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

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

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

for Heartland Automotive, LLC in Putnam County

Significant Source Modification No.: 133-40321-00027
Significant Permit Modification No.: 133-40358-00027

The Indiana Department of Environmental Management (IDEM) has received an application from Heartland Automotive, LLC, located at 300 South Warren Drive, Greencastle, Indiana 46135, for a significant modification of its Part 70 Operating Permit issued on February 22, 2017. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow Heartland Automotive, LLC to make certain changes at its existing source. Heartland Automotive, LLC has applied to construct two (2) new adhesive application booths and modify two (2) existing surface coating booths.

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

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

Putnam County Public Library
103 East Poplar Street
Greencastle, IN 46135

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

A copy of the preliminary findings is also available via IDEM's Virtual File Cabinet (VFC.) Please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

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 SSM 133-40321-00027 and SPM 133-40358-00027 in all correspondence.

Comments should be sent to:

Sarah Green
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Sarah Green or (317) 232-8423
Or dial directly: (317) 232-8423
Fax: (317) 232-6749 attn: Sarah Green
E-mail: SGreen@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 Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.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 Sarah Green of my staff at the above address.

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

DRAFT

Brett Towne
Heartland Automotive, LLC
300 South Warren Drive
Greencastle, IN 46135

Re: 133-40358-00027
Significant Permit Modification

Dear Mr. Towne:

Heartland Automotive, LLC was issued Part 70 Operating Permit Renewal No. T133-37557-00027 on February 22, 2017 for a stationary plastic automotive parts surface coating source located at 300 South Warren Drive, Greencastle, Indiana 46135. An application requesting changes to this permit was received on August 14, 2018. Pursuant to the provisions of 326 IAC 2-7-12, a Significant Permit Modification to this permit is hereby approved as described in the attached Technical Support Document.

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

Attachment A: 40 CFR 63, Subpart PPPP, NESHAP for Surface Coating of Plastic Parts and Products
Attachment B: 40 CFR 63, Subpart ZZZZ, NESHAP for Stationary Reciprocating Internal Combustion Engines
Attachment C: 40 CFR 60, Subpart JJJJ, NSPS for Stationary Spark Ignition Internal Combustion Engines

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

Previously issued approvals for this source are also available via IDEM's Virtual File Cabinet (VFC.) Please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

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

A copy of the permit is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/. A copy of the permit is also available via IDEM's Virtual File Cabinet (VFC.) Please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

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

DRAFT

If you have any questions regarding this matter, please contact Sarah Green, 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) 232-8423 or (800) 451-6027, and ask for Sarah Green or (317) 232-8423.

Sincerely,

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Modified Permit and Technical Support Document

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

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DRAFT

Part 70 Operating Permit Renewal
OFFICE OF AIR QUALITY

Heartland Automotive, LLC
300 South Warren Drive
Greencastle, Indiana 46135

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

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

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

Operation Permit No.: T133-37557-00027 Master Agency Interest ID.: 14256	
Issued by: Original signed by: Iryn Calilung, Section Chief Permits Branch, Office of Air Quality	Issuance Date: February 22, 2017 Expiration Date: February 22, 2022

Significant Permit Modification No. 133-39790-00027, issued on November 1, 2018.

Significant Permit Modification No.: 133-40358-00027	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	 Issuance Date: Expiration Date: February 22, 2022

TABLE OF CONTENTS

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary plastic automotive parts surface coating source.

Source Address:	300 South Warren Drive, Greencastle, Indiana 46135
General Source Phone Number:	765-848-1775
SIC Code:	3089 (Plastic Products, Not Elsewhere Classified) 3999 (Manufacturing Industries, Not Elsewhere Classified)
County Location:	Putnam
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

(a) One (1) headliner assembly area, constructed in 1989 and modified in 1999, consisting of four (4) headliner booths, identified as HL-1 through HL-4:

(1) HL-1, HL-2 and HL-4 use both roll on and spray water-based adhesive coating, each with a maximum capacity of 35 plastic headliners per hour, equipped with dry filters for particulate control, exhausting to Stack C2 (HL-1 and HL-4) and Stack C3 (HL-2) consisting of three (3) processes:

(A) rolled on urethane resin (solids) adhesive,
(B) sprayed on non-VOC water-based catalyst, and
(C) vacuum forming (VF).

The area also has an edge folding machine (EF), originally installed in May 1989 that is currently unused.

(2) Booth HL-3 is a hot-glue operation that has no emissions.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(b) One (1) surface coating booth, identified as SB-1, installed in 1999 and approved in 2018 for modification, with a maximum capacity of 62.5 plastic automotive parts per hour, using manual HVLP spray applicators, equipped with dry filters for particulate control and exhausting to Stack SB-1.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(c) One (1) surface coating booth, identified as SB-2, installed in 1999 and approved in 2018 for modification, with a maximum capacity of 62.5 plastic automotive parts per hour, using manual HVLP spray applicators, equipped with dry filters for particulate control and exhausting to Stack SB-2.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(d) One (1) natural gas-fired drying oven, identified as D-1, installed in 1999, used for both surface coating booths SB-1 and SB-2, exhausting to Stack D-1, rated at 1 million British thermal units per hour.

(e) One (1) adhesive application booth, identified as AB-1, installed in 2000, equipped with dry filters for particulate control and exhausting to Stack C-4.

This booth is used for either of the following processes:

(1) Service (obsolete) door panel assembly and vacuum forming (VF) service booth, with a maximum capacity of 48 special order plastic automotive door panel parts per hour, using manual HVLP spray applicators, and

(2) Touch-up booth (TB), with a maximum capacity of 13.89 plastic automotive door panel parts per hour, using HVLP spray applicators.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(f) One (1) adhesive application booth, identified as AB-2, installed in 2012, with a maximum capacity of 224 plastic automotive door panel parts (or 56 sets of 4 door panels per car) per hour, using robotic HVLP spray applicators, equipped with dry filters for particulate control and exhausting to Stack C-4.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(g) One (1) adhesive application booth, identified as AB-3, installed in 2012, with a maximum capacity of 224 plastic automotive door panel parts (or 56 sets of 4 door panels per car) per hour, using robotic HVLP spray applicators, equipped with dry filters for particulate control and exhausting to Stack C-4.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(h) One (1) adhesive application booth, identified as AB-4, installed in 2012, with a maximum capacity of 224 plastic automotive door panel parts (or 56 sets of 4 door panels per car) per hour, using robotic HVLP spray applicators, equipped with dry filters for particulate control and exhausting to Stack C-4.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(i) One (1) adhesive application booth, identified as AB-5, approved in 2018 for construction, with a maximum capacity of 60 plastic automotive dash panel parts per hour, using robotic HVLP spray applicators, equipped with dry filters for particulate control, and exhausting to Stack C-5.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(j) One (1) adhesive application booth, identified as AB-6, approved in 2018 for construction, with a maximum capacity of 60 plastic automotive dash panel parts per hour, using

robotic HVLP spray applicators, equipped with dry filters for particulate control, and exhausting to Stack C-5.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(k) One (1) surface coating line, identified as SCL, constructed in 2002, with a maximum capacity of 70 plastic vehicle parts per hour, using robotic HVLP spray applicators, equipped with a water curtain with baffles for particulate control, and exhausting to Stacks S-4 through S-7.

This line consists of three (3) spray booths in series and combustion as follows:

(1) One (1) Prime Booth,
(2) One (1) Color Base Booth,
(3) One (1) Clear Coat Booth,
(4) One (1) natural gas-fired bake oven, identified as S-12, rated at 3.5 million British thermal units per hour, exhausting to Stack S-12,
(5) One (1) natural gas-fired bake oven afterburner/oxidizer, identified as S-13, rated at 2.5 million British thermal units per hour, exhausting to Stack S-13, and
(6) One (1) natural gas-fired dry off oven, identified as S-15, rated at 0.5 million British thermal units per hour, exhausting to Stack S-15.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(l) One (1) surface coating booth, identified as MAP-1, constructed in 2004, with a maximum capacity of 34 plastic parts per hour, using robotic HVLP spray applicators, equipped with a water curtain for particulate control and exhausting to Stack MAP-1.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(m) One (1) surface coating booth, identified as MAP-2, constructed in 2012, with a maximum capacity of 34 plastic parts per hour, using robotic HVLP spray applicators, equipped with a water curtain for particulate control and exhausting to Stack MAP-2. Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(n) One (1) surface coating booth, identified as MAP-4, constructed in 2013, with a maximum capacity of 34 plastic parts per hour, using robotic HVLP spray applicators, equipped with a water curtain for particulate control and exhausting to Stack MAP-4.

Under 40 CFR 63, Subpart PPPP, this is considered part of an affected coating operation.

(o) One (1) surface coating booth, identified as MAP-5, constructed in 2013, with a maximum capacity of 34 plastic parts per hour, using robotic HVLP spray applicators, equipped with dry filters for particulate control and exhausting to Stack MAP-5.

Under 40 CFR 63, Subpart PPPP, this is considered part of an existing affected coating operation.

(p) One (1) natural gas-fired oven, identified as OVN-5, installed in 2013, rated at 0.40 million British thermal units per hour, used for surface coating booth MAP-5, exhausting to general ventilation.

(q) One (1) natural gas-fired heat exchanger (air make-up unit), identified as MAU-3, installed in 2001, rated at 33.88 million British thermal units per hour, exhausting to general ventilation.

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

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

(a) Sixty three (63) natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour:

(1) One (1) natural gas-fired hot water (radiant) boiler, identified as B-1, installed in 1989, rated at 1.36 million British thermal units per hour, exhausting to Stack B.

(2) One (1) natural gas-fired heat exchanger (air make-up unit), identified as MAU-4, installed in 2002, rated at 5.05 million British thermal units per hour, exhausting to general ventilation. [326 IAC 6-2-4]

(3) One (1) natural gas-fired powder slush burner, identified as PSB-1, installed in 1998, rated at 0.30 million British thermal units per hour, used for the slush mold/powder slush operation (SM/PS), exhausting to general ventilation.

(4) One (1) natural gas-fired powder slush burner, identified as PSB-2, installed in 1998, rated at 0.30 million British thermal units per hour, used for the slush mold/powder slush operation (SM/PS), exhausting to general ventilation.

(5) One (1) natural gas-fired powder slush burner, identified as PSB-3, installed in 1998, rated at 0.30 million British thermal units per hour, used for the slush mold/powder slush operation (SM/PS), exhausting to general ventilation.

(6) One (1) natural gas-fired powder slush burner, identified as PSB-4, installed in 1998, rated at 0.30 million British thermal units per hour, used for the slush mold/powder slush operation (SM/PS), exhausting to general ventilation.

(7) One (1) natural gas-fired powder slush burner, identified as PSB-5, installed in 1998, rated at 0.30 million British thermal units per hour, used for the slush mold/powder slush operation (SM/PS), exhausting to general ventilation.

(8) Fifty-six (56) natural gas-fired insignificant space heaters, identified as RTU1 to RTU17, RPA18 to RPA21, RMAU2 to RMAU6, UH2 to UH23, and AR1 to AR8, with a total heat capacity of 40.234 MMBtu/hr.

(b) One (1) parts washer that uses aqueous solvents that contain less than 1% by weight of VOCs.

(c) Paved and parking lots with public access.

(d) Activities with emissions equal to or less than thresholds:

(1) One (1) Injection molding operation, consisting of:

(i) Fifteen (15) presses, with a total maximum throughput of 6,355.5 pounds per hour, uncontrolled, exhausting indoors.

Unit ID	Construction date	Maximum Capacity (lb/hr)
UBE #1	1998	140
UBE #2	1998	90
UBE #3	1989	660
UBE #4	1989	660
UBE #5*	Approved in 2018 for construction	195.5
UBE #6	1997	90
UBE #7	1989	660
UBE #8	1995	270
UBE #9	1997	140
UBE #10	2002	950
UBE #11	2003	950
UBE #12	2003	490
UBE #13	2005	660
Mitsubishi #14	2013	200
Mitsubishi #15	2013	200
*Replaced an existing press (constructed in 1995)		

(ii) One (1) grinder that grinds unusable parts of molded plastic parts for use offsite as a recycled material, constructed in 1997, with a maximum throughput of 25% of the injection molding throughput will be reground in this process. The grinder is equipped with a cyclone for particulate control, exhausting indoors.

(2) One (1) Thermoforming line, constructed in 1999, consisting of three (3) presses (TP1, TP2 and TP3), with a total maximum throughput of 45.6 parts per hour, uncontrolled, exhausting indoors.

(3) Flash off areas FO-1 and FO-2, paint kitchens PK-1 associated with surface coating booths (SB-1 and SB-2), VOC emissions accounted for with the spray booths.

(4) One (1) slush mold/powder slush operation, identified as SM/PS, constructed in 1999 and modified in 2016, consisting of three (3) areas, identified as SM/PS1, SM-2 and SM-3, with a total maximum throughput of 650 pounds of PVC resin per hour, uncontrolled, exhausting to Stack E.

(e) One (1) natural gas-fired, 4-stroke, lean-burn emergency generator, identified as EG-1, approved in 2018 for construction, with a maximum heat input capacity of 0.395 MMBtu/hr, no control, and exhausting indoors.

Under 40 CFR 60, Subpart JJJJ (4J) and 40 CFR 63, Subpart ZZZZ (4Z), this unit is considered an affected emergency generator.

(f) One (1) parts washer, identified as PW-1, constructed in 2016, with a maximum usage rate of 47.7 gallons of cleaner per year, no control and exhausting indoors.

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

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, T133-37557-00027, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

and

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

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

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

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

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(A) A description of the emergency;

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

(C) Corrective actions taken.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(a) All terms and conditions of permits established prior to T133-37557-00027 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

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

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

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

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

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

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

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

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

(1) That this permit contains a material mistake.

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

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

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

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

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

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

Request for renewal shall be submitted to:

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

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

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

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the

document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(4) The Permittee notifies the:

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

and

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

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

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

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

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

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

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

(3) Any change in emissions; and

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

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

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

326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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

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

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(1) initial inspection and evaluation;

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

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

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

(1) monitoring results;

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The statement must be submitted to:

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

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

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

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

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

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

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

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

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

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

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

(b) The address for report submittal is:

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

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

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

Stratospheric Ozone Protection

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) headliner assembly area, constructed in 1989 and modified in 1999, consisting of four (4) headliner booths, identified as HL-1 through HL-4:

(1) HL-1, HL-2 and HL-4 use both roll on and spray water-based adhesive coating, each with a maximum capacity of 35 plastic headliners per hour, equipped with dry filters for particulate control, exhausting to Stack C2 (HL-1 and HL-4) and Stack C3 (HL-2) consisting of three (3) processes:

(A) rolled on urethane resin (solids) adhesive,
(B) sprayed on non-VOC water-based catalyst, and
(C) vacuum forming (VF).

The area also has an edge folding machine (EF), originally installed in May 1989 that is currently unused.

(2) Booth HL-3 is a hot-glue operation that has no emissions.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(b) One (1) surface coating booth, identified as SB-1, installed in 1999 and approved in 2018 for modification, with a maximum capacity of 62.5 plastic automotive parts per hour, using manual HVLP spray applicators, equipped with dry filters for particulate control and exhausting to Stack SB-1.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(c) One (1) surface coating booth, identified as SB-2, installed in 1999 and approved in 2018 for modification, with a maximum capacity of 62.5 plastic automotive parts per hour, using manual HVLP spray applicators, equipped with dry filters for particulate control and exhausting to Stack SB-2.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(d) One (1) natural gas-fired drying oven, identified as D-1, installed in 1999, used for both surface coating booths SB-1 and SB-2, exhausting to Stack D-1, rated at 1 million British thermal units per hour.

(e) One (1) adhesive application booth, identified as AB-1, installed in 2000, equipped with dry filters for particulate control and exhausting to Stack C-4. This booth is used for either of the following processes:

(1) Service (obsolete) door panel assembly and vacuum forming (VF) service booth, with a maximum capacity of 48 special order plastic automotive door panel parts per hour, using manual HVLP spray applicators, and

(2) Touch-up booth (TB), with a maximum capacity of 13.89 plastic automotive door panel parts per hour, using HVLP spray applicators.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(f) One (1) adhesive application booth, identified as AB-2, installed in 2012, with a maximum capacity of 224 plastic automotive door panel parts (or 56 sets of 4 door panels per car) per hour, using robotic HVLP spray applicators, equipped with dry filters for particulate control and exhausting to Stack C-4.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(g) One (1) adhesive application booth, identified as AB-3, installed in 2012, with a maximum capacity of 224 plastic automotive door panel parts (or 56 sets of 4 door panels per car) per hour, using robotic HVLP spray applicators, equipped with dry filters for particulate control and exhausting to Stack C-4.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(h) One (1) adhesive application booth, identified as AB-4, installed in 2012, with a maximum capacity of 224 plastic automotive door panel parts (or 56 sets of 4 door panels per car) per hour, using robotic HVLP spray applicators, equipped with dry filters for particulate control and exhausting to Stack C-4.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(i) One (1) adhesive application booth, identified as AB-5, approved in 2018 for construction, with a maximum capacity of 60 plastic automotive dash panel parts per hour, using robotic HVLP spray applicators, equipped with dry filters for particulate control, and exhausting to Stack C-5.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(j) One (1) adhesive application booth, identified as AB-6, approved in 2018 for construction, with a maximum capacity of 60 plastic automotive dash panel parts per hour, using robotic HVLP spray applicators, equipped with dry filters for particulate control, and exhausting to Stack C-5.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(k) One (1) surface coating line, identified as SCL, constructed in 2002, with a maximum capacity of 70 plastic vehicle parts per hour, using robotic HVLP spray applicators, equipped with a water curtain with baffles for particulate control, and exhausting to Stacks S-4 through S-7.

This line consists of three (3) spray booths in series and combustion as follows**:**

(1) One (1) Prime Booth,
(2) One (1) Color Base Booth,
(3) One (1) Clear Coat Booth,
(4) One (1) natural gas-fired bake oven, identified as S-12, rated at 3.5 million British thermal units per hour, exhausting to Stack S-12,
(5) One (1) natural gas-fired bake oven afterburner/oxidizer, identified as S-13, rated at 2.5 million British thermal units per hour, exhausting to Stack S-13, and
(6) One (1) natural gas-fired dry off oven, identified as S-15, rated at 0.5 million British thermal units per hour, exhausting to Stack S-15.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(l) One (1) surface coating booth, identified as MAP-1, constructed in 2004, with a maximum capacity of 34 plastic parts per hour, using robotic HVLP spray applicators, equipped with a water curtain for particulate control and exhausting to Stack MAP-1.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(m) One (1) surface coating booth, identified as MAP-2, constructed in 2012, with a maximum capacity of 34 plastic parts per hour, using robotic HVLP spray applicators, equipped with a water curtain for particulate control and exhausting to Stack MAP-2.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(n) One (1) surface coating booth, identified as MAP-4, constructed in 2013, with a maximum capacity of 34 plastic parts per hour, using robotic HVLP spray applicators, equipped with a water curtain for particulate control and exhausting to Stack MAP-4. Under 40 CFR 63, Subpart PPPP, this is considered part of an affected coating operation.

(o) One (1) surface coating booth, identified as MAP-5, constructed in 2013, with a maximum capacity of 34 plastic parts per hour, using robotic HVLP spray applicators, equipped with dry filters for particulate control and exhausting to Stack MAP-5.

Under 40 CFR 63, Subpart PPPP, this is considered part of an existing affected coating operation.

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

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

D.1.1 PSD Minor Limit [326 IAC 2-2]

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

The total VOC input, including coatings, dilution solvents, and cleaning solvents to the following surface coating facilities:

(a) HL-1, HL-2, and HL-4,
(b) SB-1 and SB-2,
(c) AB-1 through AB-6,
(d) SCL, and
(e) MAP-1, MAP-2, MAP-4, and MAP-5

shall not exceed 244 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

The amount of VOC in waste shipped offsite may be deducted from the reported monthly VOC input.

Compliance with this limit, 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 250 tons per 12 consecutive month period and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

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

(a) Pursuant to SSM 133-15489-00027, issued on June 11, 2002, MSM 133-18004-00027, issued on November 25, 2003, and 326 IAC 8-1-6, BACT for the two (2) surface coating booths (SB-1 and SB-2) has been determined to be:

(1) The total VOC delivered to the applicators, including coatings, dilution solvents,

and cleaning solvents, shall be limited to less than 49.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month;

(2) The method of application at the two (2) surface coating booths (SB-1 and SB-2) shall be performed with high volume-low pressure (HVLP) spray applicators or the equivalent; and

(3) The following management and work practices shall apply:

(A) Operator training course.

(B) Spray gun cleaning.

(C) The cleanup solvent containers used to transport solvent from drums/ containers to work stations shall be closed containers having soft gasketed closures.

(D) The application equipment operators shall be instructed and trained on the methods and practices utilized to minimize spillage on the floor and over application.

(E) Storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.

(F) Cleanup solvents will be reused in the process as much as possible to reduce hazardous waste and the related impact on the environment.

(b) Pursuant to SSM 133-13901-00027, issued on July 13, 2001, and 326 IAC 8-1-6, BACT for the one (1) surface coating line (SCL) has been determined to be:

(1) The total VOC delivered to the applicators, including coatings, dilution solvents, and cleaning solvents, shall be limited to less than 187.4 tons per twelve (12) consecutive month period, with compliance determined at the end of each month;

(2) The method of application at the one (1) surface coating line (SCL) shall be performed with high volume-low pressure (HVLP) spray applicators or the equivalent; and

(3) The following management and work practices shall apply:

(A) Operator training course.

(B) Spray gun cleaning.

(C) The cleanup solvent containers used to transport solvent from drums/ containers to work stations shall be closed containers having soft gasketed closures.

(D) The application equipment operators shall be instructed and trained on the methods and practices utilized to minimize spillage on the floor and over application.

(E) Storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.

(F) Cleanup solvents will be reused in the process as much as possible to

reduce hazardous waste and the related impact on the environment.

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

In order to render the requirements of 326 IAC 8-1-6 not applicable, the adhesive application booths (AB-2 through AB-6) shall be limited as follows:

(a) The total VOC input and delivered to the applicators in the adhesive application booth (AB-2), including adhesives, coatings, dilution solvents, and cleaning solvents, shall not exceed 24.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) The total VOC input and delivered to the applicators in the adhesive application booth (AB-3), including adhesives, coatings, dilution solvents, and cleaning solvents, shall not exceed 24.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(c) The total VOC input and delivered to the applicators in the adhesive application booth (AB-4), including adhesives, coatings, dilution solvents, and cleaning solvents, shall not exceed 24.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(d) The total VOC input and delivered to the applicators in the adhesive application booth (AB-5), including adhesives, coatings, dilution solvents, and cleaning solvents, shall not exceed 24.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(e) The total VOC input and delivered to the applicators in the adhesive application booth (AB-6), including adhesives, coatings, dilution solvents, and cleaning solvents, shall not exceed 24.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits shall limit the potential to emit VOC from each of the adhesive application booths (AB-2 through AB-6) to less than twenty-five (25) tons per 12 consecutive month period and shall render the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.

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

Pursuant to 326 IAC 6-3-2(d), the dry filters, and water curtains or an equivalent control device for particulate control shall be operated in accordance with manufacturer's specifications and control emissions from the following surface coating facilities:

(a) HL-1, HL-2, and HL-4,
(b) SB-1 and SB-2,
(c) AB-1 through AB-6,
(d) SCL, and
(e) MAP-1, MAP-2, MAP-4, and MAP-5

at all times when the surface coating facilities are in operation

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

A Preventive Maintenance Plan is required for the facilities listed below, and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligations with regard to the Preventive Maintenance Plan required by this condition.

(a) HL-1, HL-2, and HL-4,

(b) SB-1 and SB-2,
(c) AB-1 through AB-6,
(d) SCL, and
(e) MAP-1, MAP-2, MAP-4, and MAP-5

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

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

(a) Compliance with the VOC usage limitations contained in Conditions D.1.1, D.1.2(a)(1) and D.1.2(b)(1), and D.1.3, shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

The amount of VOC in waste shipped offsite may be deducted from the reported monthly VOC input.

(b) The following requirements are applicable to Condition D.1.1:

(i) If the amount of VOC in the waste shipped offsite for recycling or disposal is deducted from the monthly VOC input reported for Condition D.1.1, the Permittee shall determine the VOC content of the waste shipped offsite using one or a combination of the following methods:

(1) On-Site Sampling

(A) VOC content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.

(B) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

(C) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the VOC content of the VOC containing waste. Such change could include, but is not limited to, the following:

(i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or

(ii) An operational change in the coating application or cleanup operations.

The new VOC content shall be used in calculating the amount of VOC shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

(2) Certified Waste Report:

The VOC reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of VOC in the waste.

(3) Minimum Assumed VOC content:
The VOC content of the waste shipped offsite may be assumed to be equal to the VOC content of the material with the lowest VOC content that could be present in the waste, as determined using the "as supplied" and "as applied" VOC data sheets, for each month.

(ii) IDEM reserves the right to request a representative sample of the VOC containing waste stream and conduct an analysis for VOC content.

(iii) Compliance with the VOC input limitations contained in Condition D.1.1 shall be demonstrated not later than 30 days after the end of each month. This shall be based on the total volatile organic compound input for the previous month, minus the amount VOC in the waste shipped out for recycling or disposal, and adding it to previous 11 months total VOC input, minus the amount VOC in the waste shipped out for recycling or disposal, so as to arrive at VOC input for the most recent twelve (12) consecutive month period.

(iv) The VOC input for a month shall be calculated using the following equation:

$$\text{VOC}\,input = \text{SCL} - \text{SR}$$

Where:

SCL = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents, at the coating booths; and

SR = The total amount of VOC, in tons, shipped out for either recycling or disposal, including coatings, dilution solvents, and cleaning solvents, from the coating booths.

D.1.7 Particulate Control

In order to comply with Condition D.1.4, particulate from the following surface coating facilities:
(a) HL-1, HL-2, and HL-4,
(b) SB-1 and SB-2,
(c) AB-1 through AB-6,
(d) SCL, and
(e) MAP-1, MAP-2, MAP-4, and MAP-5
shall be controlled with dry filters, water curtains or an equivalent control device that shall be in operation at all times when the surface coating facilities are in operation.

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

D.1.8 Monitoring

(a) Dry Filters:
Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters for the surface coating facilities:
(i) HL-1, HL-2, and HL-4,
(ii) SB-1, SB-2,
(iii) AB-1 through AB-6, and
(iv) MAP-5.

To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating facilities stacks:
(i) C-2, C-3,
(ii) SB-1, SB-2,
(iii) C-4, C-5, and
(iv) MAP-5
while one or more of the booths are in operation.

If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

(b) Water Pans
Daily inspections shall be performed of the water level of the water pans that control particulates for the following surface coating booths:
(i) MAP-1, MAP-2, and MAP-4, and
(ii) SCL
to verify that the water level meets the manufacturer's recommended level or at a level where surface agitation indicates impact of the air flow when any of the surface coating facilities are in operation.

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, inspections of the baffle panels shall be conducted every six months, to verify that placement and configuration meet recommendations of the manufacturer.

In addition, weekly observations shall be made of the overspray from the surface coating booth stacks:
(i) MAP-1, MAP-2, and MAP-4, and
(ii) S-4 through S-7
while the associated booths to these stacks are in operation. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

(c) Monthly Inspections shall be performed of the coating emissions from the stacks:
(i) C-2, C-3,
(ii) SB-1, SB-2,
(iii) C-4, C-5,
(iv) MAP-1, MAP-2, MAP-4, and MAP-5, and
(v) S-4 through S-7
and the presence of overspray on the rooftops and the nearby ground. During periods of inclement weather, these inspections shall be performed as weather permits. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.1.9 Water Curtain Failure Detection

In the event that a water curtain failure has been observed, the failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.1.10 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below, and to document the compliance status with Conditions D.1.2(a)(1) and D.1.2(b)(1) and D.1.3, the Permittee shall maintain records in accordance with (1) through (3) below.

Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Conditions D.1.1, D.1.2(a)(1), D.1.2(b)(1) and D.1.3, and to document the quantity of any VOC shipped offsite and deducted from total reported VOC usage under Condition D.1.1.

Records necessary to demonstrate compliance shall be available not later than thirty (30) days after the end of each compliance period.

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

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

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

(B) Solvent usage records shall include solvents that are added to coatings or used as cleanup solvents.

(3) The total VOC usage for each month.

(4) If the amount of VOC in waste material is being deducted from the VOC input as allowed in Condition D.1.1, then the following records shall be maintained:

(A) The amount of VOC containing waste shipped out to be recycled or disposed each month. If multiple cleanup solvent waste streams are collected and drummed separately, the amount shipped out shall be recorded separately for each used solvent stream.

(B) The VOC content of the waste and all records necessary to verify the amount and VOC content of the VOC containing waste shipped out for recycling or disposal.

(C) The weight of VOC input, minus the weight of VOC shipped out to be recycled or disposed, for each compliance period.

(b) To document the compliance status with Conditions D.1.8(a) and D.1.8(c), the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.

(c) To document the compliance status with Conditions D.1.8(b) and D.1.8(c), the Permittee shall maintain a log of weekly overspray observations, weekly observations of the water

level in the water pans, daily water level, monthly overspray inspections, and biannual baffle panel inspections. The Permittee shall include in its daily record when a water level reading is not taken and the reason for the lack of a water level reading, (i.e. the process did not operate that day).

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

D.1.11 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1, D.1.2(a)(1), D.1.2(b)(1) and D.1.3 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting Requirements contains the Permittee's obligation with regard to the reporting required by this condition. This report requires the certification by a “responsible official” as defined by 326 IAC 2-7-1(35).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(q) One (1) natural gas-fired heat exchanger (air make-up unit), identified as MAU-3, installed in 2001, rated at 33.88 million British thermal units per hour, exhausting to general ventilation.

Insignificant activities:

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

(1) One (1) natural gas-fired hot water (radiant) boiler, identified as B-1, installed in 1989, rated at 1.36 million British thermal units per hour, exhausting to Stack B.

(2) One (1) natural gas-fired heat exchanger (air make-up unit), identified as MAU-4, installed in 2002, rated at 5.05 million British thermal units per hour, exhausting to general ventilation.

(8) Fifty-six (56) natural gas-fired insignificant space heaters, identified as RTU1 to RTU17, RPA18 to RPA21, RMAU2 to RMAU6, UH2 to UH23, and AR1 to AR8, with a total heat capacity of 40.234 MMBtu/hr.

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

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

D.2.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Limitations for Sources of Indirect Heating) the particulate emissions from each unit listed in the table below shall not exceed the pounds per MMBtu heat input emission limits, as listed in the table.

This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where:

P_t = pounds of particulate matter emitted per million Btu heat input (lb/MMBtu)
Q = total source operating capacity

Year Constructed	Emission Unit	Maximum Capacity of units constructed (MMBtu/hr)	Total Source Operating Capacity at the time of construction (MMBtu/hr) (Q)	PM Emission Limitation for each unit (lbs/MMBtu) (Pt)
1989	boiler B-1	1.36	1.36	0.60
2001	heat exchanger MAU-3	33.88	35.24	0.432

Year Constructed	Emission Unit	Maximum Capacity of units constructed (MMBtu/hr)	Total Source Operating Capacity at the time of construction (MMBtu/hr) (Q)	PM Emission Limitation for each unit (lbs/MMBtu) (Pt)
2002	heat exchanger MAU-4	5.05	40.29	0.417
2012	fifty-six (56) space heaters	40.234	80.524	0.348 (each)

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(f) One (1) parts washer, identified as PW-1, constructed in 2016, with a maximum usage rate of 47.7 gallons of cleaner per year, no control and exhausting indoors.

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

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

D.3.1 Cold Cleaner Degreaser Control Equipment and Operating Requirements [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements), the Permittee shall:

(a) Ensure the following control equipment and operating requirements are met:

(1) Equip the degreaser with a cover.

(2) Equip the degreaser with a device for draining cleaned parts.

(3) Close the degreaser cover whenever parts are not being handled in the degreaser.

(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).

(6) Store waste solvent only in closed containers.

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

(b) Ensure the following additional control equipment and operating requirements are met:

(1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
(B) A water cover when solvent used is insoluble in, and heavier than, water.
(C) A refrigerated chiller.
(D) Carbon adsorption.
(E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.

(2) Ensure the degreaser cover is designed so that it can be easily operated with

one (1) hand if the solvent is agitated or heated.

(3) If used, solvent spray:
(A) must be a solid, fluid stream; and
(B) shall be applied at a pressure that does not cause excessive splashing.

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

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

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

A Preventive Maintenance Plan is required for this parts washer. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

D.3.4 Record Keeping Requirements

(a) To document the compliance status with Condition D.3.2, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

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

(2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).

(3) The type of solvent purchased.

(4) The total volume of the solvent purchased.

(5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

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

SECTION E.1 NESHAP

Emissions Unit Description:

(a) One (1) headliner assembly area, constructed in 1989 and modified in 1999, consisting of four (4) headliner booths, identified as HL-1 through HL-4:

(1) HL-1, HL-2 and HL-4 use both roll on and spray water-based adhesive coating, each with a maximum capacity of 35 plastic headliners per hour, equipped with dry filters for particulate control, exhausting to Stack C2 (HL-1 and HL-4) and Stack C3 (HL-2) consisting of three (3) processes:

(A) rolled on urethane resin (solids) adhesive,
(B) sprayed on non-VOC water-based catalyst, and
(C) vacuum forming (VF).

The area also has an edge folding machine (EF), originally installed in May 1989 that is currently unused.

(2) Booth HL-3 is a hot-glue operation that has no emissions.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(b) One (1) surface coating booth, identified as SB-1, installed in 1999 and approved in 2018 for modification, with a maximum capacity of 62.5 plastic automotive parts per hour, using manual HVLP spray applicators, equipped with dry filters for particulate control and exhausting to Stack SB-1.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(c) One (1) surface coating booth, identified as SB-2, installed in 1999 and approved in 2018 for modification, with a maximum capacity of 62.5 plastic automotive parts per hour, using manual HVLP spray applicators, equipped with dry filters for particulate control and exhausting to Stack SB-2.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(e) One (1) adhesive application booth, identified as AB-1, installed in 2000, equipped with dry filters for particulate control and exhausting to Stack C-4. This booth is used for either of the following processes:

(1) Service (obsolete) door panel assembly and vacuum forming (VF) service booth, with a maximum capacity of 48 special order plastic automotive door panel parts per hour, using manual HVLP spray applicators, and

(2) Touch-up booth (TB), with a maximum capacity of 13.89 plastic automotive door panel parts per hour, using HVLP spray applicators.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(f) One (1) adhesive application booth, identified as AB-2, installed in 2012, with a maximum capacity of 224 plastic automotive door panel parts (or 56 sets of 4 door panels per car) per hour, using robotic HVLP spray applicators, equipped with dry filters for particulate control and exhausting to Stack C-4.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(g) One (1) adhesive application booth, identified as AB-3, installed in 2012, with a maximum capacity of 224 plastic automotive door panel parts (or 56 sets of 4 door panels per car) per hour, using robotic HVLP spray applicators, equipped with dry filters for particulate control and exhausting to Stack C-4.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(h) One (1) adhesive application booth, identified as AB-4, installed in 2012, with a maximum capacity of 224 plastic automotive door panel parts (or 56 sets of 4 door panels per car) per hour, using robotic HVLP spray applicators, equipped with dry filters for particulate control and exhausting to Stack C-4.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(i) One (1) adhesive application booth, identified as AB-5, approved in 2018 for construction, with a maximum capacity of 60 plastic automotive dash panel parts per hour, using robotic HVLP spray applicators, equipped with dry filters for particulate control, and exhausting to Stack C-5.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(j) One (1) adhesive application booth, identified as AB-6, approved in 2018 for construction, with a maximum capacity of 60 plastic automotive dash panel parts per hour, using robotic HVLP spray applicators, equipped with dry filters for particulate control, and exhausting to Stack C-5.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(k) One (1) surface coating line, identified as SCL, constructed in 2002, with a maximum capacity of 70 plastic vehicle parts per hour, using robotic HVLP spray applicators, equipped with a water curtain with baffles for particulate control, and exhausting to Stacks S-4 through S-7.

This line consists of three (3) spray booths in series and combustion as follows:

(1) One (1) Prime Booth,
(2) One (1) Color Base Booth,
(3) One (1) Clear Coat Booth,
(4) One (1) natural gas-fired bake oven, identified as S-12, rated at 3.5 million British thermal units per hour, exhausting to Stack S-12,
(5) One (1) natural gas-fired bake oven afterburner/oxidizer, identified as S-13, rated at 2.5 million British thermal units per hour, exhausting to Stack S-13, and
(6) One (1) natural gas-fired dry off oven, identified as S-15, rated at 0.5 million British thermal units per hour, exhausting to Stack S-15.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(l) One (1) surface coating booth, identified as MAP-1, constructed in 2004, with a maximum capacity of 34 plastic parts per hour, using robotic HVLP spray applicators, equipped with a water curtain for particulate control and exhausting to Stack MAP-1.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(m) One (1) surface coating booth, identified as MAP-2, constructed in 2012, with a maximum capacity of 34 plastic parts per hour, using robotic HVLP spray applicators, equipped with a water curtain for particulate control and exhausting to Stack MAP-2.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(n) One (1) surface coating booth, identified as MAP-4, constructed in 2013, with a maximum capacity of 34 plastic parts per hour, using robotic HVLP spray applicators, equipped with a water curtain for particulate control and exhausting to Stack MAP-4.

Under 40 CFR 63, Subpart PPPP, this is considered part of an affected coating operation.

(o) One (1) surface coating booth, identified as MAP-5, constructed in 2013, with a maximum capacity of 34 plastic parts per hour, using robotic HVLP spray applicators, equipped with dry filters for particulate control and exhausting to Stack MAP-5.

Under 40 CFR 63, Subpart PPPP, this is considered part of an existing affected coating operation.

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

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

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

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

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

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

E.1.2 Surface Coating of Plastic Parts and Products NESHAP [40 CFR Part 63, Subpart PPPP][326 IAC 20-81]

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

(1) 63.4480
(2) 63.4481 (a)(1), (2), (3) and (4), (b)
(3) 63.4482 (a), (b), (e)
(4) 63.4483 (b), (d)
(5) 63.4490 (b)(1), (2) and (3), (c)
(6) 63.4491 (a), (b), (c)
(7) 63.4492 (a), (b)
(8) 63.4493 (a), (b)
(9) 63.4500 (a)(1) and (2), (b), (c)
(10) 63.4501
(11) 63.4510 (a), (b), (c)

(12) 63.4520 (a), (b), (c)
(13) 63.4530 (a), (b), (c), (d), (e), (f), (g) and (h)
(14) 63.4531
(15) 63.4540
(16) 63.4541
(17) 63.4542
(18) 63.4550
(19) 63.4551
(20) 63.4552
(21) 63.4560
(22) 63.4561
(23) 63.4563
(24) 63.4564
(25) 63.4565
(26) 63.4566
(27) 63.4567
(28) 63.4568
(21) 63.4580
(22) 63.4581
(23) Tables 1 through 4 of Subpart PPPP

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

E.1.3 Testing Requirements [326 IAC 2-1.1-11][326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

In order to document the compliance status with Condition E.1.2, the Permittee shall perform the testing required under 40 CFR 63, Subpart PPPP, utilizing methods as approved by the Commissioner, not later than 90 days from when the gas-fired bake oven afterburner/oxidizer (S-13) control is first used, and shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

SECTION E.2 NESHAP

Emissions Unit Description:

(q) One (1) natural gas-fired, 4-stroke, lean-burn emergency generator, identified as EG-1, approved in 2018 for construction, with a maximum heat input capacity of 0.395 MMBtu/hr, no control, and exhausting indoors.

Under 40 CFR 60, Subpart JJJJ (4J) and 40 CFR 63, Subpart ZZZZ (4Z), this unit is considered an affected emergency generator.

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

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

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

(a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR 63, Subpart ZZZZ (4Z).

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

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

E.2.2 Stationary Reciprocating Internal Combustion Engines NESHAP [40 CFR Part 63, Subpart ZZZZ] [326 IAC 20-82-1]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart ZZZZ (included as Attachment B to the operating permit), which are incorporated by reference as 326 IAC 20-82-1, for the emission unit listed above:

(1) 40 CFR 63.6580
(2) 40 CFR 63.6585(a)
(3) 40 CFR 63.6585(b)
(4) 40 CFR 63.6590(a)(2)(ii)
(5) 40 CFR 63.6590(c)(3)
(6) 40 CFR 63.6665
(7) 40 CFR 63.6670
(8) 40 CFR 63.6675

SECTION E.3 NSPS

Emissions Unit Description:

(q) One (1) natural gas-fired, 4-stroke, lean-burn emergency generator, identified as EG-1, approved in 2018 for construction, with a maximum heat input capacity of 0.395 MMBtu/hr, no control, and exhausting indoors.

Under 40 CFR 60, Subpart JJJJ (4J) and 40 CFR 63, Subpart ZZZZ (4Z), this unit is considered an affected emergency generator.

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

New Source Performance Standards (NSPS) Requirements [326 IAC 2-7-5(1)]

E.3.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1] [40 CFR Part 60, Subpart A]

(a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 60, Subpart JJJJ (4J).

(b) Pursuant to 40 CFR 60.4, the Permittee shall submit all required notifications and reports to:

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

E.3.2 Stationary Spark Ignition Internal Combustion Engines NSPS [326 IAC 12] [40 CFR Part 60, Subpart JJJJ]

The Permittee shall comply with the following provisions of 40 CFR Part 60, Subpart JJJJ (included as Attachment C to the operating permit), which are incorporated by reference as 326 IAC 12, for the emission unit(s) listed above:

(1) 40 CFR 60.4230(a)(4)(iv)
(2) 40 CFR 60.4233(d)
(3) 40 CFR 60.4234
(4) 40 CFR 60.4237(c)
(5) 40 CFR 60.4243(a)(2)(i)
(6) 40 CFR 60.4243(d)
(7) 40 CFR 60.4243(e)
(8) 40 CFR 60.4245(a)
(9) 40 CFR 60.4245(b)
(10) 40 CFR 60.4246
(11) 40 CFR 60.4248
(12) Table 1
(13) Table 3

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

Source Name: Heartland Automotive, LLC
Source Address: 300 South Warren Drive, Greencastle, Indiana 46135
Part 70 Permit No.: T133-37557-00027

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)

☐ Report (specify)

☐ Notification (specify)

☐ Affidavit (specify)

☐ Other (specify)

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Heartland Automotive, LLC
Source Address: 300 South Warren Drive, Greencastle, Indiana 46135
Part 70 Permit No.: T133-37557-00027

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

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

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

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

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

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

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

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

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

Part 70 Quarterly Report

Source Name: Heartland Automotive, LLC
Source Address: 300 South Warren Drive, Greencastle, Indiana 46135
Part 70 Permit No.: T133-37557-00027
Facility: HL-1, HL-2, and HL-4, SB-1 and SB-2, AB-1 through AB-6, SCL, and MAP-1, MAP-2, MAP4, and MAP-5
Parameter: Total VOC Input
Limit: Total VOC input, including coatings, dilution solvents, and cleaning solvents shall not exceed a total of 244 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The amount of VOC in waste shipped offsite may be deducted from the reported monthly VOC input. (Condition D.1.1)

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)

☐ No deviation occurred in this quarter.

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

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

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

Part 70 Quarterly Report

Source Name: Heartland Automotive, LLC
Source Address: 300 South Warren Drive, Greencastle, Indiana 46135
Part 70 Permit No.: T133-37557-00027
Facility: Surface coating booths SB-1 and SB-2
Parameter: Total VOC Input
Limit: Total VOC delivered to the applicators, including coatings, dilution solvents, and cleaning solvents shall be limited to less than a total of 49.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. (Condition D.1.2(a))

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)

☐ No deviation occurred in this quarter.

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

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

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

Part 70 Quarterly Report

Source Name: Heartland Automotive, LLC
Source Address: 300 South Warren Drive, Greencastle, Indiana 46135
Part 70 Permit No.: T133-37557-00027
Facility: Surface coating line SCL
Parameter: Total VOC Input
Limit: Total VOC delivered to the applicators, including coatings, dilution solvents, and cleaning solvents shall be limited to less than a total of 187.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month. (Condition D.1.2(b))

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)

☐ No deviation occurred in this quarter.

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

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

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

Part 70 Quarterly Report

Source Name: Heartland Automotive, LLC
Source Address: 300 South Warren Drive, Greencastle, Indiana 46135
Part 70 Permit No.: T133-37557-00027
Facility: Adhesive Application booth AB-2
Parameter: Total VOC Input
Limit: Total VOC input and delivered to the applicators, including adhesives, coatings, dilution solvents, and cleaning solvents shall not exceed 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month. (Condition D.1.3)

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)

☐ No deviation occurred in this quarter.

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

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

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

Part 70 Quarterly Report

Source Name: Heartland Automotive, LLC
Source Address: 300 South Warren Drive, Greencastle, Indiana 46135
Part 70 Permit No.: T133-37557-00027
Facility: Adhesive Application booth AB-3
Parameter: Total VOC Input
Limit: Total VOC input and delivered to the applicators, including adhesives, coatings, dilution solvents, and cleaning solvents shall not exceed 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month. (Condition D.1.3)

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)

☐ No deviation occurred in this quarter.

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

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

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

Part 70 Quarterly Report

Source Name: Heartland Automotive, LLC
Source Address: 300 South Warren Drive, Greencastle, Indiana 46135
Part 70 Permit No.: T133-37557-00027
Facility: Adhesive Application booth AB-4
Parameter: Total VOC Input
Limit: Total VOC input and delivered to the applicators, including adhesives, coatings, dilution solvents, and cleaning solvents shall not exceed 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month. (Condition D.1.3)

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)

☐ No deviation occurred in this quarter.

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

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

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

Part 70 Quarterly Report

Source Name: Heartland Automotive, LLC
Source Address: 300 South Warren Drive, Greencastle, Indiana 46135
Part 70 Permit No.: T133-37557-00027
Facility: Adhesive Application booth AB-5
Parameter: Total VOC Input
Limit: Total VOC input and delivered to the applicators, including adhesives, coatings, dilution solvents, and cleaning solvents shall not exceed 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month. (Condition D.1.3)

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)

☐ No deviation occurred in this quarter.

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

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

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

Part 70 Quarterly Report

Source Name: Heartland Automotive, LLC
Source Address: 300 South Warren Drive, Greencastle, Indiana 46135
Part 70 Permit No.: T133-37557-00027
Facility: Adhesive Application booth AB-6
Parameter: Total VOC Input
Limit: Total VOC input and delivered to the applicators, including adhesives, coatings, dilution solvents, and cleaning solvents shall not exceed 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month. (Condition D.1.3)

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (tons)	Previous 11 Months (tons)	12 Month Total (tons)

☐ No deviation occurred in this quarter.

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

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

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

Source Name: Heartland Automotive, LLC
Source Address: 300 South Warren Drive, Greencastle, Indiana 46135
Part 70 Permit No.: T133-37557-00027

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

Page 1 of 2

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

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

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

Source Description and Location

Source Name:	**Heartland Automotive, LLC**
Source Location:	**300 South Warren Drive, Greencastle, Indiana 46135**
County:	**Putnam**
SIC Code:	**3089 (Plastics Products, Not Elsewhere Classified)** **3999 (Manufacturing Industries, Not Elsewhere Classified)**
Operation Permit No.:	**T133-37557-00027**
Operation Permit Issuance Date:	**February 22, 2017**
Significant Source Modification No.:	**133-40321-00027**
Significant Permit Modification No.:	**133-40358-00027**
Permit Reviewer:	**Sarah Green**

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. T133-37557-00027 on February 22, 2017. The source has since received the following approvals:

(a) Significant Permit Modification No.: 133-39790-00027, issued on November 1, 2018; and

(b) Interim Significant Source Modification No.: 133-40321I-00027, issued on October 25, 2018.

County Attainment Status

The source is located in Putnam County. The following attainment status designations are applicable to Putnam 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. Putnam 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) $PM_{2.5}$
Putnam 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
Putnam County has been classified as attainment or unclassifiable in Indiana for all the 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 (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants 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.

Greenhouse Gas (GHG) Emissions

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

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

Source Status - Existing Source

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

Process / Emission Unit	Source-Wide Emissions Before Modification (tons/year)								
	PM	PM_{10}	$PM_{2.5}$	SO_2	NO_X	VOC	CO	Single HAP*	Combined HAPs
Total for Source	37.95	40.15	40.15	0.23	39.02	249.58	32.47	14.87	40.88
PSD Major Source Thresholds	250	250	250	250	250	250	250	--	--
*The single highest source-wide HAP is Xylene.									

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

(b) This existing source is a major source of HAPs, as defined in 40 CFR 63.2, because HAP emissions are equal to or greater than ten (10) tons per year for a single HAP and equal to or greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

(c) These emissions are based on the TSD of Significant Permit Modification No.: 133-39790-00027, issued on November 1, 2018.

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed an application, submitted by Heartland Automotive, LLC on August 14, 2018, relating to the following:

(a) The source has requested to construct two new adhesive booths, described as follows:

(1) One (1) adhesive application booth, identified as AB-5, approved in 2018 for construction, with a maximum capacity of 60 plastic automotive dash panel parts per hour, using robotic HVLP spray applicators, equipped with dry filters for particulate control, and exhausting to Stack C-5.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(2) One (1) adhesive application booth, identified as AB-6, approved in 2018 for construction, with a maximum capacity of 60 plastic automotive dash panel parts per hour, using robotic HVLP spray applicators, equipped with dry filters for particulate control, and exhausting to Stack C-5.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(b) The source also intends to remove a surface coating booth from the facility, which will be removed from the permit, described as follows:

(1) One (1) surface coating booth, identified as MAP-3, constructed in 2013, with a maximum capacity of 34 plastic parts per hour, using robotic HVLP spray applicators, equipped with a water curtain for particulate control and exhausting to Stack MAP-3.

Under 40 CFR 63, Subpart PPPP, this is considered part of an existing affected coating operation.

(c) With the removal of surface coating booth, MAP-3, some production is moving from MAP-3 to the surface coating booths, identified as SB-1 and SB-2. This has resulted in an increase in potential emissions from the units, described as follows:

(1) One (1) surface coating booth, identified as SB-1, installed in 1999 and approved in 2018 for modification, with a maximum capacity of 62.5 plastic automotive parts per hour, using manual HVLP spray applicators, equipped with dry filters for particulate control and exhausting to Stack SB-1.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(2) One (1) surface coating booth, identified as SB-2, installed in 1999 and approved in 2018 for modification, with a maximum capacity of 62.5 plastic automotive parts per hour, using manual HVLP spray applicators, equipped with dry filters for particulate control and exhausting to Stack SB-2.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(d) The source has also requested that "vacuum forming" be removed from the emission unit descriptions for the adhesive application booths, as this is an outdated method of identifying the

lines. The adhesive applications booths have not been modified, but the emission unit descriptions have been updated. See the Proposed Changes section below.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

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

Permit Level Determination – Part 70 Modification to an Existing Source

Pursuant to 326 IAC 2-1.1-1(12), Potential to Emit is defined as "the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency."

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5 and 326 IAC 2-7-11. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit. If the control equipment has been determined to be integral, the table reflects the PTE after consideration of the integral control device.

Process / Emission Unit	PTE Before Controls of the New Emission Units (tons/year)								
	PM	PM_{10}	$PM_{2.5}$	SO_2	NO_X	VOC	CO	Single HAP (Methanol)	Combined HAPs
Adhesive Booth AB-5	1.95	1.95	1.95	-	-	29.69	-	1.17	1.77
Adhesive Booth AB-6	1.95	1.95	1.95	-	-	29.69	-	1.17	1.77
Total:	**3.91**	**3.91**	**3.91**	**0.0**	**0.0**	**59.38**	**0.0**	**2.34**	**3.54**

Process / Emission Unit		PTE Before Controls of the Modified Emission Units (tons/year)								
		PM	PM_{10}	$PM_{2.5}$	SO_2	NO_X	VOC	CO	Single HAP (Methanol)	Combined HAPs
Before	Surface Coating Booth SB-1	0.54	0.54	0.54	-	-	4.13	-	-	0.03
After		1.86	1.86	1.86	-	-	24.67	-	-	0.50
PTE Increase		*1.33*	*1.33*	*1.33*	*-*	*-*	*20.54*	*-*	*-*	*0.48*
Before	Surface Coating Booth SB-2	0.54	0.54	0.54	-	-	4.13	-	-	0.03
After		1.86	1.86	1.86	-	-	24.67	-	-	0.50
PTE Increase		*1.33*	*1.33*	*1.33*	*-*	*-*	*20.54*	*-*	*-*	*0.48*
Total Increase:		**2.65**	**2.65**	**2.65**	**0.0**	**0.0**	**41.07**	**0.0**	**0.0**	**0.95**

Process / Emission Unit	PTE Before Controls of the Modified Emission Units (tons/year)								
	PM	PM_{10}	$PM_{2.5}$	SO_2	NO_X	VOC	CO	Single HAP (Methanol)	Combined HAPs
PTE of New Emission Units	3.91	3.91	3.91	-	-	59.38	-	2.34	3.54
PTE Increase of Modified Emission Units	2.65	2.65	2.65	-	-	41.07	-	-	0.95
Total:	**6.56**	**6.56**	**6.56**	**0.0**	**0.0**	**100.45**	**0.0**	**2.34**	**4.49**

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

(a) Approval to Construct
Pursuant to 326 IAC 2-7-10.5(g)(4), a Significant Source Modification is required because this modification has the potential to emit VOC at greater than or equal to twenty-five (25) tons per year.

(b) Approval to Operate
Pursuant to 326 IAC 2-7-12(d)(1), this change to the permit is being made through a Significant Permit Modification because this modification does not qualify as a Minor Permit Modification or as an Administrative Amendment. The modification does require a case-by-case determination of an emission limitation or other standard to avoid 326 IAC 8-1-6 (VOC BACT) and 326 IAC 2-2 (PSD).

Permit Level Determination – PSD

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

Process / Emission Unit	Project Emissions (tons/year)						
	PM	PM_{10}	$PM_{2.5}$*	SO_2	NO_X	VOC	CO
PTE of New Emission Units	3.91	3.91	3.91	-	-	49.80[(1)(3)]	-
PTE Increase of the Modified Emission Units	2.65	2.65	2.65	-	-	0.0[(2)(3)]	-
Total for Modification	**6.56**	**6.56**	**6.56**	**0.0**	**0.0**	**49.80**	**0.0**
PSD Major Source Thresholds	250	250	250	250	250	250	250

*$PM_{2.5}$ listed is direct $PM_{2.5}$.
(1) 326 IAC 8-1-6 VOC BACT avoidance limit not to exceed 24.9 tpy, each.
(2) The modified units will continue to be limited by 326 IAC VOC BACT to less than 49 tpy, combined. There will be no increase in limited emissions.
(3) The modified units are limited, along with the other surface coating facilities, to not exceed 244 tpy of VOC total to avoid 326 IAC 2-2 PSD.

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

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

Process/ Emission Unit	Unit ID	Source-Wide Emissions after Issuance (tons/year)								
		PM	PM_{10}*	$PM_{2.5}$**	SO_2	NO_x	VOC	CO	Total HAPs	Worst Single HAP
Headliner assembly area (1)	HL-1, HL-2, HL-3, HL-4	1.54	1.54	1.54	-	-	244.00	-	-	-
Surface coating booth (1)	SB-1 (2)	1.86	1.86	1.86	-	-		-	0.50	0.28 xylene
Surface coating booth (1)	SB-2 (2)	1.86	1.86	1.86	-	-		-	0.50	0.28 xylene
Adhesive app booth (1)	AB-1	1.90	1.90	1.90	-	-		-	3.52	1.67 methanol
Adhesive app booth (1)	AB-2 (4)	6.76	6.76	6.76	-	-		-	4.65	4.05 methanol
Adhesive app booth (1)	AB-3 (4)	6.76	6.76	6.76	-	-		-	4.65	4.05 methanol
Adhesive app booth (1)	AB-4 (4)	6.76	6.76	6.76	-	-		-	4.65	4.05 methanol
Adhesive app booth (1)	AB-5 (4)	1.95	1.95	1.95	-	-		-	1.77	1.17 methanol
Adhesive app booth (1)	AB-6 (4)	1.95	1.95	1.95	-	-		-	1.77	1.17 methanol
Surface coating line (1)	SCL (3)	6.81	6.81	6.81	-	-		-	13.75	8.74 xylene
Surface coating booth (1)	MAP-1	0.72	0.72	0.72	-	-		-	3.53	2.26 xylene
Surface coating booth (1)	MAP-2	0.72	0.72	0.72	-	-		-	3.53	2.26 xylene
Surface coating booth (1)	MAP-4	0.72	0.72	0.72	-	-		-	0.57	0.54 xylene
Surface coating booth (1)	MAP-5	0.72	0.72	0.72	-	-		-	0.57	0.54 xylene
Insignificant Activities										
Natural gas combustion		0.73	2.93	2.93	0.23	38.61	2.12	32.44	0.73	0.70 hexane
Injection molding	UBE#1-#13, Mitsubishi #14-#15	0.83	0.83	0.83	-	-	2.93	-	0.10	0.05 styrene
Grinding operation		1.03	1.03	1.03	-	-	-	-	-	-
Thermoforming operation	TP1-TP3	-	-	-	-	-	0.18	-	-	-
Slush mold/powder slush operation	SM/PS	0.14	0.14	0.14	-	-	0.18	-	0.01	0.01 vinyl chloride
Parts washer	PW-1	-	-	-	-	-	0.16	-	-	-
Emergency generator	EG-1	9.8E-04	7.6E-06	7.6E-06	5.8E-05	0.40	0.01	0.03	0.01	0.01 formaldehyde
Total PTE of Entire Source		**43.78**	**45.98**	**45.98**	**0.23**	**39.02**	**249.58**	**32.47**	**44.80**	**16.14 Methanol**
Title V Major Source Thresholds		NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds		250	250	250	250	250	250	250	NA	NA

* Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a regulated air pollutant".
**$PM_{2.5}$ listed is direct $PM_{2.5}$.
(1) 326 IAC 2-2 PSD Minor VOC limit not to exceed 244 tpy
(2) 326 IAC 8-1-6 VOC BACT <49 tpy
(3) 326 IAC 8-1-6 VOC BACT <187.4 tpy
(4) 326 IAC 8-1-6 VOC BACT avoidance limit not to exceed 24.9 tpy, each

(a) This existing minor PSD stationary source will continue to be minor under 326 IAC 2-2 because the emissions of each PSD regulated pollutant will continue to be less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

Due to the modification at this source, federal rule applicability has been reviewed as follows:

New Source Performance Standards (NSPS):

(a) The requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations (40 CFR 60, Subpart MM) are not included for the proposed modification, because the source does not assemble automobiles or light duty trucks.

(b) The requirements of the New Source Performance Standard for Surface Coating of Plastic Parts for Business Machines (40 CFR 60, Subpart TTT) are not included for the proposed modification, because the source does not coat plastic parts for business machines.

(c) There are no New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the permit for this proposed modification.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

(a) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Automobiles and Light Duty Trucks (40 CFR 63, Subpart IIII)(326 IAC 20-85) are not included for the proposed modification, because the source is already subject to another NESHAP as of June 25, 2004 as described in 40 CFR 63.3081(c)(1).

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63, Subpart MMMM)(326 IAC 20-80) are not included for the proposed modification, because the source does not coat metal products or products. The source only coats plastic automotive parts.

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products (40 CFR 63, Subpart PPPP)(326 IAC 20-81) are included in the permit for the adhesive application booths, because the source coats plastics parts or products and is located at a major source of HAPs. The emissions units are considered existing affected coating operations because a plastic surface coating operation existed at this site prior to December 4, 2002. The surface coating booths, identified as SB-1 and SB-2, will continue to be subject to this subpart. The requirements will not change as a result of this modification.

The emission units subject to this rule are as follows:

(1) One (1) adhesive application booth, identified as AB-5, approved in 2018 for construction, with a maximum capacity of 60 plastic automotive dash panel parts per hour, using robotic HVLP spray applicators, equipped with dry filters for particulate control, and exhausting to Stack C-5.

(2) One (1) adhesive application booth, identified as AB-6, approved in 2018 for construction, with a maximum capacity of 60 plastic automotive dash panel parts per hour, using robotic HVLP spray applicators, equipped with dry filters for particulate control, and exhausting to Stack C-5.

The adhesive booths are subject to the following portions of 40 CFR 63, Subpart PPPP:

(1) 40 CFR 63.4480

(2) 40 CFR 63.4481 (a)(1), (2), (3) and (4), (b)
(3) 40 CFR 63.4482 (a), (b), (e)
(4) 40 CFR 63.4483 (b), (d)
(5) 40 CFR 63.4490 (b)(1), (2) and (3), (c)
(6) 40 CFR 63.4491 (a), (b), (c)
(7) 40 CFR 63.4492 (a), (b)
(8) 40 CFR 63.4493 (a), (b)
(9) 40 CFR 63.4500 (a)(1) and (2), (b), (c)
(10) 40 CFR 63.4501
(11) 40 CFR 63.4510 (a), (b), (c)
(12) 40 CFR 63.4520 (a), (b), (c)
(13) 40 CFR 63.4530 (a), (b), (c), (d), (e), (f), (g) and (h)
(14) 40 CFR 63.4531
(15) 40 CFR 63.4540
(16) 40 CFR 63.4541
(17) 40 CFR 63.4542
(18) 40 CFR 63.4550
(19) 40 CFR 63.4551
(20) 40 CFR 63.4552
(21) 40 CFR 63.4560
(22) 40 CFR 63.4561
(23) 40 CFR 63.4563
(24) 40 CFR 63.4564
(25) 40 CFR 63.4565
(26) 40 CFR 63.4566
(27) 40 CFR 63.4567
(28) 40 CFR 63.4568
(21) 40 CFR 63.4580
(22) 40 CFR 63.4581
(23) Tables 1 through 4

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

This source is already subject to this NSPS even prior to this modification.

(d) The requirements of the National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40 CFR 63, Subpart HHHHHH) are not included for the proposed modification, because this source is located at a major source of HAPs.

(e) There are no other National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included for this proposed modification.

Compliance Assurance Monitoring (CAM):

(a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:

(1) has a potential to emit before controls equal to or greater than the major source threshold for the regulated pollutant involved;

(2) is subject to an emission limitation or standard for that pollutant (or a surrogate thereof); and

(3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

(b) Pursuant to 40 CFR 64.2(b)(1)(i), emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act are exempt from the requirements of CAM. Therefore, an evaluation was not conducted for any emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act.

(c) Pursuant to 40 CFR 64.2(b)(1)(iii), Acid Rain requirements pursuant to Sections 404, 405, 406, 407(a), 407(b), or 410 of the Clean Air Act are exempt emission limitations or standards. Therefore, CAM was not evaluated for emission limitations or standards for SO_2 and NO_X under the Acid Rain Program.

(d) Pursuant to 40 CFR 64.3(d), if a continuous emission monitoring system (CEMS) is required pursuant to other federal or state authority, the owner or operator shall use the CEMS to satisfy the requirements of CAM according to the criteria contained in 40 CFR 64.3(d).

The following table is used to identify the applicability of CAM to each existing emission unit and each emission limitation or standard for a specified pollutant based on the criteria specified under 40 CFR 64.2:

Emission Unit and Pollutant	Control Device	Applicable Emission Limitation	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Adhesive booth AB-5: PM*	Dry filter	326 IAC 6-3-2	<100	-	N [1]	-
Adhesive booth AB-6: PM*	Dry filter	326 IAC 6-3-2	<100	-	N [1]	-
Surface coating booth SB-1: PM*	Dry filter	326 IAC 6-3-2	<100	-	N [1]	-
Surface coating booth SB-2: PM*	Dry filter	326 IAC 6-3-2	<100	-	N [1]	-
Uncontrolled PTE (tpy) and controlled PTE (tpy) are evaluated against the Major Source Threshold for each pollutant. Major Source Threshold for criteria pollutants (PM10, PM2.5, SO2, NOX, VOC and CO) is 100 tpy, for a single HAP ten (10) tpy, and for total HAPs twenty-five (25) tpy. Under the Part 70 Permit program (40 CFR 70), PM is not a regulated pollutant.						
PM*	For limitations under 326 IAC 6-3-2, 326 IAC 6.5, and 326 IAC 6.8, IDEM OAQ uses PM as a surrogate for the regulated air pollutant PM10. Therefore, uncontrolled PTE and controlled PTE reflect the emissions of the regulated air pollutant PM10.					
N [1]	CAM does not apply for this pollutant because the uncontrolled PTE of this pollutant is less than the major source threshold.					
Emission units without air pollution controls are not subject to CAM. The adhesive booths do not have control devices for VOC emissions. Therefore, they are not subject to CAM.						

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

State Rule Applicability Determination

Due to the modification at this source, state rule applicability has been reviewed as follows:

(a) 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))
The unlimited potential to emit of VOC is greater than 250 tons per year. The source is currently limited to less than two hundred fifty (250) tons per year to render the requirements of 326 IAC 2-2 (PSD) not applicable. This is an existing applicable requirement, and changes have been made to accommodate the proposed modification. The source has requested that the new adhesive booths, identified as AB-5 and AB-6, be included in the PSD minor limit for all of the surface coating facilities. Because the source has removed the surface coating booth, identified as MAP-3, this unit will also be removed from the limit.

The existing permit has the following condition, which has been revised to accommodate the proposed modification:

> The total VOC input, including coatings, dilution solvents, and cleaning solvents to the following surface coating facilities:

(A) HL-1, HL-2, and HL-4,
(B) SB-1 and SB-2,
(C) AB-1 through AB-6,
(D) SCL, and
(E) MAP-1, MAP-2, MAP-4, and MAP-5

shall not exceed 244 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

The amount of VOC in waste shipped offsite may be deducted from the reported monthly VOC input.

(b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The operation of each of the adhesive booths, identified as AB-5 and AB-6, and each of the surface coating booths, identified as SB-1 and SB-2, will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

(c) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2(d) are applicable to the adhesive booths, identified as AB-5 and AB-6, because they have the potential to use more than five (5) gallons of coating per day. Pursuant to 326 IAC 6-3-2, particulate from the adhesive booths, identified as AB-5 and AB-6, shall each be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

The surface coating booths, identified as SB-1 and SB-2, will continue to be subject to 326 IAC 6-3-2. There will be no changes made to these requirements due to the modification.

(d) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The unlimited potential to emit VOC from each of the adhesive booths, identified as AB-5 and AB-6, is greater than twenty-five (25) tons per year. However, the source shall limit the VOC potential emissions from each of the adhesive booths, identified as AB-5 and AB-6, to less than 24.9 tons per year. Therefore, these units are not subject to the requirements of 326 IAC 8-1-6.

The following conditions will be added to the permit:

(1) The total VOC input and delivered to the applicators in the adhesive application booth (AB-5), including adhesives, coatings, dilution solvents, and cleaning solvents, shall not exceed 24.9 tons per twelve (12) consecutive month period.

(2) The total VOC input and delivered to the applicators in the adhesive application booth (AB-6), including adhesives, coatings, dilution solvents, and cleaning solvents, shall not exceed 24.9 tons per twelve (12) consecutive month period.

The surface coating booths, identified as SB-1 and SB-2, will continue to be subject to 326 IAC 8-1-6 (VOC BACT). The existing permit has the following conditions, and no changes are being made due to this modification:

(1) Pursuant to SSM 133-15489-00027, issued on June 11, 2002, MSM 133-18004-00027, issued on November 25, 2003, and 326 IAC 8-1-6, BACT for the two (2) surface coating booths (SB-1 and SB-2) has been determined to be:

(A) The total VOC delivered to the applicators, including coatings, dilution solvents, and cleaning solvents, shall be limited to less than 49.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month;

(B) The method of application at the two (2) surface coating booths (SB-1 and SB-2)

shall be performed with high volume-low pressure (HVLP) spray applicators or the equivalent; and

(C) The following management and work practices shall apply:

(i) Operator training course.

(ii) Spray gun cleaning.

(iii) The cleanup solvent containers used to transport solvent from drums/ containers to work stations shall be closed containers having soft gasketed closures.

(iv) The application equipment operators shall be instructed and trained on the methods and practices utilized to minimize spillage on the floor and over application.

(v) Storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.

(vi) Cleanup solvents will be reused in the process as much as possible to reduce hazardous waste and the related impact on the environment.

(2) Pursuant to SSM 133-13901-00027, issued on July 13, 2001, and 326 IAC 8-1-6, BACT for the one (1) surface coating line (SCL) has been determined to be:

(A) The total VOC delivered to the applicators, including coatings, dilution solvents, and cleaning solvents, shall be limited to less than 187.4 tons per twelve (12) consecutive month period, with compliance determined at the end of each month;

(B) The method of application at the one (1) surface coating line (SCL) shall be performed with high volume-low pressure (HVLP) spray applicators or the equivalent; and

(C) The following management and work practices shall apply:

(i) Operator training course.

(ii) Spray gun cleaning.

(iii) The cleanup solvent containers used to transport solvent from drums/ containers to work stations shall be closed containers having soft gasketed closures.

(iv) The application equipment operators shall be instructed and trained on the methods and practices utilized to minimize spillage on the floor and over application.

(v) Storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.

(vi) Cleanup solvents will be reused in the process as much as possible to reduce hazardous waste and the related impact on the environment.

(e) 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Coating Operations)
Pursuant to 326 IAC 8-2-1(a)(4), the adhesive booths, identified as AB-5 and AB-6, are not subject to the requirements of 326 IAC 8-2-9, because the source, not located in Lake or Porter County, does not coat metals parts. The surface coating booths, identified as SB-1 and SB-2, will

continue to not be subject to 326 IAC 8-2-9. Therefore, the requirements of 326 IAC 8-2-9 are not applicable.

Compliance Determination and Monitoring Requirements

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

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

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

There are no testing requirements included with this proposed modification. Compliance with the VOC input limitations will be determined with VOC data sheets, and compliance with the particulate requirements will be determined with the use of a control device.

(b) The Compliance Monitoring Requirements applicable to this proposed modification are as follows:

Emission Unit/Control	Stack	Parameter	Frequency
Adhesive Booth AB-5 Dry Filter	C-5	Dry Filter Inspection	Daily
		Overspray Observation	Weekly
		Stack Exhaust and Overspray Inspection	Monthly
Adhesive Booth AB-6 Dry Filter	C-5	Dry Filter Inspection	Daily
		Overspray Observation	Weekly
		Stack Exhaust and Overspray Inspection	Monthly

These monitoring conditions are necessary because the dry filters for the adhesive booths, identified as AB-5 and AB-6, must operate properly to assure compliance with 326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Processes).

The compliance monitoring requirements of the surface coating booth, identified as SB-1 and SB-2, will not change as a result of this modification.

Proposed Changes

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

(1) Adhesive application booths, AB-5 and AB-6, have been added to the list of emission units. Surface coating booth, MAP-3, has been removed from the list of emission units. The list of emission units have been re-lettered due to the addition and removal of units.

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

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

****

(i) One (1) adhesive application booth, identified as AB-5, approved in 2018 for construction, with a maximum capacity of 60 plastic automotive dash panel parts per hour, using robotic HVLP spray applicators, equipped with dry filters for particulate control, and exhausting to Stack C-5.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(j) One (1) adhesive application booth, identified as AB-6, approved in 2018 for construction, with a maximum capacity of 60 plastic automotive dash panel parts per hour, using robotic HVLP spray applicators, equipped with dry filters for particulate control, and exhausting to Stack C-5.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(~~i~~**k**) One (1) surface coating line, identified as SCL, constructed in 2002, with a maximum capacity of 70 plastic vehicle parts per hour, using robotic HVLP spray applicators, equipped with a water curtain with baffles for particulate control, and exhausting to Stacks S-4 through S-7.

This line consists of three (3) spray booths in series and combustion as follows:

(1) One (1) Prime Booth,
(2) One (1) Color Base Booth,
(3) One (1) Clear Coat Booth,
(4) One (1) natural gas-fired bake oven, identified as S-12, rated at 3.5 million British thermal units per hour, exhausting to Stack S-12,
(5) One (1) natural gas-fired bake oven afterburner/oxidizer, identified as S-13, rated at 2.5 million British thermal units per hour, exhausting to Stack S-13, and
(6) One (1) natural gas-fired dry off oven, identified as S-15, rated at 0.5 million British thermal units per hour, exhausting to Stack S-15.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(~~j~~**l**) One (1) surface coating booth, identified as MAP-1, constructed in 2004, with a maximum capacity of 34 plastic parts per hour, using robotic HVLP spray applicators, equipped with a water curtain for particulate control and exhausting to Stack MAP-1.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(~~k~~**m**) One (1) surface coating booth, identified as MAP-2, constructed in 2012, with a maximum capacity of 34 plastic parts per hour, using robotic HVLP spray applicators, equipped with a water curtain for particulate control and exhausting to Stack MAP-2. Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

~~(l) One (1) surface coating booth, identified as MAP-3, constructed in 2013, with a maximum capacity of 34 plastic parts per hour, using robotic HVLP spray~~

~~applicators, equipped with a water curtain for particulate control and exhausting to Stack MAP-3.~~

~~Under 40 CFR 63, Subpart PPPP, this is considered part of an existing affected coating operation.~~

(~~m~~**n**) One (1) surface coating booth, identified as MAP-4, constructed in 2013, with a maximum capacity of 34 plastic parts per hour, using robotic HVLP spray applicators, equipped with a water curtain for particulate control and exhausting to Stack MAP-4.

Under 40 CFR 63, Subpart PPPP, this is considered part of an affected coating operation.

(~~n~~**o**) One (1) surface coating booth, identified as MAP-5, constructed in 2013, with a maximum capacity of 34 plastic parts per hour, using robotic HVLP spray applicators, equipped with dry filters for particulate control and exhausting to Stack MAP-5.

Under 40 CFR 63, Subpart PPPP, this is considered part of an existing affected coating operation.

(~~o~~**p**) One (1) natural gas-fired oven, identified as OVN-5, installed in 2013, rated at 0.40 million British thermal units per hour, used for surface coating booth MAP-5, exhausting to general ventilation.

(~~p~~**q**) One (1) natural gas-fired heat exchanger (air make-up unit), identified as MAU-3, installed in 2001, rated at 33.88 million British thermal units per hour, exhausting to general ventilation.

(2) Adhesive application booths, AB-5 and AB-6, have been added to the emission unit description box, and surface coating booth, MAP-3, has been removed from the emission unit description box in Section D.1. The list of emission units have been re-lettered due to the addition and removal of units.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

****

(i) One (1) adhesive application booth, identified as AB-5, approved in 2018 for construction, with a maximum capacity of 60 plastic automotive dash panel parts per hour, using robotic HVLP spray applicators, equipped with dry filters for particulate control, and exhausting to Stack C-5.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(j) One (1) adhesive application booth, identified as AB-6, approved in 2018 for construction, with a maximum capacity of 60 plastic automotive dash panel parts per hour, using robotic HVLP spray applicators, equipped with dry filters for particulate control, and exhausting to Stack C-5.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(~~i~~**k**) One (1) surface coating line, identified as SCL, constructed in 2002, with a maximum capacity of 70 plastic vehicle parts per hour, using robotic HVLP spray applicators, equipped with a water curtain with baffles for particulate control, and exhausting to Stacks S-4 through S-7.

This line consists of three (3) spray booths in series and combustion as follows**:**

(1) One (1) Prime Booth,
(2) One (1) Color Base Booth,
(3) One (1) Clear Coat Booth,
(4) One (1) natural gas-fired bake oven, identified as S-12, rated at 3.5 million British thermal units per hour, exhausting to Stack S-12,
(5) One (1) natural gas-fired bake oven afterburner/oxidizer, identified as S-13, rated at 2.5 million British thermal units per hour, exhausting to Stack S-13, and
(6) One (1) natural gas-fired dry off oven, identified as S-15, rated at 0.5 million British thermal units per hour, exhausting to Stack S-15.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(~~j~~**l**) One (1) surface coating booth, identified as MAP-1, constructed in 2004, with a maximum capacity of 34 plastic parts per hour, using robotic HVLP spray applicators, equipped with a water curtain for particulate control and exhausting to Stack MAP-1.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(~~k~~**m**) One (1) surface coating booth, identified as MAP-2, constructed in 2012, with a maximum capacity of 34 plastic parts per hour, using robotic HVLP spray applicators, equipped with a water curtain for particulate control and exhausting to Stack MAP-2.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

~~(l) One (1) surface coating booth, identified as MAP-3, constructed in 2013, with a maximum capacity of 34 plastic parts per hour, using robotic HVLP spray applicators, equipped with a water curtain for particulate control and exhausting to Stack MAP-3.~~

~~Under 40 CFR 63, Subpart PPPP, this is considered part of an existing affected coating operation.~~

(~~m~~**n**) One (1) surface coating booth, identified as MAP-4, constructed in 2013, with a maximum capacity of 34 plastic parts per hour, using robotic HVLP spray applicators, equipped with a water curtain for particulate control and exhausting to Stack MAP-4. Under 40 CFR 63, Subpart PPPP, this is considered part of an affected coating operation.

(~~n~~**o**) One (1) surface coating booth, identified as MAP-5, constructed in 2013, with a maximum capacity of 34 plastic parts per hour, using robotic HVLP spray applicators, equipped with dry filters for particulate control and exhausting to Stack MAP-5.

Under 40 CFR 63, Subpart PPPP, this is considered part of an existing affected coating operation.

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

(3) Adhesive application booths, AB-5 and AB-6, have been added to the PSD minor limit, and surface coating booth, MAP-3, has been removed from the PSD minor limit.

D.1.1 PSD Minor Limit [326 IAC 2-2]

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

The total VOC input, including coatings, dilution solvents, and cleaning solvents to the following surface coating facilities:

(a) HL-1, HL-2, and HL-4,
(b) SB-1 and SB-2,
(c) AB-1 through AB-**64**,
(d) SCL, and
(e) MAP-1**, MAP-2, MAP-4, and** ~~through~~ MAP-5

(4) 326 IAC 8-1-6 avoidance limits have been added for adhesive application booths, AB-5 and AB-6. The avoidance limits for adhesive application booths, AB-2 through AB-4, have been revised to clarify that compliance is determined at the end of each month.

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

In order to render the requirements of 326 IAC 8-1-6 not applicable, the adhesive application booths (AB-2 **through**~~, AB-3, and AB-4~~ **AB-6**) shall be limited as follows:

(a) The total VOC input and delivered to the applicators in the adhesive application booth (AB-2), including adhesives, coatings, dilution solvents, and cleaning solvents, shall not exceed 24.9 tons per twelve (12) consecutive month period**, with compliance determined at the end of each month**.

(b) The total VOC input and delivered to the applicators in the adhesive application booth (AB-3), including adhesives, coatings, dilution solvents, and cleaning solvents, shall not exceed 24.9 tons per twelve (12) consecutive month period**, with compliance determined at the end of each month**.

(c) The total VOC input and delivered to the applicators in the adhesive application booth (AB-4), including adhesives, coatings, dilution solvents, and cleaning solvents, shall not exceed 24.9 tons per twelve (12) consecutive month period**, with compliance determined at the end of each month**.

(d) The total VOC input and delivered to the applicators in the adhesive application booth (AB-5), including adhesives, coatings, dilution solvents, and cleaning solvents, shall not exceed 24.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(e) The total VOC input and delivered to the applicators in the adhesive application booth (AB-6), including adhesives, coatings, dilution solvents, and cleaning solvents, shall not exceed 24.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits shall limit the potential to emit VOC from each of the adhesive application booths (AB-2~~, AB-3 and AB-4~~ **through AB-6**) to less than twenty-five (25) tons per 12 consecutive month period and shall render the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable.

(5) Compliance determination and monitoring requirements have been added for adhesive application booths, AB-5 and AB-6, and have been removed for surface coating booth, MAP-3.

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

Pursuant to 326 IAC 6-3-2(d), the dry filters, and water curtains or an equivalent control device for particulate control shall be operated in accordance with manufacturer's specifications and control emissions from the following surface coating facilities:

(a) HL-1, HL-2, and HL-4,
(b) SB-1 and SB-2,
(c) AB-1 through AB-4**6**,
(d) SCL, and
(e) MAP-1**, MAP-2, MAP-4, and** ~~through~~ MAP-5

at all times when the surface coating facilities are in operation

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

A Preventive Maintenance Plan is required for the facilities listed below, and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligations with regard to the Preventive Maintenance Plan required by this condition.

(a) HL-1, HL-2, and HL-4,
(b) SB-1 and SB-2,
(c) AB-1 through AB-4**6**,
(d) SCL, and
(e) MAP-1**, MAP-2, MAP-4, and** ~~through~~ MAP-5

****

D.1.7 Particulate Control

In order to comply with Condition D.1.4, particulate from the following surface coating facilities:
(a) HL-1, HL-2, and HL-4,
(b) SB-1 and SB-2,
(c) AB-1 through AB-4**6**,
(d) SCL, and
(e) MAP-1**, MAP-2, MAP-4, and** ~~through~~ MAP-5
shall be controlled with dry filters, water curtains or an equivalent control device that shall be in operation at all times when the surface coating facilities are in operation.

D.1.8 Monitoring

(a) Dry Filters:
Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters for the surface coating facilities:
(i) HL-1, HL-2, and HL-4,
(ii) SB-1, SB-2,
(iii) AB-1 through AB-4**6,**~~.~~ and
(iv) MAP-5.

To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating facilities stacks:
(i) C-2, C-3,
(ii) SB-1, SB-2,
(iii) C-4, **C-5,** and
(iv) MAP-5
while one or more of the booths are in operation.
****

(b) Water Pans
Daily inspections shall be performed of the water level of the water pans that control particulates for the following surface coating booths:

(i) MAP-1**, MAP-2, and** ~~through~~ MAP-4, and
(ii) SCL
to verify that the water level meets the manufacturer's recommended level or at a level where surface agitation indicates impact of the air flow when any of the surface coating facilities are in operation.
****

In addition, weekly observations shall be made of the overspray from the surface coating booth stacks:
(i) MAP-1**, MAP-2, and** ~~through~~ MAP-4, and
(ii) S-4 through S-7
****

(c) Monthly Inspections shall be performed of the coating emissions from the stacks:
(i) C-2, C-3,
(ii) SB-1, SB-2,
(iii) C-4, **C-5**,
(iv) MAP-1**, MAP-2, MAP-4, and** ~~through~~ MAP-5, and
(v) S-4 through S-7
****

(6) The following emission unit has been re-lettered due to the addition and removal of units.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(~~p~~**q**) One (1) natural gas-fired heat exchanger (air make-up unit), identified as MAU-3, installed in 2001, rated at 33.88 million British thermal units per hour, exhausting to general ventilation.

****

(7) Adhesive application booths, AB-5 and AB-6, have been added to the emission unit description box, and surface coating booth, MAP-3, has been removed from the emission unit description box in Section E.1. The list of emission units have been re-lettered due to the addition and removal of units.

SECTION E.1 NESHAP

Emissions Unit Description:

****

(i) One (1) adhesive application booth, identified as AB-5, approved in 2018 for construction, with a maximum capacity of 60 plastic automotive dash panel parts per hour, using robotic HVLP spray applicators, equipped with dry filters for particulate control, and exhausting to Stack C-5.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(j) One (1) adhesive application booth, identified as AB-6, approved in 2018 for construction, with a maximum capacity of 60 plastic automotive dash panel parts per hour, using robotic HVLP spray applicators, equipped with dry filters for particulate control, and exhausting to Stack C-5.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating

operation.

(~~j~~**k**) One (1) surface coating line, identified as SCL, constructed in 2002, with a maximum capacity of 70 plastic vehicle parts per hour, using robotic HVLP spray applicators, equipped with a water curtain with baffles for particulate control, and exhausting to Stacks S-4 through S-7.

This line consists of three (3) spray booths in series and combustion as follows:

(1) One (1) Prime Booth,
(2) One (1) Color Base Booth,
(3) One (1) Clear Coat Booth,
(4) One (1) natural gas-fired bake oven, identified as S-12, rated at 3.5 million British thermal units per hour, exhausting to Stack S-12,
(5) One (1) natural gas-fired bake oven afterburner/oxidizer, identified as S-13, rated at 2.5 million British thermal units per hour, exhausting to Stack S-13, and
(6) One (1) natural gas-fired dry off oven, identified as S-15, rated at 0.5 million British thermal units per hour, exhausting to Stack S-15.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(~~k~~**l**) One (1) surface coating booth, identified as MAP-1, constructed in 2004, with a maximum capacity of 34 plastic parts per hour, using robotic HVLP spray applicators, equipped with a water curtain for particulate control and exhausting to Stack MAP-1.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(~~l~~**m**) One (1) surface coating booth, identified as MAP-2, constructed in 2012, with a maximum capacity of 34 plastic parts per hour, using robotic HVLP spray applicators, equipped with a water curtain for particulate control and exhausting to Stack MAP-2.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

~~(l) One (1) surface coating booth, identified as MAP-3, constructed in 2013, with a maximum capacity of 34 plastic parts per hour, using robotic HVLP spray applicators, equipped with a water curtain for particulate control and exhausting to Stack MAP-3.~~

~~Under 40 CFR 63, Subpart PPPP, this is considered part of an existing affected coating operation.~~

(~~m~~**n**) One (1) surface coating booth, identified as MAP-4, constructed in 2013, with a maximum capacity of 34 plastic parts per hour, using robotic HVLP spray applicators, equipped with a water curtain for particulate control and exhausting to Stack MAP-4.

Under 40 CFR 63, Subpart PPPP, this is considered part of an affected coating operation.

(~~n~~**o**) One (1) surface coating booth, identified as MAP-5, constructed in 2013, with a maximum capacity of 34 plastic parts per hour, using robotic HVLP spray applicators, equipped with dry filters for particulate control and exhausting to Stack MAP-5.

Under 40 CFR 63, Subpart PPPP, this is considered part of an existing affected coating operation.

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

(8) Adhesive application booths, AB-5 and AB-6, have been added to the reporting form for VOC input for the PSD minor limit, and surface coating booth, MAP-3, has been removed from the reporting form.

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

Part 70 Quarterly Report

Source Name:	Heartland Automotive, LLC
Source Address:	300 South Warren Drive, Greencastle, Indiana 46135
Part 70 Permit No.:	T133-37557-00027
Facility:	HL-1, HL-2, and HL-4, SB-1 and SB-2, AB-1 through AB-~~4~~**6**, SCL, and MAP-1**, MAP-2, MAP4, and** ~~through~~ MAP-5
Parameter:	Total VOC Input
Limit:	Total VOC input, including coatings, dilution solvents, and cleaning solvents shall not exceed a total of 244 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The amount of VOC in waste shipped offsite may be deducted from the reported monthly VOC input. (Condition D.1.1)

(9) A reporting form for the adhesive application booth, AB-5, has been added for the VOC input for the 326 IAC 8-1-6 avoidance limit.

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

Part 70 Quarterly Report

Source Name:	**Heartland Automotive, LLC**
Source Address:	**300 South Warren Drive, Greencastle, Indiana 46135**
Part 70 Permit No.:	**T133-37557-00027**
Facility:	**Adhesive Application booth AB-5**
Parameter:	**Total VOC Input**
Limit:	**Total VOC input and delivered to the applicators, including adhesives, coatings, dilution solvents, and cleaning solvents shall not exceed 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month. (Condition D.1.3)**

QUARTER : _____ **YEAR:** _____

Month	**Column 1**	**Column 2**	**Column 1 + Column 2**
	This Month (tons)	**Previous 11 Months (tons)**	**12 Month Total (tons)**

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

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

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

(10) A reporting form for the adhesive application booth, AB-6, has been added for the VOC input for the 326 IAC 8-1-6 avoidance limit.

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

Part 70 Quarterly Report

Source Name: **Heartland Automotive, LLC**
Source Address: **300 South Warren Drive, Greencastle, Indiana 46135**
Part 70 Permit No.: **T133-37557-00027**
Facility: **Adhesive Application booth AB-6**
Parameter: **Total VOC Input**
Limit: **Total VOC input and delivered to the applicators, including adhesives, coatings, dilution solvents, and cleaning solvents shall not exceed 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month. (Condition D.1.3)**

QUARTER : _____ **YEAR:** _____

Month	**Column 1**	**Column 2**	**Column 1 + Column 2**
	This Month (tons)	**Previous 11 Months (tons)**	**12 Month Total (tons)**

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

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

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

(11) The source has requested that "vacuum forming" and the vacuum forming IDs be removed from the emission unit description for the adhesive application booths.

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

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

****

(f) One (1) adhesive application ~~and vacuum forming~~ booth, identified as AB-2 ~~(VF-1)~~, installed in 2012, with a maximum capacity of 224 plastic automotive door panel parts (or 56 sets of 4 door panels per car) per hour, using robotic HVLP spray applicators, equipped with dry filters for particulate control and exhausting to Stack C-4.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(g) One (1) adhesive application ~~and vacuum forming~~ booth, identified as AB-3 ~~(VF-2)~~, installed in 2012, with a maximum capacity of 224 plastic automotive door panel parts (or 56 sets of 4 door panels per car) per hour, using robotic HVLP spray applicators, equipped with dry filters for particulate control and exhausting to Stack C-4.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(h) One (1) adhesive application ~~and vacuum forming~~ booth, identified as AB-4 ~~(VF-3)~~, installed in 2012, with a maximum capacity of 224 plastic automotive door panel parts (or 56 sets of 4 door panels per car) per hour, using robotic HVLP spray applicators, equipped with dry filters for particulate control and exhausting to Stack C-4.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

****

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

****

(f) One (1) adhesive application ~~and vacuum forming~~ booth, identified as AB-2 ~~(VF-1)~~, installed in 2012, with a maximum capacity of 224 plastic automotive door panel parts (or 56 sets of 4 door panels per car) per hour, using robotic HVLP spray applicators, equipped with dry filters for particulate control and exhausting to Stack C-4.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(g) One (1) adhesive application ~~and vacuum forming~~ booth, identified as AB-3 ~~(VF-2)~~, installed in 2012, with a maximum capacity of 224 plastic automotive door panel parts (or 56 sets of 4 door panels per car) per hour, using robotic HVLP spray applicators, equipped with dry filters for particulate control and exhausting to Stack C-4.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(h) One (1) adhesive application ~~and vacuum forming~~ booth, identified as AB-4 ~~(VF-3)~~, installed in 2012, with a maximum capacity of 224 plastic automotive door panel parts (or 56 sets of 4 door panels per car) per hour, using robotic HVLP spray applicators, equipped with dry filters for particulate control and exhausting to Stack C-4.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

****

****

SECTION E.1 NESHAP

Emissions Unit Description:

****

(f) One (1) adhesive application ~~and vacuum forming~~ booth, identified as AB-2 ~~(VF-1)~~, installed in 2012, with a maximum capacity of 224 plastic automotive door panel parts (or 56 sets of 4 door panels per car) per hour, using robotic HVLP spray applicators, equipped with dry filters for particulate control and exhausting to Stack C-4.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(g) One (1) adhesive application ~~and vacuum forming~~ booth, identified as AB-3 ~~(VF-2)~~, installed in 2012, with a maximum capacity of 224 plastic automotive door panel parts (or 56 sets of 4 door panels per car) per hour, using robotic HVLP spray applicators, equipped with dry filters for particulate control and exhausting to Stack C-4.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(h) One (1) adhesive application ~~and vacuum forming~~ booth, identified as AB-4 ~~(VF-3)~~, installed in 2012, with a maximum capacity of 224 plastic automotive door panel parts (or 56 sets of 4 door panels per car) per hour, using robotic HVLP spray applicators, equipped with dry filters for particulate control and exhausting to Stack C-4.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

****

****

(12) The emission unit descriptions for the surface coating booths, identified as SB-1 and SB-2, have been updated to include the modification date.

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

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

****

(b) One (1) surface coating booth, identified as SB-1, installed in 1999 **and approved in 2018 for modification**, with a maximum capacity of 62.5 plastic automotive parts per hour, using manual HVLP spray applicators, equipped with dry filters for particulate control and exhausting to Stack SB-1.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(c) One (1) surface coating booth, identified as SB-2, installed in 1999 **and approved in 2018 for modification**, with a maximum capacity of 62.5 plastic automotive parts per hour, using manual HVLP spray applicators, equipped with dry filters for particulate control and exhausting to Stack SB-2.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

****

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

****

(b) One (1) surface coating booth, identified as SB-1, installed in 1999 **and approved in 2018 for modification**, with a maximum capacity of 62.5 plastic automotive parts per hour, using manual HVLP spray applicators, equipped with dry filters for particulate control and exhausting to Stack SB-1.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(c) One (1) surface coating booth, identified as SB-2, installed in 1999 **and approved in 2018 for modification**, with a maximum capacity of 62.5 plastic automotive parts per hour, using manual HVLP spray applicators, equipped with dry filters for particulate control and exhausting to Stack SB-2.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

****

****

SECTION E.1 NESHAP

Emissions Unit Description:

****

(b) One (1) surface coating booth, identified as SB-1, installed in 1999 **and approved in 2018 for modification**, with a maximum capacity of 62.5 plastic automotive parts per hour, using manual HVLP spray applicators, equipped with dry filters for particulate control and exhausting to Stack SB-1.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.

(c) One (1) surface coating booth, identified as SB-2, installed in 1999 **and approved in 2018 for modification**, with a maximum capacity of 62.5 plastic automotive parts per hour, using manual HVLP spray applicators, equipped with dry filters for particulate control and exhausting to Stack SB-2.

Under 40 CFR 63, Subpart PPPP, this is considered an existing affected coating operation.
****

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 August 14, 2018. Additional information was received on October 9, 2018.

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 133-40321-00027. The operation of this proposed modification shall be subject to the conditions of the attached Significant Permit Modification No. 133-40358-00027.

The staff recommends to the Commissioner that the Part 70 Significant Source Modification and Significant Permit Modification be approved.

IDEM Contact

(a) If you have any questions regarding this permit, please contact Sarah Green, 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) 232-8423 or (800) 451-6027, and ask for Sarah Green or (317) 232-8423.

(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 Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

Appendix A: Emissions Calculations
Modification Summary

Company Name: Heartland Automotive, LLC
Source Address: 300 South Warren Drive, Greencastle, Indiana 46135
Significant Source Modification: 133-40321-00027
Significant Permit Modification: 133-40358-00027
Reviewer: Sarah Green

Unlimited/Uncontrolled Potential to Emit (tons/year)											
Emission Unit		Emission Unit ID	PM	PM_{10}	$PM_{2.5}$	SO_2	NOx	VOC	CO	Highest Single HAP (Methanol)	Combined HAPs
New Units											
Adhesive app booth		AB-5	1.95	1.95	1.95	-	-	29.69	-	1.17	1.77
Adhesive app booth		AB-6	1.95	1.95	1.95	-	-	29.69	-	1.17	1.77
PTE of New Units			*3.91*	*3.91*	*3.91*	*0.00*	*0.00*	*59.38*	*0.00*	*2.34*	*3.54*
Modified Units											
Before	Surface coating booth	SB-1	0.54	0.54	0.54	-	-	4.13	-	-	0.03
After			1.86	1.86	1.86	-	-	24.67	-	-	0.50
PTE Increase			*1.33*	*1.33*	*1.33*	*0.00*	*0.00*	*20.54*	*0.00*	*0.00*	*0.48*
Before	Surface coating booth	SB-2	0.54	0.54	0.54	-	-	4.13	-	-	0.03
After			1.86	1.86	1.86	-	-	24.67	-	-	0.50
PTE Increase			*1.33*	*1.33*	*1.33*	*0.00*	*0.00*	*20.54*	*0.00*	*0.00*	*0.48*
Total PTE			**6.56**	**6.56**	**6.56**	**0.00**	**0.00**	**100.45**	**0.00**	**2.34**	**4.49**

Limited Potential to Emit (tons/year)											
Emission Unit		Emission Unit ID	PM	PM_{10}	$PM_{2.5}$	SO_2	NOx	VOC	CO	Highest Single HAP (Methanol)	Combined HAPs
New Units											
Adhesive app booth		AB-5	1.95	1.95	1.95	-	-	24.90*	-	1.17	1.77
Adhesive app booth		AB-6	1.95	1.95	1.95	-	-	24.90*	-	1.17	1.77
PTE of New Units			*3.91*	*3.91*	*3.91*	*0.00*	*0.00*	*49.80*	*0.00*	*2.34*	*3.54*
Modified Units											
Before	Surface coating booth	SB-1	0.54	0.54	0.54	-	-	49.00**	-	-	0.03
	Surface coating booth	SB-2	0.54	0.54	0.54	-	-		-	-	0.03
After	Surface coating booth	SB-1	1.86	1.86	1.86	-	-	49.00**	-	-	0.50
	Surface coating booth	SB-2	1.86	1.86	1.86	-	-		-	-	0.50
PTE Increase			*2.65*	*2.65*	*2.65*	*0.00*	*0.00*	*0.00*	*0.00*	*0.00*	*0.95*
Total Limited PTE Increase			**6.56**	**6.56**	**6.56**	**0.00**	**0.00**	**49.80**	**0.00**	**2.34**	**4.49**

*These units are limited to 24.9 tpy to avoid 326 IAC 8-1-6 BACT. They are also included in the PSD Minor Limit of 244 tpy with the other surface coating facilities.
**These units are limited to less than 49 tpy, pursuant to 326 IAC 8-1-6 VOC BACT. They are also included in the PSD Minor Limit of 244 tpy with the other surface coating facilities.

Appendix A: Emissions Calculations
Source Wide Emissions Summary
Uncontrolled PTE and PSD Determination

Company Name: Heartland Automotive, LLC
Source Address: 300 South Warren Drive, Greencastle, Indiana 46135
Significant Source Modification: 133-40321-00027
Significant Permit Modification: 133-40358-00027
Reviewer: Sarah Green

Uncontrolled Potential Emissions for Permit Level Determination (tons/year)										
Emission Unit	**Emission Unit ID**	**PM**	**PM_{10}**	**$PM_{2.5}$**	**SO_2**	**NOx**	**VOC**	**CO**	**Highest Single HAP (Methanol)**	**Combined HAPs**
Headliner assembly area	HL-1, HL-2, HL-3, HL-4	1.54	1.54	1.54	-	-	0.00	-	-	-
Surface coating booth	SB-1	1.86	1.86	1.86	-	-	24.67	-	-	0.50
Surface coating booth	SB-2	1.86	1.86	1.86	-	-	24.67	-	-	0.50
Adhesive app booth	AB-1	1.90	1.90	1.90	-	-	31.30	-	1.67	3.52
Adhesive app booth	AB-2	6.76	6.76	6.76	-	-	100.39	-	4.05	4.65
Adhesive app booth	AB-3	6.76	6.76	6.76	-	-	100.39	-	4.05	4.65
Adhesive app booth	AB-4	6.76	6.76	6.76	-	-	100.39	-	4.05	4.65
Adhesive app booth	AB-5	1.95	1.95	1.95	-	-	29.69	-	1.17	1.77
Adhesive app booth	AB-6	1.95	1.95	1.95	-	-	29.69	-	1.17	1.77
Surface coating line	SCL	6.81	6.81	6.81	-	-	133.92	-	-	13.75
Surface coating booth	MAP-1	0.72	0.72	0.72	-	-	15.19	-	-	3.53
Surface coating booth	MAP-2	0.72	0.72	0.72	-	-	15.19	-	-	3.53
Surface coating booth	MAP-4	0.72	0.72	0.72	-	-	7.09	-	-	0.57
Surface coating booth	MAP-5	0.72	0.72	0.72	-	-	7.09	-	-	0.57
Natural gas combustion		0.73	2.93	2.93	0.23	38.61	2.12	32.44	-	0.73
Injection molding	UBE#1-#13, Mitsubishi #14-#15	0.832	0.83	0.83	-	-	2.93	-	-	0.10
Grinding operation		1.03	1.03	1.03	-	-	-	-	-	-
Thermoforming operation	TP1-TP3	-	-	-	-	-	0.18	-	-	-
Slush mold/powder slush operation	SM/PS	0.14	0.14	0.14	-	-	0.18	-	-	0.011
Parts washer	PW-1	-	-	-	-	-	0.16	-	-	-
Emergency generator	EG-1	9.8E-04	7.6E-06	7.6E-06	5.8E-05	0.40	0.01	0.03	2.5E-04	0.01
Total		**43.78**	**45.98**	**45.98**	**0.23**	**39.02**	**625.25**	**32.47**	**16.14**	**44.79**
Fugitives - paved roads		2.29	0.46	0.11	-	-	-	-	-	-

Appendix A: Emissions Calculations
Source Wide Emissions Summary
Potential to Emit After Issuance

Company Name: Heartland Automotive, LLC
Source Address: 300 South Warren Drive, Greencastle, Indiana 46135
Significant Source Modification: 133-40321-00027
Significant Permit Modification: 133-40358-00027
Reviewer: Sarah Green

Limited Potential Emissions After Issuance of Permit (tons/year)										
Emission Unit	**Emission Unit ID**	**PM**	**PM_{10}**	**$PM_{2.5}$**	**SO_2**	**NOx**	**VOC**	**CO**	**Highest Single HAP (Methanol)**	**Combined HAPs**
Headliner assembly area [1]	HL-1, HL-2, HL-3, HL-4	1.54	1.54	1.54	-	-			-	-
Surface coating booth [1]	SB-1 [2]	1.86	1.86	1.86	-	-			-	0.50
Surface coating booth [1]	SB-2 [2]	1.86	1.86	1.86	-	-			-	0.50
Adhesive app booth [1]	AB-1	1.90	1.90	1.90	-	-			1.67	3.52
Adhesive app booth [1]	AB-2 [4]	6.76	6.76	6.76	-	-			4.05	4.65
Adhesive app booth [1]	AB-3 [4]	6.76	6.76	6.76	-	-			4.05	4.65
Adhesive app booth [1]	AB-4 [4]	6.76	6.76	6.76	-	-	244.00		4.05	4.65
Adhesive app booth [1]	AB-5 [4]	1.95	1.95	1.95					1.17	1.77
Adhesive app booth [1]	AB-6 [4]	1.95	1.95	1.95					1.17	1.77
Surface coating line [1]	SCL [3]	6.81	6.81	6.81	-	-			-	13.75
Surface coating booth [1]	MAP-1	0.72	0.72	0.72	-	-			-	3.53
Surface coating booth [1]	MAP-2	0.72	0.72	0.72	-	-			-	3.53
Surface coating booth [1]	MAP-4	0.72	0.72	0.72	-	-			-	0.57
Surface coating booth [1]	MAP-5	0.72	0.72	0.72	-	-			-	0.57
Natural gas combustion		0.73	2.93	2.93	0.23	38.61	2.12	32.44	-	0.73
Injection molding	UBE#1-#13, Mitsubishi #14-#15	0.832	0.83	0.83	-	-	2.93	-	-	0.10
Grinding operation		1.03	1.03	1.03	-	-	-	-	-	-
Thermoforming operation	TP1-TP3	-	-	-	-	-	0.18	-	-	-
Slush mold/powder slush operation	SM/PS	0.14	0.14	0.14	-	-	0.18	-	-	0.01
Parts washer	PW-1	-	-	-	-	-	0.16	-	-	-
Emergency generator	EG-1	9.8E-04	7.6E-06	7.6E-06	5.8E-05	0.40	0.01	0.03	2.5E-04	0.01
Total		**43.78**	**45.98**	**45.98**	**0.23**	**39.02**	**249.58**	**32.47**	**16.14**	**44.80**
Fugitives - paved roads		2.29	0.46	0.11	-	-	-	-	-	-

[1] 326 IAC 2-2 PSD Minor VOC limit not to exceed 244 tpy
[2] 326 IAC 8-1-6 VOC BACT <49 tpy
[3] 326 IAC 8-1-6 VOC BACT <187.4 tpy
[4] 326 IAC 8-1-6 VOC BACT avoidance limit not to exceed 24.9 tpy, each

Appendix A: Emissions Calculations

Potential Source Wide HAP Emissions Summary

Company Name: **Heartland Automotive, LLC**
Source Address: **300 South Warren Drive, Greencastle, Indiana 46135**
Significant Source Modification: **133-40321-00027**
Significant Permit Modification: **133-40358-00027**
Reviewer: **Sarah Green**

Uncontrolled HAP Emission Summary (tons/year)														
Pollutant	Headliner Assembly	SB-1 & SB-2	AB-1	AB-2-AB-6	SCL	MAP-1	MAP-2	MAP-4	MAP-5	Nat Gas combustion	Injection Molding	Emergency Generator	Slush/Powder, Thermoforming	TOTAL
Single HAP														
Acetaldehyde	-	-	-	-	-	-	-	-	-	-	0.01	8.3E-04	-	0.01
Acrolein	-	-	-	-	-	-	-	-	-	-	2.7E-04	5.1E-04	-	0.00
Benzene	-	0.16	-	-	-	-	-	-	-	-	-	4.3E-05	-	0.16
Chloroform	-	-	-	-	0.04	-	-	-	-	-	-	-	-	0.04
Cumene	-	-	0.02	-	0.01	-	-	-	-	-	-	-	-	0.03
Ethylbenzene	-	-	0.20	-	1.80	0.43	0.43	-	-	-	0.01	-	-	2.88
Formaldehyde	-	-	-	-	0.004	-	-	-	-	0.03	0.02	0.01	-	0.06
Hexane	-	-	-	-	-	-	-	-	-	0.70	-	1.1E-04	-	0.70
Methanol	-	-	1.67	14.47	-	-	-	-	-	-	-	2.5E-04	-	16.14
Napthalene	-	0.28	-	-	-	-	-	-	-	-	-	-	-	0.28
MIBK	-	-	-	-	3.08	0.80	0.80	-	-	-	-	-	-	4.68
Styrene	-	-	-	-	-	-	-	-	-	-	0.05	-	-	0.05
Toluene	-	-	0.83	3.01	0.08	0.04	0.04	0.04	0.04	0.0013	-	-	-	4.06
Vinyl Chloride	-	-	-	-	-	-	-	-	-	-	-	-	0.01	0.01
Xylene	-	0.56	0.79	-	8.74	2.26	2.26	0.54	0.54	-	-	-	-	15.69
Combined HAPs	**0.00**	**1.00**	**3.52**	**17.48**	**13.75**	**3.53**	**3.53**	**0.57**	**0.57**	**0.73**	**0.10**	**0.01**	**0.01**	**44.79**

Appendix A: Emissions Calculations
VOC, HAP and Particulate From Adhesive Coating Operations
Headliner Assembly Area HA/VF/EF

Company Name: Heartland Automotive, LLC
Source Address: 300 South Warren Drive, Greencastle, Indiana 46135
Significant Source Modification: 133-40321-00027
Significant Permit Modification: 133-40358-00027
Reviewer: Sarah Green

There are 3 booths in the VF/EF/HS department with a roll coater and spray gun, each, and 1 booth with hot glue gun

Water based catalyst Spray

	Density of Catalyst	Weight %VOC - catalyst 1 part to 4 and 5% VOC	Process (parts/hr)	Catalyst Usage (gal/part)	Catalyst Rate (gal/hr)	Catalyst Rate (lb/hr)
HL-1	8.340	95.0%	35	0.160	5.613	46.815
HL-2	8.340	95.0%	35	0.160	5.613	46.815
HL-3	7.500	0.0%	35	0.000	0.000	0.000
HL-4	8.340	95.0%	35	0.160	5.613	46.815

	Density (lbs/gal)	Weight % Volatile (H_2O & Organics)	Weight % H_2O	Weight % Organics	Volume % H_2O	Volume % Non-Volatiles (solids)	Adhesive Usage (gal/part)	Process (parts/hr)	VOC Content (lbs/gal - less water)	VOC Content (lbs/gal)	VOC PTE (tpy)	Transfer Efficiency	UncontrolledPM PTE (tpy)	Controlled PM PTE (tpy) @ 90% for dry filter
HL-1	8.340	95.0%	90.00%	0.0%	90.00%	5.0%	0.160	35	0.00	0.00	**0.00**	95%	**0.51**	**0.05**
HL-2	8.340	95.0%	90.00%	0.0%	90.00%	5.0%	0.160	35	0.00	0.00	**0.00**	95%	**0.51**	**0.05**
HL-3	7.500	0.0%	90.00%	0.0%	0.00%	100.0%	0.000	35	0.00	0.00	**0.00**	100%	**0.00**	**0.00**
HL-4	8.340	95.0%	90.00%	0.0%	90.00%	5.0%	0.160	35	0.00	0.00	**0.00**	95%	**0.51**	**0.05**
Carrier for water/based adhesive is water and ammonia - 5% of catalyst is the maximum solids content and also 0% maximum VOC and HAP										**Total**	**0.00**		**1.54**	**0.15**

There are 3 booths in the VF/EF/HS department with a roll coater and spray gun, each, and 1 booth with hot glue gun

Roll Coating Operations

	Density of Mixture	Weight %VOC - catalyst 1 part to 4 and 5% VOC	Process (parts/hr)	Adhesive Usage (gal/part)	Adhesive Rate (gal/hr)	Adhesive Rate (lb/hr)
HL-1	10.250	0.0%	35	0.759	26.568	272.319
HL-2	10.250	0.0%	35	0.759	26.568	272.319
HL-3	7.500	0.0%	35	0.759	26.568	199.258
HL-4	10.250	0.0%	35	0.759	26.568	272.319

	Density (lbs/gal)	Weight % Volatile (H_2O & Organics)	Weight % H_2O	Weight % Organics	Volume % H_2O	Volume % Non-Volatiles (solids)	Adhesive Usage (gal/part)	Process (parts/hr)	VOC Content (lbs/gal - less water)	VOC Content (lbs/gal)	VOC PTE (tpy)	Transfer Efficiency	PM PTE (tpy)
HL-1	10.250	0.0%	0.00%	0.0%	0.00%	100.0%	0.759	35	0.00	0.00	**0.00**	100%	**0.00**
HL-2	10.250	0.0%	0.00%	0.0%	0.00%	100.0%	0.759	35	0.00	0.00	**0.00**	100%	**0.00**
HL-3	7.500	0.0%	0.00%	0.0%	0.00%	100.0%	0.759	35	0.00	0.00	**0.00**	100%	**0.00**
HL-4	10.250	0.0%	0.00%	0.0%	0.00%	100.0%	0.759	35	0.00	0.00	**0.00**	100%	**0.00**
										Total	**0.00**		**0.00**

Headliners are made by rolling on the adhesive (urethane) resin and spraying on catalyst activate on a separate component, then vacuum forming all the pieces together (4 components to make a headliner)
Headliner Booth #3 applies only hot melt adhesives from a robot glue gun that are 100% solids and with 100% transfer efficiency so that no VOC or particulate matter are released.

Notes & Methodology

Part Weight (kg) = supplied by client
Part Weight (lbs) = Part Weight (kg) x 2.2 kg/lb
Process (parts/hr) = supplied by client
Process Weight (lbs parts/hr) = Part Weight (lbs) x Process (parts/hr)
Adhesive Rate (gal/hr) = Process Weight (lbs parts/hr) / Density (lbs/gal)
Adhesive Usage (gal/part) = Adhesive Rate (gal/hr) / Process (parts/hr)
Density (lbs/gal) = as supplied by MSDS
Weight % Volatile (H_2O & Organics) = as supplied by MSDS
Weight % H_2O = as supplied by MSDS
Volume % H_2O = as supplied by MSDS
Volume % Non-Volatiles (solids) = as supplied by MSDS
VOC Content (lbs/gal - less water) = [Density (lbs/gal) x Weight % Organics] / [1 - Volume % H2O]
VOC Content (lbs/gal) = Density (lbs/gal) x Weight % Organics
Clean-UP Usage (gal/month) = supplied by client x 1.5 safety factor
VOC PTE (tpy) = Adhesive Usage (gal/part) x Process (parts/hr) x VOC Content (lbs/gal) x 8,760 hours per year / 2,000 lbs per ton
Transfer Efficiency = conservative estimate based upon HVLP spray equipment
PM PTE (tpy) = Adhesive Usage (gal/part) x Process (parts/hr) x [1 - Weight % Volatile (H_2O & Organics)] x Transfer Efficiency x 8,760 hours per year / 2,000 lbs per ton

Appendix A: Emissions Calculations
VOC, HAP and Particulate From Surface Coating Operations
Surface Coating Booths SB-1 and SB-2

Company Name: **Heartland Automotive, LLC**
Source Address: **300 South Warren Drive, Greencastle, Indiana 46135**
Significant Source Modification: **133-40321-00027**
Significant Permit Modification: **133-40358-00027**
Reviewer: **Sarah Green**

SB-1

Material	Density (lbs/gal)	Weight % Volatile (H_2O & Organics)	Weight % (H_2O)	Weight % (Organics)	Volume % (H_2O)	Volume % Non-Volatiles (solids)	Application (gal/unit)	Capacity (unit/hr)	VOC (lbs) per Coating (gal) less H_2O	VOC Content (lbs/gal)	VOC (lbs/gal solids)	Potential VOC (lbs/hr)	Potential VOC (lbs/day)	Potential VOC (tpy)	Transfer Efficiency	Potential Particulate (tpy)
WB-243-1 Glossy	8.98	66.79%	53.06%	13.73%	57.20%	42.80%	0.00739	62.5	2.88	1.23	2.88	0.57	13.67	2.49	75%	0.54
VH Switch Black Paint	8.71	70.43%	0.00%	35.00%	0.00%	29.57%	0.00739	62.5	3.05	3.05	10.31	1.41	33.78	6.17	75%	1.00
W 1240/5 Gal Premium Black	9.37	78.49%	70.00%	8.49%	70.00%	17.48%	0.00739	62.5	2.65	0.80	4.55	0.37	8.81	1.61	75%	0.37
Beige WM PM	9.42	71.53%	0.00%	20.00%	0.00%	28.47%	0.00739	62.5	1.88	1.88	6.61	0.87	20.87	3.81	75%	0.76
Low Gloss Black	8.11	71.09%	0.00%	64.45%	0.00%	28.91%	0.00739	62.5	5.23	5.23	18.09	2.42	57.97	**10.58**	75%	0.94
Clean-Up																
Red Spot Thinner	6.81	100.00%	0.00%	50.00%	0.00%	0.00%	0.00739	62.5	3.41	3.41	N/A	1.57	37.77	6.89	75%	0.86
Red Spot #283 Thinner	6.96	100.00%	0.00%	100.00%	0.00%	0.00%	0.00739	62.5	6.96	6.96	N/A	3.22	77.19	**14.09**	75%	0.00
IPA	6.59	100%	0.00%	100%	0.00%	0.00%	0.0009	62.5	6.59	6.59	N/A	0.37	8.89	1.62	75%	0.00
TOTAL														**24.67**		**1.86**
													PM dry filter control efficiency		90%	**0.19**

Material	Density (lbs/gal)	HAP Constituent	HAP %	HAP Emissions (tpy)
VH Switch Black Paint	8.71	-	-	-
W 1240/5 Gal Premium Black	9.37	Xylene	1.48%	0.281
	9.37	Benzene	0.42%	0.080
Beige WM PM	9.42	-	-	-
Low Gloss Black	8.11	-	-	-
Red Spot Thinner	6.81	-	-	-
Red Spot #283 Thinner	6.96	Napthalene	1.00%	0.141
IPA	6.59	-	-	-
TOTAL				**0.502**

SB-2

Material	Density (lbs/gal)	Weight % Volatile (H_2O & Organics)	Weight % (H_2O)	Weight % (Organics)	Volume % (H_2O)	Volume % Non-Volatiles (solids)	Application (gal/unit)	Capacity (unit/hr)	VOC (lbs) per Coating (gal) less H_2O	VOC Content (lbs/gal)	VOC (lbs/gal solids)	Potential VOC (lbs/hr)	Potential VOC (lbs/day)	Potential VOC (tpy)	Transfer Efficiency	Potential Particulate (tpy)
VH Switch Black Paint	8.71	70.43%	0.00%	35.00%	0.00%	29.57%	0.00739	62.5	3.05	3.05	10.31	1.41	33.78	6.17	75%	1.00
W 1240/5 Gal Premium Black	9.37	78.49%	70.00%	8.49%	70.00%	17.48%	0.00739	62.5	2.65	0.80	4.55	0.37	8.81	1.61	75%	0.37
Beige WM PM	9.42	71.53%	0.00%	20.00%	0.00%	28.47%	0.00739	62.5	1.88	1.88	6.61	0.87	20.87	3.81	75%	0.76
Low Gloss Black	8.11	71.09%	0.00%	64.45%	0.00%	28.91%	0.00739	62.5	5.23	5.23	18.09	2.42	57.97	**10.58**	75%	0.94
Clean-Up																
Red Spot Thinner	6.81	100.00%	0.00%	50.00%	0.00%	0.00%	0.00739	62.5	3.41	3.41	N/A	1.57	37.77	6.89	75%	0.86
Red Spot #283 Thinner	6.96	100.00%	0.00%	100.00%	0.00%	0.00%	0.00739	62.5	6.96	6.96	N/A	3.22	77.19	**14.09**	75%	0.00
IPA	6.59	100%	0.00%	100%	0.00%	0.00%	0.0009	62.5	6.59	6.59	N/A	0.37	8.89	1.62	75%	0.00
TOTAL														**24.67**		**1.86**
													PM dry filter control efficiency		90%	**0.19**

Material	Density (lbs/gal)	HAP Constituent	HAP %	HAP Emissions (tpy)
VH Switch Black Paint	8.71	-	-	-
W 1240/5 Gal Premium Black	9.37	Xylene	1.48%	0.281
	9.37	Benzene	0.42%	0.080
Beige WM PM	9.42	-	-	-
Low Gloss Black	8.11	-	-	-
Red Spot Thinner	6.81	-	-	-
Red Spot #283 Thinner	6.96	Napthalene	1.00%	0.141
IPA	6.59	-	-	-
TOTAL				**0.502**

Notes & Methodology

Material Specifications (density, VOC content, etc) = as supplied by MSDSs
Material Application per part and Unit Capacities = supplied by client
VOC (lbs) per Coating (gal) less H_2O = Density (lbs/gal) x Weight % (Organics) / (1 - Volume % [H_2O])
VOC Content (lbs/gal) = Density (lbs/gal) x Weight % (Organics)
VOC (lbs/gal solids) = Density (lbs/gal) x Weight % (Organics) / Volume % Non-Volatiles (solids)
Potential VOC (lbs/hr) = Application (gal/unit) x Capacity (units/hr) x VOC Content (lbs/gal)
Potential VOC (lbs/day) = Potential VOC (lbs/hr) x 24 hours per day
Potential VOC (tpy) = Potential VOC (lbs/day) x 365 days per year / 2,000 lbs per year
Potential Particulate (tpy) = Application (gal/unit) x Capacity (units/hr) x VOC Content (lbs/gal) x (1 - Weight % [Organics]) x (1 - Transfer Efficiency) x 8,760 hours per year / 2,000 lbs per ton
Totals are based on Worst Coating/cleanup and worst case HAP for each coating/cleanup

Appendix A: Emissions Calculations
VOC, HAP and Particulate From Adhesive Coating Operations
Adhesive Coating Booth AB-1

Company Name: Heartland Automotive, LLC
Source Address: 300 South Warren Drive, Greencastle, Indiana 46135
Significant Source Modification: 133-40321-00027
Significant Permit Modification: 133-40358-00027
Reviewer: Sarah Green

Door Panel Adhesive Spray Booth Emissions Calculations

AB-1 is the old hand held spray booth and is used only occasionally for service (obsolete) part production.

AB-1 - Old Manual Booth 12 sets or 48 pieces per hour

Material	Density (lbs/gal)	Weight % Volatile (H_2O & Organics)	Weight % H_2O	Weight % Organics	Volume % H_2O	Volume % Non-Volatiles (solids)	Adhesive Usage (gal/part)	Process (parts/hr)	VOC Content (lbs/gal - less water)	VOC Content (lbs/gal)	VOC PTE (lb/hr)	VOC PTE (tpy)	Transfer Efficiency	Uncontrolled PM PTE (tpy)	Controlled PM PTE (tpy) @ 90% for panel filter
Sunstar 321LH	7.16	86.2%	0.00%	86.2%	0.00%	21.4%	0.018	48	6.17	6.17	5.33	**23.35**	75%	**1.45**	**0.14**

Density (lbs/gal)	Density (lbs/gal)	Process (parts/hr)	Weight % Methanol	Methanol PTE (tpy)
Sunstar 321LH	7.16	48	3.2%	**0.87**

HAP Recap	
Methanol	**0.87**
Toluene	0.60

Total VOC **24.35**
Total HAP **1.47**

Clean-Up - Superior S-5205

Density (lbs/gal)	Clean-Up Usage (gal/month)	VOC Content (lbs/gal)	VOC PTE (tpy)	HAP PTE - toluene (tpy)
7.30	23	7.30	**1.00**	**0.60**

AB-1 - As Touch Up Paint Booth

Material	Density (lbs/gal)	Weight % Volatile (H_2O & Organics)	Weight % H_2O	Weight % Organics	Volume % H_2O	Volume % Non-Volatiles (solids)	Paint Usage (gal/part)	Process (parts/hr)	VOC Content (lbs/gal - less water)	VOC Content (lbs/gal)	VOC PTE (lb/hr)	VOC PTE (tpy)	Transfer Efficiency	Uncontrolled PM PTE (tpy)	Controlled PM PTE (tpy) @ 90% for panel filter
US Paint - Interior Silver	7.74	78.6%	0.00%	78.6%	0.00%	21.4%	0.018	14	6.08	6.08	1.52	**6.66**	75%	**0.45**	**0.05**

Density (lbs/gal)	Density (lb/gal)	Process (parts/hr)	Weight % MIK	Methanol PTE (tpy)	Weight % Xylene	Xylene PTE (tpy)	Weight % Ethyl Benzene	EB PTE (tpy)	Weight % Toluene	Toluene PTE (tpy)	Weight % Cumene	Cumene PTE (tpy)
US Paint - Interior Silver	7.74	14	9.5%	**0.801**	9.4%	**0.795**	2.4%	**0.204**	0.7%	**0.056**	0.2%	**0.018**

Clean-Up - Superior S-5205

Density (lbs/gal)	Clean-Up Usage (gal/month)	VOC Content (lbs/gal)	VOC PTE (tpy)	HAP PTE - toluene (tpy)
7.30	7	7.30	**0.29**	**0.17**

HAP Recap	
Methanol	**0.801**
Xylene	0.795
Ethyl Benzene	0.204
Toluene	0.230
Cumene	0.018

Total VOC **6.95**
Total HAP **2.048**

Notes & Methodology

Part Weight (kg) = supplied by client
Part Weight (lbs) = Part Weight (kg) x 2.2 kg/lb
Process (parts/hr) = supplied by client
Process Weight (lbs parts/hr) = Part Weight (lbs) x Process (parts/hr)
Adhesive Rate (gal/hr) = Process Weight (lbs parts/hr) / Density (lbs/gal)
Adhesive Usage (gal/part) = Adhesive Rate (gal/hr) / Process (parts/hr)
Density (lbs/gal) = as supplied by MSDS
Weight % Volatile (H_2O & Organics) = as supplied by MSDS
Weight % H_2O = as supplied by MSDS
Volume % H_2O = as supplied by MSDS
Volume % Non-Volatiles (solids) = as supplied by MSDS
VOC Content (lbs/gal - less water) = [Density (lbs/gal) x Weight % Organics] / [1 - Volume % H2O]
VOC Content (lbs/gal) = Density (lbs/gal) x Weight % Organics
VOC PTE (tpy) = Adhesive Usage (gal/part) x Process (parts/hr) x VOC Content (lbs/gal) x 8,760 hours per year / 2,000 lbs per ton
Transfer Efficiency = from orignal permit for HVLP equipment
PM PTE (tpy) = Adhesive Usage (gal/part) x Process (parts/hr) x [1 - Weight % Volatile (H_2O & Organics)] x Transfer Efficiency x 8,760 hours per year / 2,000 lbs per ton
Adhesive booths have replaceable panel fabic filters and a 90% control factor is used
HAP Cleanup is Superior S-5205 and is estimated at 100% VOC and 60% toluene - usage is 3/4 of a 5 gal. pail per operating day cleanup of machine

Appendix A: Emissions Calculations
VOC, HAP and Particulate From Adhesive Coating Operations
Adhesive Coating Booths AB-2, AB-3, AB-4

Company Name: Heartland Automotive, LLC
Source Address: 300 South Warren Drive, Greencastle, Indiana 46135
Significant Source Modification: 133-40321-00027
Significant Permit Modification: 133-40358-00027
Reviewer: Sarah Green

Door Panel Adhesive Spray Booth Emissions Calculations

The adhesive spray line is described at 224 parts (or 56 sets of 4 door panels per car) per hour. This for AB-2 and AB-3 that are operatated as a combined line (back to back)
AB-4 is not often used but is estimated to have a similar maximum capacity.

AB-2 and AB-3 are currently configured back to back and operated as one line, but could possibly be reconfigured in the future.

AB-2

Material	Density (lbs/gal)	Weight % Volatile (H_2O & Organics)	Weight % H_2O	Weight % Organics	Volume % H_2O	Volume % Non-Volatiles (solids)	Adhesive Usage (gal/part)	Process (parts/hr)	VOC Content (lbs/gal - less water)	VOC Content (lbs/gal)	VOC PTE (lb/hr)	VOC PTE (tpy)	Transfer Efficiency	Uncontrolled PM PTE (tpy)	Controlled PM PTE (tpy) @ 90% for panel filter
Sunstar 321LH	7.16	78.6%	0.00%	78.6%	0.00%	21.4%	0.018	224	5.63	5.63	22.69	**99.39**	75%	**6.76**	**0.68**

Density (lbs/gal)	Adhesive Usage (gal/part)	Process (parts/hr)	Weight % Methanol	Methanol PTE (tpy)
Sunstar 321LH	7.16	224	3.2%	**4.05**

HAP Recap	
Methanol	**4.05**
Toluene	0.60

Total VOC **100.39**
Total HAP **4.65**

Clean-Up - Superior S-5205

Density (lbs/gal)	Clean-Up Usage (gal/month)	VOC Content (lbs/gal)	VOC PTE (tpy)	HAP PTE - toluene (tpy)
7.30	23	7.30	**1.00**	**0.60**

AB-3

Material	Density (lbs/gal)	Weight % Volatile (H_2O & Organics)	Weight % H_2O	Weight % Organics	Volume % H_2O	Volume % Non-Volatiles (solids)	Adhesive Usage (gal/part)	Process (parts/hr)	VOC Content (lbs/gal - less water)	VOC Content (lbs/gal)	VOC PTE (lb/hr)	VOC PTE (tpy)	Transfer Efficiency	Uncontrolled PM PTE (tpy)	Controlled PM PTE (tpy) @ 90% for panel filter
Sunstar 321LH	7.16	78.6%	0.00%	78.6%	0.00%	21.4%	0.018	224	5.63	5.63	22.69	**99.39**	75%	**6.76**	**0.68**

Density (lbs/gal)	Adhesive Usage (gal/part)	Process (parts/hr)	Weight % Methanol	Methanol PTE (tpy)
Sunstar 321LH	7.16	224	3.2%	**4.05**

HAP Recap	
Methanol	**4.05**
Toluene	0.60

Total VOC **100.39**
Total HAP **4.65**

Clean-Up - Superior S-5205

Density (lbs/gal)	Clean-Up Usage (gal/month)	VOC Content (lbs/gal)	VOC PTE (tpy)	HAP PTE - toluene (tpy)
7.30	23	7.30	**1.00**	**0.60**

Production is mainly done on AB-2 and AB-3, but AB-4 is sometimes used and is operational

AB-4

Material	Density (lbs/gal)	Weight % Volatile (H_2O & Organics)	Weight % H_2O	Weight % Organics	Volume % H_2O	Volume % Non-Volatiles (solids)	Adhesive Usage (gal/part)	Process (parts/hr)	VOC Content (lbs/gal - less water)	VOC Content (lbs/gal)	VOC PTE (lb/hr)	VOC PTE (tpy)	Transfer Efficiency	Uncontrolled PM PTE (tpy)	Controlled PM PTE (tpy) @ 90% for panel filter
Sunstar 321LH	7.16	78.6%	0.00%	78.6%	0.00%	21.4%	0.018	224	5.63	5.63	22.69	**99.39**	75%	**6.76**	**0.68**

Density (lbs/gal)	Adhesive Usage (gal/part)	Process (parts/hr)	Weight % Methanol	Methanol PTE (tpy)
Sunstar 321LH	7.16	224	3.2%	**4.05**

HAP Recap	
Methanol	**4.05**
Toluene	0.60

Total VOC **100.39**
Total HAP **4.65**

Clean-Up - Superior S-5205

Density (lbs/gal)	Clean-Up Usage (gal/month)	VOC Content (lbs/gal)	VOC PTE (tpy)	HAP PTE - toluene (tpy)
7.30	23	7.30	**1.00**	**0.60**

Notes & Methodology

Part Weight (kg) = supplied by client
Part Weight (lbs) = Part Weight (kg) x 2.2 kg/lb
Process (parts/hr) = supplied by client
Process Weight (lbs parts/hr) = Part Weight (lbs) x Process (parts/hr)
Adhesive Rate (gal/hr) = Process Weight (lbs parts/hr) / Density (lbs/gal)
Adhesive Usage (gal/part) = Adhesive Rate (gal/hr) / Process (parts/hr)
Density (lbs/gal) = as supplied by MSDS
Weight % Volatile (H_2O & Organics) = as supplied by MSDS
Weight % H_2O = as supplied by MSDS
Volume % H_2O = as supplied by MSDS
Volume % Non-Volatiles (solids) = as supplied by MSDS
VOC Content (lbs/gal - less water) = [Density (lbs/gal) x Weight % Organics] / [1 - Volume % H2O]
VOC Content (lbs/gal) = Density (lbs/gal) x Weight % Organics
VOC PTE (tpy) = Adhesive Usage (gal/part) x Process (parts/hr) x VOC Content (lbs/gal) x 8,760 hours per year / 2,000 lbs per ton
Transfer Efficiency = from orignal permit for HVLP equipment
PM PTE (tpy) = Adhesive Usage (gal/part) x Process (parts/hr) x [1 - Weight % Volatile (H_2O & Organics)] x Transfer Efficiency x 8,760 hours per year / 2,000 lbs per ton
Adhesive booths have replaceable panel fabic filters and a 90% control factor is used
HAP Cleanup is Superior S-5205 and is estimated at 100% VOC and 60% toluene - usage is 3/4 of a 5 gal. pail per operating day cleanup of machine

Appendix A: Emissions Calculations
VOC, HAP and Particulate From Adhesive Coating Operations
Adhesive Coating Booths AB-5 and AB-6

Company Name: Heartland Automotive, LLC
Source Address: 300 South Warren Drive, Greencastle, Indiana 46135
Significant Source Modification: 133-40321-00027
Significant Permit Modification: 133-40358-00027
Reviewer: Sarah Green

Door Panel Adhesive Spray Booth Emissions Calculations
The adhesive spray line is described at 224 parts (or 56 sets of 4 door panels per car) per hour.

AB-5

Material	Density (lbs/gal)	Weight % Volatile (H_2O & Organics)	Weight % H_2O	Weight % Organics	Volume % H_2O	Volume % Non-Volatiles (solids)	Adhesive Usage (gal/part)	Process (parts/hr)	VOC Content (lbs/gal - less water)	VOC Content (lbs/gal)	VOC PTE (lb/hr)	VOC PTE (tpy)	Transfer Efficiency	Uncontrolled PM PTE (tpy)	Controlled PM PTE (tpy) @ 90% for panel filter
Sunstar 321LH	7.16	78.6%	0.00%	78.6%	0.00%	21.4%	0.019	60	5.63	5.63	6.55	**28.69**	75%	**1.95**	**0.20**

Density (lbs/gal)	Density (lbs/gal)	Adhesive Usage (gal/part)	Process (parts/hr)	Weight % Methanol	Methanol PTE (tpy)
Sunstar 321LH	7.16	0.019	60	3.2%	**1.17**

HAP Recap	
Methanol	**1.17**
Toluene	0.60

Total VOC **29.69**
Total HAP **1.77**

Clean-Up - Superior S-5205

Density (lbs/gal)	Clean-Up Usage (gal/month)	VOC Content (lbs/gal)	VOC PTE (tpy)	HAP PTE - toluene (tpy)
7.30	23	7.30	**1.00**	**0.60**

AB-6

Material	Density (lbs/gal)	Weight % Volatile (H_2O & Organics)	Weight % H_2O	Weight % Organics	Volume % H_2O	Volume % Non-Volatiles (solids)	Adhesive Usage (gal/part)	Process (parts/hr)	VOC Content (lbs/gal - less water)	VOC Content (lbs/gal)	VOC PTE (lb/hr)	VOC PTE (tpy)	Transfer Efficiency	Uncontrolled PM PTE (tpy)	Controlled PM PTE (tpy) @ 90% for panel filter
Sunstar 321LH	7.16	78.6%	0.00%	78.6%	0.00%	21.4%	0.019	60	5.63	5.63	6.55	**28.69**	75%	**1.95**	**0.20**

Density (lbs/gal)	Density (lbs/gal)	Adhesive Usage (gal/part)	Process (parts/hr)	Weight % Methanol	Methanol PTE (tpy)
Sunstar 321LH	7.16	0.019	60	3.2%	**1.17**

HAP Recap	
Methanol	**1.17**
Toluene	0.60

Total VOC **29.69**
Total HAP **1.77**

Clean-Up - Superior S-5205

Density (lbs/gal)	Clean-Up Usage (gal/month)	VOC Content (lbs/gal)	VOC PTE (tpy)	HAP PTE - toluene (tpy)
7.30	23	7.30	**1.00**	**0.60**

Notes & Methodology
Part Weight (kg) = supplied by client
Part Weight (lbs) = Part Weight (kg) x 2.2 kg/lb
Process (parts/hr) = supplied by client
Process Weight (lbs parts/hr) = Part Weight (lbs) x Process (parts/hr)
Adhesive Rate (gal/hr) = Process Weight (lbs parts/hr) / Density (lbs/gal)
Adhesive Usage (gal/part) = Adhesive Rate (gal/hr) / Process (parts/hr)
Density (lbs/gal) = as supplied by MSDS
Weight % Volatile (H_2O & Organics) = as supplied by MSDS
Weight % H_2O = as supplied by MSDS
Volume % H_2O = as supplied by MSDS
Volume % Non-Volatiles (solids) = as supplied by MSDS
VOC Content (lbs/gal - less water) = [Density (lbs/gal) x Weight % Organics] / [1 - Volume % H2O]
VOC Content (lbs/gal) = Density (lbs/gal) x Weight % Organics
VOC PTE (tpy) = Adhesive Usage (gal/part) x Process (parts/hr) x VOC Content (lbs/gal) x 8,760 hours per year / 2,000 lbs per ton
Transfer Efficiency = from orignal permit for HVLP equipment
PM PTE (tpy) = Adhesive Usage (gal/part) x Process (parts/hr) x [1 - Weight % Volatile (H_2O & Organics)] x Transfer Efficiency x 8,760 hours per year / 2,000 lbs per ton
Adhesive booths have replaceable panel fabic filters and a 90% control factor is used
HAP Cleanup is Superior S-5205 and is estimated at 100% VOC and 60% toluene - usage is 3/4 of a 5 gal. pail per operating day cleanup of machine

Appendix A: Emissions Calculations
VOC, HAP and Particulate From Surface Coating Operations
Surface Coating Line SCL

Company Name: Heartland Automotive, LLC
Source Address: 300 South Warren Drive, Greencastle, Indiana 46135
Significant Source Modification: 133-40321-00027
Significant Permit Modification: 133-40358-00027
Reviewer: Sarah Green

SCL

Material	Density (lbs/gal)	Weight % Volatile (H_2O & Organics)	Weight % (H_2O)	Weight % (Organics)	Volume % (H_2O)	Volume % Non-Volatiles (solids)	Application (gal/unit)	Capacity (unit/hr)	VOC (lbs) per Coating (gal) less H_2O	VOC Content (lbs/gal)	VOC (lbs/gal solids)	Potential VOC (lbs/hr)	Potential VOC (lbs/day)	Potential VOC (tpy)	Transfer Efficiency	Potential Particulate (tpy)
Prime Booth																
J3501	9.07	20.00%	0.00%	20.00%	0.00%	75.26%	0.015	70	1.81	1.81	2.41	1.90	45.71	8.34	75%	**1.67**
OQ1173	7.29	81.93%	0.00%	81.93%	0.00%	11.31%	0.015	70	5.97	5.97	52.81	6.27	150.51	27.47	75%	1.24
RU0073	6.64	100.00%	0.00%	100.00%	0.00%	0.00%	0.015	70	6.64	6.64	N/A	6.97	167.33	**30.54**	75%	0.00
Color Base Booth																
303LE356 VH	8.35	57.18%	0.00%	57.18%	0.00%	34.86%	0.015	70	4.77	4.77	13.70	5.01	120.32	21.96	75%	2.35
303LE359 WJ	9.70	47.03%	0.00%	47.03%	0.00%	37.91%	0.015	70	4.56	4.56	12.03	4.79	114.96	20.98	75%	**2.78**
303LE410	8.35	58.60%	0.00%	58.60%	0.00%	33.31%	0.015	70	4.89	4.89	14.69	5.14	123.31	22.50	75%	2.33
AM1174	8.32	59.92%	0.00%	59.92%	0.00%	30.98%	0.015	70	4.99	4.99	16.09	5.23	125.63	22.93	75%	2.30
AM1175	8.15	57.12%	0.00%	57.12%	0.00%	35.42%	0.015	70	4.66	4.66	13.14	4.89	117.31	21.41	75%	2.30
AM2065	8.16	53.39%	0.00%	53.39%	0.00%	38.98%	0.015	70	4.36	4.36	11.18	4.57	109.79	20.04	75%	2.33
AM5134	8.31	53.98%	0.00%	53.98%	0.00%	37.32%	0.015	70	4.49	4.49	12.02	4.71	113.04	20.63	75%	2.37
AM5135	8.28	61.23%	0.00%	61.23%	0.00%	29.95%	0.015	70	5.07	5.07	16.93	5.32	127.76	23.32	75%	2.26
AM6083	8.34	55.34%	0.00%	55.34%	0.00%	35.30%	0.015	70	4.62	4.62	13.07	4.85	116.31	21.23	75%	2.37
AM7112	8.36	56.26%	0.00%	56.26%	0.00%	33.61%	0.015	70	4.70	4.70	13.99	4.94	118.52	21.63	75%	2.37
AM8122	9.81	41.35%	0.00%	41.35%	0.00%	42.65%	0.015	70	4.06	4.06	9.51	4.26	102.22	18.66	75%	2.74
AM8123	8.56	49.50%	0.00%	49.50%	0.00%	41.22%	0.015	70	4.24	4.24	10.28	4.45	106.78	19.49	75%	2.46
AM9093	8.23	60.46%	0.00%	60.46%	0.00%	31.24%	0.015	70	4.98	4.98	15.93	5.22	125.39	22.88	75%	2.26
AS6076	8.5	47.07%	0.00%	47.07%	0.00%	45.38%	0.015	70	4.00	4.00	8.82	4.20	100.82	18.40	75%	2.43
LE9425B	8.05	59.26%	0.00%	59.26%	0.00%	35.00%	0.015	70	4.77	4.77	13.63	5.01	120.21	21.94	75%	2.23
RU0038	7.51	100.00%	0.00%	100.00%	0.00%	0.00%	0.015	70	7.51	7.51	N/A	7.89	189.25	**34.54**	75%	0.00
RU0061	7.15	100.00%	0.00%	100.00%	0.00%	0.00%	0.015	70	7.15	7.15	N/A	7.51	180.18	32.88	75%	0.00
RU0085	7.32	100.00%	0.00%	100.00%	0.00%	0.00%	0.015	70	7.32	7.32	N/A	7.69	184.46	33.66	75%	0.00
SV1213	7.13	100.00%	0.00%	100.00%	0.00%	0.00%	0.015	70	7.13	7.13	N/A	7.49	179.68	32.79	75%	0.00
WB-243-1 Flat	8.87	71.07%	58.04%	13.03%	55.28%	26.66%	0.015	70	2.58	1.16	4.34	1.21	29.13	5.32	75%	1.16
WB-243-1 Glossy	8.98	66.79%	53.06%	13.73%	57.20%	42.80%	0.015	70	2.88	1.23	2.88	1.29	31.07	5.67	75%	1.22
Clear Coat Booth																
AJ3079	8.21	51.25%	0.00%	51.25%	0.00%	42.34%	0.015	70	4.21	4.21	9.94	4.42	106.03	19.35	75%	**2.36**
RU0072	7.42	100.00%	0.00%	100.00%	0.00%	0.00%	0.015	70	7.42	7.42	N/A	7.79	186.98	**34.12**	75%	0.00
Clean-Up																
IPA	6.65	100.00%	0.00%	100.00%	0.00%	0.00%	0.015	70	6.65	6.65	N/A	6.98	167.58	30.58	75%	0.00
Musashi K060	7.51	100.00%	0.00%	100.00%	0.00%	0.00%	0.015	70	7.51	7.51	N/A	7.89	189.25	34.54	75%	0.00
Musashi K233	7.55	100.00%	0.00%	100.00%	0.00%	0.00%	0.015	70	7.55	7.55	N/A	7.93	190.26	**34.72**	75%	0.00
Paint Purge	7.08	100.00%	0.00%	100.00%	0.00%	0.00%	0.015	70	7.08	7.08	N/A	7.43	178.42	32.56	75%	0.00
TOTAL														**133.92**		**6.81**
													water curtain with baffles control efficiency		90%	**0.68**

Material	Density (lbs/gal)	HAP Constituent	HAP %	HAP Emissions (tpy)
Color Base Booth				
303LE356 VH	8.35	Xylene	0.19%	0.07
303LE359 WJ	9.70	Xylene	0.17%	0.08
303LE410	8.35	Xylene	0.18%	0.07
AM1175	8.15	Toluene	0.21%	**0.08**
AM6038	8.34	Ethylbenzene	0.04%	0.02
AM8122	9.81	Ethylbenzene	0.31%	**0.14**
	9.81	Xylene	1.00%	0.45
AM8123	8.56	Toluene	0.01%	0.00
AM6076	8.50	Ethylbenzene	0.16%	0.06
	8.50	Formaldehyde	0.01%	**0.00**
LE9425B	8.05	Xylene	5.60%	**2.07**
WB-243-1 Flat	8.87	Chloroform	0.05%	0.02
	8.87	Cumene	0.01%	0.00
	8.87	Xylene	0.01%	0.00
WB-243-1 Glossy	8.98	Chloroform	0.10%	**0.04**
	8.98	Cumene	0.02%	**0.01**
	8.98	Xylene	0.02%	0.01
Clean-Up				
Paint Purge	7.08	Ethylbenzene	5.11%	**1.66**
	7.08	MIBK	9.46%	**3.08**
	7.08	Xylene	20.46%	**6.66**
TOTAL				**13.75**

HAP Recap	
Toluene	0.08
Ethyl Benzene	1.80
Formaldyhyde	0.00
Xylene	8.74
Chloroform	0.04
Cumene	0.01
MIBK	3.08

Notes & Methodology
Material Specifications (density, VOC content, etc) = as supplied by MSDSs
Material Application per part and Unit Capacities = supplied by client
VOC (lbs) per Coating (gal) less H_2O = Density (lbs/gal) x Weight % (Organics) / (1 - Volume % [H_2O])
VOC Content (lbs/gal) = Density (lbs/gal) x Weight % (Organics)
VOC (lbs/gal solids) = Density (lbs/gal) x Weight % (Organics) / Volume % Non-Volatiles (solids)
Potential VOC (lbs/hr) = Application (gal/unit) x Capacity (units/hr) x VOC Content (lbs/gal)
Potential VOC (lbs/day) = Potential VOC (lbs/hr) x 24 hours per day
Potential VOC (tpy) = Potential VOC (lbs/day) x 365 days per year / 2,000 lbs per year
Potential Particulate (tpy) = Application (gal/unit) x Capacity (units/hr) x VOC Content (lbs/gal) x (1 - Weight % [Organics]) x (1 - Transfer Efficiency) x 8,760 hours per year / 2,000 lbs per ton
Totals are based on Worst Coating/cleanup and worst case HAP for each coating/cleanup

Appendix A: Emissions Calculations
VOC, HAP and Particulate From Surface Coating Operations
Surface Coating Booth MAP-1

Company Name: Heartland Automotive, LLC
Source Address: 300 South Warren Drive, Greencastle, Indiana 46135
Significant Source Modification: 133-40321-00027
Significant Permit Modification: 133-40358-00027
Reviewer: Sarah Green

MAP-1

Material	Density (lbs/gal)	Weight % Volatile (H_2O & Organics)	Weight % (H_2O)	Weight % (Organics)	Volume % (H_2O)	Volume % Non-Volatiles (solids)	Application (gal/unit)	Capacity (unit/hr)	VOC (lbs) per Coating (gal) less H_2O	VOC Content (lbs/gal)	VOC (lbs/gal solids)	Potential VOC (lbs/hr)	Potential VOC (lbs/day)	Potential VOC (tpy)	Transfer Efficiency	Potential Particulate (tpy)
303LE356 VH	8.35	57.18%	0.00%	57.18%	0.00%	34.86%	0.008	34	4.77	4.77	13.70	1.30	31.17	5.69	75%	0.61
303LE359 WJ	9.70	47.03%	0.00%	47.03%	0.00%	37.91%	0.008	34	4.56	4.56	12.03	1.24	29.78	5.43	75%	**0.72**
303LE410	8.35	58.60%	0.00%	58.60%	0.00%	33.31%	0.008	34	4.89	4.89	14.69	1.33	31.94	5.83	75%	0.60
LE9425B	8.05	59.26%	0.00%	59.26%	0.00%	35.00%	0.008	34	4.77	4.77	13.63	1.30	31.14	5.68	75%	0.58
Musashi Hardner	8.32	62.50%	0.00%	62.50%	0.00%	30.76%	0.008	34	5.20	5.20	16.91	1.41	33.95	**6.20**	75%	0.58
P3626	8.28	57.24%	0.00%	57.24%	0.00%	33.05%	0.008	34	4.74	4.74	14.34	1.29	30.94	5.65	75%	0.60
Clean-Up																
Musashi K060	7.51	100.00%	0.00%	100.00%	0.00%	0.00%	0.008	34	7.51	7.51	N/A	2.04	49.03	8.95	75%	0.00
Musashi K233	7.55	100.00%	0.00%	100.00%	0.00%	0.00%	0.008	34	7.55	7.55	N/A	2.05	49.29	**8.99**	75%	0.00
Paint Purge	7.08	100.00%	0.00%	100.00%	0.00%	0.00%	0.008	34	7.08	7.08	N/A	1.93	46.22	8.43	75%	0.00
TOTAL														**15.19**		**0.72**
													water curtain control efficiency		90%	**0.07**

Material	Density (lbs/gal)	HAP Constituent	HAP %	HAP Emissions (tpy)
303LE356 VH	8.35	Xylene	0.19%	0.02
303LE359 WJ	9.70	Xylene	0.17%	0.02
303LE410	8.35	Xylene	0.18%	0.02
LE9425B	8.05	Xylene	5.60%	**0.54**
P3626	8.28	Toluene	0.37%	**0.04**
Clean-Up				
Paint Purge	7.08	Ethylbenzene	5.11%	**0.43**
	7.08	MIBK	9.46%	**0.80**
	7.08	Xylene	20.46%	**1.73**
TOTAL				**3.53**

HAP Recap	
Toluene	0.04
Ethyl Benzene	0.43
Xylene	2.26
MIBK	0.80

Notes & Methodology

Material Specifications (density, VOC content, etc) = as supplied by MSDSs
Material Application per part and Unit Capacities = supplied by client
VOC (lbs) per Coating (gal) less H_2O = Density (lbs/gal) x Weight % (Organics) / (1 - Volume % [H_2O])
VOC Content (lbs/gal) = Density (lbs/gal) x Weight % (Organics)
VOC (lbs/gal solids) = Density (lbs/gal) x Weight % (Organics) / Volume % Non-Volatiles (solids)
Potential VOC (lbs/hr) = Application (gal/unit) x Capacity (units/hr) x VOC Content (lbs/gal)
Potential VOC (lbs/day) = Potential VOC (lbs/hr) x 24 hours per day
Potential VOC (tpy) = Potential VOC (lbs/day) x 365 days per year / 2,000 lbs per year
Potential Particulate (tpy) = Application (gal/unit) x Capacity (units/hr) x VOC Content (lbs/gal) x (1 - Weight % [Organics]) x (1 - Transfer Efficiency) x 8,760 hours per year / 2,000 lbs per ton
Totals are based on Worst Coating/cleanup and worst case HAP for each coating/cleanup

Appendix A: Emissions Calculations
VOC, HAP and Particulate From Surface Coating Operations
Surface Coating Booth MAP-2

Company Name: Heartland Automotive, LLC
Source Address: 300 South Warren Drive, Greencastle, Indiana 46135
Significant Source Modification: 133-40321-00027
Significant Permit Modification: 133-40358-00027
Reviewer: Sarah Green

MAP-2

Material	Density (lbs/gal)	Weight % Volatile (H_2O & Organics)	Weight % (H_2O)	Weight % (Organics)	Volume % (H_2O)	Volume % Non-Volatiles (solids)	Application (gal/unit)	Capacity (unit/hr)	VOC (lbs) per Coating (gal) less H_2O	VOC Content (lbs/gal)	VOC (lbs/gal solids)	Potential VOC (lbs/hr)	Potential VOC (lbs/day)	Potential VOC (tpy)	Transfer Efficiency	Potential Particulate (tpy)
303LE356 VH	8.35	57.18%	0.00%	57.18%	0.00%	34.86%	0.008	34	4.77	4.77	13.70	1.30	31.17	5.69	75%	0.61
303LE359 WJ	9.70	47.03%	0.00%	47.03%	0.00%	37.91%	0.008	34	4.56	4.56	12.03	1.24	29.78	5.43	75%	**0.72**
303LE410	8.35	58.60%	0.00%	58.60%	0.00%	33.31%	0.008	34	4.89	4.89	14.69	1.33	31.94	5.83	75%	0.60
LE9425B	8.05	59.26%	0.00%	59.26%	0.00%	35.00%	0.008	34	4.77	4.77	13.63	1.30	31.14	5.68	75%	0.58
Musashi Hardner	8.32	62.50%	0.00%	62.50%	0.00%	30.76%	0.008	34	5.20	5.20	16.91	1.41	33.95	**6.20**	75%	0.58
P3626	8.28	57.24%	0.00%	57.24%	0.00%	33.05%	0.008	34	4.74	4.74	14.34	1.29	30.94	5.65	75%	0.60
Clean-Up																
Musashi K060	7.51	100.00%	0.00%	100.00%	0.00%	0.00%	0.008	34	7.51	7.51	N/A	2.04	49.03	8.95	75%	0.00
Musashi K233	7.55	100.00%	0.00%	100.00%	0.00%	0.00%	0.008	34	7.55	7.55	N/A	2.05	49.29	**8.99**	75%	0.00
Paint Purge	7.08	100.00%	0.00%	100.00%	0.00%	0.00%	0.008	34	7.08	7.08	N/A	1.93	46.22	8.43	75%	0.00
TOTAL														**15.19**		**0.72**
													water curtain control efficiency		90%	**0.07**

Material	Density (lbs/gal)	HAP Constituent	HAP %	HAP Emissions (tpy)
303LE356 VH	8.35	Xylene	0.19%	0.02
303LE359 WJ	9.70	Xylene	0.17%	0.02
303LE410	8.35	Xylene	0.18%	0.02
LE9425B	8.05	Xylene	5.60%	**0.54**
P3626	8.28	Toluene	0.37%	**0.04**
Clean-Up				
Paint Purge	7.08	Ethylbenzene	5.11%	**0.43**
	7.08	MIBK	9.46%	**0.80**
	7.08	Xylene	20.46%	**1.73**
TOTAL				**3.53**

HAP Recap	
Toluene	0.04
Ethyl Benzene	0.43
Xylene	2.26
MIBK	0.80

Notes & Methodology

Material Specifications (density, VOC content, etc) = as supplied by MSDSs
Material Application per part and Unit Capacities = supplied by client
VOC (lbs) per Coating (gal) less H_2O = Density (lbs/gal) x Weight % (Organics) / (1 - Volume % [H_2O])
VOC Content (lbs/gal) = Density (lbs/gal) x Weight % (Organics)
VOC (lbs/gal solids) = Density (lbs/gal) x Weight % (Organics) / Volume % Non-Volatiles (solids)
Potential VOC (lbs/hr) = Application (gal/unit) x Capacity (units/hr) x VOC Content (lbs/gal)
Potential VOC (lbs/day) = Potential VOC (lbs/hr) x 24 hours per day
Potential VOC (tpy) = Potential VOC (lbs/day) x 365 days per year / 2,000 lbs per year
Potential Particulate (tpy) = Application (gal/unit) x Capacity (units/hr) x VOC Content (lbs/gal) x (1 - Weight % [Organics]) x (1 - Transfer Efficiency) x 8,760 hours per year / 2,000 lbs per ton
Totals are based on Worst Coating/cleanup and worst case HAP for each coating/cleanup

Appendix A: Emissions Calculations
VOC, HAP and Particulate From Surface Coating Operations
Surface Coating Booth MAP-4

Company Name: Heartland Automotive, LLC
Source Address: 300 South Warren Drive, Greencastle, Indiana 46135
Significant Source Modification: 133-40321-00027
Significant Permit Modification: 133-40358-00027
Reviewer: Sarah Green

MAP-4

Material	Density (lbs/gal)	Weight % Volatile (H_2O & Organics)	Weight % (H_2O)	Weight % (Organics)	Volume % (H_2O)	Volume % Non-Volatiles (solids)	Application (gal/unit)	Capacity (unit/hr)	VOC (lbs) per Coating (gal) less H_2O	VOC Content (lbs/gal)	VOC (lbs/gal solids)	Potential VOC (lbs/hr)	Potential VOC (lbs/day)	Potential VOC (tpy)	Transfer Efficiency	Potential Particulate (tpy)
303LE356 VH	8.35	57.18%	0.00%	57.18%	0.00%	34.86%	0.008	34	4.77	4.77	13.70	1.30	31.17	5.69	75%	0.61
303LE359 WJ	9.70	47.03%	0.00%	47.03%	0.00%	37.91%	0.008	34	4.56	4.56	12.03	1.24	29.78	5.43	75%	**0.72**
303LE410	8.35	58.60%	0.00%	58.60%	0.00%	33.31%	0.008	34	4.89	4.89	14.69	1.33	31.94	5.83	75%	0.60
LE9425B	8.05	59.26%	0.00%	59.26%	0.00%	35.00%	0.008	34	4.77	4.77	13.63	1.30	31.14	5.68	75%	0.58
Musashi Hardner	8.32	62.50%	0.00%	62.50%	0.00%	30.76%	0.008	34	5.20	5.20	16.91	1.41	33.95	**6.20**	75%	0.58
P3626	8.28	57.24%	0.00%	57.24%	0.00%	33.05%	0.008	34	4.74	4.74	14.34	1.29	30.94	5.65	75%	0.60
Clean-Up																
Acetone																
IPA	6.65	100.00%	0.00%	100%	0.00%	0.00%	0.0009	34	6.65	6.65	N/A	0.20	4.88	**0.89**	75%	0.00
TOTAL														**7.09**		**0.72**
														water curtain control efficiency	90%	**0.07**

Material	Density (lbs/gal)	HAP Constituent	HAP %	HAP Emissions (tpy)
303LE356 VH	8.35	Xylene	0.19%	0.02
303LE359 WJ	9.70	Xylene	0.17%	0.02
303LE410	8.35	Xylene	0.18%	0.02
LE9425B	8.05	Xylene	5.60%	**0.54**
P3626	8.28	Toluene	0.37%	**0.04**
Clean-Up				
Acetone & Isopropanol		Isopropanol	0.00%	0.00
		Acetone	0.00%	0.00
TOTAL				**0.57**

HAP Recap	
Toluene	0.04
Xylene	0.54

Notes & Methodology
Material Specifications (density, VOC content, etc) = as supplied by MSDSs
Material Application per part and Unit Capacities = supplied by client
VOC (lbs) per Coating (gal) less H_2O = Density (lbs/gal) x Weight % (Organics) / (1 - Volume % [H_2O])
VOC Content (lbs/gal) = Density (lbs/gal) x Weight % (Organics)
VOC (lbs/gal solids) = Density (lbs/gal) x Weight % (Organics) / Volume % Non-Volatiles (solids)
Potential VOC (lbs/hr) = Application (gal/unit) x Capacity (units/hr) x VOC Content (lbs/gal)
Potential VOC (lbs/day) = Potential VOC (lbs/hr) x 24 hours per day
Potential VOC (tpy) = Potential VOC (lbs/day) x 365 days per year / 2,000 lbs per year
Potential Particulate (tpy) = Application (gal/unit) x Capacity (units/hr) x VOC Content (lbs/gal) x (1 - Weight % [Organics]) x (1 - Transfer Efficiency) x 8,760 hours per year / 2,000 lbs per ton
Totals are based on Worst Coating/cleanup and worst case HAP for each coating/cleanup

Appendix A: Emissions Calculations
VOC, HAP and Particulate From Surface Coating Operations
Surface Coating Booth MAP-5

Company Name: Heartland Automotive, LLC
Source Address: 300 South Warren Drive, Greencastle, Indiana 46135
Significant Source Modification: 133-40321-00027
Significant Permit Modification: 133-40358-00027
Reviewer: Sarah Green

MAP-5

Material	Density (lbs/gal)	Weight % Volatile (H_2O & Organics)	Weight % (H_2O)	Weight % (Organics)	Volume % (H_2O)	Volume % Non-Volatiles (solids)	Application (gal/unit)	Capacity (unit/hr)	VOC (lbs) per Coating (gal) less H_2O	VOC Content (lbs/gal)	VOC (lbs/gal solids)	Potential VOC (lbs/hr)	Potential VOC (lbs/day)	Potential VOC (tpy)	Transfer Efficiency	Potential Particulate (tpy)
303LE356 VH	8.35	57.18%	0.00%	57.18%	0.00%	34.86%	0.008	34	4.77	4.77	13.70	1.30	31.17	5.69	75%	0.61
303LE359 WJ	9.70	47.03%	0.00%	47.03%	0.00%	37.91%	0.008	34	4.56	4.56	12.03	1.24	29.78	5.43	75%	**0.72**
303LE410	8.35	58.60%	0.00%	58.60%	0.00%	33.31%	0.008	34	4.89	4.89	14.69	1.33	31.94	5.83	75%	0.60
LE9425B	8.05	59.26%	0.00%	59.26%	0.00%	35.00%	0.008	34	4.77	4.77	13.63	1.30	31.14	5.68	75%	0.58
Musashi Hardner	8.32	62.50%	0.00%	62.50%	0.00%	30.76%	0.008	34	5.20	5.20	16.91	1.41	33.95	**6.20**	75%	0.58
P3626	8.28	57.24%	0.00%	57.24%	0.00%	33.05%	0.008	34	4.74	4.74	14.34	1.29	30.94	5.65	75%	0.60
Clean-Up																
Acetone																
IPA	6.65	100.00%	0.00%	100%	0.00%	0.00%	0.0009	34	6.65	6.65	N/A	0.20	4.88	**0.89**	75%	0.00
TOTAL														**7.09**		**0.72**
													water curtain control efficiency		90%	**0.07**

Material	Density (lbs/gal)	HAP Constituent	HAP %	HAP Emissions (tpy)
303LE356 VH	8.35	Xylene	0.19%	0.02
303LE359 WJ	9.70	Xylene	0.17%	0.02
303LE410	8.35	Xylene	0.18%	0.02
LE9425B	8.05	Xylene	5.60%	**0.54**
P3626	8.28	Toluene	0.37%	**0.04**
Clean-Up				
Acetone & Isopropanol		Isopropanol	0.00%	0.00
		Acetone	0.00%	0.00
TOTAL				**0.57**

HAP Recap	
Toluene	0.04
Xylene	0.54

Notes & Methodology
Material Specifications (density, VOC content, etc) = as supplied by MSDSs
Material Application per part and Unit Capacities = supplied by client
VOC (lbs) per Coating (gal) less H_2O = Density (lbs/gal) x Weight % (Organics) / (1 - Volume % [H_2O])
VOC Content (lbs/gal) = Density (lbs/gal) x Weight % (Organics)
VOC (lbs/gal solids) = Density (lbs/gal) x Weight % (Organics) / Volume % Non-Volatiles (solids)
Potential VOC (lbs/hr) = Application (gal/unit) x Capacity (units/hr) x VOC Content (lbs/gal)
Potential VOC (lbs/day) = Potential VOC (lbs/hr) x 24 hours per day
Potential VOC (tpy) = Potential VOC (lbs/day) x 365 days per year / 2,000 lbs per year
Potential Particulate (tpy) = Application (gal/unit) x Capacity (units/hr) x VOC Content (lbs/gal) x (1 - Weight % [Organics]) x (1 - Transfer Efficiency) x 8,760 hours per year / 2,000 lbs per ton
Totals are based on Worst Coating/cleanup and worst case HAP for each coating/cleanup

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

Company Name: **Heartland Automotive, LLC**
Source Address: **300 South Warren Drive, Greencastle, Indiana 46135**
Significant Source Modification: **133-40321-00027**
Significant Permit Modification: **133-40358-00027**
Reviewer: **Sarah Green**

Heat Input Capacity MMBtu/hr	HHV mmBtu / mmscf	Potential Throughput MMCF/yr
89.9	1020	772.3

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.73	2.93	2.93	0.23	38.61	2.12	32.44

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

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

Hazardous Air Pollutants (HAPs)

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	**Total - Organics**
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	8.1E-04	4.6E-04	2.9E-02	0.70	1.3E-03	**0.73**

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	**Total - Metals**
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	1.9E-04	4.2E-04	5.4E-04	1.5E-04	8.1E-04	**2.1E-03**

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

Total HAPs	**0.73**
Worst HAP	**0.70**
	Hexane

Appendix A: Emissions Calculations
Natural Gas Combustion Only - unit list
MM BTU/HR <100

Company Name: **Heartland Automotive, LLC**
Source Address: **300 South Warren Drive, Greencastle, Indiana 46135**
Significant Source Modification: **133-40321-00027**
Significant Permit Modification: **133-40358-00027**
Reviewer: **Sarah Green**

Process heaters (significant)

Unit description	Unit ID	Construction Date	Heat Input (MMBtu/hr)
heat exchanger	MAU-3	2001	33.88
			33.88

Boiler (insignificant)

Unit description	Unit ID	Construction Date	Heat Input (MMBtu/hr)
boiler	B-1	1989	1.36
			1.36

Process heaters (insignificant)

Unit description	Unit ID	Construction Date	Heat Input (MMBtu/hr)
drying oven (SB-1 & SB-2)	D-1	1999	1.00
bake oven (SCL)	S-12	2002	3.50
bake afterburner oven (SCL)	S-13	2002	2.50
dry-off oven (SCL)	S-15	2002	0.50
heat exchanger	MAU-4	2002	5.05
oven (MAP-5)	OVN-5	2013	0.40
powder slush burner (SM/PS)	PSB-1	1998	0.30
powder slush burner (SM/PS)	PSB-2	1998	0.30
powder slush burner (SM/PS)	PSB-3	1998	0.30
powder slush burner (SM/PS)	PSB-4	1998	0.30
powder slush burner (SM/PS)	PSB-5	1998	0.30
			14.45

Space heaters (insignificant)

Unit description	Unit ID	Construction Date	Heat Input (MMBtu/hr)
Space Heater	RTU1		0.412
Space Heater	RTU2		0.412
Space Heater	RTU3		0.412
Space Heater	RTU4		0.412
Space Heater	RTU5		0.412
Space Heater	RTU6		0.412
Space Heater	RTU7		0.412
Space Heater	RTU8		0.412
Space Heater	RTU9		0.412
Space Heater	RTU10		0.412
Space Heater	RTU11		0.130
Space Heater	RTU12		0.200
Space Heater	RTU13		0.200
Space Heater	RTU14		0.115
Space Heater	RTU15		0.270
Space Heater	RTU16		0.330
Space Heater	RTU17		0.115
Space Heater	RPA18		0.240
Space Heater	RPA19		0.235
Space Heater	RPA20		0.235
Space Heater	RPA21		0.235
Space Heater	RMAU2		5.150
Space Heater	RMAU3		5.150
Space Heater	RMAU4		5.150
Space Heater	RMAU5		2.025
Space Heater	RMAU6		2.310
Space Heater	UH2		0.149
Space Heater	UH3		0.250
Space Heater	UH4		0.150
Space Heater	UH5		0.300
Space Heater	UH6		0.120
Space Heater	UH7		0.300
Space Heater	UH8		0.080
Space Heater	UH9		0.300
Space Heater	UH10		0.300
Space Heater	UH11		0.250
Space Heater	UH12		0.100
Space Heater	UH13		0.050
Space Heater	UH14		0.050
Space Heater	UH15		0.050
Space Heater	UH16		0.130
Space Heater	UH17		0.400
Space Heater	UH18		0.400
Space Heater	UH19		0.130
Space Heater	UH20		0.130
Space Heater	UH21		0.125
Space Heater	UH22		0.130
Space Heater	UH23		0.130
Space Heater	AR1		1.250
Space Heater	AR2		1.250
Space Heater	AR3		1.250
Space Heater	AR4		1.250
Space Heater	AR5		1.250
Space Heater	AR6		1.250
Space Heater	AR7		1.250
Space Heater	AR8		1.250
			40.234

Grand Total (MMBtu/hr) **89.92**

Appendix A: Emissions Calculations
VOC, HAP and Particulate From Injection Molding Operations
including Grinding unusable molded parts

Company Name: Heartland Automotive, LLC
Source Address: 300 South Warren Drive, Greencastle, Indiana 46135
Significant Source Modification: 133-40321-00027
Significant Permit Modification: 133-40358-00027
Reviewer: Sarah Green

Injection Molding

Press #	Resin Type	Max. Throughput Rate (lbs/hr)	VOC Emission Factor (lbs/10^6 lbs)	Potential VOC (lbs/hr)	Potential VOC (tpy)	PM Emission Factor (lbs/10^6 lbs)	Potential PM (lbs/hr)	Potential PM (tpy)
UBE #1	PPE[1][2]	140	104	0.01	0.06	30.3	0.00	0.02
UBE #2	ABS[3]	90	190	0.02	0.07	0	0.00	0.00
UBE #3	PPE[1][2]	660	104	0.07	0.30	30.3	0.02	0.09
UBE #4	PPE[1][2]	660	104	0.07	0.30	30.3	0.02	0.09
UBE #5-2	PPE[1][2]	195.5	104	0.02	0.09	30.3	0.01	0.03
UBE #6	PPE[1][2]	90	104	0.01	0.04	30.3	0.00	0.01
UBE #7	PPE[1][2]	660	104	0.07	0.30	30.3	0.02	0.09
UBE #8	PPE[1][2]	270	104	0.03	0.12	30.3	0.01	0.04
UBE #9	PPE[1][2]	140	104	0.01	0.06	30.3	0.00	0.02
UBE #10	PPE[1][2]	950	104	0.10	0.43	30.3	0.03	0.13
UBE #11	PPE[1][2]	950	104	0.10	0.43	30.3	0.03	0.13
UBE #12	PPE[1][2]	490	104	0.05	0.22	30.3	0.01	0.07
UBE #13	PPE[1][2]	660	104	0.07	0.30	30.3	0.02	0.09
Mitsubishi #14	PPE[1][2]	200	104	0.02	0.09	30.3	0.01	0.03
Mitsubishi #15	PPE[1][2]	200	104	0.02	0.09	30.3	0.01	0.03
TOTAL		6355.5			**2.93**			**0.83**

Press #	Resin Type	Max. Throughput Rate (lbs/hr)	Acetaldehyde Emission Factor (lb/10^6 lbs)	Acetaldehyde Emissions (tpy)	Acrolein Emission Factor (lb/10^6 lbs)	Acrolein Emissions (tpy)	Formaldehyde Emission Factor (lb/10^6 lbs)	Formaldehyde Emissions (tpy)	Propionaldehyde Emission Factor (lb/10^6 lbs)	Propionaldehyde Emissions (tpy)	Styrene Emission Factor (lbs/10^6 lbs)	Styrene Emissions (tons/yr)	Ethylbenzene Emission Factor (lbs/10^6 lbs)	Ethylbenzene Emissions (tons/yr)	Total HAPs
UBE #1	PPE[1][2]	140	0.46	2.82E-04	0.01	6.13E-06	0.74	4.54E-04	0.05	3.07E-05	0	0.00	0	0.00	7.73E-04
UBE #2	ABS[3]	90	0.00	0.00E+00	0.00	0.00E+00	0.00	0.00E+00	0.00	0.00E+00	130	5.12E-02	27.6	1.09E-02	6.21E-02
UBE #3	PPE[1][2]	660	0.46	1.33E-03	0.01	2.89E-05	0.74	2.14E-03	0.05	1.45E-04	0	0.00	0	0.00	3.64E-03
UBE #4	PPE[1][2]	660	0.46	1.33E-03	0.01	2.89E-05	0.74	2.14E-03	0.05	1.45E-04	0	0.00	0	0.00	3.64E-03
UBE #5-2	PPE[1][2]	195.5	0.46	3.94E-04	0.01	8.56E-06	0.74	6.34E-04	0.05	4.28E-05	0	0.00	0	0.00	1.08E-03
UBE #6	PPE[1][2]	90	0.46	1.81E-04	0.01	3.94E-06	0.74	2.92E-04	0.05	1.97E-05	0	0.00	0	0.00	4.97E-04
UBE #7	PPE[1][2]	660	0.46	1.33E-03	0.01	2.89E-05	0.74	2.14E-03	0.05	1.45E-04	0	0.00	0	0.00	3.64E-03
UBE #8	PPE[1][2]	270	0.46	5.44E-04	0.01	1.18E-05	0.74	8.75E-04	0.05	5.91E-05	0	0.00	0	0.00	1.49E-03
UBE #9	PPE[1][2]	140	0.46	2.82E-04	0.01	6.13E-06	0.74	4.54E-04	0.05	3.07E-05	0	0.00	0	0.00	7.73E-04
UBE #10	PPE[1][2]	950	0.46	1.91E-03	0.01	4.16E-05	0.74	3.08E-03	0.05	2.08E-04	0	0.00	0	0.00	5.24E-03
UBE #11	PPE[1][2]	950	0.46	1.91E-03	0.01	4.16E-05	0.74	3.08E-03	0.05	2.08E-04	0	0.00	0	0.00	5.24E-03
UBE #12	PPE[1][2]	490	0.46	9.87E-04	0.01	2.15E-05	0.74	1.59E-03	0.05	1.07E-04	0	0.00	0	0.00	2.70E-03
UBE #13	PPE[1][2]	660	0.46	1.33E-03	0.01	2.89E-05	0.74	2.14E-03	0.05	1.45E-04	0	0.00	0	0.00	3.64E-03
Mitsubishi #14	PPE[1][2]	200	0.46	4.03E-04	0.01	8.76E-06	0.74	6.48E-04	0.05	4.38E-05	0	0.00	0	0.00	1.10E-03
Mitsubishi #15	PPE[1][2]	200	0.46	4.03E-04	0.01	8.76E-06	0.74	6.48E-04	0.05	4.38E-05	0	0.00	0	0.00	1.10E-03
TOTAL		6355.5		**1.26E-02**		**2.74E-04**		**2.03E-02**		**1.37E-03**		**5.12E-02**		**1.09E-02**	
													Total HAPs		**9.67E-02**
													Single HAP-Styrene		**5.12E-02**

Notes & Methodology

[1] Emission factors for PM, VOC and HAPs from Polypropylene molding were taken from a technical paper, volume 49 in January 1999, published by the Journal of Air and Waste Management Association titled "Development of Emission Factors for Polypropylene Processing".

[2] *Emission factors for PM, VOC and HAPs from Polyethylene molding were taken from a technical paper, volume 46 in January 1999, published by the Journal of Air and Waste Management Association titled "Development of Emission Factors for Polyethylene Processing". A melt temperature of 400 oF was used to determine the correct emission factor. The equation provided in the paper was used to calculate emissions factors within the temperature range provided.*

[3] ABS = acrylonitrile butadiene styrene emission factor source is: "Sampling and Analysis of Volatile Organic Compounds Evolved During Thermal Processing of ABS Composite Resins", Journal of Air & Waste Management, Volume 45, January 1995.

Max. Throughput Rate (lbs/hr) = supplied by client
Potential [Pollutant] (lbs/hr) = Max. Throughput Rate (lbs/hr) x [Pollutant] Emission Factor (lbs/106 lbs) / 1,000,000 lbs
Potential [Pollutant] (tpy) = Potential [Pollutant] x 8,760 hours per year / 2,000 lbs per ton

Grinding

Injection Molding	Resin Type	Max Throughput Rate* (lbs resin/hr)	[1] PM Emission Factor (lbs/10^6 lbs)	PM Uncontrolled Emissions (lbs/hr)	PM Uncontrolled Emissions (tons/yr)	PM Controlled Emissions (lbs/hr)	PM Controlled Emissions (tons/yr)
Regrind silo & filter	PPE	1588.875	148	0.24	1.03	0.05	0.21

Notes & Methodology

[1] Mass balance on plastics grinding at Primex Plastics permit #177-12874-00065 = 0.296 lb/ton regrind
Convert 0.296 lb/ton to lb/1,000,000 lbs = 0.296 * 1000000/2000 = 148 lb/1,000,000 lbs pellets
* Maximum of 25% regrind
Potential Hourly PM Emissions (lbs) = Maximum Hourly Throughput Rate (lbs) x Grinding Emission Factor for PM (lbs/10^6 lbs) / 1,000,000 lbs
Potential PM Emissions (tpy) = Potential Hourly PM Emissions (lbs) x 8,760 hours per year / 2,000 lbs per ton
Control efficiency is for cyclone at 80%
PM = PM10

Appendix A: Emissions Calculations
VOC, HAP and Particulate From Slush Molding Operations
including Thermoforming Operation

Company Name: **Heartland Automotive, LLC**
Source Address: **300 South Warren Drive, Greencastle, Indiana 46135**
Significant Source Modification: **133-40321-00027**
Significant Permit Modification: **133-40358-00027**
Reviewer: **Sarah Green**

Slush Mold/Power Slush Operation (SM/PS)

	Resin Type	Max Throughput Rate (lbs resin/hr)	PM Emission Factor (lbs/10^6 lbs)	PM Emissions (lbs/hr)	PM Emissions (tons/yr)	VOC Emission Factor (lbs/10^6 lbs)	VOC Emissions (lbs/hr)	VOC Emissions (tons/yr)	Vinyl Chloride Emission Factor (lbs/10^6 lbs)	Vinyl Chloride Emissions (lbs/hr)	Vinyl Chloride Emissions (tons/yr)
SM/PS1	PVC[(4)]	255	47.9	0.012	0.05	63	0.016	0.07	3.9	0.0010	0.004
SM-2	PVC[(4)]	140	47.9	0.007	0.03	63	0.009	0.04	3.9	0.0005	0.002
SM-3	PVC[(4)]	255	47.9	0.012	0.05	63	0.016	0.07	3.9	0.0010	0.004
TOTALS		**650**			**0.14**			**0.18**			**0.011**

Notes & Methodology

[(4)] PVC emissions based on *"Ernes, D. A.; Griffin, J. P. "Process emissions for vinyl pipe industry," J. of Vinyl & Additive Technology 1996, and Toronto Plastic Products Manufacturing spreadsheet.*

Potential PM (VOC, HAP) Emissions (lbs/hr) = Max. Throughput (lbs resin/hr) x Emission Factor (lbs/10^6 lbs)x 1,000,000
Potential PM (VOC, HAP) Emissions (tpy) = Potential Emissions (lbs/hr) x 8,760 hours per year / 2,000 lbs per ton

Thermoforming Line

	Material	Part Type	Density (lbs/ft^3)	Max. Throughput (parts/hr)	Volume (ft^3/part)	Emission Factor (lbs/ton)	VOC (%)	Potential VOC Emissions (lbs/hr)	Potential VOC Emissions (tpy)
TP1	Woodstock 50/50	Apron	68.64	25.00	0.0782	0.7	48.0%	0.02	0.10
TP2	Woodstock 50/50	Rear Gate	68.64	12.50	0.0694	0.7	48.0%	0.01	0.04
TP3	Woodstock 50/50	Lid	68.64	8.10	0.087	0.7	48.0%	0.01	0.04
TOTAL				**45.60**					**0.18**

Notes & Methodology

Potential VOC Emissions (lbs/hr) = Density (lbs/ft^3) x Volume (ft^3/part) x Max. Throughput (parts/hr) x VOC (%) x Emission Factor (lbs/ton) / 2,000 lbs per ton
Potential VOC Emissions (tpy) = Potential VOC Emissions (lbs/hr) x 8,760 hours per year / 2,000 lbs per ton

Appendix A: Emissions Calculations
VOC Emissions from Parts Washer

Company Name: Heartland Automotive, LLC
Source Address: 300 South Warren Drive, Greencastle, Indiana 46135
Significant Source Modification: 133-40321-00027
Significant Permit Modification: 133-40358-00027
Reviewer: Sarah Green

Emission Unit	Change Outs/ Year	Size (gal)	Maximum Potential Usage (gal/yr)	Solvent Density (lb/gal)	VOC Content (%)	VOC Emissions (lb/yr)	VOC Emissions (tpy)
Parts Washer (PW-1)	4.3	11	47.67	6.7	100%	319	0.16

Methodology
Maximum Potential Usage (gal/yr) = Change Outs/yr x Size (gal)
VOC Potential To Emit (lb/yr) = Maximum Potential Usage (gal/yr) x Density (lb/gal) x VOC Content (%)
VOC Potential To Emit (tpy) = VOC Potential To Emit (lb/yr) / 2,000 (lb/ton)
The parts washer is maintained by Safety Kleen and is on a twelve (12) week service plan (12 weeks / 52 weeks/yr = 4.3 change-outs/year)

Appendix A: Emission Calculations
Reciprocating Internal Combustion Engines - Natural Gas
4-Stroke Lean-Burn (4SLB) Engines

Company Name: **Heartland Automotive, LLC**
Source Address: **300 South Warren Drive, Greencastle, Indiana 46135**
Significant Source Modification: **133-40321-00027**
Significant Permit Modification: **133-40358-00027**
Reviewer: **Sarah Green**

Heat Input Capacity MMBtu/hr	HHV mmBtu / mmscf	Potential Throughput MMCF/yr
0.4	1020	0.2

	Pollutant						
	PM*	**PM10****	**PM2.5****	**SO2**	**Nox*****	**VOC**	**CO******
Emission Factor in lb/MMBtu	9.91E-03	7.71E-05	7.71E-05	5.88E-04	4.08	1.18E-01	3.17E-01
Potential Emission in tons/yr	9.8E-04	7.6E-06	7.6E-06	5.8E-05	0.40	0.01	0.03

*PM emission factor is condensable PM only. These Emission Factors are taken from Table 3.2-2 of AP-42.
**PM_{10} and $PM_{2.5}$ emission factors are filterable only.
***Emission factor for NO_X is for 90-105% load.
****Emission factor for CO is for 90-105% load.

Methodology
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission factors: AP-42, Chapter 3.2, Table 3.2-2 (4-Stroke Lean-Burn Engines (SCC 2-02-002-54))
Capacity (MMBtu/hr) = Maximum Fuel Usage (ft3/hr) x HHV (Btu/ft3) / 1,000,000 (Btu/MMBtu)
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 500 hrs/yr x 1 MMCF/1,020 MMBtu
Emission (tons/yr) = Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu x 500 (hrs/yr) / 2,000 (lb/ton)

Hazardous Air Pollutants (HAPs)

	HAPs						
	Formaldehyde	**Acetaldehyde**	**Acrolein**	**Methanol**	**Hexane**	**Benzene**	**Total HAPs**
Emission Factor in lb/MMBtu	5.3E-02	8.4E-03	5.1E-03	2.5E-03	1.1E-03	4.4E-04	6.95E-03
Potential Emission in tons/yr	5.21E-03	8.26E-04	5.08E-04	2.47E-04	1.10E-04	4.35E-05	
					Total HAPs		6.95E-03
					Worst HAP		5.21E-03

Methodology is the same as above.
The five highest organic HAP emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 3.2.

Formaldehyde

Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: **Heartland Automotive, LLC**
Source Address: **300 South Warren Drive, Greencastle, Indiana 46135**
Significant Source Modification: **133-40321-00027**
Significant Permit Modification: **133-40358-00027**
Reviewer: **Sarah Green**

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

Vehicle Informtation (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	32.3	1.0	32.3	40.0	1291.4	300	0.057	1.8	669.6
Vehicle (leaving plant) (one-way trip)	32.3	1.0	32.3	40.0	1291.4	300	0.057	1.8	669.6
		Totals	**64.6**		**2582.9**			**3.7**	**1339.1**

Average Vehicle Weight Per Trip = 40.0 tons/trip
Average Miles Per Trip = 0.06 miles/trip

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

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	40.0	40.0	40.0	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m^2 = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [1 - (p/4N)] (Equation 2 from AP-42 13.2.1)
Mitigated Emission Factor, Eext = Ef * [1 - (p/4N)]
Total 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	3.745	0.749	0.1838	lb/mile
Mitigated Emission Factor, Eext =	3.424	0.685	0.1681	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	1.25	0.25	0.06	1.15	0.23	0.06
Vehicle (leaving plant) (one-way trip)	1.25	0.25	0.06	1.15	0.23	0.06
Totals	**2.51**	**0.50**	**0.12**	**2.29**	**0.46**	**0.11**

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

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

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

November 5, 2018

Mr. Brett Towne
Heartland Automotive, LLC
300 South Warren Drive
Greencastle, IN 46135

Re: Public Notice
Heartland Automotive, LLC
Permit Level: Title V Significant Source Modification and Significant Permit Modification
Permit Number: 133-40321-00027 and 133-40358-00027

Dear Mr. Towne:

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

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Banner Graphic in Greencastle publish the abbreviated version of the public notice no later than November 7, 2018. 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 Putnam County Public Library, 103 East Poplar Street in Greencastle, 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 Sarah Green, 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 (317)232-8423 or dial (317) 232-8423.

Sincerely,

Vivian Haun

Vivian Haun
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter 1/9/2017

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Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

November 2, 2018

Banner Graphic
PO Box 509
Greencastle, IN 46135

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Heartland Automotive, LLC, Putnam County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than November 7, 2018.

Please send the invoice, notarized form, clippings showing the date of publication to Bo Liu, at the Indiana Department of Environmental Management, Accounting, Room N1340, 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 317-233-6878 or dial 317-233-6878.

Sincerely,

Vivian Haun

Vivian Haun
Permit Branch
Office of Air Quality

Permit Level: Title V Significant Source Modification and Significant Permit Modification
Permit Number: 133-40321-00027 and 133-40358-00027

Enclosure
PN Newspaper.dot 1/9/2017

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Commissioner

November 5, 2018

To: Putnam County Public Library

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

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

Applicant Name: Heartland Automotive, LLC
Permit Number: 133-40321-00027 and 133-40358-00027

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 1/9/2017

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Commissioner

Notice of Public Comment

November 5, 2018
Heartland Automotive, LLC
133-40321-00027 and 133-40358-00027

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 Letter 1/9/2017

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AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD
DRAFT INDIANA AIR PERMIT

November 5, 2018

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

Permit Number: **133-40321-00027 and 133-40358-00027**
Applicant Name: **Heartland Automotive, LLC**
Location: **Greencastle, Putnam County, Indiana**

The public notice, draft permit and technical support documents can be accessed via the **IDEM Air Permits Online** site at:
http://www.in.gov/ai/appfiles/idem-caats/

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

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

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

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IDEM Staff	VHAUN 11/5/2018 Heartland Automotive LLC 133-40321 and 40358-00027 DRAFT		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		Brett Towne HEARTLAND AUTOMOTIVE L L C 300 S Warren Dr Greencastle IN 461350648 (Source RM)									
2		Yutaka Ueno President Heartland Automotive LLC 300 S Warren Dr Greencastle IN 46135 *(RO RM)*									
3		Putnam County Commissioners One West Washington Street Greencastle IN 46135 *(Local Official)*									
4		Greencastle City Council and Mayors Office 1 N. Locust St. PO Box 607 Greencastle IN 46135 *(Local Official)*									
5		Putnam County Public Library 103 E Poplar Street Greencastle IN 46135-0116 *(Library)*									
6		Putnam County Health Department P.O. Box 507 Greencastle IN 46135-0507 *(Health Department)*									
7		Mr. Richard Monday 545 E. Margaret Dr. Terre Haute IN 47801 *(Affected Party)*									
8		J.P. Roehm PO Box 303 Clinton IN 47842 *(Affected Party)*									
9		Christopher Koucky Cornerstone Environmental 2330 Victory Parkway, Suite 701 Cincinnati OH 45206 *(Consultant)*									
10											
11											
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