applicable", to be considered technically feasible. A technology is considered "available" if it can be obtained by the applicant through commercial channels. An available technology is considered "applicable" if it can reasonably be installed and operated on the unit in question. Table 3 below summarizes whether the control technologies identified in Step 1 are technically feasible, with explanations provided after the table.

Table 3. Emission Control Feasibility Determination	
Control Technology	**Technically Feasible?**
Regenerative Thermal Oxidizer (RTO)	Yes
Carbon Adsorption	Yes
Recuperative and Regenerative Catalytic Oxidation	Yes
Zeolite VOC Concentrator	No

The feasibility of each of the potentially applicable control options identified is reviewed below.

(a) Regenerative Thermal Oxidizer (RTO)
Regenerative thermal oxidizer (RTO) is considered a technically-feasible control option for controlling VOC emissions from this plastic parts surface coating line (EU08). Based on the RBCL review described under Step 1 above, regenerative thermal oxidizers have been used at plastic parts surface coating operations to control VOC.

Regenerative thermal oxidizers can typically achieve VOC control efficiencies of approximately 95 to 98% on a continuous basis.

(b) Carbon Adsorption
Carbon adsorption is considered a technically-feasible option for controlling VOC emissions from this plastic parts surface coating line (EU08). Based on the RBCL review described under Step 1 above, carbon adsorption has been used at plastic parts surface coating operations to control VOC.

Carbon adsorption can typically achieve VOC control efficiencies of approximately 95% on a continuous basis.

(c) Recuperative and Regenerative Catalytic Oxidation
Carbon adsorption is considered a technically-feasible option for controlling VOC emissions from this plastic parts surface coating line (EU08). Based on the RBCL review described under Step 1 above, no existing applications of carbon adsorption were found for controlling VOC emissions from the coating of plastic parts.

Carbon adsorption can typically achieve VOC control efficiencies of approximately 95% on a continuous basis.

(d) Zeolite VOC Concentrator
The use of a zeolite VOC concentrator is not considered a technically-feasible option for controlling VOC emissions from this plastic parts surface coating line (EU08). Zeolite concentrators do not operate efficiently if the waste gas temperature is greater than 120 degrees Fahrenheit. Therefore, heat from the cure oven may result in a lower efficiency for the concentrator.

Step 3 – Rank Remaining Control Technologies by Control Effectiveness

The remaining technically feasible options for controlling VOC emissions from this plastic parts surface coating line (EU08) are listed in Table 4 below in descending order by control effectiveness:

Table 4. Control Effectiveness for Technically Feasible Control Options

Control Technology	Control Efficiency (%)
Regenerative Thermal Oxidizer (RTO)	95%
Carbon Adsorption	95%
Catalytic Oxidation	95%

IDEM is aware that that the above control technologies may be able to periodically achieve control efficiencies higher than indicated in the table above under certain operating conditions. However, BACT must be achievable on a consistent basis under normal operational conditions. BACT limitations do not necessarily reflect the highest possible control efficiency achievable by the technology on which the emission limitation is based. The permitting authority has the discretion to base the emission limitation on a control efficiency that is somewhat lower than the optimal level. There are several reasons why the permitting authority might choose to do this. One reason is that the control efficiency achievable through the use of the technology may fluctuate, so that it would not always achieve its optimal control efficiency. In that case, setting the emission limitation to reflect the highest control efficiency would make violations of the permit unavoidable. To account for this possibility, a permitting authority must be allowed a certain degree of discretion to set the emission limitation at a level that does not necessarily reflect the highest possible control efficiency, but will allow the Permittee to achieve compliance consistently.

Step 4 – Evaluate the Most Effective Controls and Document the Results

Greenville Technology, Inc. - Anderson has proposed as BACT to install a regenerative thermal oxidizer (RTO) to control VOC emissions from the plastic parts surface coating line (EU08). Each of the technically feasible control options (an RTO, a carbon adsorption unit, and a catalytic oxidizer) is considered the highest ranked technology proposed as BACT. A cost analysis conducted by Greenville Technology, Inc. (appendix C) found that the RTO is a cost effective with a cost of $362 per ton of VOC controlled. Therefore, controlling VOC emissions from the plastic parts surface coating line (EU08) with a regenerative thermal oxidizer (RTO) is considered BACT and it is not necessary to perform any further technical, economic or environmental analysis for a pollutant BACT.

Step 5 – Select BACT

Greenville Technology, Inc. - Anderson has proposed as BACT to install a regenerative thermal oxidizer to control VOC emissions from the plastic parts surface coating line (EU08). Upon evaluation of the BACT proposed by Greenville Technology, Inc. - Anderson, IDEM, OAQ has determined that the following requirements represent BACT for this surface coating line:

Pursuant to 326 IAC 8-1-6 (New Facilities, General Reduction Requirements), the Permittee shall control VOC emissions from the plastic parts surface coating line (EU08) using the Best Available Control Technology (BACT), which has been determined to be the following:

(a) The VOC emissions from the plastic parts surface coating line (EU08) shall be controlled by regenerative thermal oxidizer (CE03) at all times that the surface coating line is in operation.

(b) The Permittee shall comply with the following:

(1) The VOC capture efficiency for the regenerative thermal oxidizer (CE03) shall be no less than 100% and the VOC destruction efficiency for the regenerative thermal oxidizer (CE03) shall be at least 95%; or

(2) The VOC capture efficiency for the regenerative thermal oxidizer (CE03) shall be no less than 100% and the VOC outlet concentration shall not exceed 10 ppmv.

(c) The VOC emissions (including after control emissions and uncaptured emissions) from the regenerative thermal oxidizer (CE03), which is used to control the emissions from the paint booth, flash off tunnel, and natural gas-fired cure oven of the plastic parts surface coating line (EU08), shall not exceed 15.126 pounds per hour.

Compliance with the above shall satisfy the requirements of 326 IAC 8-1-6 (New Facilities, General Reduction Requirements) for the plastic parts surface coating line (EU08).

IDEM Contact

(a) Questions regarding this BACT Analysis can be directed to Brian Wright at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-6544 or toll free at 1-800-451-6027 extension 4-6544.

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

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

Indiana Department of Environmental Management
Office of Air Quality

Appendix C
Best Available Control Technology (BACT) Analysis
(4 Pages, including this cover page)

Technical Support Document (TSD) for a
Registration Transitioning to a Federally Enforceable State Operating Permit (FESOP)

Company Name:	**Greenville Technology, Inc. - Anderson**
Source Address:	**3511 West 73rd Street, Anderson, IN 46013**
FESOP Significant Permit Revision (SPR) No.:	**095-37334-00136**
Reviewer:	**Brian Wright**

Greenville Technology, Inc. - Anderson 19-Sep-16
Control of VOCs from Plasitics Coating Line

SCENARIO DESCRIPTION:
40,000 cfm RTO @ 95% destrction efficiency contolling coating booth, flash-off and cure oven.

CAPITAL RECOVERY TERM YEARS	10		**INTEREST RATE (%)**	8
ITEM	**REFERENCE**	**COST FACTOR**	**MULTIPLIER**	**COST**
CAPITAL COSTS				
PURCHASE	DURR	RTO	**	$1,056,185
AUXILARY EQUIPMENT & INCREASED FLOOR SPACE	DURR	Ductwork	**	$ 50,000
			TOTAL EQUIPMENT COSTS	$ 1,106,185
INSTRUMENTS & CONTROLS	OAQPS	0.10	1.00	$ 110,619
TAXES	OAQPS	0.03	0.00	$ -
FREIGHT	OAQPS	0.05	1.00	$ 55,309
			BASE PRICE	$ 1,272,113
DIRECT INSTALLATION COSTS				
FOUNDATIONS/SUPPORTS	OAQPS	0.08	1.00	$ 101,769
ERECTION/HANDLING	OAQPS	0.14	1.00	$ 178,096
ELECTRICAL	OAQPS	0.04	1.00	$ 50,885
PIPING	OAQPS	0.02	1.00	$ 25,442
INSULATION	OAQPS	0.01	1.00	$ 12,721
PAINTING	OAQPS	0.01	1.00	$ 12,721
		TOTAL DIRECT INSTALLATION COSTS		$ 381,634
			TOTAL DIRECT COSTS	$ 1,653,747
INDIRECT INSTALLATION COSTS				
ENGINEERING/SUPERVISION	OAQPS	0.10	1.00	$ 127,211
CONSTRUCTION/FIELD EXPENSES	OAQPS	0.05	1.00	$ 63,606
CONSTRUCTION FEE	OAQPS	0.10	1.00	$ 127,211
START-UP	OAQPS	0.02	1.00	$ 25,442
PERFORMANCE TEST	EHS	0.01	1.00	$ 12,000
CONTINGENCIES	OAQPS	0.03	1.00	$ 38,163
		TOTAL INDIRECT INSTALLATION COSTS		$ 393,634
			TOTAL CAPITAL COSTS	**$ 2,047,380**
ANNUALIZED COSTS				
DIRECT OPERATING COSTS				
OPERATING LABOR		per Man/Hour	Hours/Year	
OPERATOR	OAQPS	$ 12.95	546	$ 7,071
SUPERVISOR 15% of Operator	OAQPS	15%		$ 1,061
OPERATING MATERIALS		AS REQUIRED	**	$ -
MAINTENANCE				
LABOR	OAQPS	$ 14.26	546	$ 7,786
MATERIALS 100% of Labor	OAQPS	100%		$ 7,786
UTILITIES				
ELECTRICITY	OAQPS	$0.059/KWH		$90,539
NATURAL GAS	OAQPS	$3.30/1000 CU. FT.		($56,701)
			TOTAL DIRECT OPERATING COSTS	$ 57,541
INDIRECT OPERATING COSTS (FIXED COSTS)				
OVERHEAD 60% of Labor	OAQPS	60%		$ 9,550
PROPERTY TAX 1% of Capital	OAQPS	1%		$ 20,474
INSURANCE 1% of Capital	OAQPS	1%		$ 20,474
ADMINISTRATION 2% of Capital	OAQPS	2%		$ 40,948
CAPITAL RECOVERY COSTS	OAQPS	0.14903		$ 305,120
			TOTAL INDIRECT OPERATING COSTS	$ 396,566
			TOTAL ANNUALIZED COSTS	**$454,107**
			TOTAL OC REMOVED (TPY)	**1,255.04**
COST EFFECTIVENESS				
= $ per ton of pollutant removed			***COST EFFECTIVENESS***	***$362***

Greenville Technology, Inc. - Anderson 19-Sep-16
Control of VOCs from Plasitics Coating Line

SCENARIO DESCRIPTION:
40,000 cfm RTO @ 95% destrction efficiency contolling coating booth, flash-off and cure oven.

Calculations to estimate the energy costs associated with the operation of pollution control equipment.

Natural Gas Consumption and Fuel Costs

BTU's/hr = ACFM * 1.08 * delta T	**INPUT**	
Estimated ACFM	40,000	
Ambient Gas Temp degrees F	100	
Incineration Temp degrees F	1550	
Gross BTU Requirement		62,640,000
Estimated Energy Recovery %	95%	regenerative
Net BTU Requirement		3,132,000
TOC Input [lbs/hr]	282.97	
TOC BTU/ Lb estimated	18000	
Fuel Requirement		(1,961,425)
Fuel Cost per MM BTU	$3.30	
Annual Hours of Operation	8760	
Fuel Cost Per Year		*($56,701)*

Electrial Consumption and Energy Costs

Fan Horsepower = [CFM*TotalPressure] / [Fan Efficiency*6356]

System CFM		40,000
System Total Pressure [Wg]	25	
Fan Efficiency	67%	
Operating HP		235

Energy [KWh] = HP * .746 * Hrs of operation

Electric $/KW Hr	$0.06	
Electrical Cost/Yr		*$90,539*

CAPTURE	100%	
CONTROL FACTOR	95%	
UNCONTROLLED EMISSIONS [LBS/YR	2,478,800.00	
CAPTURED EMISSIONS [LBS/YR]		2,478,800.00
CAPTURED EMISSIONS [TPY]	1,239.40	
CONTROLLED EMISSIONS [TPY]		*1,177.43*

Greenville Technology, Inc. - Anderson
Emission Calculations

Source	Max Coating Usage Rate (gal/hr)	Max VOC Content of Coating (lb VOC/gal)*	Max Hrly VOC (lbs/hr)	Max Annual VOC (TPY)1
Coating Line	54		282.97	1,239.40

[1] Annual TPY does not match value on VOC Summary spreadsheet due to the recovery of VOC through recycling the purge solvent.

Indiana Department of Environmental Management
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

September 19, 2016

Mr. Les Siegler
Greenville Technology, Inc. - Anderson
5755 State Route 571 East
Greenville, OH 45331

Re: Public Notice
Greenville Technology, Inc. - Anderson
Permit Level: Federally Enforceable State Operating Permit (FESOP) Significant Permit Revision
Permit Number: 095-37334-00136

Dear Mr. Siegler:

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

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Herald Bulletin in Anderson, Indiana publish the abbreviated version of the public notice no later than September 22, 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 Anderson Public Library, 111 East 12th Street in Anderson, 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 Brian Wright, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-6544 or dial (317) 234-6544.

Sincerely,

Vivian Haun

Vivian Haun
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 2/17/2016

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

September 19, 2016

Herald Bulletin
1133 Jackson Street
Anderson, IN 46016

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Greenville Technology, Inc. - Anderson, Madison, 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 22, 2016.

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

To ensure proper payment, please reference account # 100174737.

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

Sincerely,

Vivian Haun

Vivian Haun
Permit Branch
Office of Air Quality

Permit Level: Federally Enforceable State Operating Permit (FESOP)
Significant Permit Revision
Permit Number: 095-37334-00136

Enclosure
PN Newspaper.dot 8/27/2015

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

September 19, 2016

To: Anderson Public Library

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

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

Applicant Name: Greenville Technology, Inc. - Anderson
Permit Number: 095-37334-00136

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

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

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

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

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

Enclosures
PN Library.dot 2/16/2016

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

Notice of Public Comment

September 19, 2016
Greenville Technology, Inc. - Anderson
095-37334-00136

Dear Concerned Citizen(s):

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

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

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

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

Enclosure
PN AAA Cover.dot 2/17/2016

Mail Code 61-53

IDEM Staff	VHAUN 9/19/2016 Greenville Technology, Inc. - Anderson 095-37334-00136 DRAFT		
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