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 Ottenweller Company, Inc. in Allen County

Significant Source Modification No.: 003-40520-00224
Significant Permit Modification No.: 003-40534-00224

The Indiana Department of Environmental Management (IDEM) has received an application from Ottenweller Company, Inc., located at 3011 Congressional Parkway, Fort Wayne, Indiana 46808 and 2010 Independence Drive, Fort Wayne, Indiana 46808, for a significant modification of its Part 70 Operating Permit issued on September 22, 2016. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow Ottenweller Company, Inc. to make certain changes at its existing source. Ottenweller Company, Inc. has applied to construct a new coating line and natural gas combustion units.

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:

Allen County Public Library
900 Library Plaza
Fort Wayne, IN 46801

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 003-40520-00224 and SPM 003-40534-00224 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

Joyce Moran
Ottenweller Company, Inc.
3011 Congressional Parkway
Fort Wayne, IN 46808

Re: 003-40534-00224
Significant Permit Modification

Dear Joyce Moran:

Ottenweller Company, Inc. was issued Part 70 Operating Permit Renewal No. T003-36975-00224 on September 22, 2016 for a stationary fabricated metal surface coating operation located at 3011 Congressional Parkway, Fort Wayne, Indiana 46808 and 2010 Independence Drive, Fort Wayne, Indiana 46808. An application requesting changes to this permit was received on September 26, 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 attachment. Since this attachment has been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of this attachment with this modification:

Attachment A: 40 CFR 63, Subpart MMMM, NESHAP for Surface Coating of Miscellaneous Metal Parts and Products

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 - Allen County
Allen County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch

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Eric J. Holcomb
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DRAFT

Bruno L. Pigott
Commissioner

Part 70 Operating Permit Renewal
OFFICE OF AIR QUALITY

Ottenweller Company, Inc.
3011 Congressional Parkway
Fort Wayne, Indiana 46808

(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.: T003-36975-00224 Master Agency Interest ID.: 14739	
Issued by: Original signed by: Iryn Calilung, Section Chief Permits Branch, Office of Air Quality	Issuance Date: September 22, 2016 Expiration Date: September 22, 2021

Significant Permit Modification No.: 003-39630-00224, issued May 1, 2018

Significant Permit Modification No.: 003-40534-00224	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date: September 22, 2021

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SECTION A SOURCE SUMMARY

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

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

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

Source Address:	3011 Congressional Parkway, Fort Wayne, Indiana 46808, and 3010 Independence Drive, Fort Wayne, Indiana 46808
General Source Phone Number:	(260) 484-3166
SIC Code:	3469 (Metal Stampings, Not Elsewhere Classified) 3499 (Fabricated Metal Products, Not Elsewhere Classified)
County Location:	Allen
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Source Definition [326 IAC 2-7-1(22)]

This fabricated metal surface coating company consists of two (2) plants:

(a) Plant 1 is located at 3011 Congressional Parkway, Fort Wayne, Indiana 46808; and

(b) Plant 2 is located at 3010 Independence Drive, Fort Wayne, Indiana 46808.

These plants are located on adjacent properties, have the same two digit SIC code and are still under common control, therefore they are considered one (1) major source, as defined by 326 IAC 2-7-1(22). This determination was carried over from Permit Renewal No.: T003-30626-00224, issued on December 19, 2011.

A.3 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) paint booth, utilizing two (2) air atomization guns, identified as PB_2, constructed in 1995, with a maximum throughput of 75 units per hour of metal parts, and using 0.21 gallons of coating material per part, using dry filters as control, and exhausting to stack PB2S;

The above unit is considered an existing affected coating operation under 40 CFR 63, Subpart MMMM.

(b) One (1) coating line, identified as PB_3, constructed in 2012, consisting of the following:

(1) One wash booth, utilizing water solution jet for cleaning purpose, generating no particulate emissions;

(2) Air dryers;

(3) One (1) paint booth, utilizing one (1) air atomization gun, identified as PB_3 booth, with a throughput rate of 2 metal components per hour and using 0.35 gallons of coating per metal component, using dry filters for particulate control, exhausting to stack PB3-1;

The above unit is considered an existing affected coating operation under 40 CFR 63, Subpart MMMM.

(4) Flash-Off Tunnel;

(5) One (1) natural gas fired oven, capacity 2.5 MMBtu/hr; and

(c) One (1) continuous coating line for coating metal parts, identified as PB_5, approved in 2018 for construction, with a maximum capacity of 50 units per hour, consisting of the following:

(1) One (1) primer booth, utilizing two (2) air atomization guns, with a maximum capacity of 50 units per hour, using 0.2635 gallons of coating per unit, using a dry filter for particulate control, exhausting to stacks EF-6 and EF-7;

The above unit is considered an existing affected coating operation under 40 CFR 63, Subpart MMMM.

(2) Primer flash off, exhausting to stack EF-8;

(3) One (1) natural gas-fired primer paint drying oven, identified as TCB-2, with a maximum heat input capacity of 0.286 MMBtu/hr, using no controls, and exhausting to stack EF-8;

(4) One (1) paint booth, utilizing two (2) air atomization guns, with a maximum capacity of 50 units per hour, using 0.2635 gallons of coating per unit, using a dry filter for particulate control, exhausting to stacks EF-10 and EF-11;

The above unit is considered an existing affected coating operation under 40 CFR 63, Subpart MMMM.

(5) Paint flash off, exhausting to stack EF-12;

(6) One (1) natural gas-fired paint curing oven, identified as TCB-3, with a maximum heat input capacity of 1.305 MMBtu/hr, using no controls, and exhausting to stacks EF-13 and EF-14.

A.4 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:

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

(1) One (1) natural gas-fired burn-off oven, identified as BU1, with a maximum capacity of 1.6 MMBTU per hour, constructed in 1995, exhausting to stack thirteen (S13);

(2) One (1) natural gas-fired combination of dry off and cure oven, identified as BO1, with a maximum combined capacity of 3.3 million British thermal units per hour

(MMBtu/hour), constructed in 2002, exhausting to stack seven (S7);

(3) Three (3) natural gas-fired water heaters for cleaning metal parts, identified as Stage 1, with a maximum heat input capacity of 2.5 MMBtu/hour, Stage 3 with maximum heat input capacity of 2.5 MMBtu/hr, and Stage 5 with maximum input capacity of 1.5 MMBtu/hr, constructed in 1995, exhausting to stacks S1, S2A, S2B, S4, S5,and S10;

This metal parts cleaning operation uses acid and a hot water wash rather than organic solvents.

(4) Four (4) natural gas-fired heating furnaces, with a maximum capacity of 0.06 MMBtu/hr each;

(5) Eight (8) natural gas-fired space heaters, with a maximum capacity of 0.1 MMBtu/hr each;

(6) One (1) natural gas-fired steam cleaner, with a maximum capacity of 0.55 MMBtu/hr;

(7) One (1) natural gas-fired batch paint drying oven, with maximum capacity of 0.8 MMBtu/hr, constructed in 2003;

(8) One (1) natural gas-fired small mobile washer with maximum capacity of 0.55 million British thermal units per hour (MMBtu/hour), constructed in 1995;

(9) Two (2) natural gas-fired parts washer water heaters, identified as T1 and T2, approved in 2018 for construction, with a maximum heat input capacity of 0.460 MMBtu/hr and 1.520 MMBtu/hr, respectively, using no controls, and exhausting to stacks EF-1 and EF-2;

This parts washer uses materials with no VOC and HAPs.

(10) One (1) natural gas-fired washer drying oven, identified as TCB-1, approved in 2018 for construction, with a maximum heat input capacity of 0.193 MMBtu/hr, using no controls, and exhausting to stacks EF-4, EF-15, and EF-16;

(11) One (1) natural gas-fired primer booth heating furnace, identified as MAU-2, approved in 2018 for construction, with a maximum heat input capacity of 6.480 MMBtu/hr, using no controls, and exhausting to stacks EF-6, EF-7, and EF-8;

(12) One (1) natural gas-fired paint booth heating furnace, identified as MAU-4, approved in 2018 for construction, with a maximum heat input capacity of 6.480 MMBtu/hr, using no controls, and exhausting to stacks EF-10, EF-11, and EF-12;

(13) Two (2) natural gas-fired make-up air heating furnaces, identified as MAU-1 and MAU-3, approved in 2018 for construction, with a maximum heat input capacity of 3.080 MMBtu/hr and 2.640 MMBtu/hr, respectively, using no controls, and exhausting indoors;

(b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment cutting torches, soldering equipment, welding equipment;

(c) Paved and unpaved roads and parking lots with public access;

(d) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to

326 IAC 20-6;

(e) A laboratory as defined in 326 IAC 2-7-1(20)(D);

(f) Combustion source flame safety purging on startup;

(g) The following VOC and HAP storage containers: Storage tanks with capacity less than or equal to 1,000 gallons, and dispensing less than 12,000 gallons; Vessels storing lubricating oils, hydraulic oils, and machining fluids;

(h) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;

(i) Machining where an aqueous cutting coolant continuously floods machining interface;

(j) Cleaners and solvents characterized as follows:

(1) Having a vapor pressure equal to or less than 2 kPa; 15 mmHg; or 0.3 psi measured at 38 degrees C (100^{o}F) or;

(2) Having a vapor pressure equal to or less than 0.7 kPa; 5 mmHg; or 0.1 ps measured at 20^{o}C (68^{o}F);

the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;

(k) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs;

(l) Water based adhesives that are less than or equal to 5% by volume VOCs excluding HAPs;

(m) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;

(n) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process;

(o) Blowdown for any of the following: sight glass, boiler, compressors; pumps; and cooling tower;

(p) Filter or coalescer media changeout; and

(q) Emission units whose potential uncontrolled emissions meet the exemption levels specified in 326 IAC 2-1.1-3(d)(1);

(1) Maintenance painting, parking lot resealing, roof repair;

(2) Testing or evaluations of alternate paints and coating or solvents and thinners and of different paint systems or components;

(3) Handle pressure cylinders (welding or cutting gases, lift fuel truck);

(4) Water vapor emissions, paint line washing stations;

(5) Activities for pH adjustment and other water conditionings;

(6) Ventilation stations at laser and plasma metal cutting machines; and

(7) Using 80 tons or less of welding consumables.

A.5 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, T003-36975-00224, 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 T 003-36975-00224 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 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.7 Performance Testing [326 IAC 3-6]

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

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

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

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

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

C.12 Risk Management Plan [326 IAC 2-7-5(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.13 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.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

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

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

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

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

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

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

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

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

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

The statement must be submitted to:

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

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

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

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

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

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

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

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

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

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

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) paint booth, utilizing two (2) air atomization guns, identified as PB_2, constructed in 1995, with a maximum throughput of 75 units per hour of metal parts, and using 0.21 gallons of coating material per part, using dry filters as control, and exhausting to stack PB2S;

The above unit is considered an existing affected coating operation under 40 CFR 63, Subpart MMMM.

(b) One (1) coating line, identified as PB_3, constructed in 2012, consisting of the following:

(3) One (1) paint booth, utilizing one (1) air atomization gun, identified as PB_3 booth, with a throughput rate of 2 metal components per hour and using 0.35 gallons of coating per metal component, using dry filters for particulate control, exhausting to stack PB3-1;

The above unit is considered an existing affected coating operation under 40 CFR 63, Subpart MMMM.

(c) One (1) continuous coating line for coating metal parts, identified as PB_5, approved in 2018 for construction, with a maximum capacity of 50 units per hour, consisting of the following:

(1) One (1) primer booth, utilizing two (2) air atomization guns, with a maximum capacity of 50 units per hour, using 0.2635 gallons of coating per unit, using a dry filter for particulate control, exhausting to stacks EF-6 and EF-7;

The above unit is considered an existing affected coating operation under 40 CFR 63, Subpart MMMM.

(4) One (1) paint booth, utilizing two (2) air atomization guns, with a maximum capacity of 50 units per hour, using 0.2635 gallons of coating per unit, using a dry filter for particulate control, exhausting to stacks EF-10 and EF-11;

The above unit is considered an existing affected coating operation under 40 CFR 63, Subpart MMMM.

(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 Volatile Organic Compound (VOC) Limit [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 not applicable, the total VOC input, including coatings, dilution solvents, and cleaning solvents to the three (3) paint booths/coating lines, identified as PB_2, PB_3, and PB_5, shall not exceed 249 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with the above limit in combination with potential VOC emissions from all other emission units at the source, shall limit the VOC from the entire source to less than 250 tons per twelve (12) consecutive month period, and render 326 IAC 2-2 (PSD) not applicable.

D.1.2 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9(c)(2) (Miscellaneous Metal Coating Operations), the Permittee shall not discharge into the atmosphere of any VOC in excess of three and five-tenths (3.5) pounds per gallon of coating excluding water, delivered to a coating applicator in the three (3) paint booths, PB_2, PB_3, and PB_5 that is air dried or forced warm air dried at temperatures up to ninety (90) degrees Celsius (one hundred ninety-four (194) degrees Fahrenheit).

(b) Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:

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

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

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

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

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

D.1.3 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), particulate from the three (3) paint booths identified as PB_2, PB_3, and PB_5 shall be controlled by a dry particulate filter, waterwash, or an equivalent control device and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

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

D.1.5 Volatile Organic Compounds (VOC)

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

(b) Compliance with Condition D.1.2(a), when using non-compliant coating, the volume weighted average shall be determined for each paint booth by the following equation on a daily basis:

$A = [\sum(C \times U) / \sum U]$

Where:

A is the volume weighted average in pounds VOC per gallon less water as applied;

C is the VOC content of the coating in pounds VOC per gallon less water as applied; and

U is the usage rate of the coating in gallons per day.

D.1.6 Particulate Control

In order to comply with Condition D.1.3, the dry filters for particulate control shall be in operation and control emissions from the paint booths at all times the three (3) paint booths identified as PB_2, PB_3, and PB_5 are in operation.

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

D.1.7 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the three (3) paint booths while these 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 obligations with regard to responding to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take 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.

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

D.1.8 Record Keeping Requirement

(a) To document the compliance status with Conditions D.1.1, D.1.2(a) and D.1.5, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken and shall be complete and sufficient to establish compliance with the VOC input limit established in Conditions D.1.1 and D.1.2(a).

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

(2) The amount of coating material and solvent used on a monthly and daily basis;

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

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

(3) The cleanup solvent usage for each day and month;

(4) The total VOC usage for each day and month;

(5) The volume weighted VOC content of the coating used for each day for each paint booth; and

(6) The total usage for each compliance period.

(b) To document the compliance status with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspection.

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

D.1.8 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.1 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of each calendar quarter. The report 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). Section C - General Reporting Requirements contains the Permittee's obligations with regard to the reporting required by this condition.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Insignificant Activities

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

(1) One (1) natural gas-fired burn-off oven, identified as BU1, with a maximum capacity of 1.6 MMBTU per hour, constructed in 1995, exhausting to thirteen (S13) stack [326 IAC 4-2-2];

(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 Matter (Incinerators)[326 IAC 4-2-2]

Pursuant to 326 IAC 4-2-2 (Incinerators), the natural gas-fired burn-off oven (BU1), rated at 1.6 MMBtu/hr. shall:

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

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

(c) Comply with 326 IAC 5-1 (Opacity Limitations) and 326 IAC 2 (Permit Review Rules).

(d) Be maintained properly as specified by the manufacturer and approved by IDEM.

(e) Be operated according to the manufacturer's recommendation and only burn waste approved by the IDEM.

(f) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators.

(g) Be operated so that emissions of hazardous material including, but not limited to, viable pathogenic bacteria, dangerous chemical or gases, or noxious odors are prevented.

(h) Not create a nuisance or fire hazard.

(i) Not emit particulate matter (PM) in excess of 0.3 pound per 1000 pounds of dry exhaust gas corrected to 50 percent excess air.

The operation of this incinerator shall be terminated immediately upon noncompliance with any of the above mentioned requirements.

SECTION E.1 NESHAP

Emissions Unit Description:

(a) One (1) paint booth, utilizing two (2) air atomization guns, identified as PB_2, constructed in 1995, with a maximum throughput of 75 units per hour of metal parts, and using 0.21 gallons of coating material per part, using dry filters as control, and exhausting to stack PB2S;

The above unit is considered an existing affected coating operation under 40 CFR 63, Subpart MMMM.

(b) One (1) coating line, identified as PB_3, constructed in 2012, consisting of the following:

(3) One (1) paint booth, utilizing one (1) air atomization gun, identified as PB_3 booth, with a throughput rate of 2 metal components per hour and using 0.35 gallons of coating per metal component, using dry filters for particulate control, exhausting to stack PB3-1;

The above unit is considered an existing affected coating operation under 40 CFR 63, Subpart MMMM.

(c) One (1) continuous coating line for coating metal parts, identified as PB_5, approved in 2018 for construction, with a maximum capacity of 50 units per hour, consisting of the following:

(1) One (1) primer booth, utilizing two (2) air atomization guns, with a maximum capacity of 50 units per hour, using 0.2635 gallons of coating per unit, using a dry filter for particulate control, exhausting to stacks EF-6 and EF-7;

The above unit is considered an existing affected coating operation under 40 CFR 63, Subpart MMMM.

(4) One (1) paint booth, utilizing two (2) air atomization guns, with a maximum capacity of 50 units per hour, using 0.2635 gallons of coating per unit, using a dry filter for particulate control, exhausting to stacks EF-10 and EF-11;

The above unit is considered an existing affected coating operation under 40 CFR 63, Subpart MMMM.

(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 [326 IAC 20-1][40 CFR Part 63, Subpart A]

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 paint booths PB_2, PB_3, and PB_5 listed above, except as otherwise specified in 40 CFR Part 63, Subpart MMMM.

E.1.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart MMMM] [326 IAC 20-80]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart MMMM (included as Attachment A to the operating permit), which are incorporated by reference as 326 IAC 20-80, for the paint booths PB_2, PB_3, and PB_5 listed above:

(1)	40 CFR 63.3880	What is the purpose of this subpart?
(2)	40 CFR 63.3881(a)(1-3), (b)	Am I subject to this subpart?
(3)	40 CFR 63.3882	What parts of my plant does this subpart cover?
(4)	40 CFR 63.3883, (b), (d)	When do I have to comply with this subpart?
(5)	40 CFR 63.3890(b)(1-2), (c)	What emission limits must I meet?
(6)	40 CFR 63.3891, (a)(b)	What are my options for meeting the emission l limits?
(7)	40 CFR 63.3892(a)	What operating limits must I meet?
(8)	40 CFR 63.3893(a)	What work practice standards must I meet?
(9)	40 CFR 63.3900(a)(1), (b)	What are my general requirements for complying with this subpart?
(10)	40 CFR 63.3901	What parts of the General Provisions apply to me?
(11)	40 CFR 63.3910(a), (b), (c)(1-7), (c)(8)(i), (c)(10-11)	What notifications must I submit?
(12)	40 CFR 63.3920(a)(1-2), (a)(3)(i-iv, vi-vii), (a)(4-5)	What reports must I submit?
(13)	40 CFR 63.3930, (a-b), (c)(1-2), (d-g), (h-j)	What records must I keep
(14)	40 CFR 63.3931	In what form and for how long must I keep my records?
(15)	40 CFR 63.3940	By what date must I conduct the initial compliance demonstration?
(16)	40 CFR 63.3941	How do I demonstrate initial compliance with the emission limitations?
(17)	40 CFR 63.3942	How do I demonstrate continuous compliance with the emission limitations?
(18)	40 CFR 63.3950	By what date must I conduct the initial compliance demonstration?
(19)	40 CFR 63.3951	How do I demonstrate initial compliance with the emission limitations?
(20)	40 CFR 63.3952	How do I demonstrate continuous compliance with the emission limitations?
(21)	40 CFR 63.3980	Who implements and enforces this subpart?
(22)	40 CFR 63.3981	What definitions apply to this subpart?
(23)	Table 2 to Subpart MMMM of Part 63	Applicability of General Provisions to Subpart MMMM of Part 63
(24)	Table 3 to Subpart MMMM of Part 63	Default Organic HAP Mass Fraction for Solvents and Solvent Blends
(25)	Table 4 to Subpart MMMM of Part 63	Default Organic HAP Mass Fraction for Petroleum Solvent Groups

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

Source Name: Ottenweller Company, Inc
Source Address: 3011 Congressional Parkway and 3010 Independence Drive, Fort Wayne, Indiana 46808
Part 70 Permit No.: T 003-36975-00224

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: Ottenweller Company, Inc
Source Address: 3011 Congressional Parkway and 3010 Independence Drive, Fort Wayne, Indiana 46808
Part 70 Permit No.: T 003-36975-00224

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: Ottenweller Company, Inc
Source Address: 3011 Congressional Parkway and 3010 Independence Drive, Fort Wayne, Indiana 46808
Part 70 Permit No.: T003-36975-00224
Facility: Three (3) paint booths/coating lines, identified as PB_2, PB_3, and PB_5
Parameter: VOC
Limit: Shall not exceed 249 tons per twelve consecutive month period

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: Ottenweller Company, Inc
Source Address: 3011 Congressional Parkway and 3010 Independence Drive, Fort Wayne, Indiana 46808
Part 70 Permit No.: T 003-36975-00224

Months: _____ to _____ Year: _____

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

□ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

□ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

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:	**Ottenweller Company, Inc.**
Source Location:	**3011 Congressional Parkway, Fort Wayne, Indiana 46808** **3010 Independence Drive, Fort Wayne, Indiana 46808**
County:	**Allen**
SIC Code:	**3469 (Metal Stampings, Not Elsewhere Classified)** **3499 (Fabricated Metal Products, Not Elsewhere Classified)**
Operation Permit No.:	**T003-36975-00224**
Operation Permit Issuance Date:	**September 22, 2016**
Significant Source Modification No.:	**003-40520-00224**
Significant Permit Modification No.:	**003-40534-00224**
Permit Reviewer:	**Sarah Green**

Source Definition

This source consists of the following plants:

(a) Plant 1 is located at 3011 Congressional Parkway; and
(b) Plant 2 is located at 3010 Independence Drive.

In order to consider both plants as one single source, all three of the following criteria must be met:

(1) The plants must have common ownership/control;
(2) The plants must have the same SIC code; and
(3) The plants must be located on contiguous or adjacent properties.

These plants are located on adjacent properties, have the same SIC codes of 34, and are under common control, therefore they will be considered one (1) source, as defined by 326 IAC 2-7-1(22). This determination was initially made under Administrative Amendment No. 003-19933-00224, issued on December 29, 2004.

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. T003-36975-00224 on September 22, 2016. The source has since received the following approvals:

(a) Minor Source Modification No.: 003-39486-00224, issued on March 6, 2018; and

(b) Significant Permit Modification No.: 003-39630-00224, issued on May 1, 2018.

County Attainment Status

The source is located in Allen County. The following attainment status designations are applicable to Allen County:

Pollutant	Designation
SO_2	Better than national standards.

Pollutant	Designation
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. Allen 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) $PM_{2.5}$

Allen 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

Allen 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 (ton/year)								
	PM	PM_{10}	$PM_{2.5}$	SO_2	NO_X	VOC	CO	Single HAP*	Combined HAPs
Total for Source	47.33	47.87	47.87	0.01	249.50	7.11	9.08	2.78	4.25
PSD Major Source Thresholds	250	250	250	250	250	250	250	--	--

*Single highest source-wide HAP.

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

(c) These emissions are based on the TSD of Significant Permit Modification No.: 003-39630-00224, issued on May 1, 2018.

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed an application, submitted by Ottenweller Company, Inc. on September 26, 2018, relating to the following:

(a) The source has requested to construct a coating line, described as follows:

(1) One (1) continuous coating line for coating metal parts, identified as PB_5, approved in 2018 for construction, with a maximum capacity of 50 units per hour, consisting of the following:

(A) One (1) primer booth, utilizing two (2) air atomization guns, with a maximum capacity of 50 units per hour, using 0.2635 gallons of coating per unit, using a dry filter for particulate control, exhausting to stacks EF-6 and EF-7;

The above unit is considered an existing affected coating operation under 40 CFR 63, Subpart MMMM.

(B) Primer flash off, exhausting to stack EF-8;

(C) One (1) natural gas-fired primer paint drying oven, identified as TCB-2, with a maximum heat input capacity of 0.286 MMBtu/hr, using no controls, and exhausting to stack EF-8;

(D) One (1) paint booth, utilizing two (2) air atomization guns, with a maximum capacity of 50 units per hour, using 0.2635 gallons of coating per unit, using a dry filter for particulate control, exhausting to stacks EF-10 and EF-11;

The above unit is considered an existing affected coating operation under 40 CFR 63, Subpart MMMM.

(E) Paint flash off, exhausting to stack EF-12;

(F) One (1) natural gas-fired paint curing oven, identified as TCB-3, with a maximum heat input capacity of 1.305 MMBtu/hr, using no controls, and exhausting to stacks EF-13 and EF-14.

(b) The source has requested to construct the following insignificant natural gas combustion units:

(A) Two (2) natural gas-fired parts washer water heaters, identified as T1 and T2, approved in 2018 for construction, with a maximum heat input capacity of 0.460 MMBtu/hr and 1.520 MMBtu/hr, respectively, using no controls, and exhausting to stacks EF-1 and EF-2;

This parts washer uses materials with no VOC and HAPs.

(B) One (1) natural gas-fired washer drying oven, identified as TCB-1, approved in 2018 for construction, with a maximum heat input capacity of 0.193 MMBtu/hr, using no controls, and exhausting to stacks EF-4, EF-15, and EF-16;

(C) One (1) natural gas-fired primer booth heating furnace, identified as MAU-2, approved in 2018 for construction, with a maximum heat input capacity of 6.480 MMBtu/hr, using no controls, and exhausting to stacks EF-6, EF-7, and EF-8;

(D) One (1) natural gas-fired paint booth heating furnace, identified as MAU-4, approved in 2018 for construction, with a maximum heat input capacity of 6.480 MMBtu/hr, using no controls, and exhausting to stacks EF-10, EF-11, and EF-12;

(E) Two (2) natural gas-fired make-up air heating furnaces, identified as MAU-1 and MAU-3, approved in 2018 for construction, with a maximum heat input capacity of 3.080 MMBtu/hr and 2.640 MMBtu/hr, respectively, using no controls, and exhausting indoors;

(c) The source has requested the paint booth, identified as PB4, be removed from the permit, because it was never constructed.

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 (ton/year)								
		PM	PM_{10}	$PM_{2.5}$	SO_2	NO_X	VOC	CO	Single HAP (Xylene)	Combined HAPs
Coating Line (PB5):	Primer Booth	70.96	70.96	70.96	-	-	46.69	-	0.55	0.55
	Paint Booth	67.90	67.90	67.90	-	-	191.04	-	0.68	1.05
Coating Line (PB5): Drying & Curing Ovens		0.01	0.05	0.05	4.1E-03	0.68	0.04	0.57	-	0.01
Insignificant Natural Gas Combustion		0.17	0.68	0.68	0.05	8.95	0.49	7.52	-	0.17
Total:		**139.04**	**139.59**	**139.59**	**0.06**	**9.64**	**238.26**	**8.10**	**1.23**	**1.78**

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 PM, PM_{10}, $PM_{2.5}$, and 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

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}	$PM_{2.5}$[1]	SO_2	NO_X	VOC	CO
Coating Line (PB5):	Primer Booth[2]	70.96	70.96	70.96	-	-	46.69	-
	Paint Booth[2]	67.90	67.90	67.90	-	-	191.04	-
Coating Line (PB5): Drying & Curing Ovens		0.01	0.05	0.05	4.1E-03	0.68	0.04	0.57
Insignificant Natural Gas Combustion		0.17	0.68	0.68	0.05	8.95	0.49	7.52
Total for Modification		**139.04**	**139.59**	**139.59**	**0.06**	**9.64**	**238.26**	**8.10**
PSD Major Source Thresholds		250	250	250	250	250	250	250

[1] $PM_{2.5}$ listed is direct $PM_{2.5}$.
[2] The primer and paint booths along with the existing paint booths are limited to 249 tons per year of VOC to render 326 IAC 2-2 not applicable.

(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		Source-Wide Emissions after Issuance (tons/year)								
		PM	PM_{10}	$PM_{2.5}$[1]	SO_2	NO_X	VOC	CO	Single HAP (Xylene)	Combined HAPs
Paint Booth (PB2)		30.52	30.52	30.52	-	-	249.00[2]	-	1.37	2.46
Paint Booth (PB3)		13.30	13.30	13.30	-	-		-	1.09	1.46
Coating Line (PB5):	Primer Booth	70.96	70.96	70.96	-	-		-	0.55	0.55
	Paint Booth	67.90	67.90	67.90	-	-		-	0.68	1.05
Paint Booth (PB3): Oven		0.02	0.08	0.08	0.01	1.07	0.06	0.90	-	0.02
Coating Line (PB5): Drying and Curing Ovens		0.01	0.05	0.05	4.1E-03	0.68	0.04	0.57	-	0.01
Insignificant Natural Gas Combustion		0.29	1.15	1.15	0.09	15.11	0.83	12.69	-	0.29
Total for Source		**183.00**	**183.96**	**183.96**	**0.10**	**16.87**	**249.93**	**14.17**	**3.69**	**5.84**
Title V Major Source Thresholds		-	100	100	100	100	100	100	10	25
PSD Major Source Thresholds		250	250	250	250	250	250	250	-	-

[1]$PM_{2.5}$ listed is direct $PM_{2.5}$.
[2]The paint booths are limited to 249 tons per year of VOC to render 326 IAC 2-2 not applicable.

(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):

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

National Emission Standards for Hazardous Air Pollutants (NESHAP):

On January 25, 2018, the U.S. EPA issued a guidance memorandum titled "Reclassification of Major Sources as Area Sources Under Section 112 of the Clean Air Act." This memorandum withdrew the 1995 policy regarding major sources of hazardous air pollutants (HAP) that became area sources commonly known as "once in, always in" (the OIAI policy). Under the 1995 policy, once a source was classified as a major source of HAP under Section 112 of the Clean Air Act (CAA) and determined to be subject to a major source NESHAP (MACT) the source remained subject to the major source NESHAP for perpetuity.

Effective immediately, the guidance memorandum titled "Reclassification of Major Sources as Area Sources Under Section 112 of the Clean Air Act." withdraws the 1995 policy commonly known as "once in, always in" (the OIAI policy). Based on the 2018 memorandum, a source that was previously classified

as a major source of HAP under Section 112 of the Clean Air Act (CAA) and subject to a major source NESHAP, and which is now classified as an area source of HAP under Section 112 of the Clean Air Act (CAA), will no longer be subject to a NESHAP that was applicable to it as a major source of HAP.

A number of environmental organizations filed a March 26th Petition for Review ("Petition") in the United States Court of Appeals for the District of Columbia Circuit challenging a the 2018 memorandum rescinding its Clean Air Act "Once In, Always In" policy.

The 2018 memorandum can be found at the following internet site:
https://www.epa.gov/sites/production/files/2018-01/documents/reclassification_of_major_sources_as_area_sources_under_section_112_of_the_clean_air_act.pdf

As a result of this change in U.S. EPA policy, IDEM, OAQ determined that the following major source NESHAP is no longer applicable to this source.

However, the source has requested the previously applicable requirements of the NESHAP remain in the permit due to the pending litigation. Regardless of the 2018 memorandum and/or the outcome of the litigation, the source is required to comply with all conditions contained within their permit.

(a) 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 included in the permit for the coating line, identified as PB5, because the source performed surface coating of metal parts and products when the source was a major source of HAPs. Although this source has since become an area source of HAPs, the source is still subject to this subpart, because of the "Once-in-Always in" policy.

The emission units subject to this rule are as follows:

(1) One (1) continuous coating line for coating metal parts, identified as PB_5, approved in 2018 for construction, with a maximum capacity of 50 units per hour, consisting of the following:

(A) One (1) primer booth, utilizing two (2) air atomization guns, with a maximum capacity of 50 units per hour, using 0.2635 gallons of coating per unit, using a dry filter for particulate control, exhausting to stacks EF-6 and EF-7;

(B) One (1) paint booth, utilizing two (2) air atomization guns, with a maximum capacity of 50 units per hour, using 0.2635 gallons of coating per unit, using a dry filter for particulate control, exhausting to stacks EF-10 and EF-11;

The primer booth and paint booth are subject to the following portions of 40 CFR 63, Subpart MMMM:

(1) 40 CFR 63.3880
(2) 40 CFR 63.3881(a)(1-3), (b)
(3) 40 CFR 63.3882
(4) 40 CFR 63.3883(b), (d)
(5) 40 CFR 63.3890(b)(1-2), (c)
(6) 40 CFR 63.3891, (a)(b)
(7) 40 CFR 63.3892(a)
(8) 40 CFR 63.3893(a)
(9) 40 CFR 63.3900(a)(1), (b)
(10) 40 CFR 63.3901
(11) 40 CFR 63.3910(a), (b), (c)(1-7), (c)(8)(i), (c)(10-11)
(12) 40 CFR 63.3920(a)(1-2), (a)(3)(i-iv, vi-vii), (a)(4-5)
(13) 40 CFR 63.3930, (a-b), (c)(1-2), (d-g), (h-j)
(14) 40 CFR 63.3931
(15) 40 CFR 63.3940
(16) 40 CFR 63.3941

(17) 40 CFR 63.3942
(18) 40 CFR 63.3950
(19) 40 CFR 63.3951
(20) 40 CFR 63.3952
(21) 40 CFR 63.3980
(22) 40 CFR 63.3981
(23) Table 2 to Subpart MMMM
(24) Table 3 to Subpart MMMM
(25) Table 4 to Subpart MMMM

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 MMMM.

(b) 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 in the permit, because the source does not perform metal stripping operations, autobody refinishing operations, or apply coatings that contain compounds of chromium, lead, manganese, nickel, or cadmium.

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants for Nine Metal Fabrication and Finishing Source Categories (40 CFR 63, Subpart XXXXXX) are not included in the permit, because the source uses coatings that do not contain the following HAPs: cadmium, chromium, lead, nickel, or manganese.

(d) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (40 CFR Part 63, 326 IAC 14, and 326 IAC 20) included in the permit 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/Pollutant		Control Device	Applicable Emission Limitation	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Coating Line PB5	Primer Booth: PM*	Dry Filter	326 IAC 6-3-2	<100 tpy	-	N [1]	-
	Paint Booth: PM*	Dry Filter	326 IAC 6-3-2	<100 tpy	-	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 PM because the uncontrolled PTE of PM is less than the major source threshold.						
Emission units without air pollution controls are not subject to CAM. Therefore, they are not listed.							

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 and uncontrolled potential to emit of VOC is still greater than 250 tons per year. The source is currently limited to less than 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 new coating line, identified as PB5, has been added to the limit. The existing paint booth, identified as PB4, has been removed from the permit, since it was never constructed.

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 three (3) paint booths/coating lines, identified as PB_2, PB_3, and PB_5, shall not exceed 249 tons per twelve consecutive month period with compliance determined at the end of each month.

(b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The operation of the coating line, identified as PB5, 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 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
Pursuant to 326 IAC 6-2-1, the requirements of 326 IAC 6-2 are not applicable to the natural gas-fired ovens, heaters, and furnaces added in this modification, because they are not considered combustion for indirect heating as defined in 326 IAC 1-2-19. They are all direct-fired units.

(d) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
(1) Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2(d) are applicable to the primer booth and paint booth associated with the coating line, identified as PB5, since 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 primer booth and paint booth shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the source shall operate the control device in accordance with manufacturer's specifications.

(2) Liquid and gaseous fuels and combustion air are excluded from the definition of process weight as defined in 326 IAC 1-2-59(a). Therefore, the natural gas-fired ovens, heaters,

and furnaces added in this modification are not subject to the requirements of 326 IAC 6-3-2.

(e) 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)
Pursuant to 326 IAC 7-1.1-1, the natural gas-fired ovens, heaters, and furnaces added in this modification are not subject to the requirements of 326 IAC 7-1.1, because the SO2 PTE of these units is less than 25 tons per year or 10 pounds per hour.

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

(1) Pursuant to 326 IAC 8-1-6(3)(A), the primer booth and paint booth associated with the coating line, identified as PB5, are not subject to the requirements of 326 IAC 8-1-6, because they are subject to other provisions of 326 IAC 8.

(2) Pursuant to 326 IAC 8-1-6(1), the natural gas-fired ovens, heaters, and furnaces added in this modification are not subject to the requirements of 326 IAC 8-1-6, because the unlimited VOC potential emissions of each of these units is less than 25 tons per year.

(g) 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Coating Operations)
Pursuant to 326 IAC 8-2-1(a)(4), the primer booth and paint booth associated with the coating line, identified as PB5, are subject to the requirements of 326 IAC 8-2-9, because they were constructed after July 1, 1990, are not located in Lake or Porter County, and have the potential to emit greater than 15 pounds of VOC per day. Pursuant to 326 IAC 8-2-9(a)(1), the primer booth and paint booth associated with the coating line, identified as PB5, are subject to the VOC limitations under 326 IAC 8-2-9(c) and work practices under 326 IAC 8-2-9(f), because they coat metal parts or products under the SIC code major group #34.

Pursuant to 8-2-9(c), the VOC content of the coating delivered to the applicator at the primer booth and paint booth shall be limited to 3.5 pounds of VOCs per gallon of coating, excluding water, delivered to a coating applicator in a coating application system that is air dried or forced warm air dried at temperatures up to 90°C (194°F).

When non-compliant coating is used, compliance with this limit shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis with the following equation:

$$A = [\sum(C \times U) / \sum U]$$

Where:

A is the volume weighted average in pounds VOC per gallon less water as applied;

C is the VOC content of the coating in pounds VOC per gallon less water as applied; and

U is the usage rate of the coating in gallons per day.

Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials.

(h) 326 IAC 8-3 (Organic Solvent Degreasing Operations)
Pursuant to 326 IAC 8-3-1(a)(1), the parts washer is not subject to the requirements of 326 IAC 8-3, because it does not use materials containing VOC.

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 proposed 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 volume weighted averaging, 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
Primer Booth Dry Filter	EF-6 and EF-7	Filter Inspection	Daily
		Overspray Observation	Weekly
		Stack Exhaust and Overspray Inspection	Monthly
Paint Booth Dry Filter	EF-10 and EF-11	Filter Inspection	Daily
		Overspray Observation	Weekly
		Stack Exhaust and Overspray Inspection	Monthly

These monitoring conditions are necessary because the dry filters for the primer booth and paint booth must operate properly to assure compliance with 326 IAC 2-2 (PSD) and 326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Processes).

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:

A.3 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) paint booth, utilizing two (2) air atomization guns, identified as PB_2, constructed in 1995, with a maximum throughput of 75 units per hour of metal parts, and using 0.21 gallons of coating material per part, using dry filters as control, and exhausting to stack PB2S~~.~~**;**

The above unit is considered an existing affected coating operation under 40 CFR 63, Subpart MMMM ~~(4M)~~.

(b) One **(1)** ~~C~~**c**oating line, identified as PB_3, constructed in 2012, consisting of the following:

(~~i~~**1**) One wash booth, utilizing water solution jet for cleaning purpose, generating no particulate emissions**;**

(~~ii~~**2**) Air dryers**;**

(~~iii~~**3**) One (1) paint booth, utilizing one (1) air atomization gun, identified as PB_3 booth, with a throughput rate of 2 metal components per hour and using 0.35 gallons of coating per metal component, using dry filters for particulate control, exhausting to stack PB3-1~~.~~**;**

The above unit is considered an existing affected coating operation under 40 CFR 63, Subpart MMMM ~~(4M)~~.

(~~iv~~**4**) F**l**ash-Off Tunnel**;**

(~~v~~**5**) One (1) natural gas fired oven, capacity 2.5 MMBtu/hr~~.~~**; and**

~~(c) One (1) paint booth, identified as PB_4, approved in 2018 for construction, utilizing one (1) air atomization gun, with a maximum capacity of 1 large metal part per day, using 12.40 gallons of coatings per unit, using dry disposable synthetic fiber filter media as control, identified as PB_4-F1, exhausting to the outside through stack PB_4-01, and:~~

~~The above unit is considered an existing affected coating operation under 40 CFR 63, Subpart MMMM (4M).~~

~~(i) One (1) natural gas-fired drying oven, identified as PB_4-1, approved in 2018 for construction, with a capacity of 3.0 MMBtu/hr, no control and exhausting to the outside through stack PB_4-01.~~

(c) One (1) continuous coating line for coating metal parts, identified as PB_5, approved in 2018 for construction, with a maximum capacity of 50 units per hour, consisting of the following:

(1) One (1) primer booth, utilizing two (2) air atomization guns, with a maximum capacity of 50 units per hour, using 0.2635 gallons of coating per unit, using a dry filter for particulate control, exhausting to stacks EF-6 and EF-7;

The above unit is considered an existing affected coating operation under 40 CFR 63, Subpart MMMM.

(2) Primer flash off, exhausting to stack EF-8;

(3) One (1) natural gas-fired primer paint drying oven, identified as TCB-2, with a maximum heat input capacity of 0.286 MMBtu/hr, using no controls, and exhausting to stack EF-8;

(4) One (1) paint booth, utilizing two (2) air atomization guns, with a maximum capacity of 50 units per hour, using 0.2635 gallons of coating per unit, using a dry filter for particulate control, exhausting to stacks EF-10 and EF-11;

The above unit is considered an existing affected coating operation under 40 CFR 63, Subpart MMMM.

(5) Paint flash off, exhausting to stack EF-12;

(6) One (1) natural gas-fired paint curing oven, identified as TCB-3, with a maximum heat input capacity of 1.305 MMBtu/hr, using no controls, and exhausting to stacks EF-13 and EF-14.

A.4 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:

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

****

(9) Two (2) natural gas-fired parts washer water heaters, identified as T1 and T2, approved in 2018 for construction, with a maximum heat input capacity of 0.460 MMBtu/hr and 1.520 MMBtu/hr, respectively, using no controls, and exhausting to stacks EF-1 and EF-2;

This parts washer uses materials with no VOC and HAPs.

(10) One (1) natural gas-fired washer drying oven, identified as TCB-1, approved in 2018 for construction, with a maximum heat input capacity of 0.193 MMBtu/hr, using no controls, and exhausting to stacks EF-4, EF-15, and EF-16;

(11) One (1) natural gas-fired primer booth heating furnace, identified as MAU-2, approved in 2018 for construction, with a maximum heat input capacity of 6.480 MMBtu/hr, using no controls, and exhausting to stacks EF-6, EF-7, and EF-8;

(12) One (1) natural gas-fired paint booth heating furnace, identified as MAU-4, approved in 2018 for construction, with a maximum heat input capacity of 6.480 MMBtu/hr, using no controls, and exhausting to stacks EF-10, EF-11, and EF-12;

(13) Two (2) natural gas-fired make-up air heating furnaces, identified as MAU-1 and MAU-3, approved in 2018 for construction, with a maximum heat input capacity of 3.080 MMBtu/hr and 2.640 MMBtu/hr, respectively, using no controls, and exhausting indoors;

****

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) paint booth, utilizing two (2) air atomization guns, identified as PB_2, constructed in 1995, with a maximum throughput of 75 units per hour of metal parts, and using 0.21 gallons of coating material per part, using dry filters as control, and exhausting to stack PB2S~~.~~**;**

The above unit is considered an existing affected coating operation under 40 CFR 63, Subpart MMMM ~~(4M)~~.

(b) One **(1)** ~~C~~**c**oating line, identified as PB_3, constructed in 2012, consisting of the following:

(~~iii~~**3**) One (1) paint booth, utilizing one (1) air atomization gun, identified as PB_3 booth, with a throughput rate of 2 metal components per hour and using 0.35 gallons of coating per metal component, using dry filters for particulate control,

exhausting to stack PB3-1~~.~~**;**

The above unit is considered an existing affected coating operation under 40 CFR 63, Subpart MMMM ~~(4M)~~.

~~(c) One (1) paint booth, identified as PB_4, approved in 2018 for construction, utilizing one (1) air atomization gun, with a maximum capacity of 1 large metal part per day, using 12.40 gallons of coatings per unit, using dry disposable synthetic fiber filter media as control, identified as PB_4-F1, exhausting to the outside through stack PB_4-01.~~

~~The above unit is considered an existing affected coating operation under 40 CFR 63, Subpart MMMM (4M).~~

(c) One (1) continuous coating line for coating metal parts, identified as PB_5, approved in 2018 for construction, with a maximum capacity of 50 units per hour, consisting of the following:

(1) One (1) primer booth, utilizing two (2) air atomization guns, with a maximum capacity of 50 units per hour, using 0.2635 gallons of coating per unit, using a dry filter for particulate control, exhausting to stacks EF-6 and EF-7;

The above unit is considered an existing affected coating operation under 40 CFR 63, Subpart MMMM.

(4) One (1) paint booth, utilizing two (2) air atomization guns, with a maximum capacity of 50 units per hour, using 0.2635 gallons of coating per unit, using a dry filter for particulate control, exhausting to stacks EF-10 and EF-11;

The above unit is considered an existing affected coating operation under 40 CFR 63, Subpart MMMM.

(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 Volatile Organic Compound (VOC) Limit [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 not applicable, the total VOC input, including coatings, dilution solvents, and cleaning solvents to the three (3) paint booths**/coating lines, identified as** PB_2, PB_3, and ~~PB_4~~**PB_5,** shall not exceed 249 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with the above limit in combination with potential VOC emissions from all other emission units at the source, shall limit the VOC from the entire source to less than 250 tons per twelve (12) consecutive month period, and render 326 IAC 2-2 (PSD) not applicable.

D.1.2 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9(c)(2) (Miscellaneous Metal Coating Operations), the Permittee shall not discharge into the atmosphere of any VOC in excess of three and five-tenths (3.5) pounds per gallon of coating excluding water, delivered to a coating applicator in the three (3) paint booths, PB_2, PB_3, and ~~PB_4~~**PB_5** that is air dried or forced warm air dried at temperatures up to ninety (90) degrees Celsius (one hundred ninety-four (194) degrees Fahrenheit).

****

D.1.3 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), particulate from the three (3) paint booths identified as PB_2, PB_3, and ~~PB_4~~**PB_5** shall be controlled by a dry particulate filter, waterwash, or an equivalent control device and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

****

D.1.6 Particulate Control

In order to comply with Condition D.1.3, the dry filters for particulate control shall be in operation and control emissions from the paint booths at all times the three (3) paint booths identified as PB_2, PB_3, and ~~PB_4~~**PB_5** are in operation.

****

SECTION E.1 NESHAP

Emissions Unit Description:

(a) One (1) paint booth, utilizing two (2) air atomization guns, identified as PB_2, constructed in 1995, with a maximum throughput of 75 units per hour of metal parts, and using 0.21 gallons of coating material per part, using dry filters as control, and exhausting to stack PB2S~~.~~**;**

The above unit is considered an existing affected coating operation under 40 CFR 63, Subpart MMMM ~~(4M)~~.

(b) One **(1)** ~~C~~**c**oating line, identified as PB_3, constructed in 2012, consisting of the following:

(~~iii~~**3**) One (1) paint booth, utilizing one (1) air atomization gun, identified as PB_3 booth, with a throughput rate of 2 metal components per hour and using 0.35 gallons of coating per metal component, using dry filters for particulate control, exhausting to stack PB3-1~~.~~**;**

The above unit is considered an existing affected coating operation under 40 CFR 63, Subpart MMMM ~~(4M)~~.

~~(c) One (1) paint booth, identified as PB_4, approved in 2018 for construction, utilizing one (1) air atomization gun, with a maximum capacity of 1 large metal part per day, using 12.40 gallons of coatings per unit, using dry disposable synthetic fiber filter media as control, identified as PB_4-F1, exhausting to the outside through stack PB_4-01.~~

~~The above unit is considered an existing affected coating operation under 40 CFR 63, Subpart MMMM (4M).~~

(c) One (1) continuous coating line for coating metal parts, identified as PB_5, approved in 2018 for construction, with a maximum capacity of 50 units per hour, consisting of the following:

(1) One (1) primer booth, utilizing two (2) air atomization guns, with a maximum capacity of 50 units per hour, using 0.2635 gallons of coating per unit, using a dry filter for particulate control, exhausting to stacks EF-6 and EF-7;

The above unit is considered an existing affected coating operation under 40 CFR 63, Subpart MMMM.

(4) One (1) paint booth, utilizing two (2) air atomization guns, with a maximum capacity of 50 units per hour, using 0.2635 gallons of coating per unit, using a dry filter for particulate control, exhausting to stacks EF-10 and

EF-11;

The above unit is considered an existing affected coating operation under 40 CFR 63, Subpart MMMM.

(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 [326 IAC 20-1][40 CFR Part 63, Subpart A]

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 paint booths PB_2, PB_3, and PB_{45} listed above, except as otherwise specified in 40 CFR Part 63, Subpart MMMM.

E.1.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart MMMM] [326 IAC 20-80]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart MMMM (included as Attachment A to the operating permit), which are incorporated by reference as 326 IAC 20-80, for the paint booths PB_2, PB_3, and PB_{45} listed above:

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

Part 70 Quarterly Report

Source Name:	Ottenweller Company, Inc
Source Address:	3011 Congressional Parkway and 3010 Independence Drive, Fort Wayne, Indiana 46808
Part 70 Permit No.:	T003-36975-00224
Facility:	Three (3) paint booths/coating lines, identified as PB_2, PB_3, and ~~PB_4~~ **PB_5**
Parameter:	VOC
Limit:	Shall not exceed 249 tons per twelve consecutive month period

****

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 September 26, 2018. Additional information was received on October 15, 2018.

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 003-40520-00224. The operation of this proposed modification shall be subject to the conditions of the attached Significant Permit Modification No. 003-40534-00224.

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
Source-wide Emission Summary

Company Name: Ottenweller Company, Inc
Source Address: 3011 Congressional Parkway, Fort Wayne, Indiana 46808
3010 Independence Drive, Fort Wayne, Indiana 46808
Significant Source Modification No.: 003-40520-00224
Significant Permit Modification No.: 003-40534-00224
Reviewer: Sarah Green

Unlimited/Uncontrolled Potential to Emit (tons/year)										
Emission Unit		**PM**	**PM_{10}**	**$PM_{2.5}$***	**SO_2**	**NO_x**	**VOC**	**CO**	**Combined HAPs**	**Single HAP (Xylene)**
Paint Booth PB2		30.52	30.52	30.52	-	-	261.75	-	2.46	1.37
Paint Booth PB3		13.30	13.30	13.30	-	-	18.70	-	1.46	1.09
Coating Line PB5	Primer Booth	70.96	70.96	70.96	-	-	46.69	-	0.55	0.55
	Paint Booth	67.90	67.90	67.90	-	-	191.04	-	1.05	0.68
Paint Booth PB3: Oven		0.02	0.08	0.08	0.01	1.07	0.06	0.90	0.02	-
Coating Line PB5: Ovens (TCB-2 and TCB-		0.01	0.05	0.05	4.1E-03	0.68	0.04	0.57	0.01	-
Insignificant Natural Gas Combustion		0.29	1.15	1.15	0.09	15.11	0.83	12.69	0.29	-
Total Emissions		**183.00**	**183.96**	**183.96**	**0.10**	**16.87**	**519.10**	**14.17**	**5.84**	**3.69**

Limited Potential to Emit (tons/year)										
Emission Unit		**PM**	**PM_{10}**	**$PM_{2.5}$***	**SO_2**	**NO_x**	**VOC**	**CO**	**Combined HAPs**	**Single HAP (Xylene)**
Paint Booth PB2[1]		30.52	30.52	30.52	-	-	249.00	-	2.46	1.37
Paint Booth PB3[1]		13.30	13.30	13.30	-	-		-	1.46	1.09
Coating Line PB5	Primer Booth[1]	70.96	70.96	70.96	-	-		-	0.55	0.55
	Paint Booth[1]	67.90	67.90	67.90	-	-		-	1.05	0.68
Paint Booth PB3: Oven		0.02	0.08	0.08	0.01	1.07	0.06	0.90	0.02	-
Coating Line PB5: Ovens (TCB-2 and TCB-		0.01	0.05	0.05	4.1E-03	0.68	0.04	0.57	0.01	-
Insignificant Natural Gas Combustion		0.29	1.15	1.15	0.09	15.11	0.83	12.69	0.29	-
PTE After Issuance:		**183.00**	**183.96**	**183.96**	**0.10**	**16.87**	**249.93**	**14.17**	**5.84**	**3.69**

**PM2.5 listed is direct PM2.5*

[1] The VOC emissions from the paint booths are limited to render the requirements of 326 IAC 2-2 (PSD) not applicable.

Appendix A: Emissions Calculations
Modification Summary

Company Name: Ottenweller Company, Inc
Source Address: 3011 Congressional Parkway, Fort Wayne, Indiana 46808
3010 Independence Drive, Fort Wayne, Indiana 46808
Significant Source Modification No.: 003-40520-00224
Significant Permit Modification No.: 003-40534-00224
Reviewer: Sarah Green

Unlimited/Uncontrolled Potential to Emit (tons/year)										
Emission Unit		**PM**	**PM_{10}**	**$PM_{2.5}$***	**SO_2**	**NO_x**	**VOC**	**CO**	**Combined HAPs**	**Single HAP (Xylene)**
Coating Line PB5	Primer Booth	70.96	70.96	70.96	-	-	46.69	-	0.55	0.55
	Paint Booth	67.90	67.90	67.90	-	-	191.04	-	1.05	0.68
Coating Line PB5: Ovens (TCB-2 and TCB-		0.01	0.05	0.05	4.1E-03	0.68	0.04	0.57	0.01	-
Insignificant Natural Gas Combustion		0.17	0.68	0.68	0.05	8.95	0.49	7.52	0.17	-
Total Emissions of New Units		**139.04**	**139.59**	**139.59**	**0.06**	**9.64**	**238.26**	**8.10**	**1.78**	**1.23**

**PM2.5 listed is direct PM2.5*

Appendix A: Emissions Calculations
VOC and Particulate
Paint Booth PB2

Company Name: **Ottenweller Company, Inc**
Source Address: **3011 Congressional Parkway, Fort Wayne, Indiana 46808**
3010 Independence Drive, Fort Wayne, Indiana 46808
Significant Source Modification No.: **003-40520-00224**
Significant Permit Modification No.: **003-40534-00224**
Reviewer: **Sarah Green**

Uncontrolled Potential To Emit	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
SPU74820 (Primer)	8.60	52.33%	0.02%	52.3%	0.02%	40.44%	0.087	75.000	4.50	29.26	702.20	128.15	11.68	11.12	90%
Q135-9164 (Topcoat)	7.09	34.40%	0.04%	35.9%	0.05%	49.40%	0.093	75.000	2.55	17.82	427.67	78.05	14.25	5.15	90%
SPU72739 (Topcoat)	7.45	40.90%	0.00%	21.0%	0.00%	46.70%	0.040	75.000	1.56	4.69	112.64	20.56	5.79	3.35	90%
SPU71745 (Topcoat)	6.91	38.32%	0.06%	31.2%	0.07%	47.08%	0.040	75.000	2.16	6.47	155.33	28.35	5.60	4.58	90%
SPU72522 (Topcoat)	6.87	49.64%	0.12%	35.5%	0.12%	39.29%	0.027	75.000	2.44	4.89	117.35	21.42	3.03	6.21	90%
Q3615-9555 (Topcoat)	7.09	36.35%	0.13%	36.2%	0.16%	49.79%	0.013	75.000	2.57	2.57	61.58	11.24	1.97	5.16	90%
GXH1080 (Catalyst)	7.31	20.00%	0.00%	20.0%	0.00%	74.97%	0.010	75.000	1.46	1.10	26.32	4.80	1.92	1.95	90%
GXM350 (Catalyst)	10.12	65.51%	0.00%	65.5%	0.00%	37.66%	0.023	75.000	6.63	11.59	278.05	50.74	2.67	17.60	90%
		Total:					**0.21**					**261.75**	**30.52**		

The above information was provided by source during the renewal T003-36975-00224.

METHODOLOGY

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

Appendix A: Emission Calculations
HAP Emission Calculations
Paint Booth PB2

Company Name: Ottenweller Company, Inc
Source Address: 3011 Congressional Parkway, Fort Wayne, Indiana 46808
3010 Independence Drive, Fort Wayne, Indiana 46808
Significant Source Modification No.: 003-40520-00224
Significant Permit Modification No.: 003-40534-00224
Reviewer: Sarah Green

Paint Materials	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Benzene	Weight % Hexane	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	Formaldehyde Emissions (tons/yr)	Benzene Emissions (tons/yr)	Hexane Emissions (tons/yr)
SPU74820 (Primer)	7.55	0.087	75.00	0.20%	0.00%	0.00%	0.00%	0.00%	0.43	0.00	0.00	0.00	0.00
Q135-9164 (Topcoat)	7.09	0.093	75.00	0.28%	0.50%	0.00%	0.00%	0.00%	0.61	1.09	0.00	0.00	0.00
SPU72739 (Topcoat)	7.45	0.040	75.00	0.20%	0.00%	0.00%	0.00%	0.00%	0.20	0.00	0.00	0.00	0.00
SPU71745 (Topcoat)	6.91	0.040	75.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
SPU72522 (Topcoat)	6.87	0.027	75.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Q3615-9555 (Topcoat)	7.09	0.013	75.00	0.22%	0.00%	0.00%	0.00%	0.00%	0.07	0.00	0.00	0.00	0.00
GXH1080 (Catalyst)	7.31	0.010	75.00	0.30%	0.00%	0.00%	0.00%	0.00%	0.07	0.00	0.00	0.00	0.00
GXM350 (Catalyst)	10.12	0.023	75.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
								Single HAP PTE:	**1.37**	**1.09**	**0.00**	**0.00**	**0.00**
								Total HAPs PTE:	**2.46**				

The above information was provided by source during the renewal T003-36975-00224.

METHODOLOGY
HAPS emission rate (tons/yr) = Density (lbs/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
VOC and Particulate
PB3 Booth

Company Name: Ottenweller Company, Inc
Source Address: 3011 Congressional Parkway, Fort Wayne, Indiana 46808
3010 Independence Drive, Fort Wayne, Indiana 46808
Significant Source Modification No.: 003-40520-00224
Significant Permit Modification No.: 003-40534-00224
Reviewer: Sarah Green

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
53X145B	8.84	28.54%	0.0%	28.5%	0.0%	65.8%	0.35	2	2.52	2.52	1.77	42.39	7.74	9.68	3.83	50%
PXA0222	11.99	30.82%	0.0%	30.8%	0.0%	49.9%	0.35	2	3.70	3.70	2.59	62.08	11.33	12.72	7.41	50%
SPU71766	8.66	26.48%	0.0%	26.5%	0.0%	43.0%	0.35	2	2.29	2.29	1.61	38.53	7.03	9.76	5.34	50%
SPU72573	8.56	27.78%	0.0%	27.8%	0.0%	44.9%	0.35	2	2.38	2.38	1.66	39.95	7.29	9.48	5.30	50%
SPU72726	8.73	34.79%	0.0%	34.8%	0.0%	44.1%	0.35	2	3.04	3.04	2.13	51.02	9.31	8.73	6.89	50%
CEC0120	7.78	32.00%	0.0%	49.6%	0.0%	65.3%	0.35	2	3.86	3.86	2.70	64.88	11.84	8.11	5.91	50%
EEY0116	12.32	29.59%	0.0%	29.6%	0.0%	47.0%	0.35	2	3.65	3.65	2.55	61.24	11.18	13.30	7.76	50%
GXH1080	9.15	20.00%	0.0%	20.0%	0.0%	75.0%	0.35	2	1.83	1.83	1.28	30.74	5.61	11.22	2.44	50%
SPU71720	9.21	35.79%	0.0%	35.8%	0.0%	53.4%	0.35	2	3.30	3.30	2.31	55.38	10.11	9.07	6.18	50%
SPU71745	9.54	38.32%	0.0%	38.3%	0.0%	47.1%	0.35	2	3.66	3.66	2.56	61.42	11.21	9.02	7.76	50%
SPU72522	8.41	49.64%	0.0%	49.6%	0.0%	39.3%	0.35	2	4.17	4.17	2.92	70.14	12.80	6.49	10.63	50%
SPU72574	10.76	32.29%	0.0%	32.3%	0.0%	49.0%	0.35	2	3.47	3.47	2.43	58.37	10.65	11.17	7.09	50%
SPU72739	9.71	40.94%	0.0%	40.9%	0.0%	46.7%	0.35	2	3.98	3.98	2.78	66.78	12.19	8.79	8.52	50%
SPU73177	9.08	39.71%	0.0%	39.7%	0.0%	48.3%	0.35	2	3.61	3.61	2.52	60.58	11.05	8.39	7.47	50%
SPU73183	8.27	47.34%	0.0%	47.3%	0.0%	43.5%	0.35	2	3.92	3.92	2.74	65.77	12.00	6.68	9.00	50%
SPU73189	9.08	39.71%	0.0%	39.7%	0.0%	48.3%	0.35	2	3.61	3.61	2.52	60.58	11.05	8.39	7.47	50%
SPU73451	8.39	45.37%	0.0%	45.4%	0.0%	44.8%	0.35	2	3.81	3.81	2.66	63.95	11.67	7.03	8.50	50%

Solvent Material

	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	-	Solvent Usage (gallons/month)	-	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of solvent	-	Potential VOC pounds per day	Potential VOC tons per year
GXS73263	6.46	46.82%	0.0%	46.8%	0.0%	-	325	-	3.02	3.02	-	32.32	5.90

Total **18.70** **13.30**

METHODOLOGY

Coating Material

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

Solvent Material

Potential VOC Tons per Year = Solvent Usage (gallons/month) * Density (Lb/Gal) * Weight % Volatile (H20 & Organics) * (12 months/yr) * (1 ton/2000 lbs)

Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
VOC and Particulate
Paint Booth PB3

Company Name: Ottenweller Company, Inc
Source Address: 3011 Congressional Parkway, Fort Wayne, Indiana 46808
3010 Independence Drive, Fort Wayne, Indiana 46808
Significant Source Modification No.: 003-40520-00224
Significant Permit Modification No.: 003-40534-00224
Reviewer: Sarah Green

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Benzene	Weight % Hexane	Weight % Glycol Ethers	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)
53X145B	8.84	0.35	2	0.58%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.16	0.00	0.00	0.00	0.00	0.00	0.00
CEC0120	7.78	0.35	2	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
EEY0116	12.32	0.35	2	0.96%	1.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.36	0.38	0.00	0.00	0.00	0.00	0.00
GXH1080	9.15	0.35	2	1.50%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.42	0.00	0.00	0.00	0.00	0.00	0.00
SPU71720	9.21	0.35	2	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SPU71745	9.54	0.35	2	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SPU72522	8.41	0.35	2	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SPU72574	10.76	0.35	2	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SPU72739	9.71	0.35	2	0.49%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.15	0.00	0.00	0.00	0.00	0.00	0.00
SPU73177	9.08	0.35	2	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SPU73183	8.27	0.35	2	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SPU73189	9.08	0.35	2	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SPU73451	8.39	0.35	2	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
									Single HAP PTE:		**1.09**	**0.38**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**
									Total HAPs PTE:		**1.46**						

METHODOLOGY

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

Appendix A: Emissions Calculations
VOC and Particulate
Continuous Coating Line PB5

Company Name: Ottenweller Company, Inc
Source Address: 3011 Congressional Parkway, Fort Wayne, Indiana 46808
3010 Independence Drive, Fort Wayne, Indiana 46808
Significant Source Modification No.: 003-40520-00224
Significant Permit Modification No.: 003-40534-00224
Reviewer: Sarah Green

Primer Booth

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
SPU75953 (Primer)	7.27	31.54%	0.01%	31.53%	0.01%	45.70%	0.093000	50.000	2.29	2.29	10.66	255.81	46.69	70.96	5.02	30%
										Total Potential to Emit	**10.66**	**255.81**	**46.69**	**70.96**		

Paint Booth

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
GXH1080 (Catalyst)	7.31	20.00%	0.00%	20.00%	0.00%	74.97%	0.031000	50.000	1.46	1.46	2.27	54.39	9.93	27.79	1.95	30%
GXM350 (Catalyst)	10.12	65.51%	0.00%	65.51%	0.00%	37.66%	0.031000	50.000	6.63	6.63	10.28	246.62	45.01	16.59	17.60	30%
SPU72739 (Topcoat)	7.45	40.90%	0.00%	40.90%	0.00%	46.70%	0.093000	50.000	3.05	3.05	14.17	340.05	62.06	62.77	6.52	30%
SPU74820 (Topcoat)	7.55	52.33%	0.02%	52.31%	0.02%	40.44%	0.093000	50.000	3.95	3.95	18.36	440.75	80.44	51.31	9.77	30%
SPU71720 (Topcoat)	7.07	35.79%	0.01%	35.78%	0.01%	53.37%	0.093000	50.000	2.53	2.53	11.76	282.31	51.52	64.72	4.74	30%
SPU71745 (Topcoat)	6.91	38.32%	0.06%	38.26%	0.07%	47.08%	0.093000	50.000	2.65	2.64	12.29	295.04	53.85	60.76	5.62	30%
SPU72574 (Topcoat)	6.81	32.29%	0.05%	32.24%	0.06%	48.99%	0.093000	50.000	2.20	2.20	10.21	245.02	44.72	65.74	4.48	30%
GXS73263 (Thinner)	6.46	100.00%	0.29%	99.71%	0.22%	0.00%	0.046500	50.000	6.46	6.44	14.98	359.42	65.59	0.00	0.00	30%
										Total Potential to Emit	**43.62**	**1046.80**	**191.04**	**67.90**		

METHODOLOGY

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

Appendix A: Emissions Calculations
Hazardous Air Pollutants (HAPs)
Continuous Coating Line PB5

Company Name: Ottenweller Company, Inc
Source Address: 3011 Congressional Parkway, Fort Wayne, Indiana 46808
3010 Independence Drive, Fort Wayne, Indiana 46808
Significant Source Modification No.: 003-40520-00224
Significant Permit Modification No.: 003-40534-00224
Reviewer: Sarah Green

Primer Booth

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Cumene	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Benzene	Weight % Hexane	Weight % Glycol Ethers	Weight % Methanol	Cumene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)
SPU75953 (Primer)	7.27	0.093000	45.000	0.00%	0.41%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.55	0.00	0.00	0.00	0.00	0.00	0.00
											Single HAP PTE:	**0.00**	**0.55**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**
											Total HAPs PTE:	**0.55**							

Paint Booth

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Cumene	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Benzene	Weight % Hexane	Weight % Glycol Ethers	Weight % Methanol	Cumene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)
GXH1080 (Catalyst)	7.31	0.031000	45.000	0.20%	0.30%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.09	0.13	0.00	0.00	0.00	0.00	0.00	0.00
GXM350 (Catalyst)	10.12	0.031000	45.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SPU72739 (Topcoat)	7.45	0.093000	45.000	0.10%	0.20%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.14	0.27	0.00	0.00	0.00	0.00	0.00	0.00
SPU74820 (Topcoat)	7.55	0.093000	45.000	0.10%	0.20%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.14	0.28	0.00	0.00	0.00	0.00	0.00	0.00
SPU71720 (Topcoat)	7.07	0.093000	45.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SPU71745 (Topcoat)	6.91	0.093000	45.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SPU72574 (Topcoat)	6.81	0.093000	45.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
GXS73263 (Thinner)	6.46	0.046500	45.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
								Total Potential Emissions			**Single HAP PTE:**	**0.36**	**0.68**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**
											Total HAPs PTE:	**1.05**							

METHODOLOGY
HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Daily Volume-Weighted Average
Paint Booths PB2 and PB3

Company Name: Ottenweller Company, Inc
Source Address: 3011 Congressional Parkway, Fort Wayne, Indiana 46808
3010 Independence Drive, Fort Wayne, Indiana 46808
Significant Source Modification No.: 003-40520-00224
Significant Permit Modification No.: 003-40534-00224
Reviewer: Sarah Green

Material	Gal of Mat. (gal/unit)	Maximum (unit/hour)	VOC Content of Coating (lbs VOC/gal of coating less water as applied)	Σ(C*U)	Coating Usage Rate (Σ U)	Volume Weighted Average (A)
Paint Booth (PB2)						
SPU74820 (Primer)	0.087	75	4.50	702.2	156.1	
Q135-9164 (Topcoat)	0.093	75	2.55	427.7	167.9	
SPU72739 (Topcoat)	0.040	75	1.56	112.6	72.0	
SPU71745 (Topcoat)	0.040	75	2.16	155.3	72.0	
SPU72522 (Topcoat)	0.027	75	2.44	117.4	48.1	
Q3615-9555 (Topcoat)	0.013	75	2.57	61.6	23.9	
GXH1080 (Catalyst)	0.010	75	1.46	26.3	18.0	
GXM350 (Catalyst)	0.023	75	6.63	278.0	41.9	
				1881.1	**599.9**	**3.14**
Paint Booth (PB3)						
53X145B	0.35	2	2.52	42.39	16.80	
PXA0222	0.35	2	3.70	62.08	16.80	
SPU71766	0.35	2	2.29	38.53	16.80	
SPU72573	0.35	2	2.38	39.95	16.80	
SPU72726	0.35	2	3.04	51.02	16.80	
CEC0120	0.35	2	3.86	64.88	16.80	
EEY0116	0.35	2	3.65	61.24	16.80	
GXH1080	0.35	2	1.83	30.74	16.80	
SPU71720	0.35	2	3.30	55.38	16.80	
SPU71745	0.35	2	3.66	61.42	16.80	
SPU72522	0.35	2	4.17	70.14	16.80	
SPU72574	0.35	2	3.47	58.37	16.80	
SPU72739	0.35	2	3.98	66.78	16.80	
SPU73177	0.35	2	3.61	60.58	16.80	
SPU73183	0.35	2	3.92	65.77	16.80	
SPU73189	0.35	2	3.61	60.58	16.80	
SPU73451	0.35	2	3.81	63.95	16.80	
				953.79	**285.60**	**3.34**
Coating Line (PB5): Primer Booth						
SPU75953 (Primer)	0.093	50	2.29	255.8	111.6	**2.29**
Coating Line (PB5): Paint Booth						
GXH1080 (Catalyst)	0.031	50	1.462	54.4	37.2	
GXM350 (Catalyst)	0.031	50	6.629612	246.6	37.2	
SPU72739 (Topcoat)	0.093	50	3.04705	340.1	111.6	
SPU74820 (Topcoat)	0.093	50	3.950195039	440.8	111.6	
SPU71720 (Topcoat)	0.093	50	2.52989899	282.3	111.6	
SPU71745 (Topcoat)	0.093	50	2.645617933	295.3	111.6	
SPU72574 (Topcoat)	0.093	50	2.196862117	245.2	111.6	
GXS73263 (Thinner)	0.0465	50	6.45546803	360.2	55.8	
				2264.9	688.2	**3.29**

Methodology
Volume Weighted Average Equation:
$A = [\sum (Cx\ U) / \sum U]$
Where:
A = the volume weighted average in pounds VOC per gallon less water as applied;
C = the VOC content of the coating in pounds VOC per gallon less water as applied; and
U = the usage rate of the coating in gallons per day.

Appendix A: Emissions Calculations
Natural Gas-Fired Oven for PB3

Company Name: **Ottenweller Company, Inc**
Source Address: **3011 Congressional Parkway, Fort Wayne, Indiana 46808**
3010 Independence Drive, Fort Wayne, Indiana 46808
Significant Source Modification No.: **003-40520-00224**
Significant Permit Modification No.: **003-40534-00224**
Reviewer: **Sarah Green**

Heat Input Capacity MMBtu/hr	HHV mmBtu/mmscf	Potential Throughput MMCF/yr
2.5	1020	21.5

	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	0.02	0.08	0.08	0.01	1.07	0.06	0.90

*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	2.3E-05	1.3E-05	8.1E-04	0.02	3.7E-05	**0.02**

	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	5.4E-06	1.2E-05	1.5E-05	4.1E-06	2.3E-05	**5.9E-05**
					Total HAPs	**0.02**
					Worst HAP	**0.02**

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

Appendix A: Emissions Calculations
Natural Gas-Fired Ovens (TCB-2 and TCB-3)
Ovens for Coating Line PB5

Company Name: **Ottenweller Company, Inc**
Source Address: **3011 Congressional Parkway, Fort Wayne, Indiana 46808**
3010 Independence Drive, Fort Wayne, Indiana 46808
Significant Source Modification No.: **003-40520-00224**
Significant Permit Modification No.: **003-40534-00224**
Reviewer: **Sarah Green**

Unit ID	MMBtu/hr
TCB-2	0.286
TCB-3	1.305
Total:	1.591

Heat Input Capacity MMBtu/hr	HHV mmBtu / mmscf	Potential Throughput MMCF/yr
1.6	1020	13.7

	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	0.01	0.05	0.05	0.00	0.68	0.04	0.57

*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	1.4E-05	8.2E-06	5.1E-04	0.01	2.3E-05	**0.01**

	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	3.4E-06	7.5E-06	9.6E-06	2.6E-06	1.4E-05	**3.7E-05**
					Total HAPs	**0.01**
					Worst HAP	**0.01**

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

Appendix A: Emissions Calculations
Natural Gas Combustion

Company Name: Ottenweller Company, Inc
Source Address: 3011 Congressional Parkway, Fort Wayne, Indiana 46808
3010 Independence Drive, Fort Wayne, Indiana 46808
Significant Source Modification No.: 003-40520-00224
Significant Permit Modification No.: 003-40534-00224
Reviewer: Sarah Green

Unit (ID)	Number of Like Units	MMBtu/hr	Total MMBtu/hr
Burn-off oven (BU1)	1	1.6	1.6
Dry off and cure oven (BO1)	1	3.3	3.3
Parts cleaner heater (Stage 1)	1	2.5	2.5
Parts cleaner heater (Stage 3)	1	2.5	2.5
Parts cleaner heater (Stage 5)	1	1.5	1.5
Heating furnaces	4	0.06	0.24
Space heaters	8	0.1	0.8
Steam cleaner	1	0.55	0.55
Batch paint drying oven	1	0.8	0.8
Small mobile washer	1	0.55	0.55
Parts washer water heater (T1)	1	0.46	0.46
Parts washer water heater (T2)	1	1.52	1.52
Washer drying oven (TCB-1)	1	0.193	0.193
Heating furnaces (MAU-2, MAU-4)	2	6.48	12.96
Make-up air heating furnaces (MAU-1)	1	3.08	3.08
Make-up air heating furnaces (MAU-3)	1	2.64	2.64
		Total:	35.193

Heat Input Capacity MMBtu/hr	HHV mmBtu / mmscf	Potential Throughput MMCF/yr
35.2	1020	302.2

	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	0.29	1.15	1.15	0.09	15.11	0.83	12.69

*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	3.2E-04	1.8E-04	1.1E-02	0.27	5.1E-04	**0.28**

	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	7.6E-05	1.7E-04	2.1E-04	5.7E-05	3.2E-04	**8.3E-04**
					Total HAPs	**0.29**
					Worst HAP	**0.27**

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

Appendix A: Emissions Calculations
Natural Gas Combustion

Company Name: **Ottenweller Company, Inc**
Source Address: **3011 Congressional Parkway, Fort Wayne, Indiana 46808**
3010 Independence Drive, Fort Wayne, Indiana 46808
Significant Source Modification No.: **003-40520-00224**
Significant Permit Modification No.: **003-40534-00224**
Reviewer: **Sarah Green**

Unit (ID)	Number of Like Units	MMBtu/hr	Total MMBtu/hr
Parts washer water heater (T1)	1	0.46	0.46
Parts washer water heater (T2)	1	1.52	1.52
Washer drying oven (TCB-1)	1	0.193	0.193
Heating furnaces (MAU-2, MAU-4)	2	6.48	12.96
Make-up air heating furnaces (MAU-1)	1	3.08	3.08
Make-up air heating furnaces (MAU-3)	1	2.64	2.64
		Total:	20.853

Heat Input Capacity MMBtu/hr	HHV mmBtu / mmscf	Potential Throughput MMCF/yr
20.9	1020	179.1

	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	0.17	0.68	0.68	0.05	8.95	0.49	7.52

*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	1.9E-04	1.1E-04	6.7E-03	0.16	3.0E-04	**0.17**

	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	4.5E-05	9.8E-05	1.3E-04	3.4E-05	1.9E-04	**4.9E-04**
					Total HAPs	**0.17**
					Worst HAP	**0.16**

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.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

November 7, 2018

Joyce Moran
Ottenweller Company, Inc.
3011 Congressional Parkway
Fort Wayne, Indiana 46808

Re: Public Notice
Ottenweller Company, Inc.
Permit Level: Title V SSM (Minor PSD) and
Title V SPM
Permit Number: 003-40520-00224 and
003-40534-00224

Dear Ms. Moran:

Enclosed is a copy of your draft Title V Significant Source Modification (Minor PSD) and your draft Title V 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 Fort Wayne Journal Gazette in Fort Wayne, Indiana publish the abbreviated version of the public notice no later than November 9, 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 Allen County Public Library, 900 Library Plaza in Fort Wayne, 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 2-8423 or dial (317) 232-8423.

Sincerely,

John F. Jackson

John F. Jackson
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter 1/9/2017

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

November 7, 2018

Fort Wayne Journal Gazette
600 West Main Street
P.O. Box 100
Fort Wayne, Indiana 46801

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Ottenweller Company, Inc., Allen 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 9, 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 John Jackson at 800-451-6027 and ask for extension 3-1449 or dial 317-233-1449.

Sincerely,

John F. Jackson

John F. Jackson
Permit Branch
Office of Air Quality

Permit Level: Title V Significant Source Modification (Minor PSD) and
Title V Significant Permit Modification
Permit Number: 003-40520-00224 and 003-40534-00224

Enclosure

PN Newspaper Letter 8/22/2018

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Eric J. Holcomb
Governor
Bruno L. Pigott
Commissioner

November 7, 2018

To: Allen 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: Ottenweller Company, Inc.
Permit Number: 003-40520-00224 and 003-40534-00224

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

Notice of Public Comment

November 7, 2018
Ottenweller Company, Inc.
003-40520-00224 and 003-40534-00224

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD
DRAFT INDIANA AIR PERMIT

November 7, 2018

A 30-day public comment period has been initiated for:

Permit Number: **003-40520-00224 and 003-40534-00224**
Applicant Name: **Ottenweller Company, Inc.**
Location: **Fort Wayne , Allen 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.

Mail Code 61-53

IDEM Staff	JJACKSON 11/7/2018 OTTENWELLER CO INC 003-40520-00224 and 003-40534-00224 (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		Joyce Moran Ottenweller Company Inc 3011 Congressional Pkwy Fort Wayne IN 46808 (Source CAATS)									
2		Michael Ottenweller OTTENWELLER CO INC 3011 Congressional Pkwy Fort Wayne IN 46808 *(RO CAATS)*									
3		Daniel & Sandy Trimmer 15021 Yellow River Road Columbia City IN 46725 *(Affected Party)*									
4		Duane & Deborah Clark Clark Farms 6973 E. 500 S. Columbia City IN 46725 *(Affected Party)*									
5		Fort Wayne City Council and Mayors Office 200 E Berry Street Ste 120 Fort Wayne IN 46802 *(Local Official)*									
6		Mr. Jeff Coburn Plumbers & Steamfitters, Local 166 2930 W Ludwig Rd Fort Wayne IN 46818-1328 *(Affected Party)*									
7		Allen Co. Board of Commissioners 200 E Berry Street Ste 410 Fort Wayne IN 46802 *(Local Official)*									
8		Fort Wayne-Allen County Health Department 200 E Berry St Suite 360 Fort Wayne IN 46802 *(Health Department)*									
9		Allen County Public Library 900 Library Plaza Fort Wayne IN 46802 *(Library)*									
10											
11											
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15											

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

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