



Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

June 28, 2004

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TO: Interested Parties / Applicant

RE: Subaru of Indiana Automotive, Inc. / 157-5906-00050

FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

### Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and

- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency  
401 M Street  
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.



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## **PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY**

**Subaru of Indiana Automotive, Inc.  
5500 State Road 38 East  
Lafayette, Indiana 47903**

(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 re-issuance, 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. This permit also addresses certain New Source Review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.

Operation Permit No.: T157-5906-00050	
Issued by: Original signed by Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 28, 2004  Expiration Date: June 28, 2009



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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(15)] [326 IAC 2-7-1(22)]

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The Permittee owns and operates an automotive and light-duty truck assembly plant.

Responsible Official:	Vice President
Source Address:	5500 State Road 38 East, Lafayette, IN 47903
Mailing Address:	P.O. Box 5689, Lafayette, IN 47903
General Source Phone Number:	765 449-6242
SIC Code:	3711
County Location:	Tippecanoe
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (a) Electrodeposition Coating of Vehicle Bodies and Chassis (ED Coating Line), identified as Unit 001, with a capacity of 60 units per hour, constructed in 1989, consisting of the following units:
- (1) One (1) ED Body Pretreatment area;
  - (2) One (1) ED Pretreatment Drying Oven, with one (1) insignificant natural gas-fired burner with a heat input capacity of 5.55 MMBtu/hr;
  - (3) One (1) insignificant boiler for paint temperature control, with a heat input capacity of 4.0 MMBtu/hr;
  - (4) Two (2) insignificant pretreatment boilers for warming water surrounding the ED Body Coating Tank, each with a heat input capacity of 1.045 MMBtu/hr;
  - (5) One (1) ED Body Coating Tank, utilizing dipping as the method of application;
  - (6) One (1) ED Body Oven, with five (5) natural gas-fired burners totaling 13.7 MMBtu/hr, using a 6.0 MM Btu/hr natural gas-fired thermal incinerator (B-ED) as VOC control, and exhausting to one (1) stack, identified as B-ED Inc. (emissions from the entrance to, and exit from, the ED Body Oven use no controls and exhaust to one (1) stack, identified as B-ED Hood Exhaust);
  - (7) One (1) ED Body Cool Down area;
  - (8) One (1) ED Chassis Pretreatment area;
  - (9) One (1) ED Chassis Coating Tank, utilizing dipping as the method of application;

- (10) One (1) insignificant hot water boiler for the ED Chassis Coating Tank, with a heat input capacity of 5.0 MMBtu/hr;
  - (11) One (1) ED Chassis Oven, with two (2) natural gas-fired burners totaling 4.37 MMBtu/hr, using a 2.25 MM Btu/hr natural gas-fired thermal incinerator (CH) as VOC control, and exhausting to one (1) stack, identified as CH Inc. (emissions from the entrance to, and exit from, the ED Chassis Oven use no controls and exhaust to one (1) stack, identified as CH Hood Exhaust); and
  - (12) One (1) Chassis Cool Down area.
- (b) Sealing and PVC Undercoating Line, identified as Unit 002, with a capacity of 60 units per hour, consisting of the following units:
- (1) One (1) PVC Coating Booth #1, constructed in 1989, utilizing the airless spray method of application, using a dry filter as particulate matter control, and exhausting to one (1) stack, identified as PVC-1-2;
  - (2) One (1) PVC Coating Booth #1 Preheat, constructed in 1989, with one (1) natural gas-fired burner with a heat input capacity of 16.8 MMBtu/hr;
  - (3) One (1) PVC Coating Booth #2, constructed in 1999, utilizing the airless spray method of application, using a water wash as particulate matter control, and exhausting to one (1) stack, identified as PVC-Booth 2;
  - (4) One (1) PVC Coating Booth #2 Preheat, constructed in 1999, with one (1) natural gas-fired burner with a heat capacity of 16.8 MMBtu/hr;
  - (5) One (1) PVC Seal Oven, constructed in 1989, with two (2) insignificant natural gas-fired burners totaling 6.94 MMBtu/hr, using no controls, and exhausting to one (1) stack, identified as PVC-Oven Exhaust;
  - (6) One (1) PVC Cool Down area, constructed in 1989, using no controls, and exhausting to one (1) stack, identified as PVC Cooling;
- (c) Topcoat System, identified as Unit 003, with a capacity of 60 units per hour, constructed in 1989, consisting of the following units:
- (1) One (1) Topcoat #1 Booth, utilizing the electrostatic air atomized, electrostatic bell method of application, using a water wash as particulate matter control, and exhausting to ten (10) stacks, identified as TC1-1 through TC1-10;
  - (2) One (1) Topcoat #1 Booth Preheat, with three (3) natural gas-fired burners, each with a heat input capacity of 20.57 MMBtu/hr;
  - (3) One (1) Topcoat #1 Booth Reheat, with three (3) insignificant natural gas-fired burners;
  - (4) One (1) Topcoat #1 Oven, with three (3) insignificant natural gas-fired burners, using a 3.46 MMBtu/hr natural gas-fired thermal incinerator (TC-1) as VOC control, and exhausting to one (1) stack, identified as TC-1 Inc. (emissions from the entrance to and exit from the Topcoat #1 Oven use no controls and exhaust to one (1) stack, identified as TC-1 Ex.);
  - (5) One (1) Topcoat #1 Cool Down area, using no controls, and exhausting to one (1) stack, identified as TC-1 O.Cl.;

- (6) One (1) Topcoat #2 Booth, utilizing the electrostatic air atomized, electrostatic bell method of application, using a water wash as particulate matter control, and exhausting to ten (10) stacks, identified as TC2-1 through TC2-10;
  - (7) One (1) Topcoat #2 Booth Preheat, with three (3) natural gas-fired burners, each with a heat input capacity of 20.57 MMBtu/hr;
  - (8) One (1) Topcoat #2 Booth Reheat, with three (3) insignificant natural gas-fired burners;
  - (9) One (1) Topcoat #2 Oven, with three (3) insignificant natural gas-fired burners, using a 3.46 MMBtu/hr natural gas-fired thermal incinerator (TC-2) as VOC control, and exhausting to one (1) stack, identified as TC-2 Inc. (emissions from the entrance to and exit from the Topcoat #1 Oven use no controls and exhaust to one (1) stack, identified as TC-2 Ex.);
  - (10) One (1) Topcoat #2 Cool Down area, using no controls, and exhausting to one (1) stack, identified as TC-2 O.Cl.;
  - (11) One (1) Twotone and Repair Booth, utilizing the electrostatic air atomized, electrostatic bell method of application, using a water wash as particulate matter control, and exhausting to five (5) stacks, identified as TUT-1 through TUT-5;
  - (12) One (1) Twotone and Repair Booth Preheat, with two (2) natural gas-fired burners, each with a heat input capacity of 16.26 MMBtu/hr;
  - (13) One (1) Twotone and Repair Booth Reheat, with one (1) insignificant natural gas-fired burner;
  - (14) One (1) Twotone and Repair Oven, with three (3) insignificant natural gas-fired burners, using a 2.41 MMBtu/hr natural gas-fired thermal incinerator (TUT) as VOC control, and exhausting to one (1) stack, identified as TUT-O-1-2;
  - (15) One (1) Twotone and Repair Cool Down area; and
  - (16) One (1) Wet Sand Repair Dryoff Oven, with one (1) insignificant natural gas-fired burner with a heat input capacity of 1.49 MMBtu/hr.
- (d) Intermediate (Surfacer) Coating Line, identified as Unit 004, with a capacity of 60 units per hour, constructed in 1989, consisting of the following units:
- (1) One (1) Intermediate Working Stage burner, with a heat input capacity of 19.74 MMBtu/hr;
  - (2) One (1) Intermediate Coating Booth, utilizing the electrostatic air atomized, electrostatic bell method of application, using a water wash as particulate matter control, and exhausting to six (6) stacks, identified as SUR-2 through SUR-7;
  - (3) One (1) Intermediate Booth Preheat, with two (2) natural gas-fired burners, each with a heat input capacity of 28.275 MMBtu/hr;
  - (4) One (1) Intermediate Booth Reheat burner, with two (2) insignificant natural gas-fired burners;
  - (5) One (1) Intermediate Coating Oven, with four (4) insignificant natural gas-fired burners totaling 9.92 MMBtu/hr, using a 4.15 MMBtu/hr natural gas-fired thermal incinerator as VOC control, and exhausting to one (1) stack, identified as SUR

- Inc. (emissions from the entrance to and exit from the Intermediate Coating Oven use no controls and exhaust to one (1) stack, identified as Surfacer Hood Exhaust); and
- (6) One (1) Intermediate Cool Down area, using no controls, and exhausting to one (1) stack, identified as Surfacer Cooling.
- (e) Plastic Bumper Coating Line (PBL), identified as Unit 005, with a capacity of 60 units per hour, constructed in 1989, consisting of the following units:
- (1) One (1) PBL Paint Booth, utilizing the air atomization method of spraying, using a water wash as particulate matter control, and exhausting to three (3) stacks, identified as BPR-1, BPR-2, and BPR-JR;
  - (2) One (1) PBL Booth Preheat, with one (1) natural gas-fired burner with a heat input capacity of 17.10 MMBtu/hr;
  - (3) One (1) PBL Booth Reheat, with two (2) insignificant natural gas-fired burners;
  - (4) One (1) PBL Oven, using a 2.0 MMBtu/hr natural gas-fired thermal incinerator as VOC control, and exhausting to one (1) stack, identified as BPR Inc.; and
  - (5) One (1) PBL Cool Down area.
- (f) Anticorrosion Coating, identified as Unit 006, with a capacity of 60 units per hour, constructed in 1989, and including the following equipment:
- (1) One (1) Black Coat and Wax Booth, utilizing the air-assisted method of spraying, using a dry filter as particulate matter control, exhausting to BCW Stack;
  - (2) One (1) Black and Wax Coat natural gas-fired burner, with a heat input capacity of 24.0 MMBtu/hr;
  - (3) One (1) Anticorrosion Coating Booth, utilizing the air-assisted method of spraying, using a water wash as particulate matter control, exhausting to Anticorrosion Stack; and
  - (4) One (1) insignificant Anticorrosion Coating natural gas-fired burner.
- (g) Final Repair (Touchup) painting, identified as Unit 007, with a capacity of 10 units per hour, constructed in 1989, and including the following equipment:
- (1) One (1) Touchup IPC Booth, located in the In-Process Control area, utilizing the air atomization method of spraying;
  - (2) One (1) Touchup Trim Booth, located in the Trim area, utilizing the air atomization method of spraying, using a dry filter as particulate matter control; and
  - (3) One (1) insignificant Touchup Trim natural gas-fired burner.
- (h) One (1) paint mixing room for the Plastic Bumper Coating Line, identified as Unit 008, constructed in 1989, using no controls, and exhausting to three (3) vents, identified as Mix-1, Mix-2, and Mix-3.

- (i) One (1) paint storage room for the ED Coating Line, identified as Unit 009, constructed in 1989.
- (j) Application of adhesives to various vehicle parts, identified as Unit 010, constructed in 1989.
- (k) Three (3) storage tanks, identified collectively as Unit 011, and including the following equipment:
  - (1) Gasoline storage tank, with a capacity of 15,000 gallons, constructed in 1988, using a certified vapor collection and control system;
  - (2) Purge thinner storage tank, with a capacity of 5,000 gallons, constructed in 1988, using a certified vapor collection and control system; and
  - (3) Waste purge thinner storage tank, with a capacity of 6,000 gallons, constructed in 1992.
- (l) Purge solvent recovery system, identified as Unit 012, with a maximum throughput of 168,000 gallons per year, constructed in 2001, and including the following equipment:
  - (1) Dirty purge Tank A, with a capacity of 1,096 gallons;
  - (2) Distillation overs Tank B, with a capacity of 1,096 gallons;
  - (3) Clean solvent Tank C, with a capacity of 1,096 gallons;
  - (4) Methanol Tank E, with a capacity of 1,096 gallons;
  - (5) Xylene Tank, with a capacity of 1,096 gallons;
  - (6) Acetone Tank, with a capacity of 1,096 gallons;
  - (7) Clean purge Tank OK, with a capacity of 1,949 gallons; and
  - (8) One (1) distillation unit.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

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

- (a) Space heaters, process heaters, or boilers using the following fuels: Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
  - (1) Six (6) general hot water boilers with a combined heat input capacity of 23.08 MMBtu/hr. [40 CFR 52.21] [326 IAC 2-2] [326 IAC 6-2-4]
  - (2) Other insignificant natural gas combustion units: [40 CFR 52.21] [326 IAC 2-2]
    - (A) Stamping Shop Steam Cleaner
    - (B) Distillation Room Heater
    - (C) Makeup Air Units (7)

- (D) Unit Heaters (50)
  - (E) Door Heaters (14)
  - (F) Air Handling Units (44)
  - (G) Heating and Ventilation Units (6)
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment: [40 CFR 52.21] [326 IAC 2-2] [40 CFR Part 52 Subpart P]
- (1) One (1) Stamping Shop; and
  - (2) One (1) Body Shop.
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (d) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: [326 IAC 6-3-2] [40 CFR Part 52 Subpart P]
- (1) Grinding and machining operations occurring in the engine manufacturing facility; and
  - (2) Other deburring; buffing; polishing; abrasive blasting activities; pneumatic conveying; and woodworking operations.
- (e) Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO<sub>2</sub>; 5 lb/hr or 25 lb/day NO<sub>x</sub>; 3 lb/hr or 15 lb/day VOC; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:
- (1) Gasoline Fill Operations (Benzene, Naphthalene, Ethylbenzene, Styrene, Toluene, Hexane, Xylene, Methyl Tert-butyl Ether) [40 CFR 52.21] [326 IAC 2-2]
  - (2) The following storage tanks permitted under OP 79-09-93-0454, issued on July 26, 1989:
    - (A) One (1) double-walled fixed-roof engine oil storage tank, with a capacity of 10,000 gallons; and
    - (B) One (1) double-walled fixed-roof gear oil storage tank, with a capacity of 10,000 gallons;
  - (3) The following activities permitted under E 157-14535-00050, issued on October 10, 2001: assembly and testing (including engine test stands);
  - (4) Manual solvent wipedown.

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

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

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

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

## SECTION B GENERAL CONDITIONS

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

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

### B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit 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.

### B.3 Enforceability [326 IAC 2-7-7]

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.4 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.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. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). 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) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

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

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

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]**  
**[326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, 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 Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (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 or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 the 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 Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

- (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 Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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) IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) 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.
  - (h) The Permittee shall include in the Quarterly Deviation and Compliance Monitoring Report all emergencies not previously reported pursuant to Paragraph (b)(5) of this Condition. Any emergencies that have been previously reported pursuant to Paragraph (b)(5) of this condition and certified by the Responsible Official need only be referenced by the date of the original report.

**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 as provided in this Condition. The permit shield provides that compliance with the conditions of this permit shall be deemed in 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) IDEM, OAQ has made the following determinations regarding this source:

None of the facilities listed in Section A, Emission Units and Pollution Control Equipment Summary are subject to the requirements of the following rules because of the following reasons:

- (1) The thermal incinerators are not subject to the requirements of 40 CFR Part 60, Subpart E (Standards of Performance for Incinerators) because none of the incinerators at the source burns or combusts solid waste as defined in 40 CFR 60.51(b).
- (2) The thermal incinerators are not subject to the requirements of 40 CFR Part 60, Subpart CCCC (Standards of Performance for Commercial and Industrial Solid Waste Incineration Units) because none of the incinerators at the source is a new incineration unit as defined in 40 CFR 60.2015.
- (3) The insignificant engine test stands are not subject to the requirements of 40 CFR Part 63, Subpart P (National Emission Standards for Hazardous Air Pollutants for Engine Test Cells/Stands) because construction of each engine test stand facility at the source commenced in October 2000. Because this construction date is prior to May 14, 2002, SIA is an existing affected source as defined in 40 CFR 63.9290(a)(1), and therefore has no applicable requirements under this Subpart, pursuant to 40 CFR 63.9290(b).

(c) 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.

(d) 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.

(e) 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.
- (f) 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).
- (g) 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)]
- (h) 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]**

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

**B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. 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.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

**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]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 2-7-4]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. 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(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) 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.
  - (2) If IDEM, OAQ, upon receiving a timely and complete 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.

- (c) **Right to Operate After Application for Renewal** [326 IAC 2-7-3]  
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 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]

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- (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  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

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

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- (a) No Part 70 permit revision 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]

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), 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 emissions allowable under 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  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

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 which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes 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), (c)(1), and (e)(2).

(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(36)) 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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in 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.

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

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A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

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

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

- (a) Enter upon the Permittee's premises where a 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]**

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- (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  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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]**

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- (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 (BLT)), to determine the appropriate permit fee.

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

Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

**SECTION C**

**SOURCE OPERATION CONDITIONS**

Entire Source
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**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 [40 CFR 52 Subpart P] [326 IAC 6-3-2(c)]

- (a) Pursuant to [40 CFR 52 Subpart P], particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) 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. This condition is not federally enforceable.

C.2 Opacity [326 IAC 5-1]

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

- (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. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

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

- (a) The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.
- (b) The thermal incinerators required by this permit for the control and destruction of VOC emissions from various coating system ovens are not incinerators within the meaning and intent of 326 IAC 4-2 and 326 IAC 9-1-2.

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 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

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

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

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

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 by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 14-10-4-1, 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 Accredited 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 Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

##### **C.9 Performance Testing [326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

**C.10 Compliance Requirements [326 IAC 2-1.1-11]**

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any

monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

#### **C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

Unless otherwise specified in this permit, all monitoring requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, 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 Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

#### **C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

#### **C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of a unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature or amperage, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

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

### **C.14 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 prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) 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.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]**

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

### **C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]**

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have a Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its

Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan to include such response steps that the Permittee finds to be effective or useful.

The Parametric Monitoring and SMM Plan shall be submitted within the time frames specified by the applicable 40 CFR60/63 requirement.

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan; or
  - (2) If none of the reasonable response steps listed in the Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall

prevail.

- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]**

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- (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 take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) 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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

**C.18 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]**

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- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.

- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The annual emission statement 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.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]**

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- (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. 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, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (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) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

**Stratospheric Ozone Protection**

**C.21 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

Source-Wide Operations
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### Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Prevention of Significant Deterioration (PSD) - Particulate Matter [326 IAC 2-2] [40 CFR 52.21]  
Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, CP 157-4485-00050, issued September 13, 1995, CP 157-9619-00050, issued February 11, 1999, and as revised by this Part 70 permit, the Permittee must adhere to the following conditions:

- (a) The source shall not produce greater than 262,000 vehicles per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The particulate (PM/PM10) emissions from PVC #1 Coating Booth, Topcoat #1 Coating Booth, Topcoat #2 Coating Booth, Twotone and Repair Coating Booth, Intermediate (Surfacer) Coating Booth, Plastic Bumper Coating Booth, Black Coat and Wax Coating Booth, Anticorrosion Coating Booth, Touchup Trim Coating Booth, Touchup IPC Coating Booth, source-wide natural gas combustion, and all insignificant facilities that were permitted by the PSD (79) 1651 Revision shall not exceed 23.1 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) The visible emissions from any plant stack, vent or other emission point shall not exceed 10% opacity.
- (d) The total natural gas combustion at the source shall not exceed 2,380 million standard cubic feet per 12 consecutive month period with compliance determined at the end of each month.

Compliance with these limitations will render the requirements of 326 IAC 2-2 and 40 CFR 52.21 not applicable.

D.1.2 Prevention of Significant Deterioration (PSD) - Carbon Monoxide and Sulfur Dioxide [326 IAC 2-2] [40 CFR 52.21]

Compliance with the total natural gas combustion limitation contained in Condition D.1.1(d) is equivalent to CO and SO<sub>2</sub> emissions of less than 100 tons per year, and 40 tons per year, respectively, and renders the requirements of 326 IAC 2-2 and 40 CFR 52.21 not applicable.

D.1.3 Prevention of Significant Deterioration (PSD) - Best Available Control Technology for Volatile Organic Compounds (VOC) [326 IAC 2-2][326 IAC 8-1-6] [40 CFR 52.21]

Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, 326 IAC 2-2-3, and 326 IAC 8-1-6, the total VOC emissions from all surface coating and associated purge solvent operations and storage shall not exceed 1,128 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limitation, and those contained in Conditions D.2.4, D.3.4, D.4.5, D.5.4, D.6.5 and D.7.1, will satisfy the requirements of 326 IAC 2-2, 326 IAC 8-1-6 and 40 CFR 52.21.

### Compliance Determination Requirements

D.1.4 Prevention of Significant Deterioration (PSD) [326 IAC 2-2] [40 CFR 52.21]

Compliance with the particulate (PM/PM10) emission limit in Condition D.1.1(b) shall be determined by using the following equation, which calculates pounds of particulate emissions per month, and adding the result to the calculated particulate emissions from the previous eleven months:

Total Particulate Emissions (lb/month) = PVC #1 Coating PM/PM10 + Topcoat #1 Coating PM/PM10 + Topcoat #2 Coating PM/PM10 + Twotone and Repair Coating PM/PM10 + Intermediate (Surfacer) Coating PM/PM10 + Plastic Bumper Coating PM/PM10 + Black Coat and Wax Coating PM/PM10 + Anticorrosion Coating PM/PM10 + Touchup Trim Coating PM/PM10 + Touchup IPC Coating PM/PM10 + Natural Gas Combustion PM/PM10 + Insignificant PM/PM10 Sources

Where:

PM/PM10 emissions from each coating booth =  $\sum_{i=1}^n (C_i * D_i * S_i) * (1-TE) * (1-CE)$ ;

Natural Gas Combustion PM/PM10 = natural gas usage (MMCF/month) \* 7.6 lb PM/MMCF;

Insignificant PM/PM10 Sources = PM/PM10 emissions in lb/month from insignificant facilities that were permitted by the PSD (79) 1651 Revision;

$C_i$  = usage of coating  $i$  in gallons per month;

$D_i$  = density of coating  $i$  in pounds per gallon;

$S_i$  = solids content of coating  $i$ , expressed as a decimal weight percent;

TE = solids transfer efficiency of the applicator for each booth, based on transfer efficiency determination tests; and

CE = overall particulate control efficiency for each booth, based on manufacturer data.

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

### D.1.5 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (11) below. Records maintained for (1) through (11) shall be taken as stated below and shall be complete and sufficient to establish compliance with the particulate emission limit established in Condition D.1.1(b), the natural gas combustion limit established in Conditions D.1.1(d) and D.1.2 and the VOC emission limit established in Condition D.1.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each coating material and solvent (including purge solvents and thinners) used less water.
  - (2) The amount of coating material and solvent (including purge solvents and thinners) used on a 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 solvent.

- (3) The total VOC emissions from coatings and solvents (including purge solvents and thinners) for each day.
  - (4) The amount of coating material and solvent (including purge solvents and thinners) transferred off-site for disposal or recycling for each day.
  - (5) The density of each coating.
  - (6) The solids content of each coating, expressed as a decimal weight percent.
  - (7) The particulate transfer efficiency and particulate control efficiency for each surface coating booth, kept on a monthly basis, and an explanation of how these figures were determined.
  - (8) The process weight rate of the insignificant robotic welding, brazing equipment, cutting torches, soldering equipment, grinding equipment, and machining equipment.
  - (9) Any process information necessary to calculate particulate (PM/PM10) emissions from other insignificant operations described in Section D.7 (e.g., deburring, buffing, polishing, abrasive blasting activities, pneumatic conveying, woodworking operations, etc.).
  - (10) A log of the dates of use.
  - (11) The plant-wide metered natural gas usage for each month.
- (b) To document compliance with Condition D.1.1(a), the Permittee shall maintain records of daily vehicle production.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.6 Reporting Requirements

- (a) Reports of monthly production totals shall be submitted to IDEM, OAQ on a quarterly basis to comply with Condition D.1.1(a). These reports shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.
- (b) Based on records required by Condition D.1.5(a), and to demonstrate compliance with Condition D.1.1(b), reports of monthly particulate (PM/PM10) emissions shall be submitted to IDEM, OAQ on a quarterly basis to comply with Condition D.1.1(b). This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.
- (c) Reports of monthly natural gas usage shall be submitted to IDEM, OAQ on a quarterly basis to comply with Conditions D.1.1(d) and D.1.2. These reports shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the month period being reported.
- (d) Based on records required by Condition D.1.5(a), reports of monthly VOC emissions from surface coating operations and associated purge solvent operations and storage shall be submitted to IDEM, OAQ on a quarterly basis to comply with Condition D.1.3. These reports shall be submitted to the address listed in Section C - General Reporting

Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

- (e) Plastic Bumper Coating Line (PBL), identified as Unit 005, with a capacity of 60 units per hour, constructed in 1989, consisting of the following units:
  - (1) One (1) PBL Paint Booth, utilizing the air atomization method of spraying, using a water wash as particulate matter control, and exhausting to three (3) stacks, identified as BPR-1, BPR-2, and BPR-JR;
  - (2) One (1) PBL Booth Preheat, with one (1) natural gas-fired burner with a heat input capacity of 17.10 MMBtu/hr;
  - (3) One (1) PBL Booth Reheat, with two (2) insignificant natural gas-fired burners;
  - (4) One (1) PBL Oven, using a 2.0 MMBtu/hr natural gas-fired thermal incinerator as VOC control, and exhausting to one (1) stack, identified as BPR Inc.; and
  - (5) One (1) PBL Cool Down area.
- (h) One (1) paint mixing room for the Plastic Bumper Coating Line, identified as Unit 008, constructed in 1989, using no controls, and exhausting to three (3) vents, identified as Mix-1, Mix-2, and Mix-3.

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

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

#### D.2.1 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A][Table 2 to 40 CFR Part 63, Subpart IIII][Table 2 to 40 CFR Part 63, Subpart PPPP][40 CFR 63.3101][40 CFR 63.4501]

- (a) The provisions of 40 CFR Part 63, Subpart A - General Provisions (which are incorporated by reference as 326 IAC 20-1-1):
  - (1) Apply to the affected source to the extent expressly specified by Table 2 to 40 CFR Part 63, Subpart PPPP and Table 2 to 40 CFR Part 63, Subpart IIII; and
  - (2) To the extent applicable to the affected source, are incorporated in this condition by reference. The Permittee must comply with these requirements on and after April 19, 2007 (for 40 CFR 63, Subpart PPPP) and June 25, 2007 (for 40 CFR Part 63, Subpart IIII).
- (b) Since the applicable requirements addressed by paragraph (a) of this condition are included and specifically identified (by reference) in this permit, the permit shield established by Section B of this permit in the condition titled Permit Shield, and authorized by 326 IAC 2-7-15, applies to paragraph (a) of this condition.

#### D.2.2 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products: Limitations and Requirements [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482]

- (a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source (as defined in (d) below). A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40

CFR 63.4483(b), the Permittee must comply with these requirements on and after April 19, 2007.

- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The surface coating of plastic bumpers on the Plastic Bumper Coating Line meets the applicability criteria of both 40 CFR Part 63, Subpart PPPP (Surface Coating of Plastic Parts and Products) and 40 CFR Part 63, Subpart IIII (Surface Coating of Automobiles and Light-Duty Trucks). As a result, the Permittee must select and implement a valid option for complying with this rule, and any other applicable rules of 40 CFR Part 63, pursuant to 40 CFR 63.4481(d) and (e).
- (d) Consistent with 40 CFR 63.4481, the emission units described in this Section D.2 which also meet one or more of the descriptions listed below, to the extent employed in the surface coating of plastic parts and products as defined in 40 CFR Part 63, Subpart PPPP, comprise the affected source that is subject to 40 CFR Part 63, Subpart PPPP:
  - (1) All coating operations as defined in 40 CFR 63.4581;
  - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
  - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (e) Definitions of terms used in this section that are contained in 40 CFR 63.2 or in 40 CFR 63.4581 are incorporated herein by reference.

D.2.3 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Automobiles and Light Duty Trucks: Limitations and Requirements [40 CFR Part 63, Subpart IIII] [40 CFR 63.3081] [40 CFR 63.3082] [40 CFR 63.3176]

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- (a) The provisions of 40 CFR Part 63, Subpart IIII (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Automobiles and Light Duty Trucks) apply to the affected source (as defined in (c) below). A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/auto/autopg.html>. Pursuant to 40 CFR 63.3083(b), the Permittee must comply with these requirements on and after June 25, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) Consistent with 40 CFR 63.3081, the emission units described in this Section D.2 which also meet one or more of the descriptions listed below, to the extent employed in the surface coating of automobiles and light-duty trucks as defined in 40 CFR Part 63, Subpart IIII, comprise the affected source that is subject to 40 CFR Part 63, Subpart IIII:
  - (1) All coating operations as defined in 40 CFR 63.3176;

- (2) All storage containers and mixing vessels in which coatings, thinners, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings, thinners, and cleaning materials; and
  - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Definitions of terms used in this section that are contained in 40 CFR 63.2 or in 40 CFR 63.3176 are incorporated herein by reference.

D.2.4 Prevention of Significant Deterioration (PSD) - Best Available Control Technology for Volatile Organic Compounds (VOC) [326 IAC 2-2][326 IAC 8-1-6] [40 CFR 52.21]

Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, 326 IAC 2-2-3, and 326 IAC 8-1-6, BACT for the Plastic Bumper Coating Line is the following:

- (a) The daily VOC emissions from the PBL Coating Booth shall not exceed 38.2 pounds of VOC per gallon of applied solids (4.57 kilograms of VOC per liter of applied solids). This limit applies to the weighted average of all plastics bumper coatings. Compliance with this limit shall be demonstrated pursuant to Condition D.2.9.
- (b) The thermal incinerator, used to control VOC emissions from the PBL Oven, shall achieve a minimum 20% capture efficiency and 90% destruction efficiency.
- (c) Pretreatment Cleaning shall utilize only VOC free detergents, conditioners, and rinses in the body and chassis pre-treatment cleaning operations.
- (d) Pertaining to purge solvent use:
  - (1) Purge solvent capture systems will be utilized each time that any coating application equipment is purged. The purge solvent capture systems shall have a minimum overall capture efficiency of at least eighty percent (80%). Collected purge solvent shall be retained in closed containers until such time as they are shipped offsite for disposal or recycled.
  - (2) Block painting will be utilized whenever possible to minimize color changes and the resulting purge.

Compliance with these limitations, and those contained in Conditions D.1.3, D.3.4, D.4.5, D.5.4, D.6.5 and D.7.1, will satisfy the requirements of 326 IAC 2-2, 326 IAC 8-1-6 and 40 CFR 52.21.

D.2.5 Prevention of Significant Deterioration - Best Available Control Technology for Nitrogen Oxides (NO<sub>x</sub>) [40 CFR 52.21] [326 IAC 2-2]

Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, and 326 IAC 2-2-3, BACT for NO<sub>x</sub> for the natural gas combustion equipment described in this section is the following:

- (a) The NO<sub>x</sub> emissions from the PBL Oven shall not exceed 0.10 pounds per million Btu (lb/MMBtu) heat input;
- (b) The NO<sub>x</sub> emissions from the PBL Booth Preheat Burner, insignificant PBL Oven thermal incinerator, and the two (2) insignificant PBL Booth Reheat burners shall not exceed 0.12 pounds per million Btu (lb/MMBtu) heat input each; and
- (c) The PBL Preheat burner, Reheat burners, and Oven shall use low-NO<sub>x</sub> natural gas burners.

Compliance with these limitations, and those contained in Conditions D.3.5, D.4.6, D.5.5 and D.7.2, will satisfy the requirements of 40 CFR 52.21 and 326 IAC 2-2.

**D.2.6 Particulate Matter (PM) [40 CFR Part 52 Subpart P]**

Pursuant to CP-157-9619-00050, issued on February 11, 1999, and 40 CFR Part 52 Subpart P, the particulate matter (PM) from the facilities described in this section shall be limited using one of the following equations (as applicable):

Those activities with a process weight rate of less than 100 pounds per hour shall be limited to 0.551 pounds per hour.

Or, depending on the process weight rate:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour.}$$

**D.2.7 Particulate [326 IAC 6-3-2(d)]**

Pursuant to 326 IAC 6-3-2(d), particulate emissions from the PBL Paint Booth shall be controlled by a water wash and the Permittee shall operate the control device in accordance with manufacturer's specifications.

**D.2.8 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their respective control devices.

**Compliance Determination Requirements**

**D.2.9 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]**

Compliance with the VOC emission limit in Condition D.2.4 shall be determined with the following equation:

$$\text{VOC emissions (lb VOC/gal applied solids)} = [3 (C \times U) / 3 (S \times TE)] \times [1 - (CE \times DE)]$$

Where:

C is the VOC content of the coating in pounds of VOC per gallon of coating, as applied;  
U is the usage rate of the coating in gallons per day;  
S is the usage rate of coating solids in gallons per day;  
TE is the transfer efficiency of the applicator;  
CE is the minimum capture efficiency of the incinerator required in Condition D.2.4; and  
DE is the minimum destruction efficiency of the incinerator required in Condition D.2.4.

**D.2.10 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]**

- (a) Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the incinerator at all times the PBL Oven is in operation to ensure compliance with Condition D.2.4.
- (b) The incinerator on the PBL Oven shall be operated such that it achieves the minimum capture and destruction efficiencies specified in Condition D.2.4.

**D.2.11 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]**

Within one hundred and eighty (180) days after issuance, the Permittee shall conduct a performance test to verify VOC control efficiency as per Condition D.2.4 for the thermal incinerator utilizing methods as approved by the Commissioner. This test shall be repeated at

least once every thirty (30) months (2.5 years) from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

#### D.2.12 Thermal Incinerator Temperature [326 IAC 2-7-5(3)]

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal incinerator for measuring operating temperature. For the purposes of this condition, continuous monitoring shall mean no less often than once per minute. The output of this system shall be recorded as a three-hour average. If the continuous monitoring system is not in operation, the temperature will be recorded manually once in a 15-minute period. Nothing in this permit shall excuse the Permittee from complying with the requirement to continuously monitor the temperature of the thermal incinerator.
- (b) From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal incinerator at or above the three-hour average temperature of 1,400 °F. The Permittee shall determine the minimum three-hour average operating temperature from the most recent valid stack test that demonstrates compliance with Condition D.2.4. This determination must be approved by IDEM.
- (c) The Permittee shall then operate the thermal incinerator at or above the minimum three-hour average temperature as observed during the most recent compliant stack test following approval of that temperature.
- (d) The Permittee take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the three-hour average temperature of the thermal incinerator is below the compliant three-hour average temperature. A three-hour average temperature that is below the compliant three-hour average temperature is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

#### D.2.13 Parametric Monitoring [326 IAC 2-7-5(3)]

The thermal incinerator on the PBL Line shall be equipped with a mechanism that automatically shuts down the incinerator if either the duct pressure or the fan amperage deviates from a preset range. This preset range shall be based on the normal range as established in the most recent compliant stack test. This shut-down mechanism shall be functional at all times that the incinerator is in use. If, at any time, an incinerator is shut down because of a deviation from these preset ranges, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. An incinerator shutdown is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

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

#### D.2.14 Operator Training Program

The Permittee shall implement an operator training program.

- (a) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the water wash control system on the Plastic Bumper Coating Line. All existing operators shall be trained upon permit issuance. All new operators shall be trained upon hiring or transfer.
- (b) Training shall include proper water level of the water pans, proper placement and configuration of baffle panels, other factors that affect water pan capture efficiency (e.g., debris in the water pans), and trouble shooting practices. The training program shall be

written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.

- (c) All operators shall be given refresher training annually.

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

#### **D.2.15 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products and Surface Coating of Automobiles and Light Duty Trucks - Notifications [40 CFR 63.4510][40 CFR 61.3110]**

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- (a) The Permittee must submit the applicable notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, and as provided in paragraph (b) and (c) below.
- (b) With respect to 40 CFR Part 63, Subpart PPPP, the Permittee must submit the:
- (1) Initial notification required by 40 CFR 63.9(b) and 40 CFR 63.4510 no later than April 19, 2005. If using compliance with the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (40 CFR Part 63, Subpart IIII) as provided for under 40 CFR 63.4881(d) to constitute compliance with this subpart for any or all of the plastic parts coating operations, then the Permittee must include a statement to this effect in the initial notification, and no other notifications are required under this subpart in regard to those plastic parts coating operations.
  - (2) Notification Of Compliance Status required by 40 CFR 63.9(h) and 40 CFR 63.4510 no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).
- (c) With respect to 40 CFR Part 63, Subpart IIII, the Permittee must submit the:
- (1) Initial notification required by 40 CFR 63.9(b) and 40 CFR 63.3110 no later than June 25, 2005. Existing sources that have previously submitted notifications of applicability of this rule pursuant to Section 112(j) of the CAA are not required to submit an initial notification under 40 CFR 63.9(b) except to identify and describe all additions to the affected source made pursuant to 40 CFR 63.3082(c).
  - (2) Notification Of Compliance Status required by 40 CFR 63.9(h) and 40 CFR 63.3110 no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3160. The notification of compliance status must contain the information specified in 40 CFR 63.3110(c), paragraphs (1) through (12) and in 40 CFR 63.9(h).
- (d) All notifications, required by (a), (b) and (c) above, must be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Director, Air and Radiation Division  
77 Jackson Boulevard  
Chicago, Illinois 60604-3590

D.2.16 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

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The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information from the Notification Of Compliance Status (NOCS) in the Title V permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, and include: information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR Part 63, Subpart PPPP and Subpart IIII, a description of the affected source and activities subject to the standards, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than July 19, 2006, and shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

D.2.17 Record Keeping Requirements

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- (a) To document compliance with Conditions D.2.4, D.2.12 and D.2.13, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.2.4, and the compliance determination requirements established in Conditions D.2.12 and D.2.13. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The VOC content of each coating material (as applied) and the VOC content of each solvent (including purge solvents and thinners) used less water.

- (2) The solids content of each coating material used (as applied).

- (3) The amount of coating material and solvent (including purge solvents and thinners) used on a 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 solvent.

- (4) The volume weighted average VOC content of the coatings used (as applied) for each day.

- (5) The continuous temperature records (on a three-hour average basis) for the thermal incinerator and the three-hour average temperature used to demonstrate compliance during the most recent compliant stack test.

- (6) Records of any thermal incinerator shutdowns due to duct pressure or fan amperage deviations.

- (b) To document compliance with Condition D.2.8, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) To document compliance with Condition D.2.14, the Permittee shall maintain copies of the training program, and the list of trained operators. Training records shall be maintained on site or available within 1 hour for inspection by IDEM.
- (d) To document compliance with Condition D.2.2, the Permittee shall collect and keep records of the data and information specified in 40 CFR 63.4530, paragraphs (c) through (h). Failure to collect and keep these records is a deviation from the applicable standard.
  - (1) These records shall be in a form suitable and readily available for expeditious review. Where appropriate, the records may be maintained as electronic spreadsheets or as a database.
  - (2) The Permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee shall keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee may keep the records off-site for the remaining 3 years.
  - (3) Compliance with the record keeping requirements of 40 CFR Part 63, Subpart IIII satisfies these record keeping requirements.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.2.18 Reporting Requirements

- (a) To document compliance with Condition D.2.4, compliance reports shall be submitted on a calendar monthly basis within 21 days of the end of each month. The reports shall contain the following data for each operation on a monthly basis, based on actual daily coating usage:
  - (1) Average coating VOC content in kg VOC/liter coating as applied;
  - (2) Average coating volume % solids as applied;
  - (3) Average actual solids transfer efficiency;
  - (4) Overall thermal incinerator control efficiency, reflecting capture and destruction efficiency;
  - (5) Average kg VOC/liter of applied solids, based on actual transfer efficiency; and
  - (6) Coating usage in liters.

When more than one coating has been averaged for compliance purposes, the average shall be determined on a weighted average by volume basis. All data necessary to verify weighted averages shall be included in the report.

- (b) In order to demonstrate compliance with Condition D.2.2, the Permittee shall submit semiannual compliance reports for each affected source according to the requirements of 40 CFR 63.4520(a), paragraphs (1) through (7). The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in 40 CFR 63.4520, paragraph (a)(2). Compliance

with the reporting requirements of 40 CFR Part 63, Subpart IIII satisfies this reporting requirement.

### SECTION D.3 FACILITY OPERATION CONDITIONS

#### Facility Description [326 IAC 2-7-5(15)]:

- (a) Electrodeposition Coating of Vehicle Bodies and Chassis (ED Coating Line), identified as Unit 001, with a capacity of 60 units per hour, constructed in 1989, consisting of the following units:
- (1) One (1) ED Body Pretreatment area;
  - (2) One (1) ED Pretreatment Drying Oven, with one (1) insignificant natural gas-fired burner with a heat input capacity of 5.55 MMBtu/hr;
  - (3) One (1) insignificant boiler for paint temperature control, with a heat input capacity of 4.0 MMBtu/hr;
  - (4) Two (2) insignificant pretreatment boilers for warming water surrounding the ED Body Coating Tank, each with a heat input capacity of 1.045 MMBtu/hr;
  - (5) One (1) ED Body Coating Tank, utilizing dipping as the method of application;
  - (6) One (1) ED Body Oven, with five (5) natural gas-fired burners totaling 13.7 MMBtu/hr, using a 6.0 MM Btu/hr natural gas-fired thermal incinerator (B-ED) as VOC control, and exhausting to one (1) stack, identified as B-ED Inc. (emissions from the entrance to, and exit from, the ED Body Oven use no controls and exhaust to one (1) stack, identified as B-ED Hood Exhaust);
  - (7) One (1) ED Body Cool Down area;
  - (8) One (1) ED Chassis Pretreatment area;
  - (9) One (1) ED Chassis Coating Tank, utilizing dipping as the method of application;
  - (10) One (1) insignificant hot water boiler for the ED Chassis Coating Tank, with a heat input capacity of 5.0 MMBtu/hr;
  - (11) One (1) ED Chassis Oven, with two (2) natural gas-fired burners totaling 4.37 MMBtu/hr, using a 2.25 MM Btu/hr natural gas-fired thermal incinerator (CH) as VOC control, and exhausting to one (1) stack, identified as CH Inc. (emissions from the entrance to, and exit from, the ED Chassis Oven use no controls and exhaust to one (1) stack, identified as CH Hood Exhaust); and
  - (12) One (1) Chassis Cool Down area.
- (c) Topcoat System, identified as Unit 003, with a capacity of 60 units per hour, constructed in 1989, consisting of the following units:
- (1) One (1) Topcoat #1 Booth, utilizing the electrostatic air atomized, electrostatic bell method of application, using a water wash as particulate matter control, and exhausting to ten (10) stacks, identified as TC1-1 through TC1-10;
  - (2) One (1) Topcoat #1 Booth Preheat, with three (3) natural gas-fired burners, each with a heat input capacity of 20.57 MMBtu/hr;

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

**Facility Description [326 IAC 2-7-5(15)]: (continued)**

- (3) One (1) Topcoat #1 Booth Reheat, with three (3) insignificant natural gas-fired burners;
- (4) One (1) Topcoat #1 Oven, with three (3) insignificant natural gas-fired burners, using a 3.46 MMBtu/hr natural gas-fired thermal incinerator (TC-1) as VOC control, and exhausting to one (1) stack, identified as TC-1 Inc. (emissions from the entrance to and exit from the Topcoat #1 Oven use no controls and exhaust to one (1) stack, identified as TC-1 Ex.);
- (5) One (1) Topcoat #1 Cool Down area, using no controls, and exhausting to one (1) stack, identified as TC-1 O.Cl.;
- (6) One (1) Topcoat #2 Booth, utilizing the electrostatic air atomized, electrostatic bell method of application, using a water wash as particulate matter control, and exhausting to ten (10) stacks, identified as TC2-1 through TC2-10;
- (7) One (1) Topcoat #2 Booth Preheat, with three (3) natural gas-fired burners, each with a heat input capacity of 20.57 MMBtu/hr;
- (8) One (1) Topcoat #2 Booth Reheat, with three (3) insignificant natural gas-fired burners;
- (9) One (1) Topcoat #2 Oven, with three (3) insignificant natural gas-fired burners, using a 3.46 MMBtu/hr natural gas-fired thermal incinerator (TC-2) as VOC control, and exhausting to one (1) stack, identified as TC-2 Inc. (emissions from the entrance to and exit from the Topcoat #1 Oven use no controls and exhaust to one (1) stack, identified as TC-2 Ex.);
- (10) One (1) Topcoat #2 Cool Down area, using no controls, and exhausting to one (1) stack, identified as TC-2 O.Cl.;
- (11) One (1) Twotone and Repair Booth, utilizing the electrostatic air atomized, electrostatic bell method of application, using a water wash as particulate matter control, and exhausting to five (5) stacks, identified as TUT-1 through TUT-5;
- (12) One (1) Twotone and Repair Booth Preheat, with two (2) natural gas-fired burners, each with a heat input capacity of 16.26 MMBtu/hr;
- (13) One (1) Twotone and Repair Booth Reheat, with one (1) insignificant natural gas-fired burner;
- (14) One (1) Twotone and Repair Oven, with three (3) insignificant natural gas-fired burners, using a 2.41 MMBtu/hr natural gas-fired thermal incinerator (TUT) as VOC control, and exhausting to one (1) stack, identified as TUT-O-1-2;
- (15) One (1) Twotone and Repair Cool Down area; and
- (16) One (1) Wet Sand Repair Dryoff Oven, with one (1) insignificant natural gas-fired burner with a heat input capacity of 1.49 MMBtu/hr.

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

**Facility Description [326 IAC 2-7-5(15)]: (continued)**

- (d) Intermediate (Surfacer) Coating Line, identified as Unit 004, with a capacity of 60 units per hour, constructed in 1989, consisting of the following units:
- (1) One (1) Intermediate Working Stage burner, with a heat input capacity of 19.74 MMBtu/hr;
  - (2) One (1) Intermediate Coating Booth, utilizing the electrostatic air atomized, electrostatic bell method of application, using a water wash as particulate matter control, and exhausting to six (6) stacks, identified as SUR-2 through SUR-7;
  - (3) One (1) Intermediate Booth Preheat, with two (2) natural gas-fired burners, each with a heat input capacity of 28.275 MMBtu/hr;
  - (4) One (1) Intermediate Booth Reheat burner, with two (2) insignificant natural gas-fired burners;
  - (5) One (1) Intermediate Coating Oven, with four (4) insignificant natural gas-fired burners totaling 9.92 MMBtu/hr, using a 4.15 MMBtu/hr natural gas-fired thermal incinerator as VOC control, and exhausting to one (1) stack, identified as SUR Inc. (emissions from the entrance to and exit from the Intermediate Coating Oven use no controls and exhaust to one (1) stack, identified as Surfacer Hood Exhaust); and
  - (6) One (1) Intermediate Cool Down area, using no controls, and exhausting to one (1) stack, identified as Surfacer Cooling.
- (i) One (1) paint storage room for the ED Coating Line, identified as Unit 009, constructed in 1989.

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

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

D.3.1 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A][Table 2 to 40 CFR Part 63, Subpart IIII][Table 2 to 40 CFR Part 63, Subpart MMMM][40 CFR 63.3101][40 CFR 63.3901]

- (a) The provisions of 40 CFR Part 63, Subpart A - General Provisions (which are incorporated by reference as 326 IAC 20-1-1):
- (1) apply to the affected source to the extent expressly specified by Table 2 to 40 CFR Part 63, Subpart MMMM and Table 2 to 40 CFR 63, Subpart IIII; and
  - (2) to the extent applicable to the affected source, are incorporated in this condition by reference. The Permittee must comply with these requirements on and after January 2, 2007 (for 40 CFR Part 63, Subpart MMMM) and June 25, 2007 (for 40 CFR Part 63, Subpart IIII).
- (b) Since the applicable requirements addressed by paragraph (a) of this condition are included and specifically identified (by reference) in this permit, the permit shield established by Section B of this permit in the condition titled Permit Shield, and authorized by 326 IAC 2-7-15, applies to paragraph (a) of this condition.

D.3.2 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart M] [40 CFR 63.3882][40 CFR 63.3883][40 CFR 63.3890]

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- (a) The provisions of 40 CFR Part 63, Subpart M (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source (as defined in (d) below). A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.3891, the Permittee must comply with these requirements on and after January 2, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The surface coating of metal parts in the various coating operations described in this Section D.3 meets the applicability criteria of both 40 CFR Part 63, Subpart M (Surface Coating of Miscellaneous Metal Parts and Products) and 40 CFR Part 63, Subpart IIII (Surface Coating of Automobiles and Light-Duty Trucks). As a result, the Permittee must select and implement a valid option for complying with this rule, and any other applicable rules of 40 CFR Part 63, pursuant to 40 CFR 63.3881(d) and (e).
- (d) Consistent with 40 CFR 63.3881(a), the emission units described in this Section D.3 which also meet one or more of the descriptions listed below, to the extent employed in the surface coating of metal parts or products as defined in 40 CFR Part 63, Subpart M, comprise the affected source that is subject to 40 CFR Part 63, Subpart M:
  - (1) All coating operations as defined in 40 CFR 63.3981;
  - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings thinners and/or other additives, and cleaning materials; and
  - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (e) Definitions of terms used in this section that are contained in 40 CFR 63.2 or in 40 CFR 63.3981 are incorporated herein by reference.

D.3.3 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Automobiles and Light Duty Trucks: Limitations and Requirements [40 CFR Part 63, Subpart IIII] [40 CFR 63.3081] [40 CFR 63.3082] [40 CFR 63.3176]

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- (a) The provisions of 40 CFR Part 63, Subpart IIII (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Automobiles and Light Duty Trucks) apply to the affected source (as defined in (c) below). A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/auto/autopg.html>. Pursuant to 40 CFR 63.3083(b), the Permittee must comply with these requirements on and after June 25, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

- (c) Consistent with 40 CFR 63.3081, the emission units described in this Section D.3 which also meet one or more of the descriptions listed below, to the extent employed in the surface coating of automobiles and light-duty trucks as defined in 40 CFR Part 63, Subpart IIII, comprise the affected source that is subject to 40 CFR Part 63, Subpart IIII:
  - (1) All coating operations as defined in 40 CFR 63.3176;
  - (2) All storage containers and mixing vessels in which coatings, thinners, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings, thinners, and cleaning materials; and
  - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Definitions of terms used in this section that are contained in 40 CFR 63.2 or in 40 CFR 63.3176 are incorporated herein by reference.

D.3.4 Prevention of Significant Deterioration (PSD) - Best Available Control Technology for Volatile Organic Compounds (VOC) [326 IAC 2-2] [40 CFR 52.21]

Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, 326 IAC 2-2-3, BACT for VOC for the facilities described in this section is the following:

- (a) The daily VOC emissions from each facility shall not exceed the corresponding limits in the following table. Compliance with these limits shall be demonstrated pursuant to Condition D.3.13:

Facility	lb VOC/gal applied solids	kg VOC/liter applied solids
ED Body Coating Tank	0.52	0.062
ED Chassis Coating Tank	0.41	0.049
Topcoat booths (Topcoat #1 Booth, Topcoat #2 Booth, Twotone and Repair Booth)	12.3 <sup>a</sup>	1.47 <sup>a</sup>
Intermediate Coating Booth	8.76 <sup>b</sup>	1.05 <sup>b</sup>

<sup>a</sup> Weighted average of all Topcoat coatings.

<sup>b</sup> Weighted average of all Intermediate coatings.

- (b) The thermal incinerators used to control VOC emissions from the Topcoat #1 Booth, Topcoat #2 Booth, Twotone and Repair Booth, and Intermediate Coating Booth shall each achieve a minimum 20% capture efficiency and 90% destruction efficiency. The ED Body Oven thermal incinerator and the ED Chassis Oven thermal incinerator shall each achieve a minimum 70% capture efficiency and 90% destruction efficiency.
- (c) Pretreatment Cleaning shall utilize only VOC free detergents, conditioners, and rinses in the body and chassis pre-treatment cleaning operations.
- (d) Pertaining to purge solvent use:
  - (1) Purge solvent capture systems will be utilized each time that any coating application equipment is purged. The purge solvent capture systems shall have a minimum overall capture efficiency of at least eighty percent (80%). Collected

purge solvent shall be retained in closed containers until such time as they are shipped offsite for disposal or recycled.

- (2) Block painting will be utilized whenever possible to minimize color changes and the resulting purge.

Compliance with these limitations, and those contained in Conditions D.1.3, D.2.4, D.4.5, D.5.4, D.6.5 and D.7.1, will satisfy the requirements of 326 IAC 2-2 and 40 CFR 52.21.

D.3.5 Prevention of Significant Deterioration - Best Available Control Technology for Nitrogen Oxides (NO<sub>x</sub>) [40 CFR 52.21] [326 IAC 2-2]

Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, and 326 IAC 2-2-3, BACT for NO<sub>x</sub> for the natural gas combustion equipment described in this section is the following:

- (a) NO<sub>x</sub> emissions from the following facilities:

- (1) Shall not exceed 0.10 pounds per million Btu heat input for each facility listed as follows:
  - (A) the Intermediate Working Stage burner;
  - (B) the three (3) Topcoat #1 Booth Preheat burners;
  - (C) the three (3) Topcoat #2 Booth Preheat burners;
  - (D) the two (2) Twotone and Repair Booth Preheat burners;
  - (E) the insignificant ED Pretreatment Drying Oven burner;
  - (F) the insignificant ED Paint Temperature Control boiler;
  - (G) the two (2) insignificant ED Pretreatment boilers ;
  - (H) the five (5) insignificant ED Body Oven burner;
  - (I) the insignificant ED Body Oven thermal incinerator;
  - (J) the insignificant ED Chasis hot water boiler;
  - (K) the two (2) insignificant ED Chassis Oven burners;
  - (L) the insignificant ED Chassis Oven thermal incinerator;
  - (M) the four (4) insignificant Intermediate Oven burners;
  - (N) the three (3) insignificant Topcoat #1 Booth Reheat burners;
  - (O) the three (3) insignificant Topcoat #1 Oven burners;
  - (P) the three (3) insignificant Topcoat #2 Booth Reheat burner;
  - (Q) the three (3) insignificant Topcoat #2 Oven burners;
  - (R) the insignificant Two tone Booth Reheat burner;
  - (S) the three (3) insignificant Two tone Oven burners; and

- (T) the insignificant Wet Sand Repair Dryoff Oven burner.
- (2) Shall not exceed 0.12 pounds per million Btu heat input for each facility listed as follows:
  - (A) the two (2) Intermediate Booth Preheat burners;
  - (B) the two (2) insignificant Intermediate (Surfacer) Booth Reheat burner;
  - (C) the insignificant Intermediate (Surfacer) Oven thermal incinerator;
  - (D) the insignificant Topcoat #1 Oven thermal incinerator;
  - (E) the insignificant Topcoat #2 Oven thermal incinerator; and
  - (F) the insignificant Two tone Oven thermal incinerator.
- (b) All combustion operations listed above shall use low-NO<sub>x</sub> natural gas burners.

Compliance with these limitations, and those contained in Conditions D.2.5, D.4.6, D.5.5 and D.7.2, will satisfy the requirements of 40 CFR 52.21 and 326 IAC 2-2.

**D.3.6 Automobile and Light Duty Truck Surface Coating Standard, NSPS [326 IAC 12] [40 CFR 60.390-398, Subpart MM]**

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Pursuant to 40 CFR Part 63, Subpart MM, and 326 IAC 12:

- (a) The daily VOC emissions from the ED Body Coating Tank shall not exceed 1.42 pounds of VOC per gallon of applied solids (0.17 kilograms of VOC per liter of applied solids).
- (b) The daily VOC emissions from the Topcoat booths (Topcoat #1 Booth, Topcoat #2 Booth, and Twotone and Repair Booth) shall not exceed 12.3 pounds of VOC per gallon of applied solids (1.47 kilograms of VOC per liter of applied solids). This limit applies to the weighted average of all topcoat coatings.
- (c) The daily VOC emissions from the Intermediate Coating Booth shall not exceed 11.7 pounds of VOC per gallon of applied solids (1.40 kilograms of VOC per liter of applied solids). This limit applies to the weighted average of all intermediate coatings.

Compliance with these limits shall be demonstrated pursuant to Condition D.3.13.

**D.3.7 Particulate Matter from Sources of Indirect Heating [326 IAC 6-2-4]**

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Pursuant to 326 IAC 6-2-4, the particulate matter emissions from the one (1) insignificant 5.0-MMBtu/hr ED Chassis hot water boiler, the two (2) insignificant 1.045-MMBtu/hr ED Pretreatment boilers, and the one (1) insignificant 4.0-MMBtu/hr ED Paint Temperature Control boiler shall each not exceed 0.435 pounds per MMBtu energy input.

This limitation is based on the following equation:

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

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.  
Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. (Q = 34.17 MMBtu/hr).

**D.3.8 Volatile Organic Compound (VOC) Limitations [326 IAC 8-2-2]**

- 
- (a) Pursuant to 326 IAC 8-2-2, the Permittee shall not allow the discharge of VOC into the atmosphere in excess of the following limits:

- (1) The daily VOC emissions from the Topcoat booths (Topcoat #1 Booth, Topcoat #2 Booth, and Twotone and Repair Booth) shall not exceed 15.3 pounds of VOC per gallon of applied solids (1.83 kilograms of VOC per liter of applied solids) (site-specific RACT limit established pursuant to 325 IAC 8-1-5 (Petition for alternate controls)). This limit applies to the weighted average of all Topcoat coatings.
  - (2) The daily VOC emissions from the Intermediate Coating Booth shall not exceed 15.3 pounds of VOC per gallon of applied solids (1.83 kilograms of VOC per liter of applied solids) (site-specific RACT limit established pursuant to 325 IAC 8-1-5 (Petition for alternate controls)). This limit applies to the weighted average of all Intermediate coatings.
- (b) Compliance with the VOC emission limits in paragraph (a) of this condition shall be determined with the following equation:

Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the thermal incinerators (TC-1, TC-2, TUT, and SUR) shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{V - (E * TE)}{V} * 100$$

Where:

- V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
- E = 326 IAC 8-2-2 emission limit in pounds of VOC per gallon of applied solids.
- TE = The overall transfer efficiency of the applicator for all coatings applied in the subject coating line, expressed as a decimal.
- O = Equivalent overall efficiency of the capture system and control device as a percentage.

- (c) At this time, IDEM is collecting the coating information necessary to calculate the overall efficiency of the capture system and control device necessary to meet the limit above, pursuant to 326 IAC 8-1-2(c). Once this information is available, the OAQ will promptly reopen the permit using provisions of 326 IAC 2-7-9 (Permit Reopening) to include this information.

#### D.3.9 Volatile Organic Compound (VOC) Limitations [326 IAC 8-2-2] [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-2, the daily VOC emissions from the ED Body Coating Tank shall not exceed 1.17 pounds of VOC per gallon of coating less water (0.14 kilograms of VOC per liter of coating less water) (site-specific RACT limit established pursuant to 325 IAC 8-1-5 (Petition for alternate controls)).
- (b) Pursuant to 326 IAC 8-2-9, the daily VOC emissions from the ED Chassis Coating Tank shall not exceed 3.0 pounds of VOC per gallon of coating less water (0.36 kilograms of VOC per liter of coating less water).

Compliance with these limits shall be demonstrated pursuant to Condition D.3.13.

D.3.10 Particulate Matter (PM) [40 CFR Part 52 Subpart P]

Pursuant to CP-157-9619-00050, issued on February 11, 1999, and 40 CFR Part 52 Subpart P, the particulate matter (PM) from the facilities described in this section shall be limited using one of the following equations (as applicable):

Those activities with a process weight rate of less than 100 pounds per hour shall be limited to 0.551 pounds per hour.

Or, depending on the process weight rate:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour.}$$

D.3.11 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate emissions from the Topcoat booths (Topcoat #1 Booth, Topcoat #2 Booth, and Twotone and Repair Booth) and the Intermediate Coating Booth shall be controlled by water washes and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

D.3.12 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their respective control devices.

**Compliance Determination Requirements**

D.3.13 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Compliance with the VOC emission limits in Conditions D.3.4, D.3.6 and D.3.9 shall be determined with the following equations (as applicable):

$$\text{VOC emissions (lb VOC/gal applied solids)} = [3 (C \times U) / 3 (S \times TE)] \times [1 - (CE \times DE)]$$

Where:

C is the VOC content of the coating in pounds of VOC per gallon of coating, as applied;  
U is the usage rate of the coating in gallons per day;  
S is the usage rate of coating solids in gallons per day;  
TE is the transfer efficiency of the applicator;  
CE is the minimum capture efficiency of the incinerator required in Condition D.3.4; and  
DE is the minimum destruction efficiency of the incinerator required in Condition D.3.4.

Or, if the emission limit is in units of pounds of VOC per gallon of coating less water:

$$\text{VOC emissions (lb VOC/gal coating less water)} = [3 (C \times U) / 3 U] \times [(1 - (CE \times DE))]$$

Where:

C is the VOC content of the coating in pounds of VOC per gallon of coating less water, as applied;  
U is the usage rate of the coating in gallons per day;  
CE is the minimum capture efficiency of the incinerator required in Condition D.3.4; and  
DE is the minimum destruction efficiency of the incinerator required in Condition D.3.4.

D.3.14 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

(a) Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the incinerators at all times the

respective facilities are in operation to ensure compliance with Conditions D.3.4, D.3.6 and D.3.8.

- (b) The incinerators shall be operated such that they achieve the minimum capture and destruction efficiencies specified in Condition D.3.4.

D.3.15 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within one hundred and eighty (180) days after issuance, the Permittee shall conduct a performance test to verify VOC control efficiency (pursuant to Condition D.3.4) for each incinerator utilizing methods as approved by the Commissioner. This test shall be repeated at least once every thirty (30) months (2.5 years) from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.3.16 Thermal Incinerator Temperature [326 IAC 2-7-5(3)]

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on each thermal incinerator (B-ED, CH, TC-1, TC-2, TUT, and SUR) for measuring operating temperature. For the purposes of this condition, continuous monitoring shall mean no less often than once per minute. The output of this system shall be recorded as a three-hour average. If the continuous monitoring system is not in operation, the temperature will be recorded manually once in a 15-minute period. Nothing in this permit shall excuse the Permittee from complying with the requirement to continuously monitor the temperature of each thermal incinerator.
- (b) From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate each thermal incinerator at or above the hourly average temperature of 1,400 °F (except for the ED Chassis Oven thermal incinerator (CH), which shall be operated at or above the three-hour average temperature of 1,325 °F). The Permittee shall determine the minimum three-hour average operating temperature from the most recent valid stack test that demonstrates compliance with Conditions D.3.4, D.3.6 and D.3.8. This determination must be approved by IDEM.
- (c) The Permittee shall then operate each thermal incinerator at or above the minimum three-hour average temperature as observed during the most recent compliant stack test following approval of that temperature.
- (d) The Permittee take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the three-hour average temperature of a thermal incinerator is below the compliant three-hour average temperature. A three-hour average temperature that is below the compliant three-hour average temperature is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.3.17 Parametric Monitoring [326 IAC 2-7-5(3)]

Each incinerator (B-ED, CH, TC1, TC-2, TUT, and SUR) shall be equipped with a mechanism that automatically shuts down the incinerator if either the duct pressure or the fan amperage deviates from a preset range. This preset range shall be based on the normal range as established in the most recent compliant stack test. These shut-down mechanisms shall be functional at all times that the associated incinerator is in use. If, at any time, an incinerator is shut down because of a deviation from these preset ranges, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. An incinerator shutdown is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

#### D.3.18 VOC Compliance Monitoring

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Pursuant to 40 CFR 60.393, monthly NSPS performance tests for the operations listed in Condition D.3.6 shall be performed to document compliance with the NSPS limits.

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

#### D.3.19 Operator Training Program

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The Permittee shall implement an operator training program.

- (a) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the water wash control systems on the Topcoat #1, Topcoat #2, Twotone and Repair, and Intermediate Coating lines. All existing operators shall be trained upon permit issuance. All new operators shall be trained upon hiring or transfer.
- (b) Training shall include proper water level of the water pans, proper placement and configuration of baffle panels, other factors that affect water pan capture efficiency (e.g., debris in the water pans), and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.
- (c) All operators shall be given refresher training annually.

Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

#### D.3.20 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products and Surface Coating of Automobiles and Light Duty Trucks - Notifications [40 CFR 63.3910][49 CFR 63.3110]

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- (a) The Permittee must submit the applicable notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, and as provided in paragraphs (b) and (c) below.
- (b) With respect to 40 CFR Part 63, Subpart Mmmm, the Permittee must submit the:
  - (1) Initial notification required by 40 CFR 63.9(b) and 40 CFR 63.3910 no later than January 2, 2005. If using compliance with the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (40 CFR Part 63, Subpart IIII) as provided for under 40 CFR 63.3881(d) to constitute compliance with this subpart for any or all of the metal parts coating operations, then the Permittee must include a statement to this effect in the initial notification, and no other notifications are required under this subpart in regard to those metal parts coating operations.
  - (2) Notification Of Compliance Status required by 40 CFR 63.9(h) and 40 CFR 63.3910 no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).
- (c) With respect to 40 CFR Part 63, Subpart IIII, the Permittee must submit the:

- (1) Initial notification required by 40 CFR 63.9(b) and 40 CFR 63.3110 no later than June 25, 2005. Existing sources that have previously submitted notifications of applicability of this rule pursuant to Section 112(j) of the CAA are not required to submit an initial notification under 40 CFR 63.9(b) except to identify and describe all additions to the affected source made pursuant to 40 CFR 63.3082(c).
  - (2) Notification Of Compliance Status required by 40 CFR 63.9(h) and 40 CFR 63.3110 no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3160. The notification of compliance status must contain the information specified in 40 CFR 63.3110(c), paragraphs (1) through (12) and in 40 CFR 63.9(h).
- (d) All notifications, required by (a), (b) and (c) above, must be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Director, Air and Radiation Division  
77 Jackson Boulevard  
Chicago, Illinois 60604-3590

**D.3.21 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]**

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The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information from the Notification Of Compliance Status (NOCS) in the Title V permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, and include: information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR Part 63, Subpart M and Subpart IIII, a description of the affected source and activities subject to the standards, and a description of how the Permittee will meet the applicable requirements of the standards.
- (b) The significant permit modification application shall be submitted no later than April 2, 2006 and shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

**D.3.22 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.3.4, D.3.6, D.3.8, D.3.9 and D.3.16, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken as stated below and shall be complete and sufficient to establish compliance the VOC emission limits established in Conditions D.3.4, D.3.6, D.3.8, and D.3.9, and the compliance determination requirements established in Conditions D.3.16. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
    - (1) The VOC content of each coating material (as applied) and the VOC content of each solvent (including purge solvents and thinners) used less water.

- (2) The VOC content of each coating material used in the ED Body and ED Chassis Coating Tanks, as applied, less water.
  - (3) The solids content of each coating material used (as applied).
  - (4) The amount of coating material and solvent (including purge solvents and thinners) used on a 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 solvent.
  - (5) The volume weighted average VOC content of the coatings used (as applied) for each day.
  - (6) The continuous temperature records (on a three-hour average basis) for each thermal incinerator and the three-hour average temperature used to demonstrate compliance during the most recent compliant stack test.
  - (7) Records of any thermal incinerator shutdowns due to duct pressure or fan amperage deviations.
- (b) To document compliance with Condition D.3.12, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
  - ((c) To document compliance with Condition D.3.19, the Permittee shall maintain copies of the training program, and the list of trained operators. Training records shall be maintained on site or available within 1 hour for inspection by IDEM.
  - (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.3.23 Reporting Requirements

- (a) Monthly NSPS performance tests for the operations listed in Condition D.3.6 shall be submitted as required by 40 CFR 60.395.
- (b) To document compliance with Conditions D.3.4, D.3.8 and D.3.9, compliance reports shall be submitted on a calendar monthly basis within 21 days of the end of each month. The reports shall contain the following data for each operation on a monthly basis, based on actual daily coating usage:
  - (1) Average coating VOC content in kg VOC/liter coating as applied
  - (2) Average coating VOC content in kg VOC/liter coating, as applied, less water, for the ED Body and ED Chassis Coating Tanks
  - (3) Average coating volume % solids as applied
  - (4) Average actual solids transfer efficiency
  - (5) Overall thermal incinerator control efficiency, reflecting capture and destruction efficiency
  - (6) Average kg VOC/liter of applied solids, based on actual transfer efficiency

(7) Coating usage in liters

When more than one coating has been averaged for compliance purposes, the average shall be determined on a weighted average by volume basis. All data necessary to verify weighted averages shall be included in the report.

## SECTION D.4 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

- (g) Final Repair (Touchup) painting, identified as Unit 007, with a capacity of 10 units per hour, constructed in 1989, and including the following equipment:
- (1) One (1) Touchup IPC Booth, located in the In-Process Control area, utilizing the air atomization method of spraying;
  - (2) One (1) Touchup Trim Booth, located in the Trim area, utilizing the air atomization method of spraying, using a dry filter as particulate matter control; and
  - (3) One (1) insignificant Touchup Trim natural gas-fired burner.

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

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

#### D.4.1 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A][Table 2 to 40 CFR Part 63, Subpart IIII][Table 2 to 40 CFR Part 63, Subpart MMMM][Table 2 to 40 CFR Part 63, Subpart PPPP] [40 CFR 63.3101][40 CFR 63.3901][40 CFR 63.4501]

- (a) The provisions of 40 CFR Part 63, Subpart A - General Provisions (which are incorporated by reference as 326 IAC 20-1-1):
- (1) apply to the affected source to the extent expressly specified by Table 2 to 40 CFR Part 63, Subpart MMMM, Table 2 to 40 CFR Part 63, Subpart PPPP and Table 2 to 40 CFR Part 63, Subpart IIII; and
  - (2) to the extent applicable to the affected source, are incorporated in this condition by reference. The Permittee must comply with these requirements on and after January 2, 2007 (for 40 CFR Part 63, Subpart MMMM), April 19, 2007 (for 40 CFR Part 63, Subpart PPPP) and June 25, 2007 (for 40 CFR Part 63, Subpart IIII).
- (b) Since the applicable requirements addressed by paragraph (a) of this condition are included and specifically identified (by reference) in this permit, the permit shield established by Section B of this permit in the condition titled Permit Shield, and authorized by 326 IAC 2-7-15, applies to paragraph (a) of this condition.

#### D.4.2 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products : Limitations and Requirements [40 CFR Part 63, Subpart MMMM][40 CFR 63.3882][40 CFR 63.3883][40 CFR 63.3890]

- (a) The provisions of 40 CFR Part 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source (as defined in (d) below). A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.3891, the Permittee must comply with these requirements on and after January 2, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

- (c) The surface coating of metal parts in the various coating operations described in this Section D.4 meets the applicability criteria of both 40 CFR Part 63, Subpart M MMM (Surface Coating of Miscellaneous Metal Parts and Products) and 40 CFR Part 63, Subpart IIII (Surface Coating of Automobiles and Light-Duty Trucks). As a result, the Permittee must select and implement a valid option for complying with this rule, and any other applicable rules of 40 CFR Part 63, pursuant to 40 CFR 63.3881(d) and (e).
- (d) Consistent with 40 CFR 63.3881(a), the emission units described in this Section D.4 which also meet one or more of the descriptions listed below, to the extent employed in the surface coating of metal parts or products as defined in 40 CFR Part 63, Subpart M MMM, comprise the affected source that is subject to 40 CFR Part 63, Subpart M MMM:
  - (1) All coating operations as defined in 40 CFR 63.3981;
  - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings thinners and/or other additives, and cleaning materials; and
  - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (e) Definitions of terms used in this section that are contained in 40 CFR 63.2 or in 40 CFR 63.3981 are incorporated herein by reference.

D.4.3 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products: Limitations and Requirements [40 CFR Part 63, Subpart P PPP] [40 CFR 63.4481] [40 CFR 63.4482]

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- (a) The provisions of 40 CFR Part 63, Subpart P PPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source (as defined in (d) below). A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after April 19, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The surface coating of plastic parts in the various coating operations described in this Section D.4 meets the applicability criteria of both 40 CFR Part 63, Subpart P PPP (Surface Coating of Plastic Parts and Products) and 40 CFR Part 63, Subpart IIII (Surface Coating of Automobiles and Light-Duty Trucks). As a result, the Permittee must select and implement a valid option for complying with this rule, and any other applicable rules of 40 CFR Part 63, pursuant to 40 CFR 63.3881(d) and (e).
- (d) Consistent with 40 CFR 63.4481, the emission units described in this Section D.4 which also meet one or more of the descriptions listed below, to the extent employed in the surface coating of plastic parts and products as defined in 40 CFR Part 63, Subpart P PPP, comprise the affected source that is subject to 40 CFR Part 63, Subpart P PPP:
  - (1) All coating operations as defined in 40 CFR 63.4581;

- (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
  - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (e) Definitions of terms used in this section that are contained in 40 CFR 63.2 or in 40 CFR 63.4581 are incorporated herein by reference.

D.4.4 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Automobiles and Light Duty Trucks: Limitations and Requirements [40 CFR Part 63, Subpart IIII] [40 CFR 63.3081] [40 CFR 63.3082] [40 CFR 63.3176]

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- (a) The provisions of 40 CFR Part 63, Subpart IIII (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Automobiles and Light Duty Trucks) apply to the affected source (as defined in (c) below). A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/auto/autopg.html>. Pursuant to 40 CFR 63.3083(b), the Permittee must comply with these requirements on and after June 25, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) Consistent with 40 CFR 63.3081, the emission units described in this Section D.4 which also meet one or more of the descriptions listed below, to the extent employed in the surface coating of automobiles and light-duty trucks as defined in 40 CFR Part 63, Subpart IIII, comprise the affected source that is subject to 40 CFR Part 63, Subpart IIII:
- (1) All coating operations as defined in 40 CFR 63.3176;
  - (2) All storage containers and mixing vessels in which coatings, thinners, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings, thinners, and cleaning materials; and
  - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Definitions of terms used in this section that are contained in 40 CFR 63.2 or in 40 CFR 63.3176 are incorporated herein by reference.

D.4.5 Prevention of Significant Deterioration (PSD) - Best Available Control Technology for Volatile Organic Compounds (VOC) [326 IAC 2-2] [40 CFR 52.21]

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Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, and 326 IAC 2-2-3, BACT for VOC for the Final Repair (Touchup) Operation is the following:

- (a) The daily VOC emissions from the Final Repair booths (Touchup IPC Booth and Touchup Trim Booth) shall not exceed 4.84 pounds of VOC per gallon of coating less water (0.58 kilograms of VOC per liter of coating less water). This limit applies to the weighted average of all Final Repair coatings and solvents.

Compliance with this limit shall be demonstrated pursuant to Condition D.4.12.

- (b) Pretreatment Cleaning shall utilize only VOC free detergents, conditioners, and rinses in the body and chassis pre-treatment cleaning operations.
- (c) Pertaining to purge solvent use:
  - (1) Purge solvent capture systems will be utilized each time that any coating application equipment is purged. The purge solvent capture systems shall have a minimum overall capture efficiency of at least eighty percent (80%). Collected purge solvent shall be retained in closed containers until such time as they are shipped offsite for disposal or recycled.
  - (2) Block painting will be utilized whenever possible to minimize color changes and the resulting purge.

Compliance with these limitations, and those contained in Conditions D.1.3, D.2.4, D.3.4, D.5.4, D.6.5 and D.7.1, will satisfy the requirements of 326 IAC 2-2 and 40 CFR 52.21.

**D.4.6 Prevention of Significant Deterioration - Best Available Control Technology for Nitrogen Oxides (NO<sub>x</sub>) [40 CFR 52.21] [326 IAC 2-2]**

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Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, and 326 IAC 2-2-3, BACT for NO<sub>x</sub> for the natural gas combustion equipment described in this section is the following:

- (a) The NO<sub>x</sub> emissions from the Touchup Trim Booth burner shall not exceed 0.10 pounds per million Btu (lb/MMBtu) heat input; and
- (b) All combustion facilities listed in this section shall use low-NO<sub>x</sub> natural gas burners.

Compliance with these limitations, and those contained in Conditions D.2.5, D.3.5, D.5.5 and D.7.2, will satisfy the requirements of 40 CFR 52.21 and 326 IAC 2-2.

**D.4.7 Volatile Organic Compound (VOC) Limitations [326 IAC 8-2-2]**

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Pursuant to 326 IAC 8-2-2, the daily VOC emissions from the Final Repair booths (Touchup IPC Booth and Touchup Trim Booth) shall not exceed 4.84 pounds of VOC per gallon of coating less water (0.58 kilograms of VOC per liter of coating less water). This limit applies to the weighted average of all Final Repair coatings and solvents.

Compliance with this limit shall be demonstrated pursuant to Condition D.4.12.

**D.4.8 Particulate Matter (PM) [40 CFR Part 52 Subpart P]**

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Pursuant to CP-157-9619-00050, issued on February 11, 1999, and 40 CFR Part 52 Subpart P, the particulate matter (PM) from the facilities described in this section shall be limited using one of the following equations (as applicable):

Those activities with a process weight rate of less than 100 pounds per hour shall be limited to 0.551 pounds per hour.

Or, depending on the process weight rate:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour.}$$

**D.4.9 Particulate [326 IAC 6-3-2(d)]**

The Touchup Trim Booth uses less than five (5) gallons of coating per day. The Permittee shall notify IDEM, OAQ of any changes in operation that could result in the Touchup Trim Booth using five (5) gallons or more of coating per day.

**D.4.10 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their respective control devices.

**Compliance Determination Requirements**

**D.4.11 Particulate**

Pursuant to PSD (79) 1651, issued on July 30, 1987, particulate emissions from the Touchup Trim Booth shall be controlled by a dry filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

**D.4.12 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]**

Compliance with the VOC emission limits in Conditions D.4.5 and D.4.7 shall be determined with the following equation:

$$\text{VOC emissions (lb VOC/gal coating less water)} = [ 3 (C \times U) / 3 U ]$$

Where:

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

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

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

**D.4.13 Operator Training Program**

The Permittee shall implement an operator training program.

- (a) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the dry filter on the Touchup Trim coating operation. All existing operators shall be trained upon permit issuance. All new operators shall be trained upon hiring or transfer.
- (b) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.
- (c) All operators shall be given refresher training annually.

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

**D.4.14 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products, and Surface Coating of Plastic Parts and Products and Surface Coating of Automobiles and Light Duty Trucks - Notifications [40 CFR 63.3910] [40 CFR 63.4510][40 CFR 63.3110]**

- (a) The Permittee must submit the applicable notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, and as provided in paragraphs (b) and (c) below.

- (b) With respect to 40 CFR Part 63, Subparts MMMM and PPPP, the Permittee must submit the:
- (1) Initial notifications required by 40 CFR 63.9(b), 40 CFR 63.3910, and 40 CFR 63.4510 no later than January 2, 2005 (for 40 CFR Part 63, Subpart MMMM) and April 19, 2005 (for 40 CFR Part 63, Subpart PPPP) . If using compliance with the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (40 CFR Part 63, Subpart IIII) as provided for under 40 CFR 63.3881(d) and 63.4881(d) to constitute compliance with these subparts for any or all of the metal or plastic parts coating operations, then the Permittee must include a statement to this effect in the initial notifications, and no other notifications are required under these subparts in regard to those metal or plastic parts coating operations.
  - (2) Notification Of Compliance Status required by 40 CFR 63.9(h), 40 CFR 63.3910, and 40 CFR 63.4510 no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, 63.3960, 63.4540, 63.4550 or 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11), 40 CFR 63.4510(c), paragraphs (1) through (11), and any additional information specified in 40 CFR 63.9(h).
- (c) With respect to 40 CFR Part 63, Subpart IIII, the Permittee must submit the:
- (1) Initial notification required by 40 CFR 63.9(b) and 40 CFR 63.3110 no later than June 25, 2005. Existing sources that have previously submitted notifications of applicability of this rule pursuant to Section 112(j) of the CAA are not required to submit an initial notification under 40 CFR 63.9(b) except to identify and describe all additions to the affected source made pursuant to 40 CFR 63.3082(c).
  - (2) Notification Of Compliance Status required by 40 CFR 63.9(h) and 40 CFR 63.3110 no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3160. The notification of compliance status must contain the information specified in 40 CFR 63.3110(c), paragraphs (1) through (12) and in 40 CFR 63.9(h).
- (d) All notifications, required by (a), (b) and (c) above, must be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Director, Air and Radiation Division  
77 Jackson Boulevard  
Chicago, Illinois 60604-3590

D.4.15 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information from the Notification Of Compliance Status (NOCS) in the Title V permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, and include: information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR Part 63, Subpart M, Subpart P and Subpart III, a description of the affected source and activities subject to the standards, and a description of how the Permittee will meet the applicable requirements of the standards.
- (b) The significant permit modification application shall be submitted no later than April 2, 2006 and shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

#### D.4.16 Record Keeping Requirements

- (a) To document compliance with Conditions D.4.5 and D.4.7, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance the VOC emission limits established in Conditions D.4.5 and D.4.7. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
  - (1) The VOC content of each coating material (as applied, less water) and the VOC content of each solvent (including purge solvents and thinners) used less water.
  - (2) The amount of coating material and solvent (including purge solvents and thinners) used on a 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 solvent.
    - (C) Records shall be sufficient to demonstrate that the Touchup Trim Booth uses less than five gallons of coating per day.
  - (3) The volume weighted average VOC content of the coatings used (as applied) for each day.
- (b) To document compliance with Condition D.4.10, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) To document compliance with Condition D.4.13, the Permittee shall maintain copies of the training program, and the list of trained operators. Training records shall be maintained on site or available within 1 hour for inspection by IDEM.
- (d) To document compliance with Condition D.4.3, the Permittee shall collect and keep records of the data and information specified in 40 CFR 63.4530, paragraphs (c) through (h). Failure to collect and keep these records is a deviation from the applicable standard.
  - (1) These records shall be in a form suitable and readily available for expeditious review. Where appropriate, the records may be maintained as electronic spreadsheets or as a database.

- (2) The Permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee shall keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee may keep the records off-site for the remaining 3 years.
- (3) Compliance with the record keeping requirements of 40 CFR Part 63, Subpart IIII satisfies these record keeping requirements.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.4.17 Reporting Requirements

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- (a) To document compliance with Conditions D.4.5 and D.4.7, compliance reports shall be submitted on a calendar monthly basis within 21 days of the end of each month. The reports shall contain the following data for each operation on a monthly basis, based on actual daily coating usage:
  - (1) Average coating VOC content in kg VOC/liter coating minus water
  - (2) Coating usage in liters

When more than one coating has been averaged for compliance purposes, the average shall be determined on a weighted average by volume basis. All data necessary to verify weighted averages shall be included in the report.
- (b) In order to demonstrate compliance with Condition D.4.3, the Permittee shall submit semiannual compliance reports for each affected source according to the requirements of 40 CFR 63.4520(a), paragraphs (1) through (7). The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in 40 CFR 63.4520, paragraph (a)(2). Compliance with the reporting requirements of 40 CFR Part 63, Subpart IIII satisfies this reporting requirement.

**SECTION D.5**

**FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)]:**

- (b) Sealing and PVC Undercoating Line, identified as Unit 002, with a capacity of 60 units per hour, consisting of the following units:
  - (1) One (1) PVC Coating Booth #1, constructed in 1989, utilizing the airless spray method of application, using a dry filter as particulate matter control, and exhausting to one (1) stack, identified as PVC-1-2;
  - (2) One (1) PVC Coating Booth #1 Preheat, constructed in 1989, with one (1) natural gas-fired burner with a heat input capacity of 16.8 MMBtu/hr;
  - (3) One (1) PVC Coating Booth #2, constructed in 1999, utilizing the airless spray method of application, using a water wash as particulate matter control, and exhausting to one (1) stack, identified as PVC-Booth 2;
  - (4) One (1) PVC Coating Booth #2 Preheat, constructed in 1999, with one (1) natural gas-fired burner with a heat capacity of 16.8 MMBtu/hr;
  - (5) One (1) PVC Seal Oven, constructed in 1989, with two (2) insignificant natural gas-fired burners totaling 6.94 MMBtu/hr, using no controls, and exhausting to one (1) stack, identified as PVC-Oven Exhaust;
  - (6) One (1) PVC Cool Down area, constructed in 1989, using no controls, and exhausting to one (1) stack, identified as PVC Cooling;
- (f) Anticorrosion Coating, identified as Unit 006, with a capacity of 60 units per hour, constructed in 1989, and including the following equipment:
  - (1) One (1) Black Coat and Wax Booth, utilizing the air-assisted method of spraying, using a dry filter as particulate matter control, exhausting to BCW Stack;
  - (2) One (1) Black and Wax Coat natural gas-fired burner, with a heat input capacity of 24.0 MMBtu/hr;
  - (3) One (1) Anticorrosion Coating Booth, utilizing the air-assisted method of spraying, using a water wash as particulate matter control, exhausting to Anticorrosion Stack; and
  - (4) One (1) insignificant Anticorrosion Coating natural gas-fired burner.

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

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

D.5.1 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A][Table 2 to 40 CFR Part 63, Subpart IIII][Table 2 to 40 CFR Part 63, Subpart MMMM][40 CFR 63.3901][40 CFR 63.3101]

- (a) The provisions of 40 CFR Part 63, Subpart A - General Provisions (which are incorporated by reference as 326 IAC 20-1-1):

- (1) apply to the affected source to the extent expressly specified by Table 2 to 40 CFR Part 63, Subpart Mmmm and Table 2 to 40 CFR part 63, Subpart IIII; and
  - (2) to the extent applicable to the affected source, are incorporated in this condition by reference. The Permittee must comply with these requirements on and after January 2, 2007 (for 40 CFR Part 63, Subpart Mmmm) and June 25, 2007 (for 40 CFR Part 63, Subpart IIII).
- (b) Since the applicable requirements addressed by paragraph (a) of this condition are included and specifically identified (by reference) in this permit, the permit shield established by Section B of this permit in the condition titled Permit Shield, and authorized by 326 IAC 2-7-15, applies to paragraph (a) of this condition.

D.5.2 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products: Limitations and Requirements [40 CFR Part 63, Subpart Mmmm][40 CFR 63.3882][40 CFR 63.3883][40 CFR 63.3890]

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- (a) The provisions of 40 CFR Part 63, Subpart Mmmm (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source (as defined in (d) below). A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.3891, the Permittee must comply with these requirements on and after January 2, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The surface coating of metal parts in the various coating operations described in this Section D.5 meets the applicability criteria of both 40 CFR Part 63, Subpart Mmmm (Surface Coating of Miscellaneous Metal Parts and Products) and 40 CFR Part 63, Subpart IIII (Surface Coating of Automobiles and Light-Duty Trucks). As a result, the Permittee must select and implement a valid option for complying with this rule, and any other applicable rules of 40 CFR Part 63, pursuant to 40 CFR 63.3881(d) and (e).
- (d) Consistent with 40 CFR 63.3881(a), the emission units described in this Section D.5 which also meet one or more of the descriptions listed below, to the extent employed in the surface coating of metal parts or products as defined in 40 CFR Part 63, Subpart Mmmm, comprise the affected source that is subject to 40 CFR Part 63, Subpart Mmmm:
  - (1) All coating operations as defined in 40 CFR 63.3981;
  - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings thinners and/or other additives, and cleaning materials; and
  - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (e) Definitions of terms used in this section that are contained in 40 CFR 63.2 or in 40 CFR 63.3981 are incorporated herein by reference.

D.5.3 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Automobiles and Light Duty Trucks: Limitations and Requirements [40 CFR Part 63, Subpart IIII] [40 CFR 63.3081] [40 CFR 63.3082] [40 CFR 63.3176]

- (a) The provisions of 40 CFR Part 63, Subpart IIII (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Automobiles and Light Duty Trucks) apply to the affected source (as defined in (c) below). A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/auto/autopg.html>. Pursuant to 40 CFR 63.3083(b), the Permittee must comply with these requirements on and after June 25, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) Consistent with 40 CFR 63.3081, the emission units described in this Section D.5 which also meet one or more of the descriptions listed below, to the extent employed in the surface coating of automobiles and light-duty trucks as defined in 40 CFR Part 63, Subpart IIII, comprise the affected source that is subject to 40 CFR Part 63, Subpart IIII:
- (1) All coating operations as defined in 40 CFR 63.3176;
  - (2) All storage containers and mixing vessels in which coatings, thinners, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings, thinners, and cleaning materials; and
  - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Definitions of terms used in this section that are contained in 40 CFR 63.2 or in 40 CFR 63.3176 are incorporated herein by reference.

D.5.4 Volatile Organic Compounds (VOC) Best Available Control Technology for Volatile Organic Compounds (VOC) [326 IAC 2-2] [40 CFR 52.21]

Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, and 326 IAC 2-2-3, BACT for VOC for the facilities described in this section is the following:

- (a) The daily VOC emissions from each facility shall not exceed the corresponding limits in the following table. Compliance with these limits shall be demonstrated pursuant to Condition D.5.11:

Facility	lb VOC/gal coating solids	kg VOC/liter coating solids
PVC Coating Booth #1	0.25	0.03
Black and Wax Booth (black phthalic resin application)	17.9	2.14
Black and Wax Booth (inner panel wax application)	6.43	0.77
Anticorrosion Coating Booth (underfloor wax application)	3.59	0.43

- (b) The following spray application methods must be used whenever applying the following coatings:
  - (1) PVC Undercoat - Airless  
(in PVC Coating Booth #1)
  - (2) Underfloor Wax - Airless  
(in Anticorrosion Booth)
  - (3) Inner Panel Wax - Air or Airless with minimum transfer  
(in Black and Wax Booth) efficiency of 80%
- (c) Pretreatment Cleaning shall utilize only VOC free detergents, conditioners, and rinses in the body and chassis pre-treatment cleaning operations.
- (d) Pertaining to purge solvent use:
  - (1) Purge solvent capture systems will be utilized each time that any coating application equipment is purged. The purge solvent capture systems shall have a minimum overall capture efficiency of at least eighty percent (80%). Collected purge solvent shall be retained in closed containers until such time as they are shipped offsite for disposal or recycled.
  - (2) Block painting will be utilized whenever possible to minimize color changes and the resulting purge.

Compliance with these limitations, and those contained in Conditions D.1.3, D.2.4, D.3.4, D.4.5, D.6.5 and D.7.1, will satisfy the requirements of 326 IAC 2-2 and 40 CFR 52.21.

**D.5.5 Prevention of Significant Deterioration - Best Available Control Technology for Nitrogen Oxides (NO<sub>x</sub>) [40 CFR 52.21] [326 IAC 2-2]**

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Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, and 326 IAC 2-2-3, BACT for NO<sub>x</sub> for the natural gas combustion facilities described in this section is the following:

- (a) The NO<sub>x</sub> emissions from the PVC Coating Booth #1 Preheat Burner, the Black and Wax Coat Booth burner, the two (2) insignificant PVC Seal Oven burners, the two (2) insignificant natural gas-fired burners, and the insignificant Anticorrosion Booth burner shall not exceed 0.10 pounds per million Btu (lb/MMBtu) heat input each; and
- (b) All combustion facilities listed in this section shall use low-NO<sub>x</sub> natural gas burners.

Compliance with these limitations, and those contained in Conditions D.2.5, D.3.5, D.4.6 and D.7.2, will satisfy the requirements of 40 CFR 52.21 and 326 IAC 2-2.

**D.5.6 Volatile Organic Compound (VOC) Limitations [326 IAC 8-2-9]**

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Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge of VOC into the atmosphere in excess of the following limits:

- (a) The daily VOC emissions from PVC Coating (PVC Coating Booth #1 and PVC Coating Booth #2) shall not exceed 3.5 pounds of VOC per gallon of coating less water (0.42 kilograms of VOC per liter of coating less water).
- (b) The daily VOC emissions from Anticorrosion Coating (Black and Wax Booth and Anticorrosion Coating Booth) shall not exceed 3.0 pounds of VOC per gallon of coating less water (0.36 kilograms of VOC per liter of coating less water). This limit applies to the weighted average of all Anticorrosion coatings.

Compliance with these limits shall be demonstrated pursuant to Condition D.5.11.

**D.5.7 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]**

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of the PVC Coating Booths, Black and Wax Booth, and Anticorrosion Coating Booth during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

**D.5.8 Particulate Matter (PM) [40 CFR Part 52 Subpart P]**

Pursuant to CP-157-9619-00050, issued on February 11, 1999, and 40 CFR Part 52 Subpart P, the particulate matter (PM) from the facilities described in this section shall be limited using one of the following equations (as applicable):

Those activities with a process weight rate of less than 100 pounds per hour shall be limited to 0.551 pounds per hour.

Or, depending on the process weight rate:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour.}$$

**D.5.9 Particulate [326 IAC 6-3-2(d)]**

Pursuant to 326 IAC 6-3-2(d), particulate emissions from the Black and Wax Booth and PVC Coating Booth #1 shall be controlled by dry filters. Particulate emissions from the Anticorrosion Coating Booth and PVC Coating Booth #2 shall be controlled by water washes. The Permittee shall operate the control devices in accordance with manufacturer's specifications.

**D.5.10 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their respective control devices.

**Compliance Determination Requirements**

**D.5.11 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]**

Compliance with the VOC emission limits in Conditions D.5.4 and D.5.6 shall be determined with the following equations (as applicable):

$$\text{VOC emissions (lb VOC/gal coating solids)} = [ 3 (C \times U) / 3 U ]$$

Where:

C is the VOC content of the coating in pounds of VOC per gallon of coating solids as applied; and  
U is the usage rate of the coating in gallons per day.

Or, if the emission limit is in units of pounds of VOC per gallon of coating less water:

$$\text{VOC emissions (lb VOC/gal coating less water)} = [ 3 (C \times U) / 3 U ]$$

Where:

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

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

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

#### **D.5.12 Operator Training Program**

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The Permittee shall implement an operator training program.

- (a) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the dry filters on the PVC Booth #1 and Black Coat and Wax Coating operations, and of the water wash control systems on the PVC Booth #2 and Anticorrosion Coating operations. All existing operators shall be trained upon permit issuance. All new operators shall be trained upon hiring or transfer.
- (b) Training shall include proper filter alignment, filter inspection and maintenance, proper water level of the water pans, proper placement and configuration of baffle panels, other factors that affect water pan capture efficiency (e.g., debris in the water pans), and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.
- (c) All operators shall be given refresher training annually.

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

#### **D.5.13 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products and Surface Coating of Automobiles and Light Duty Trucks - Notifications [40 CFR 63.3910][40 CFR 63.3110]**

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- (a) The Permittee must submit the applicable notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, and as provided in paragraphs (b) and (c) below.
- (b) With respect to 40 CFR Part 63, Subpart Mmmm, the Permittee must submit the:
  - (1) Initial notification required by 40 CFR 63.9(b) and 40 CFR 63.3910 no later than January 2, 2005. If using compliance with the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (40 CFR Part 63, Subpart IIII) as provided for under 40 CFR 63.3881(d) to constitute compliance with this subpart for any or all of the metal parts coating operations, then the Permittee must include a statement to this effect in the initial notification, and no other notifications are required under this subpart in regard to those metal parts coating operations.
  - (2) Notification Of Compliance Status required by 40 CFR 63.9(h) and 40 CFR 63.3910 no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).
- (c) With respect to 40 CFR Part 63, Subpart IIII, the Permittee must submit the:
  - (1) Initial notification required by 40 CFR 63.9(b) and 40 CFR 63.3110 no later than June 25, 2005. Existing sources that have previously submitted notifications of applicability of this rule pursuant to Section 112(j) of the CAA are not required to submit an initial notification under 40 CFR 63.9(b) except to identify and

describe all additions to the affected source made pursuant to 40 CFR 63.3082(c).

- (2) Notification Of Compliance Status required by 40 CFR 63.9(h) and 40 CFR 63.3110 no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3160. The notification of compliance status must contain the information specified in 40 CFR 63.3110(c), paragraphs (1) through (12) and in 40 CFR 63.9(h).
- (d) All notifications, required by (a), (b) and (c) above, must be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Director, Air and Radiation Division  
77 Jackson Boulevard  
Chicago, Illinois 60604-3590

**D.5.14 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]**

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The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information from the Notification Of Compliance Status (NOCS) in the Title V permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, and include: information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR Part 63, Subpart M and Subpart IIII, a description of the affected source and activities subject to the standards, and a description of how the Permittee will meet the applicable requirements of the standards.
- (b) The significant permit modification application shall be submitted no later than April 2, 2006 and shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

**D.5.15 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.5.4 and D.5.6, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limits established in Conditions D.5.4 and D.5.6. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each coating material (as applied, less water) and the VOC content of each solvent (including purge solvents and thinners) used less water.
- (2) The solids content of each coating material used (as applied).
- (3) The amount of coating material and solvent (including purge solvents and thinners) used on a 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 solvent.
- (4) The volume weighted average VOC content of the coatings used (as applied) for each day.
- (b) To document compliance with Condition D.5.10, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) To document compliance with Condition D.5.12, the Permittee shall maintain copies of the training program, and the list of trained operators. Training records shall be maintained on site or available within 1 hour for inspection by IDEM.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.5.16 Reporting Requirements

- (a) To document compliance with Conditions D.5.4 and D.5.6, compliance reports shall be submitted on a calendar monthly basis within 21 days of the end of each month. The reports shall contain the following data for each operation on a monthly basis, based on actual daily coating usage:
  - (1) Average coating VOC content in kg VOC/liter coating as applied
  - (2) Average coating VOC content in kg VOC/liter coating, as applied, less water
  - (3) Average coating volume % solids as applied
  - (4) Average kg VOC/liter of coating solids as applied
  - (5) Coating usage in liters

When more than one coating has been averaged for compliance purposes, the average shall be determined on a weighted average by volume basis. All data necessary to verify weighted averages shall be included in the report.

**SECTION D.6**

**FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)]:**

- (j) Application of adhesives to various vehicle parts, identified as Unit 010, constructed in 1989.
- (k) Three (3) storage tanks, identified collectively as Unit 011, and including the following equipment:
  - (1) Gasoline storage tank, with a capacity of 15,000 gallons, constructed in 1988, using a certified vapor collection and control system;
  - (2) Purge thinner storage tank, with a capacity of 5,000 gallons, constructed in 1988, using a certified vapor collection and control system; and
  - (3) Waste purge thinner storage tank, with a capacity of 6,000 gallons, constructed in 1992.
- (l) Purge solvent recovery system, identified as Unit 012, with a maximum throughput of 168,000 gallons per year, constructed in 2001, and including the following equipment:
  - (1) Dirty purge Tank A, with a capacity of 1,096 gallons;
  - (2) Distillation overs Tank B, with a capacity of 1,096 gallons;
  - (3) Clean solvent Tank C, with a capacity of 1,096 gallons;
  - (4) Methanol Tank E, with a capacity of 1,096 gallons;
  - (5) Xylene Tank, with a capacity of 1,096 gallons;
  - (6) Acetone Tank, with a capacity of 1,096 gallons;
  - (7) Clean purge Tank OK, with a capacity of 1,949 gallons; and
  - (8) One (1) distillation unit.

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

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

D.6.1 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A][Table 2 to 40 CFR Part 63, Subpart IIII][Table 2 to 40 CFR Part 63, Subpart MMMM][Table 2 to 40 CFR Part 63, Subpart PPPP][40 CFR 63.3101][40 CFR 63.3901][40 CFR 63.4501]

- (a) The provisions of 40 CFR Part 63, Subpart A - General Provisions (which are incorporated by reference as 326 IAC 20-1-1):
  - (1) apply to the affected source to the extent expressly specified by Table 2 to 40 CFR Part 63, Subpart MMMM, Table 2 to 40 CFR Part 63, Subpart PPPP, and Table 2 to 40 CFR Part 63, Subpart IIII; and
  - (2) to the extent applicable to the affected source, are incorporated in this condition by reference. The Permittee must comply with these requirements on and after January 2, 2007 (for 40 CFR Part 63, Subpart MMMM), April 19, 2007 (for 40

CFR Part 63, Subpart PPPP) and June 2, 2007 (for 40 CFR Part 63, Subpart IIII).

- (b) Since the applicable requirements addressed by paragraph (a) of this condition are included and specifically identified (by reference) in this permit, the permit shield established by Section B of this permit in the condition titled Permit Shield, and authorized by 326 IAC 2-7-15, applies to paragraph (a) of this condition.

D.6.2 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products: Limitations and Requirements [40 CFR Part 63, Subpart MMMM][40 CFR 63.3882][40 CFR 63.3883][40 CFR 63.3890]

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- (a) The provisions of 40 CFR Part 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source (as defined in (d) below). A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.3891, the Permittee must comply with these requirements on and after January 2, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The application of adhesives to metal parts and the purge solvent recovery system described in this Section D.6 meet the applicability criteria of both 40 CFR Part 63, Subpart MMMM (Surface Coating of Miscellaneous Metal Parts and Products) and 40 CFR Part 63, Subpart IIII (Surface Coating of Automobiles and Light-Duty Trucks). As a result, the Permittee must select and implement a valid option for complying with this rule, and any other applicable rules of 40 CFR Part 63, pursuant to 40 CFR 63.3881(d) and (e).
- (d) Consistent with 40 CFR 63.3881(a), the emission units described in this Section D.6 which also meet one or more of the descriptions listed below, to the extent employed in the surface coating of metal parts or products as defined in 40 CFR Part 63, Subpart MMMM, comprise the affected source that is subject to 40 CFR Part 63, Subpart MMMM:
- (1) All coating operations as defined in 40 CFR 63.3981;
  - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings thinners and/or other additives, and cleaning materials; and
  - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (e) Definitions of terms used in this section that are contained in 40 CFR 63.2 or in 40 CFR 63.3981 are incorporated herein by reference.

D.6.3 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products: Limitations and Requirements [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482]

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- (a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source (as defined in (d) below). A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40

CFR 63.4483(b), the Permittee must comply with these requirements on and after April 19, 2007.

- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The application of adhesives to plastic parts and the purge solvent recovery system described in this Section D.6 meet the applicability criteria of both 40 CFR Part 63, Subpart PPPP (Surface Coating of Plastic Parts and Products) and 40 CFR Part 63, Subpart IIII (Surface Coating of Automobiles and Light-Duty Trucks). As a result, the Permittee must select and implement a valid option for complying with this rule, and any other applicable rules of 40 CFR Part 63, pursuant to 40 CFR 63.4481(d) and (e).
- (d) Consistent with 40 CFR 63.4481, the emission units described in this Section D.6 which also meet one or more of the descriptions listed below, to the extent employed in the surface coating of plastic parts and products as defined in 40 CFR Part 63, Subpart PPPP, comprise the affected source that is subject to 40 CFR Part 63, Subpart PPPP:
  - (1) All coating operations as defined in 40 CFR 63.4581;
  - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
  - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (e) Definitions of terms used in this section that are contained in 40 CFR 63.2 or in 40 CFR 63.4581 are incorporated herein by reference.

D.6.4 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Automobiles and Light Duty Trucks: Limitations and Requirements [40 CFR Part 63, Subpart IIII] [40 CFR 63.3081] [40 CFR 63.3082] [40 CFR 63.3176]

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- (a) The provisions of 40 CFR Part 63, Subpart IIII (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Automobiles and Light Duty Trucks) apply to the affected source (as defined in (c) below). A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/auto/autopg.html> Pursuant to 40 CFR 63.3083(b), the Permittee must comply with these requirements on and after June 25, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) Consistent with 40 CFR 63.3081, the emission units described in this Section D.6 which also meet one or more of the descriptions listed below, to the extent employed in the surface coating of automobiles and light-duty trucks as defined in 40 CFR Part 63, Subpart IIII, comprise the affected source that is subject to 40 CFR Part 63, Subpart IIII:
  - (1) All coating operations as defined in 40 CFR 63.3176;

- (2) All storage containers and mixing vessels in which coatings, thinners, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings, thinners, and cleaning materials; and
  - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Definitions of terms used in this section that are contained in 40 CFR 63.2 or in 40 CFR 63.3176 are incorporated herein by reference.

**D.6.5 Prevention of Significant Deterioration (PSD) - Best Available Control Technology for Volatile Organic Compounds (VOC) [326 IAC 2-2] [40 CFR 52.21]**

Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, and 326 IAC 2-2-3, BACT for VOC for the facilities described in this section is the following:

- (a) Purge solvent capture systems will be utilized each time that any coating application equipment is purged. The purge solvent capture systems shall have a minimum overall capture efficiency of at least eighty percent (80%). Collected purge solvent shall be retained in closed containers until such time as they are shipped offsite for disposal or recycled.
- (b) The 15,000-gallon gasoline storage tank (one of three tanks identified as 011) shall be equipped with:
  - (1) a submerged fill pipe,
  - (2) pressure relief valve set to 0.7 psi or orifice of 0.5 inches in diameter, and
  - (3) a Stage I vapor balance system between the tank and transport.

Tank trucks shall not be unloaded unless they are properly equipped and connected to the vapor balance system and the system is in operation.

Compliance with these limitations, and those contained in Conditions D.1.3, D.2.4, D.3.4, D.4.5, D.5.4 and D.7.1, will satisfy the requirements of 326 IAC 2-2, 326 IAC 8-1-6 and 40 CFR 52.21.

**D.6.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their respective control devices.

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

**D.6.7 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products, Surface Coating of Plastic Parts and Products and Surface Coating of Automobiles and Light Duty Trucks - Notifications [40 CFR 63.3910] [40 CFR 63.4510][40 CFR 63.3110]**

- (a) The Permittee must submit the applicable notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, and as provided in paragraphs (b) and (c) below.
- (b) With respect to 40 CFR Part 63, Subparts Mmmm and Pppp, the Permittee must submit the:
  - (1) Initial notifications required by 40 CFR 63.9(b), 40 CFR 63.3910, and 40 CFR 63.4510 no later than January 2, 2005 (for 40 CFR Part 63, Subpart Mmmm)

and April 19, 2005 (for 40 CFR Part 63, Subpart PPPP). If using compliance with the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (40 CFR Part 63, Subpart IIII) as provided for under 40 CFR 63.3881(d) and 63.4881(d) to constitute compliance with these subparts for any or all of the metal or plastic parts coating operations, then the Permittee must include a statement to this effect in the initial notifications, and no other notifications are required under these subparts in regard to those metal or plastic parts coating operations.

- (2) Notification Of Compliance Status required by 40 CFR 63.9(h), 40 CFR 63.3910, and 40 CFR 63.4510 no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, 63.3960, 63.4540, 63.4550 or 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11), 40 CFR 63.4510(c), paragraphs (1) through (11), and any additional information specified in 40 CFR 63.9(h).
- (c) With respect to 40 CFR Part 63, Subpart IIII, the Permittee must submit the:
  - (1) Initial notification required by 40 CFR 63.9(b) and 40 CFR 63.3110 no later than June 25, 2005. Existing sources that have previously submitted notifications of applicability of this rule pursuant to Section 112(j) of the CAA are not required to submit an initial notification under 40 CFR 63.9(b) except to identify and describe all additions to the affected source made pursuant to 40 CFR 63.3082(c).
  - (2) Notification Of Compliance Status required by 40 CFR 63.9(h) and 40 CFR 63.3110 no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3160. The notification of compliance status must contain the information specified in 40 CFR 63.3110(c), paragraphs (1) through (12) and in 40 CFR 63.9(h).
- (d) All notifications, required by (a), (b) and (c) above, must be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Director, Air and Radiation Division  
77 Jackson Boulevard  
Chicago, Illinois 60604-3590

D.6.8 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information from the Notification Of Compliance Status (NOCS) in the Title V permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, and include: information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR Part 63, Subpart MMMM, Subpart PPPP and Subpart IIII, a description of the affected source and activities subject to the standards,

and a description of how the Permittee will meet the applicable requirements of the standards.

- (b) The significant permit modification application shall be submitted no later than April 2, 2006 and shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

#### D.6.9 Record Keeping Requirements

- (a) Pursuant to 326 IAC 12, the Permittee shall maintain records of the dimensions and an analysis showing the capacity of the 15,000-gallon gasoline storage tank. These records shall be maintained for the life of the source.
- (b) To document compliance with Condition D.6.6, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) To document compliance with Condition D.6.3, the Permittee shall collect and keep records of the data and information specified in 40 CFR 63.4530, paragraphs (c) through (h). Failure to collect and keep these records is a deviation from the applicable standard.
- (1) These records shall be in a form suitable and readily available for expeditious review. Where appropriate, the records may be maintained as electronic spreadsheets or as a database.
- (2) The Permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee shall keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee may keep the records off-site for the remaining 3 years.
- (3) Compliance with the record keeping requirements of 40 CFR Part 63, Subpart IIII satisfies these record keeping requirements.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.6.10 Reporting Requirements

In order to demonstrate compliance with Condition D.6.3, the Permittee shall submit semiannual compliance reports for each affected source according to the requirements of 40 CFR 63.4520(a), paragraphs (1) through (7). The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in 40 CFR 63.4520, paragraph (a)(2). Compliance with the reporting requirements of 40 CFR Part 63, Subpart IIII satisfies this reporting requirement.

**SECTION D.7**

**FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)]:**

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

- (a) Space heaters, process heaters, or boilers using the following fuels: Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
  - (1) Six (6) general hot water boilers with a combined heat input capacity of 23.08 MMBtu/hr. [40 CFR 52.21] [326 IAC 2-2] [326 IAC 6-2-4]
  - (2) Other insignificant natural gas combustion units: [40 CFR 52.21] [326 IAC 2-2]
    - (A) Stamping Shop Steam Cleaner
    - (B) Distillation Room Heater
    - (C) Makeup Air Units (7)
    - (D) Unit Heaters (50)
    - (E) Door Heaters (14)
    - (F) Air Handling Units (44)
    - (G) Heating and Ventilation Units (6)
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment: [40 CFR 52.21] [326 IAC 2-2] [40 CFR Part 52 Subpart P]
  - (1) One (1) Stamping Shop; and
  - (2) One (1) Body Shop.
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (d) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: [326 IAC 6-3-2] [40 CFR Part 52 Subpart P]
  - (1) Grinding and machining operations occurring in the engine manufacturing facility; and
  - (2) Other deburring; buffing; polishing; abrasive blasting activities; pneumatic conveying; and woodworking operations.

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

**Facility Description [326 IAC 2-7-5(15)]: (continued)**

- (e) Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO<sub>2</sub>; 5 lb/hr or 25 lb/day NO<sub>x</sub>; 3 lb/hr or 15 lb/day VOC; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:
- (1) Gasoline Fill Operations (Benzene, Naphthalene, Ethylbenzene, Styrene, Toluene, Hexane, Xylene, Methyl Tert-butyl Ether) [40 CFR 52.21] [326 IAC 2-2]
  - (2) The following storage tanks permitted under OP 79-09-93-0454, issued on July 26, 1989:
    - (A) One (1) double-walled fixed-roof engine oil storage tank, with a capacity of 10,000 gallons; and
    - (B) One (1) double-walled fixed-roof gear oil storage tank, with a capacity of 10,000 gallons;
  - (3) The following activities permitted under E 157-14535-00050, issued on October 10, 2001: assembly and testing (including engine test stands);
  - (4) Manual solvent wipedown.

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

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

**D.7.1 Prevention of Significant Deterioration (PSD) - Best Available Control Technology for Volatile Organic Compounds (VOC) [326 IAC 2-2] [40 CFR 52.21]**

Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, and 326 IAC 2-2-3, BACT for VOC for the insignificant vehicle gasoline fueling operation is the use of a Stage II vapor balance control system. This system shall be in operation whenever vehicles are being fueled.

Compliance with this limitation, and those contained in Conditions D.1.3, D.2.4, D.3.4, D.4.5, D.5.4 and D.6.5, will satisfy the requirements of 326 IAC 2-2 and 40 CFR 52.21.

**D.7.2 Prevention of Significant Deterioration - Best Available Control Technology for Nitrogen Oxides (NO<sub>x</sub>) [40 CFR 52.21] [326 IAC 2-2]**

Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, and 326 IAC 2-2-3, BACT for NO<sub>x</sub> for the insignificant natural gas combustion equipment described in this section is the following:

- (a) The NO<sub>x</sub> emissions from the following insignificant natural gas combustion facilities shall not exceed 0.10 pounds per million Btu (lb/MMBtu) heat input each:
- (1) Stamping Shop Steam Cleaner
  - (2) Hot Water Boilers (6)
  - (3) Makeup Air Units (7)
  - (4) Unit Heaters (33 - does not include 17 unit heaters in new engine manufacturing facility)

- (5) Door Heaters (12 - does not include 2 door heaters in new engine manufacturing facility)
  - (6) Air Handling Units (38 - does not include 6 air handling units in new engine manufacturing facility)
  - (7) Heating and Ventilation Units (6)
- (b) All combustion operations at the source shall use low-NO<sub>x</sub> natural gas burners.

Compliance with these limitations, and those contained in Conditions D.2.5, D.3.5, D.4.6 and D.5.5, will satisfy the requirements of 40 CFR 52.21 and 326 IAC 2-2.

D.7.3 Particulate Matter from Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, the particulate matter emissions from the six (6) insignificant natural gas-fired general hot water boilers with a combined heat input capacity of 23.08 MMBtu/hr.

This limitation is based on the following equation:

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

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.  
Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. (Q = 34.17 MMBtu/hr).

D.7.4 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 and Exemption No. 157-14535-00050, issued on October 10, 2001, the allowable particulate emission rate from the insignificant metal machining of engine crankshaft in the engine manufacturing facility shall not exceed 1.03 pounds per hour when operating at a process weight rate of 0.128 tons per hour. This limit was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour;  
and P = process weight rate in tons per hour.  
= 14 kg/unit crankshaft \* 6,000 units/mo  
\* 1 mo/30 days \* 1 day/24 hr \* 1 ton/907 kg  
= 0.128 ton/hr

D.7.5 Particulate Matter (PM) [40 CFR Part 52 Subpart P]

Pursuant to 40 CFR Part 52 Subpart P, particulate emissions from the insignificant robotic welding, brazing equipment, cutting torches, soldering equipment, grinding equipment, or machining equipment (other than the metal machining of engine crankshaft) shall not exceed 0.551 pounds per hour when operating at a process weight rate of less than 100 pounds per hour.

D.7.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the insignificant gasoline filling operation and its Stage II vapor balance control system.

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

**D.7.7 Record Keeping Requirements**

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- (a) To document compliance with Condition D.7.6, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
  
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Subaru of Indiana Automotive, Inc.  
Source Address: 5500 State Road 38 East, Lafayette, Indiana 47903  
Mailing Address: 5500 State Road 38 East, Lafayette, Indiana 47903  
Part 70 Permit No.: T157-5906-00050

**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 BRANCH  
100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Subaru of Indiana Automotive, Inc.  
Source Address: 5500 State Road 38 East, Lafayette, Indiana 47903  
Mailing Address: 5500 State Road 38 East, Lafayette, Indiana 47903  
Part 70 Permit No.: T157-5906-00050

**This form consists of 2 pages**

**Page 1 of 2**

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
  - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

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

**Page 2 of 2**

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

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

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

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

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

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
Compliance Data Section**

**Part 70 Quarterly Report**

Source Name: Subaru of Indiana Automotive, Inc.  
Source Address: 5500 State Road 38 East, Lafayette, Indiana 47903  
Mailing Address: 5500 State Road 38 East, Lafayette, Indiana 47903  
Part 70 Permit No.: T157-5906-00050  
Facility: Natural gas combustion units  
Parameter: NO<sub>x</sub>, PM  
Limit: Less than 2,380 MMCF per twelve (12) consecutive month period with compliance determined at the end of each month.

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

Month	Natural Gas Usage This Month (MMCF)	Natural Gas Usage for Past 11 Months (MMCF)	Total Natural Gas Usage for 12 Month Period (MMCF)
Month 1			
Month 2			
Month 3			

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

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

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

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

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
Compliance Data Section**

**Part 70 Quarterly Report**

Source Name: Subaru of Indiana Automotive, Inc.  
Source Address: 5500 State Road 38 East, Lafayette, Indiana 47903  
Mailing Address: 5500 State Road 38 East, Lafayette, Indiana 47903  
Part 70 Permit No.: T157-5906-00050  
Facility: Source-wide  
Parameter: # vehicles produced  
Limit: Less than 262,000 vehicles per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

Month	Vehicle Production This Month (# vehicles)	Vehicle Production for Past 11 Months (# vehicles)	Total Vehicle Production for 12 Month Period (# vehicles)
Month 1			
Month 2			
Month 3			

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

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

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

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

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
Compliance Data Section**

**Part 70 Quarterly Report**

Source Name: Subaru of Indiana Automotive, Inc.  
Source Address: 5500 State Road 38 East, Lafayette, Indiana 47903  
Mailing Address: 5500 State Road 38 East, Lafayette, Indiana 47903  
Part 70 Permit No.: T157-5906-00050  
Facility: Source-wide surface coating operations, associated purge solvent operations and storage  
Parameter: VOC  
Limit: Less than 1,128 tons VOC per twelve (12) consecutive month period with compliance determined at the end of each month.

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

Month	VOC emissions This Month (tons)	VOC emissions for Past 11 Months (tons)	Total VOC emissions for 12 Month Period (tons)
Month 1			
Month 2			
Month 3			

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

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

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

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

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**Compliance Data Section**  
  
**Part 70 Quarterly Report**

Source Name: Subaru of Indiana Automotive, Inc.  
Source Address: 5500 State Road 38 East, Lafayette, Indiana 47903  
Mailing Address: 5500 State Road 38 East, Lafayette, Indiana 47903  
Part 70 Permit No.: T157-5906-00050  
Facility: PVC #1 Coating Booth, Topcoat #1 Coating Booth, Topcoat #2 Coating Booth, Twotone and Repair Coating Booth, Intermediate (Surfacer) Coating Booth, Plastic Bumper Coating Booth, Black Coat and Wax Coating Booth, Anticorrosion Coating Booth, Touchup Trim Coating Booth, Touchup IPC Coating Booth, source-wide natural gas combustion, and all insignificant facilities that were permitted by the PSD (79) 1651 Revision.  
  
Parameter: PM  
Limit: Less than 23.1 tons PM/PM10 per twelve (12) consecutive month period with compliance determined at the end of each month, using the equation contained in Condition D.1.4 of this permit.

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

Month	PM/PM10 emissions This Month (tons)	PM/PM10 emissions for Past 11 Months (tons)	Total PM/PM10 emissions for 12 Month Period (tons)
Month 1			
Month 2			
Month 3			

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

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

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

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

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 Compliance Data Section**

**PART 70 OPERATING PERMIT  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Subaru of Indiana Automotive, Inc.  
 Source Address: 5500 State Road 38 East, Lafayette, Indiana 47903  
 Mailing Address: 5500 State Road 38 East, Lafayette, Indiana 47903  
 Part 70 Permit No.: T157-5906-00050

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

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do 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".</p>	
<p><input type="radio"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="radio"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p><b>Permit Requirement</b> (specify permit condition #)</p>	
<p><b>Date of Deviation:</b></p>	<p><b>Duration of Deviation:</b></p>
<p><b>Number of Deviations:</b></p>	
<p><b>Probable Cause of Deviation:</b></p>	
<p><b>Response Steps Taken:</b></p>	
<p><b>Permit Requirement</b> (specify permit condition #)</p>	
<p><b>Date of Deviation:</b></p>	<p><b>Duration of Deviation:</b></p>
<p><b>Number of Deviations:</b></p>	
<p><b>Probable Cause of Deviation:</b></p>	
<p><b>Response Steps Taken:</b></p>	

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

Form Completed By: \_\_\_\_\_

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

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

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

Attach a signed certification to complete this report.

**Issued June 28, 2004**  
**Indiana Department of Environmental Management**  
**Office of Air Quality**

Addendum to the Technical Support Document  
for a Part 70 Operating Permit

**Source Background and Description**

Source Name:	Subaru of Indiana Automotive, Inc.
Source Location:	5500 State Road 38 East, Lafayette, Indiana 47903
County:	Tippecanoe
SIC Code:	3711
Operation Permit No.:	T157-5906-00050
Permit Reviewer:	ERG/PG

On December 27, 2003, the Office of Air Quality (OAQ) had a notice published at the Tippecanoe County Public Library, 627 South Street, Lafayette, IN 47901 and in the Journal & Courier of Lafayette, Indiana, stating that Subaru of Indiana Automotive had applied for a Part 70 Permit to operate an automotive and light-duty truck assembly plant. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On February 5, 2004, Subaru of Indiana Automotive submitted comments on the proposed Part 70 Permit. The following is a summary of the comments and responses to those comments. Bold language has been added and language with a line through it has been deleted. The Table Of Contents has been modified, if applicable, to reflect any changes.

**Comment No. 1:**

Paragraph A.2(a)(7) should be revised to read as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]  
[326 IAC 2-7-5(15)]

---

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

(7) One (1) <sup>...</sup>~~ED~~ Body Cool Down area;

Also, since there are two PVC coating booths but only one PVC oven (one oven services both booths), paragraph A.2 (b) should be revised to read as follows:

- (1) One (1) PVC Coating #1 Booth #1, constructed in 1989, utilizing the airless spray method of application, using a dry filter as particulate matter control, and exhausting to one (1) stack, identified as PVC-1-2;
- (2) One (1) PVC Coating #1 Booth #1 Preheat, constructed in 1989, with one (1) natural gas-fired burner with a heat capacity of 16.8 MMBtu/hr;
- (3) **One (1) PVC Coating Booth #2, constructed in 1999, utilizing the airless spray method of application, using a water wash as particulate matter control, and exhausting to one (1) stack, identified as PVC-Booth 2;**
- (4) **One (1) PVC Coating Booth #2 Preheat, constructed in 1999, with one (1) natural gas-fired burner with a heat capacity of 16.8 MMBtu/hr;**

- ~~(3)(5)~~ One (1) PVC Seal #4 Oven, constructed in 1989, with two (2) insignificant natural gas-fired burners totaling 6.94 MM Btu/hr, using no controls, and exhausting to one stack, identified as PVC-Oven Exhaust;
- ~~(4)(6)~~ One (1) PVC Cool Down #4 area, constructed in 1989, using no controls, and exhausting to one (1) stack, identified as PVC-Cooling;
- ~~(7)~~ One (1) PVC Coating Booth #2, constructed in 1999, utilizing the airless spray method of application, using a water wash as particulate matter control, and exhausting to one (1) stack, identified as PVC-Booth2
- ~~(8)~~ One (1) PVC Coating Booth #2 Preheat, constructed in 1999, with one (1) natural gas-fired burner with a heat capacity of 16.8 MMBtu/hr;
- ~~(9)~~ One (1) PVC Seal #2 Oven, constructed in 1999, with two (2) insignificant natural gas-fired burners totaling 6.94 MM Btu/hr, using no controls, and exhausting to one stack, identified as PVC-Oven Exhaust;
- ~~(10)~~ One PVC Cool Down #2 area, constructed in 1999.

A new paragraph (m) should be added to read as follows:

- (m) The information contained in this Condition A.2 is solely descriptive in nature and does not constitute enforceable conditions.**

#### Response to Comment No. 1:

The paragraph at the beginning of Section A includes the following statement, which makes the addition of the suggested paragraph (m) unnecessary: "The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions."

IDEM has made the following revisions to the permit in response to this comment and to make the facility descriptions in Sections D.2 and D.4 consistent with Condition A.2 (note that some of the revisions indicated below were made in response to source comments addressed elsewhere in this document):

#### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (a) Electrodeposition Coating of Vehicle Bodies and Chassis (ED Coating Line), identified as Unit 001, with a capacity of 60 units per hour, constructed in 1989, consisting of the following units:
  - ...
  - (7) One (1) **ED** Body Cool Down area;
  - ...
- (b) Sealing and PVC Undercoating Line, identified as Unit 002, with a capacity of 60 units per hour, consisting of the following units:
  - (1) One (1) PVC Coating #4 Booth #1, constructed in 1989, utilizing the airless spray method of application, using a dry filter as particulate matter control, and exhausting to one (1) stack, identified as PVC-1-2;

- (2) One (1) PVC Coating #4 Booth #1 Preheat, constructed in 1989, with one (1) natural gas-fired burner with a heat input capacity of 16.8 MMBtu/hr;
- (3) One (1) PVC Coating Booth #2, constructed in 1999, utilizing the airless spray method of application, using a water wash as particulate matter control, and exhausting to one (1) stack, identified as PVC-Booth2;**
- (4) One (1) PVC Coating Booth #2 Preheat, constructed in 1999, with one (1) natural gas-fired burner with a heat input capacity of 16.8 MMBtu/hr;**
- ~~(3)(5)~~ (5) One (1) PVC Seal #4 Oven, constructed in 1989, with two (2) insignificant natural gas-fired burners totaling 6.94 MMBtu/hr, using no controls, and exhausting to one (1) stack, identified as PVC-Oven Exhaust; and
- ~~(4)(6)~~ (6) One (1) PVC Cool Down #4 area, constructed in 1989, using no controls, and exhausting to one (1) stack, identified as PVC Cooling.
- ~~(5)~~ One (1) PVC Coating #2 Booth, constructed in 1999, utilizing the airless spray method of application, using a water wash as particulate matter control, and exhausting to stack PVC-Booth2;
- ~~(6)~~ One (1) PVC Coating #2 Booth Preheat, constructed in 1999, with one (1) natural gas-fired burner with a heat input capacity of 16.8 MMBtu/hr;
- ~~(7)~~ One (1) PVC Seal #2 Oven, constructed in 1999, with two (2) insignificant natural gas-fired burners totaling 6.94 MMBtu/hr, using no controls, and exhausting to one (1) stack, identified as PVC-Oven Exhaust; and
- ~~(8)~~ One (1) PVC Cool Down #2 area, constructed in 1999.

**SECTION D-2 D.3**

**FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)]:**

(a) Electrodeposition Coating of Vehicle Bodies and Chassis (ED Coating Line), identified as Unit 001, with a capacity of 60 units per hour, constructed in 1989, consisting of the following units:

...

(7) One (1) **ED** Body Cool Down area;

...

**SECTION D-4 D.5**

**FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)]:**

- (b) Sealing and PVC Undercoating Line, identified as Unit 002, with a capacity of 60 units per hour, consisting of the following units:
  - (1) One (1) PVC Coating #1 Booth #1, constructed in 1989, utilizing the airless spray method of application, using a dry filter as particulate matter control, and exhausting to one (1) stack, identified as PVC-1-2;
  - (2) One (1) PVC Coating #1 Booth #1 Preheat, constructed in 1989, with one (1) natural gas-fired burner with a heat input capacity of 16.8 MMBtu/hr;
  - (3) One (1) PVC Coating Booth #2, constructed in 1999, utilizing the airless spray method of application, using a water wash as particulate matter control, and exhausting to one (1) stack, identified as PVC-Booth2;**
  - (4) One (1) PVC Coating Booth #2 Preheat, constructed in 1999, with one (1) natural gas-fired burner with a heat input capacity of 16.8 MMBtu/hr;**
  - ~~(5) One (1) PVC Seal #1 Oven, constructed in 1989, with two (2) insignificant natural gas-fired burners totaling 6.94 MMBtu/hr, using no controls, and exhausting to one (1) stack, identified as PVC-Oven Exhaust; and~~
  - ~~(6) One (1) PVC Cool Down #1 area, constructed in 1989, using no controls, and exhausting to one (1) stack, identified as PVC Cooling.~~
  - ~~(7) One (1) PVC Coating #2 Booth, constructed in 1999, utilizing the airless spray method of application, using a water wash as particulate matter control, and exhausting to stack PVC-Booth2;~~
  - ~~(8) One (1) PVC Coating #2 Booth Preheat, constructed in 1999, with one (1) natural gas-fired burner with a heat input capacity of 16.8 MMBtu/hr;~~
  - ~~(9) One (1) PVC Seal #2 Oven, constructed in 1999, with two (2) insignificant natural gas-fired burners totaling 6.94 MMBtu/hr, using no controls, and exhausting to one (1) stack, identified as PVC-Oven Exhaust; and~~
  - ~~(10) One (1) PVC Cool Down #2 area, constructed in 1999.~~

**D-4-6**

**D.5.5** Prevention of Significant Deterioration - Best Available Control Technology for Nitrogen Oxides (NO<sub>x</sub>) [40 CFR 52.21] [326 IAC 2-2]

Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, and 326 IAC 2-2-3, BACT for NO<sub>x</sub> for the natural gas combustion facilities described in this section is the following:

- (a) The NO<sub>x</sub> emissions from the PVC Coating #1 Booth #1 Preheat Burner, the Black and Wax Coat Booth burner, the two (2) insignificant PVC Seal #1 Oven burners, the two (2) insignificant natural gas-fired burners, and the insignificant Anticorrosion Booth burner shall not exceed 0.12 pounds per million Btu (lb/MMBtu) heat input each; and
- (b) All combustion facilities listed in this section shall use low-NO<sub>x</sub> natural gas burners.

Compliance with these limitations, **and those contained in Conditions D.2.5, D.3.5, D.4.6 and**

**D.7.2**, will satisfy the requirements of 40 CFR 52.21 and 326 IAC 2-2.

~~D.4.7~~

**D.5.6** Volatile Organic Compound (VOC) Limitations [326 IAC 8-2-9]

---

Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge of VOC into the atmosphere in excess of the following limits:

- (a) The daily VOC emissions from PVC Coating (PVC Coating #1 Booth #1 and PVC Coating #2 Booth #2) shall not exceed 3.5 pounds of VOC per gallon of coating less water (0.42 kilograms of VOC per liter of coating less water).
- (b) ...

Compliance with these limits shall be demonstrated pursuant to Condition ~~D.4.13~~ **D.5.11**.

~~D.4.8~~

**D.5.7** Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

---

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of the PVC Coating Booths, Black and Wax Booth, and Anticorrosion Coating Booth during cleanup or color changes shall be directed into containers. ...

~~D.4.9~~ Particulate Matter (PM) [40 CFR Part 52 Subpart P]

**D.5.8**

~~D.4.10~~

**D.5.9** Particulate [326 IAC 6-3-2(d)]

---

Pursuant to 326 IAC 6-3-2(d), particulate emissions from the Black and Wax Booth and the PVC Coating Booth #1 shall be controlled by dry filters. Particulate emissions from the Anticorrosion Coating Booth and PVC Coating Booth #2 shall be controlled by a water washes. The Permittee shall operate the control devices in accordance with manufacturer's specifications.

**Comment No. 2:**

A new paragraph (f) should be added to read as follows:

- (f) The information contained in this Condition A.3 is solely descriptive in nature and does not constitute enforceable conditions.

**Response to Comment No. 2:**

The paragraph at the beginning of Section A includes the following statement, which makes the addition of the suggested paragraph (f) unnecessary: "The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions." IDEM has made no revisions to the permit in response to this comment.

**Comment No. 3:**

Paragraph (h) of Condition B.11 (Emergency Provisions), which requires the Permittee to report emergencies in the Quarterly Deviation and Compliance Monitoring Report, is in conflict with both 326 IAC 2-7-5(3)(C)(ii) and 326 IAC 2-7-16(b)(5). Both cited rule provisions state that the submittal of written notice to the IDEM Commissioner under the emergency procedures of 326 IAC 2-7-16(b)(5) fulfills the requirements for deviation reporting under 326 IAC 2-7-5(3)(C)(ii). This point is expressly stated, as well, in the draft permit in paragraph (b)(5) of this Condition B.11. Thus, Condition B.11(h), being inconsistent with and contrary to both cited rule provisions, should be deleted from the draft permit.

### Response to Comment No. 3:

Paragraph (b)(5) of Condition B.11 pertains to the reporting of emergencies lasting at least one hour; these emergencies must be reported in an Emergency Occurrence Report Form within two days of the emergency and do not have to be certified by the Responsible Official. Paragraph (h) of Condition B.11 was intended to address the reporting of other types of emergencies that are not required to be reported pursuant to paragraph (b)(5). In order to clarify this paragraph, IDEM has revised the language as follows and to provide the Responsible Official's Certification of previously reported emergencies:

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

---

...

- (h) The Permittee shall include ~~all emergencies~~ in the Quarterly Deviation and Compliance Monitoring Report **all emergencies not previously reported pursuant to Paragraph (b)(5) of this Condition. Any emergencies that have been previously reported pursuant to Paragraph (b)(5) of this condition and certified by the Responsible Official need only be referenced by the date of the original report.**

### Comment No. 4:

Subaru requests that a new paragraph (b) be added to Condition B.12 (Permit Shield) to identify particular regulatory provisions that have been determined to be not applicable to Subaru's plant, which paragraph would read as follows:

- "(b) In addition to the nonapplicability determinations set forth in Sections D of this permit, the IDEM, OAQ has made the following determinations regarding this source:
- (1) 40 CFR 60, Subpart E – Incinerators: This source is not subject to 40 CFR 60, Subpart E, because none of the incinerators at the Subaru Plant burns or combusts solid waste as defined in 40 CFR 60.51(b).
  - (2) 40 CFR 60, Subpart CCCC – Commercial-Industrial Incinerators: This source is not subject to 40 CFR 60, Subpart CCCC, because none of the incinerators at the Subaru Plant is a new incineration unit as defined in 40 CFR 60.2015.
  - (3) 40 CFR 63, Subpart P P P P P – NESHAP for Engine Test Cell/Stand: This source, though nominally subject to 40 CFR 63, Subpart P P P P P, has no applicable requirements under such regulation, pursuant to 40 CFR 63.9290(b), since Subaru's engine test stand facilities, construction of which commenced in October 2000, prior to May 14, 2002, is an existing affected source as defined in 40 CFR 63.9290(a)(1)."

### Response to Comment No. 4:

IDEM agrees that the rules discussed above are not applicable to any operations at the source. Accordingly, IDEM has incorporated the following language into the permit:

#### 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 as provided in this Condition....

- (b) **IDEM, OAQ has made the following determinations regarding this source:**

**None of the facilities listed in Section A, Emission Units and Pollution Control**

**Equipment Summary are subject to the requirements of the following rules because of the following reasons:**

- (1) The thermal incinerators are not subject to the requirements of 40 CFR Part 60, Subpart E (Standards of Performance for Incinerators) because none of the incinerators at the source burns or combusts solid waste as defined in 40 CFR 60.51(b).**
- (2) The thermal incinerators are not subject to the requirements of 40 CFR Part 60, Subpart CCCC (Standards of Performance for Commercial and Industrial Solid Waste Incineration Units) because none of the incinerators at the source is a new incineration unit as defined in 40 CFR 60.2015.**
- (3) The insignificant engine test stands are not subject to the requirements of 40 CFR Part 63, Subpart P (National Emission Standards for Hazardous Air Pollutants for Engine Test Cells/Stands) because construction of each engine test stand facility at the source commenced in October 2000. Because this construction date is prior to May 14, 2002, SIA is an existing affected source as defined in 40 CFR 63.9290(a)(1), and therefore has no applicable requirements under this Subpart, pursuant to 40 CFR 63.9290(b).**

**(c)(b)** If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement ...

...

**Comment No. 5:**

Paragraph (d) of Condition B.16 (Permit Renewal) is superfluous and should be deleted from the draft permit. The authority of the U.S. EPA to terminate or revoke and reissue the permit for cause exists as a matter of statute independently of any provision in the permit. This state-issued permit cannot detract from or add to that federal statutory authority and thus this Condition is surplusage that may be deleted.

**Response to Comment No. 5:**

IDEM typically includes this provision to ensure that the source is aware of EPA's authority; however, it may be removed at the Permittee's request. Accordingly, IDEM has made the following revision to the permit:

B.16 Permit Renewal [326 IAC 2-7-4]

---

...

~~(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]~~  
~~If IDEM, OAQ fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.~~

**Comment No. 6:**

Paragraph (a)(2) of Condition C.16 (Compliance Response Plan - Preparation, Implementation, Records, and Reports), as drafted, contains a requirement for revision to the Compliance Response Plan which is overbroad and could lead to counterproductive and inefficient results. In a hypothetical circumstance in which Subaru attempted to return a deviation back to a

compliant condition through the use, on a trial basis, certain response steps not in its current Compliance Response Plan, Condition C.17(a)(2) would require Subaru to amend its Response Plan to incorporate such trial response steps whether or not they proved beneficial or effective. Subaru asks that this provision be revised to require amendment of the Compliance Response Plan only if ad hoc response steps are found to be effective or useful. The provision as proposed would read as follows:

“If, at any time, the Permittee takes reasonable response steps that: **(A)** are not set forth in the Permittee’s current Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan, **(B) the Permittee finds to be effective or useful, and (C) are documented by** the Permittee ~~documents such response~~ in accordance with subsection (e) below, the Permittee shall amend its Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan to include such response steps ~~taken.~~”

#### Response to Comment No. 6:

IDEM would not expect a Permittee to include response steps that were not beneficial or effective. Steps that a Permittee considers reasonable should be included in the plan in order to document that those steps should be taken in the event of a similar excursion occurring again. In order to clarify the requirements of this condition, IDEM has revised the permit language as follows:

#### C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- 
- (a) ...
- (1) ...
- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan to include such response steps **that the Permittee finds to be effective or useful.**

#### Comment No. 7:

As a general comment and recommendation, Subaru suggests that a separate part of Section D - say a new D.1 - be inserted which contains several limitations of plantwide applicability. Examples would include the overall vehicle production limit, the overall emission limit for PM/PM10, the overall natural gas consumption limit, and the overall VOC emission limit. Including these limitations in a general Section D would avoid the need to repeat them several times throughout various sections of Section D and would simplify and shorten the permit. This would also preclude one exceedance of a limit - such as, hypothetically, the production limit - from creating deviations from four separate, redundant permit conditions, instead of one.

#### Response to Comment No. 7:

While IDEM does not believe that having separate, redundant permit conditions affects how the source would be subject to any enforcement actions, IDEM does agree that creating a new part of Section D for source-wide conditions would simplify and shorten the permit. Accordingly, IDEM has made the following revisions to the permit (note that some of the revisions indicated below were made in response to source comments addressed elsewhere in this document):

### SECTION D.1

### FACILITY OPERATION CONDITIONS

<b>Source-Wide Operations</b>
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**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

**D.1.1 Prevention of Significant Deterioration (PSD) - Particulate Matter [326 IAC 2-2] [40 CFR 52.21]**

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Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, CP 157-4485-00050, issued September 13, 1995, CP 157-9619-00050, issued February 11, 1999, and as revised by this Part 70 permit, the Permittee must adhere to the following conditions:

- (a) The source shall not produce greater than 262,000 vehicles per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The particulate (PM/PM10) emissions from PVC #1 Coating Booth, Topcoat #1 Coating Booth, Topcoat #2 Coating Booth, Twotone and Repair Coating Booth, Intermediate (Surfacer) Coating Booth, Plastic Bumper Coating Booth, Black Coat and Wax Coating Booth, Anticorrosion Coating Booth, Touchup Trim Coating Booth, Touchup IPC Coating Booth, source-wide natural gas combustion, and all insignificant facilities that were permitted by the PSD (79) 1651 Revision shall not exceed 23.1 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) The visible emissions from any plant stack, vent or other emission point shall not exceed 10% opacity.
- (d) The total natural gas combustion at the source shall not exceed 2,380 million standard cubic feet per 12 consecutive month period with compliance determined at the end of each month.

Compliance with these limitations will render the requirements of 326 IAC 2-2 and 40 CFR 52.21 not applicable.

**D.1.2 Prevention of Significant Deterioration (PSD) - Carbon Monoxide and Sulfur Dioxide [326 IAC 2-2] [40 CFR 52.21]**

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Compliance with the total natural gas combustion limitation contained in Condition D.1.1(d) is equivalent to CO and SO<sub>2</sub> emissions of less than 100 tons per year and 40 tons per year, respectively, and renders the requirements of 326 IAC 2-2 and 40 CFR 52.21 not applicable.

**D.1.3 Prevention of Significant Deterioration (PSD) - Best Available Control Technology for Volatile Organic Compounds (VOC) [326 IAC 2-2][326 IAC 8-1-6] [40 CFR 52.21]**

---

Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, 326 IAC 2-2-3, and 326 IAC 8-1-6, the total VOC emissions from all surface coating and associated purge solvent operations and storage shall not exceed 1,128 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with this limitation, and those contained in Conditions D.2.4, D.3.4, D.4.5, D.5.4, D.6.5 and D.7.1, will satisfy the requirements of 326 IAC 2-2, 326 IAC 8-1-6 and 40 CFR 52.21.

**Compliance Determination Requirements**

**D.1.4 Prevention of Significant Deterioration (PSD) [326 IAC 2-2] [40 CFR 52.21]**

Compliance with the particulate (PM/PM10) emission limit in Condition D.1.1(b) shall be determined by using the following equation, which calculates pounds of particulate emissions per month, and adding the result to the calculated particulate emissions from the previous eleven months:

$$\text{Total Particulate Emissions (lb/month)} = \text{PVC \#1 Coating PM/PM10} + \text{Topcoat \#1 Coating PM/PM10} + \text{Topcoat \#2 Coating PM/PM10} + \text{Twotone and Repair Coating PM/PM10} + \text{Intermediate (Surfacer) Coating PM/PM10} + \text{Plastic Bumper Coating PM/PM10} + \text{Black Coat and Wax Coating PM/PM10} + \text{Anticorrosion Coating PM/PM10} + \text{Touchup Trim Coating PM/PM10} + \text{Touchup IPC Coating PM/PM10} + \text{Natural Gas Combustion PM/PM10} + \text{Insignificant PM/PM10 Sources}$$

Where:

$$\text{PM/PM10 emissions from each coating booth} = \sum_{i=1}^n (C_i * D_i * S_i) * (1-TE) * (1-CE);$$

Natural Gas Combustion PM/PM10 = natural gas usage (MMCF/month) \* 7.6 lb PM/MMCF;

Insignificant PM/PM10 Sources = PM/PM10 emissions in lb/month from insignificant facilities that were permitted by the PSD (79) 1651 Revision;

$C_i$  = usage of coating  $i$  in gallons per month;

$D_i$  = density of coating  $i$  in pounds per gallon;

$S_i$  = solids content of coating  $i$ , expressed as a decimal weight percent;

TE = solids transfer efficiency of the applicator for each booth, based on transfer efficiency determination tests; and

CE = overall particulate control efficiency for each booth, based on manufacturer data.

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

### D.1.5 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1, D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (11) below. Records maintained for (1) through (11) shall be taken as stated below and shall be complete and sufficient to establish compliance with the particulate emission limit established in Condition D.1.1(b), the natural gas combustion limit established in Conditions D.1.1(d) and D.1.2 and the VOC emission limit established in Condition D.1.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

(2) The amount of coating material and solvent (including purge solvents and

thinners) used on a 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 solvent.
- (3) The total VOC emissions from coatings and solvents (including purge solvents and thinners) for each day.
  - (4) The amount of coating material and solvent (including purge solvents and thinners) transferred off-site for disposal or recycling for each day.
  - (5) The density of each coating.
  - (6) The solids content of each coating, expressed as a decimal weight percent.
  - (7) The particulate transfer efficiency and particulate control efficiency for each surface coating booth, kept on a monthly basis, and an explanation of how these figures were determined.
  - (8) The process weight rate of the insignificant robotic welding, brazing equipment, cutting torches, soldering equipment, grinding equipment, and machining equipment.
  - (9) Any process information necessary to calculate particulate (PM/PM10) emissions from other insignificant operations described in Section D.7 (e.g., deburring, buffing, polishing, abrasive blasting activities, pneumatic conveying, woodworking operations, etc.).
  - (10) A log of the dates of use.
  - (11) The plant-wide metered natural gas usage for each month.
- (b) To document compliance with Condition D.1.1(a), the Permittee shall maintain records of daily vehicle production.
  - (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### **D.1.6 Reporting Requirements**

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- (a) Reports of monthly production totals shall be submitted to IDEM, OAQ on a quarterly basis to comply with Condition D.1.1(a). These reports shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.
- (b) Based on records required by Condition D.1.5(a), and to demonstrate compliance with Condition D.1.1(b), reports of monthly particulate (PM/PM10) emissions shall be submitted to IDEM, OAQ on a quarterly basis to comply with Condition D.1.1(b). This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the

**end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.**

- (c) Reports of monthly natural gas usage shall be submitted to IDEM, OAQ on a quarterly basis to comply with Conditions D.1.1(d) and D.1.2. These reports shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the month period being reported.**
- (d) Based on records required by Condition D.1.5(a), reports of monthly VOC emissions from surface coating operations and associated purge solvent operations and storage shall be submitted to IDEM, OAQ on a quarterly basis to comply with Condition D.1.3. These reports shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.**

**D.1.2**

**D.2.2 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products: Limitations and Requirements [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482]**

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...

- (d) Consistent with 40 CFR 63.4481, the emission units described in this Section ~~D.4~~ **D.2** which also meet one or more of the descriptions listed below, to the extent employed in the surface coating of plastic parts and products...**

~~D.1.3 Prevention of Significant Deterioration (PSD) - Particulate Matter [326 IAC 2-2] [40 CFR 52.21]~~

~~Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, CP 157-4485-00050, issued September 13, 1995, CP 157-9619-00050, issued February 11, 1999, and as revised by this Part 70 permit, the Permittee must adhere to the following conditions:~~

- ~~(a) The source shall not produce greater than 262,000 vehicles per twelve (12) consecutive month period with compliance determined at the end of each month.~~
- ~~(b) The particulate (PM/PM10) emissions from the entire source shall not exceed 23.1 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.~~
- ~~(c) The visible emissions from all stacks and emission points associated with the Plastic Bumper Coating Line shall not exceed 10% opacity.~~
- ~~(d) The total natural gas combustion at the source shall not exceed 2,380 million standard cubic feet per 12 consecutive month period with compliance determined at the end of each month.~~

~~Compliance with these limitations, and those contained in Conditions D.2.3, D.3.5, D.4.3, D.5.5, and D.6.1, will render the requirements of 326 IAC 2-2 and 40 CFR 52.2 not applicable.~~

~~D.1.4 Prevention of Significant Deterioration (PSD) - Carbon Monoxide and Sulfur Dioxide [326 IAC 2-2] [40 CFR 52.21]~~

~~Compliance with the total natural gas combustion limitation contained in Condition D.1.3(d) is equivalent to CO and SO<sub>2</sub> emissions of less than 100 tons per year, and 40 tons per year respectively, and will render the requirements of 326 IAC 2-2 and 40 CFR 52.21 not applicable.~~

**D.2.3 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Automobiles and Light Duty Trucks: Limitations and Requirements [40 CFR Part 63, Subpart IIII] [40 CFR 63.3081] [40 CFR 63.3082] [40 CFR 63.3176]**

- (a) The provisions of 40 CFR Part 63, Subpart IIII (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Automobiles and Light Duty Trucks) apply to the affected source (as defined in (c) below). A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/auto/autopg.html>. Pursuant to 40 CFR 63.3083(b), the Permittee must comply with these requirements on and after June 25, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) Consistent with 40 CFR 63.3081, the emission units described in this Section D.2 which also meet one or more of the descriptions listed below, to the extent employed in the surface coating of automobiles and light-duty trucks as defined in 40 CFR Part 63, Subpart IIII, comprise the affected source that is subject to 40 CFR Part 63, Subpart IIII:
- (1) All coating operations as defined in 40 CFR 63.3176;
  - (2) All storage containers and mixing vessels in which coatings, thinners, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings, thinners, and cleaning materials; and
  - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Definitions of terms used in this section that are contained in 40 CFR 63.2 or in 40 CFR 63.3176 are incorporated herein by reference.

~~D.1.5~~

**D.2.4 Prevention of Significant Deterioration (PSD) - Best Available Control Technology for Volatile Organic Compounds (VOC) [326 IAC 2-2][326 IAC 8-1-6] [40 CFR 52.21]**

Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, 326 IAC 2-2-3, and 326 IAC 8-1-6, BACT for the Plastic Bumper Coating Line is the following:

- (a) The daily VOC emissions from the PBL Coating Booth shall not exceed 38.2 pounds of VOC per gallon of applied solids (4.57 kilograms of VOC per liter of applied solids). This limit ~~applied~~**applies** to the weighted average of all plastics bumper coatings. Compliance with this limit shall be demonstrated pursuant to Condition ~~D.1.14~~ **D.2.9**.

...

- (e) — The total VOC emissions from source-wide surface coating and associated purge solvent operations and storage shall not exceed 1,128 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with these limitations, **and those contained in Conditions D.1.3, D.3.4, D.4.5, D.5.4, D.6.5 and D.7.1**, will satisfy the requirements of 326 IAC 2-2, 326 IAC 8-1-6 and 40 CFR 52.21.

~~D.1.10 Prevention of Significant Deterioration (PSD) [326 IAC 2-2] [40 CFR 52.21]~~

~~Compliance with the source-wide particulate (PM/PM10) emission limit in Condition D.1.3(b) shall be determined by using the following equation, which calculates pounds of particulate emissions per month, and adding the result to the calculated particulate emissions from the previous eleven months:~~

~~$$\text{Total Particulate Emissions (lb/month)} = \text{PVC \#1 Coating PM/PM10} + \text{Topcoat \#1 Coating PM/PM10} + \text{Topcoat \#2 Coating PM/PM10} + \text{Twotone and Repair Coating PM/PM10} + \text{Intermediate (Surfacer) Coating PM/PM10} + \text{Plastic Bumper Coating PM/PM10} + \text{Black Coat and Wax Coating PM/PM10} + \text{Anticorrosion Coating PM/PM10} + \text{Touchup Trim Coating PM/PM10} + \text{Touchup IPC Coating PM/PM10} + \text{Natural Gas Combustion PM/PM10} + \text{Insignificant PM/PM10 Sources}$$~~

~~Where:~~

~~$$\text{PVC \#1 Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.80) * (1-0.85);$$~~

~~$$\text{Topcoat \#1 Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85);$$~~

~~$$\text{Topcoat \#2 Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85);$$~~

~~$$\text{Twotone and Repair Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85);$$~~

~~$$\text{Intermediate (Surfacer) Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.516) * (1-0.85);$$~~

~~$$\text{Plastic Bumper Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.423) * (1-0.85);$$~~

~~$$\text{Black Coat and Wax Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85);$$~~

~~$$\text{Anticorrosion Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.80) * (1-0.85);$$~~

~~$$\text{Touchup Trim Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85);$$~~

~~$$\text{Touchup IPC Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85);$$~~

~~$$\text{Natural Gas Combustion PM/PM10} = \text{natural gas usage (MMCF/month)} * 7.6 \text{ lb PM/MMCF};$$~~

~~Insignificant PM/PM10 Sources = PM/PM10 emissions in lb/month from insignificant facilities that were permitted by the PSD (79) 1651 Revision;~~

~~C<sub>i</sub> = usage of coating i in gallons per month; and~~

~~S<sub>i</sub> = solids content of coating i in pounds of solids per gallon of coating.~~

~~D.1.12~~

**D.2.10** Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

- (a) Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the incinerator at all times the PBL Oven is in operation to ensure compliance with Condition ~~D.1.5~~ **D.2.4**.
- (b) The incinerator on the ~~PBL~~ **PBL** Oven shall be operated such that it achieves the minimum capture and destruction efficiencies specified in Condition ~~D.1.5~~ **D.2.4**.

~~D.1.14~~

**D.2.12** Thermal Incinerator Temperature [326 IAC 2-7-5(3)]

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal incinerator (~~BPR~~) for measuring operating temperature. For the purposes of this condition, continuous monitoring shall mean no less often than once per minute. The output of this system shall be recorded as a three-hour average. If the continuous monitoring system is not in operation, the temperature will be recorded manually once in a 15-minute period. Nothing in this permit shall excuse the Permittee from complying with the requirement to continuously monitor the temperature of the thermal incinerator.
- (b) From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal incinerator (~~BPR~~) at or above the three-hour average temperature of 1,400 EF. The Permittee shall determine the minimum three-hour average operating temperature from the most recent valid stack test that demonstrates compliance with Condition ~~D.1.5~~ **D.2.4**. This determination must be approved by IDEM.
- (c) The Permittee shall then operate the thermal incinerator (~~BPR~~) at or above the minimum three-hour average temperature as observed during the most recent compliant stack test following approval of that temperature.
- (d) The Permittee take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the three-hour average temperature of the thermal incinerator (~~BPR~~) is below the compliant three-hour average temperature. A three-hour average temperature that is below the compliant three-hour average temperature is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

~~D.1.19~~

**D.2.17** Record Keeping Requirements

- (a) To document compliance with Conditions ~~D.1.3(b), D.1.3(d), D.1.4, D.1.5, D.1.14 and D.1.15~~ **D.2.4, D.2.12 and D.2.13**, the Permittee shall maintain records in accordance with (1) through ~~(8)~~ **(6)** below. Records maintained for (1) through ~~(8)~~ **(6)** shall be taken as stated below and shall be complete and sufficient to establish compliance with ~~the particulate emission limit established in Condition D.1.3(b), the natural gas combustion limit established in Conditions D.1.3(d) and D.1.4, the VOC emission limits established in Condition D.1.5, D.2.4 and the compliance determination requirements established in Conditions D.1.14 and D.1.15~~ **D.2.12 and D.2.13**. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The VOC content of each coating material **(as applied)** and **the VOC content of each** solvent (including purge solvents and thinners) used less water.
- (2) The solids content of each coating material used **(as applied)**.
- (3) The amount of coating material and solvent (including purge solvents and thinners) used on a 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 solvent.
- (4) The volume weighted average VOC content of the coatings used **(as applied)** for each day.
- ~~(5) The total VOC emissions from coatings and solvents (including purge solvents and thinners) for each day.~~
- ~~(5)(6)~~ The continuous temperature records (on a three-hour average basis) for the thermal incinerator and the three-hour average temperature used to demonstrate compliance during the most recent compliant stack test.
- (6) Records of any thermal incinerator shutdowns due to duct pressure or fan amperage deviations.**
- ~~(7) Daily records of the duct pressure or fan amperage.~~
- ~~(8) The plant-wide metered natural gas usage for each month.~~
- ~~(b) To document compliance with Condition D.1.3(a), the Permittee shall maintain records of daily vehicle production. The vehicle production record keeping requirements established in Conditions D.1.19(b), D.2.24(b), D.3.18(b), D.4.18(b), D.5.11(c) and D.6.10(b) comprise one record keeping requirement.~~
- (b)(e) To document compliance with Condition ~~D.1.9~~ D.2.8, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.**
- (c) To document compliance with Condition D.2.14, the Permittee shall maintain copies of the training program, and the list of trained operators. Training records shall be maintained on site or available within 1 hour for inspection by IDEM.**
- ~~(d) To document compliance with Condition D.1.16, the Permittee shall maintain a log of weekly and monthly overspray observations, daily observations of the water level in the pans, and weekly observations of the placement and configuration of baffle panels.~~
- (d) To document compliance with Condition D.2.2, the Permittee shall collect and keep records of the data and information specified in 40 CFR 63.4530, paragraphs (c) through (h). Failure to collect and keep these records is a deviation from the applicable standard.**
  - (1) These records shall be in a form suitable and readily available for expeditious review. Where appropriate, the records may be maintained as electronic spreadsheets or as a database.**

- (2) **The Permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee shall keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee may keep the records off-site for the remaining 3 years.**
  - (3) **Compliance with the record keeping requirements of 40 CFR Part 63, Subpart IIII satisfies these record keeping requirements.**
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

~~D.1.20~~

**D.2.18 Reporting Requirements**

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- (a) To document compliance with Condition ~~D.1.5~~ **D.2.4**, compliance reports shall be submitted on a calendar monthly basis within 21 days of the end of each month. The reports shall contain the following data for each operation on a monthly basis, based on actual daily coating usage:
- (1) Average coating VOC content in kg VOC/liter coating ~~minus water~~ **as applied**;
  - (2) Average coating volume % solids **as applied**;
  - ~~(3) Average kg VOC/liter of coating solids (if subject to a limit expressed on this basis);~~
  - ~~(3)(4) Average actual solids transfer efficiency (if subject to a limit expressed on a kg VOC/liter of applied solids basis);~~
  - ~~(4)(5) Overall thermal Thermal incinerator control efficiency, reflecting capture and destruction efficiency (if applicable);~~
  - ~~(5)(6) Average kg VOC/liter of applied solids, based on actual transfer efficiency (if subject to a limit expressed on this basis); and~~
  - ~~(6)(7) Coating usage in liters.~~

When more than one coating has been averaged for compliance purposes, the average shall be determined on a weighted average by volume basis. All data necessary to verify weighted averages shall be included in the report.

- (b) **In order to demonstrate compliance with Condition D.2.2, the Permittee shall submit semiannual compliance reports for each affected source according to the requirements of 40 CFR 63.4520(a), paragraphs (1) through (7). The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in 40 CFR 63.4520, paragraph (a)(2). Compliance with the reporting requirements of 40 CFR Part 63, Subpart IIII satisfies this reporting requirement.**
- ~~(b) The makeup of the solvents used by the Permittee shall be reviewed on an annual basis. By January 31 of each year, a list of all solvents, by compound, used during the previous calendar year shall be submitted to IDEM, OAQ. This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The solvent makeup~~

reporting requirements established in Conditions D.1.20(b), D.2.25(c), D.3.19(b) and D.4.19(b) comprise one reporting requirement.

- ~~(c) Reports of monthly production totals shall be submitted to IDEM, OAQ on a quarterly basis, to comply with Condition D.1.3(a). This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The vehicle production reporting requirements established in Conditions D.1.20(c), D.2.25(d), D.3.19(c), D.4.19(c), D.5.12(a) and D.6.11(a) comprise one reporting requirement.~~
- ~~(d) A quarterly summary of the information to document compliance with Conditions D.1.3(d) and D.1.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the month period being reported. The natural gas usage reporting requirements established in Conditions D.1.20(d), D.2.25(e), D.3.19(d), D.4.19(d) and D.6.11(b) comprise one reporting requirement.~~
- ~~(e) Based on records required by Conditions D.1.19(a), D.2.24(a), D.3.18(a), D.4.18(a), and D.5.11(a), reports of monthly VOC emissions from surface coating operations and associated purge solvent operations and storage shall be submitted to IDEM, OAQ on a quarterly basis, to comply with Condition D.1.5(e). This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The VOC emission reporting requirements established in Conditions D.1.20(e), D.2.25(f), D.3.19(e), D.4.19(e) and D.5.12(b) comprise one reporting requirement.~~
- ~~(f) Based on records required by Conditions D.1.19(a), D.2.24(a), D.3.18(a), D.4.18(a), and D.6.10(a), reports of monthly source-wide particulate (PM/PM10) emissions shall be submitted to IDEM, OAQ on a quarterly basis, to comply with Condition D.1.3(b). This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The particulate emission reporting requirements established in Conditions D.1.20(f), D.2.25(g), D.3.19(f), D.4.19(f) and D.6.11(c) comprise one reporting requirement.~~

~~D.2.1~~

~~**D.3.1** General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A][**Table 2 to 40 CFR Part 63, Subpart IIII**][Table 2 to 40 CFR Part 63, Subpart MMMM][**40 CFR 63.3101**][40 CFR 63.3901]~~

~~D.2.2~~

~~**D.3.2** National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products: **Limitations and Requirements** [40 CFR Part 63, Subpart MMMM][40 CFR 63.3882][40 CFR 63.3882][40 CFR 63.3883][40 CFR 63.3890]~~

...

- (c) The surface coating of metal parts in the various coating operations described in this Section ~~D.2~~ **D.3** meets the applicability criteria of both 40 CFR Part 63, Subpart MMMM (Surface Coating of Miscellaneous Metal Parts and Products) and 40 CFR Part 63, Subpart IIII (Surface Coating of Automobiles and Light-Duty Trucks), which has not yet been promulgated. The Permittee may elect, pursuant to 40 CFR 63.3884(d), to comply with Subpart IIII (once it is promulgated) for the surface coating of metal parts or products used in its manufacturing of automobiles and/or light-duty trucks in lieu of complying with each rule separately. **As a result, the Permittee must select and**

**implement a valid option for complying with this rule, and any other applicable rules of 40 CFR Part 63, pursuant to 40 CFR 63.3881(d) and (e).**

- (d) Consistent with 40 CFR 63.3881(a), the emission units described in this Section ~~D.2~~ **D.3** which also meet one or more of the descriptions listed below, ...

~~D.2.3 Prevention of Significant Deterioration (PSD) - Particulate Matter [326 IAC 2-2] [40 CFR 52.21]~~

~~Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, CP 157-4485-00050, issued September 13, 1995, CP 157-9619-00050, issued February 11, 1999, and as revised by this Part 70 permit, the Permittee must adhere to the following conditions:~~

- ~~(a) The source shall not produce greater than 262,000 vehicles per twelve (12) consecutive month period with compliance determined at the end of each month.~~
- ~~(b) The particulate (PM/PM10) emissions from the entire source shall not exceed 23.1 tons per twelve (12) consecutive month period with compliance determined at the end of each month.~~
- ~~(c) The visible emissions from all stacks and emission points associated with the facilities described in this section shall not exceed 10% opacity.~~
- ~~(d) The total natural gas combustion at the source shall not exceed 2,380 million standard cubic feet per 12 consecutive month period with compliance determined at the end of each month.~~

~~Compliance with these limitations, and those contained in Conditions D.1.3, D.3.5, D.4.3, D.5.5, and D.6.1, will render the requirements of 326 IAC 2-2 and 40 CFR 52.21 not applicable.~~

~~D.2.4 Prevention of Significant Deterioration (PSD) - Carbon Monoxide and Sulfur Dioxide [326 IAC 2-2] [40 CFR 52.21]~~

~~Compliance with the total natural gas combustion limitation contained in Condition D.2.3(d) is equivalent to CO and SO<sub>2</sub> emissions of less than 100 tons per year, and 40 tons per year respectively, and will render the requirements of 326 IAC 2-2 and 40 CFR 52.21 not applicable.~~

~~D.2.5~~

~~**D.3.4** Prevention of Significant Deterioration (PSD) - Best Available Control Technology for Volatile Organic Compounds (VOC) [326 IAC 2-2] [40 CFR 52.21]~~

~~Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, 326 IAC 2-2-3, BACT for VOC for the facilities described in this section is the following:~~

- ~~(a) The daily VOC emissions from each facility shall not exceed the corresponding limits in the following table. Compliance with these limits shall be demonstrated pursuant to Condition ~~D.2.15~~ **D.3.13**: ...~~

~~...~~

- ~~(e) The total VOC emissions from source-wide surface coating operations and associated purge solvent operations and storage shall not exceed 1,128 tons per twelve consecutive month period with compliance determined at the end of each month.~~

~~Compliance with these limitations, and those contained in Conditions **D.1.3, D.2.4, D.4.5, D.5.4, D.6.5 and D.7.1**, will satisfy the requirements of 326 IAC 2-2, 326 IAC 8-1-6 and 40 CFR 52.21.~~

~~D.2.6~~

**D.3.5** Prevention of Significant Deterioration - Best Available Control Technology for Nitrogen Oxides (NO<sub>x</sub>) [40 CFR 52.21] [326 IAC 2-2]

~~D.2.7~~

**D.3.6** Automobile and Light Duty Truck Surface Coating Standard, NSPS [326 IAC 12] [40 CFR 60.390-398, Subpart MM]

Pursuant to 40 CFR Part 63, Subpart MM, and 326 IAC 12:

...

Compliance with these limits shall be demonstrated pursuant to Condition ~~D.2.15~~ **D.3.13**.

~~D.2.8~~

**D.3.7** Particulate Matter from Sources of Indirect Heating [326 IAC 6-2-4]

~~D.2.9~~

**D.3.8** Volatile Organic Compound (VOC) Limitations [326 IAC 8-2-2]

~~D.2.10~~

**D.3.9** Volatile Organic Compound (VOC) Limitations [326 IAC 8-2-2] [326 IAC 8-2-9]

...

Compliance with these limits shall be demonstrated pursuant to Condition ~~D.2.15~~ **D.3.13**.

~~D.2.11~~

**D.3.10** Particulate Matter (PM) [40 CFR Part 52 Subpart P]

~~D.2.12~~

**D.3.11** Particulate [326 IAC 6-3-2(d)]

~~D.2.13~~

**D.3.12** Preventive Maintenance Plan [326 IAC 2-7-5(13)]

~~D.2.14~~ Prevention of Significant Deterioration (PSD) [326 IAC 2-2] [40 CFR 52.21]

Compliance with the source-wide particulate (PM/PM10) emission limit in Condition ~~D.2.3(b)~~ shall be determined by using the following equation, which calculates pounds of particulate emissions per month, and adding the result to the calculated particulate emissions from the previous eleven months:

$$\text{Total Particulate Emissions (lb/month)} = \text{PVC \#1 Coating PM/PM10} + \text{Topcoat \#2 Coating PM/PM10} + \text{Twotone and Repair Coating PM/PM10} + \text{Intermediate (Surfacer) Coating PM/PM10} + \text{Plastic Bumper Coating PM/PM10} + \text{Black Coat and Wax Coating PM/PM10} + \text{Anticorrosion Coating PM/PM10} + \text{Touchup Trim Coating PM/PM10} + \text{Touchup IPC Coating PM/PM10} + \text{Natural Gas Combustion PM/PM10} + \text{Insignificant PM/PM10 Sources}$$

Where:

$$\text{PVC \#1 Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.80) * (1-0.85);$$

~~Topcoat #1 Coating PM/PM10 =  $\sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85)$ ;~~

~~Topcoat #2 Coating PM/PM10 =  $\sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85)$ ;~~

~~Twotone and Repair Coating PM/PM10 =  $\sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85)$ ;~~

~~Intermediate (Surfacer) Coating PM/PM10 =  $\sum_{i=1}^n (C_i * S_i) * (1-0.516) * (1-0.85)$ ;~~

~~Plastic Bumper Coating PM/PM10 =  $\sum_{i=1}^n (C_i * S_i) * (1-0.423) * (1-0.85)$ ;~~

~~Black Coat and Wax Coating PM/PM10 =  $\sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85)$ ;~~

~~Anticorrosion Coating PM/PM10 =  $\sum_{i=1}^n (C_i * S_i) * (1-0.80) * (1-0.85)$ ;~~

~~Touchup Trim Coating PM/PM10 =  $\sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85)$ ;~~

~~Touchup IPC Coating PM/PM10 =  $\sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85)$ ;~~

~~Natural Gas Combustion PM/PM10 = natural gas usage (MMCF/month) \* 7.6 lb PM/MMCF;~~

~~Insignificant PM/PM10 Sources = PM/PM10 emissions in lb/month from insignificant facilities that were permitted by the PSD (79) 1651 Revision;~~

~~C<sub>i</sub> = usage of coating *i* in gallons per month; and~~

~~S<sub>i</sub> = solids content of coating *i* in pounds of solids per gallon of coating.~~

~~D.2.16~~

~~**D.3.14** Volatile Organic Compounds (VOC) [326 IAC 8-1-2]~~

- ~~(a) Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the incinerators at all times the respective facilities are in operation to ensure compliance with Conditions ~~D.2.5, D.2.7, and D.2.9~~ **D.3.4, D.3.6 and D.3.8**.~~
- ~~(b) The incinerators shall be operated such that they achieve the minimum capture and destruction efficiencies specified in Condition ~~D.2.5~~ **D.3.4**.~~

~~D.2.18~~

~~**D.3.16** Thermal Incinerator Temperature [326 IAC 2-7-5(3)]~~

~~...~~

- ~~(b) From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate each thermal incinerator **at** or above the hourly average temperature of 1,400 °F (except for the ED Chassis Oven thermal incinerator (CH), which shall be operated at or above the three-hour average temperature of 1,325 °F). The Permittee shall determine the minimum three-hour average operating temperature from the most recent valid stack test that demonstrates compliance with Conditions ~~D.2.5, D.2.7, and D.2.9~~ **D.3.4, D.3.6 and D.3.8**. This determination must be approved by IDEM.~~

~~D.2.20~~

**D.3.18 VOC Compliance Monitoring**

---

Pursuant to 40 CFR 60.393, monthly NSPS performance tests for the operations listed in Condition ~~D.2.7~~ **D.3.6** shall be performed to document compliance with the NSPS limits.

~~D.2.21 Particulate Compliance Monitoring~~

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~~(a) Daily inspections shall be performed to verify that the water level of the water pans employed for particulate control in each spray coating booth described in this Section D.2 meet the manufacturer's recommended level.~~

~~(b) In addition, weekly observations shall be made of the overspray from the surface coating booth stacks TC1-1 through TC1-10, TC2-1 through TC2-10, TUT-1 through TUT-5, and SUR-2 through SUR-7 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.~~

~~(c) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.~~

~~(d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

**D.3.19 Operator Training Program**

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The Permittee shall implement an operator training program.

(a) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the water wash control systems on the Topcoat #1, Topcoat #2, Twotone and Repair, and Intermediate Coating lines. All existing operators shall be trained upon permit issuance. All new operators shall be trained upon hiring or transfer.

(b) Training shall include proper water level of the water pans, proper placement and configuration of baffle panels, other factors that affect water pan capture efficiency (e.g., debris in the water pans), and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.

(c) All operators shall be given refresher training annually.

Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

~~D.2.24~~

**D.3.22 Record Keeping Requirements**

---

- (a) To document compliance with Conditions ~~D.2.3(b), D.2.3(d), D.2.4, D.2.5, D.2.7, D.2.9, D.2.10, D.2.18 and D.2.19~~ **D.3.4, D.3.6, D.3.8, D.3.9 and D.3.16**, the Permittee shall maintain records in accordance with (1) through ~~(8)~~ **(7)** below. Records maintained for (1) through ~~(8)~~ **(7)** shall be taken as stated below and shall be complete and sufficient to establish compliance with ~~the particulate emission limit established in Condition D.2.3(b), the natural gas combustion limit established in Conditions D.2.3(d) and D.2.4,~~ the VOC emission limits established in Conditions ~~D.2.5, D.2.7, D.2.9 and D.2.10,~~ **D.3.4, D.3.6, D.3.8 and D.3.9** and the compliance determination requirements established in Conditions ~~D.2.18 and D.2.19~~ **D.3.16**. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each coating material **(as applied)** and **the VOC content of each** solvent (including purge solvents and thinners) used less water.
- (2) The VOC content of each coating material used in the ED Body and ED Chassis Coating Tanks, as applied, less water.**
- ~~(3)(2)~~ The solids content of each coating material used **(as applied)**.
- ~~(4)(3)~~ The amount of coating material and solvent (including purge solvents and thinners) used on a 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 solvent.
- ~~(5)(4)~~ The volume weighted average VOC content of the coatings used **(as applied)** for each day.
- ~~(5)~~ ~~The total VOC emissions from coatings and solvents (including purge solvents and thinners) for each day.~~
- (6) The continuous temperature records (on a three-hour average basis) for ~~the~~ **each** thermal incinerator and the three-hour average temperature used to demonstrate compliance during the most recent compliant stack test.
- (7) Records of any thermal incinerator shutdowns due to duct pressure or fan amperage deviations.**
- ~~(7)~~ ~~Daily records of the duct pressure or fan amperage.~~
- ~~(8)~~ ~~The plant-wide metered natural gas usage for each month.~~
- ~~(b)~~ ~~To document compliance with Condition D.2.3(a), the Permittee shall maintain records of monthly vehicle production. The vehicle production record keeping requirements established in Conditions D.1.19(b), D.2.24(b), D.3.18(b), D.4.18(b), D.5.11(e) and D.6.10(b) comprise one record keeping requirement.~~
- ~~(b)(e)~~ To document compliance with Condition ~~D.2.13(a)~~ **D.3.12**, the Permittee shall maintain ~~of~~ records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) To document compliance with Condition D.3.19, the Permittee shall maintain copies of the training program, and the list of trained operators. Training records shall be maintained on site or available within 1 hour for inspection by IDEM.**

- ~~(d)~~ To document compliance with Condition D.2.21, the Permittee shall maintain a log of weekly and monthly overspray observations, daily observations of the water level in the pans, and weekly observations of the placement and configuration of baffle panels.
- ~~(d)~~**(e)** All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

~~D.2.25~~

**D.3.23 Reporting Requirements**

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- (a) Monthly NSPS performance tests for the operations listed in Condition ~~D.2.7~~ **D.3.6** shall be submitted as required by 40 CFR 60.395.
- (b) To document compliance with Conditions ~~D.2.5, D.2.9 and D.2.10~~ **D.3.4, D.3.8 and D.3.9**, compliance reports shall be submitted on a calendar monthly basis within 21 days of the end of each month. The reports shall contain the following data for each operation on a monthly basis, based on actual daily coating usage:
- (1) Average coating VOC content in kg VOC/liter coating ~~minus water~~ **as applied**
  - (2) Average coating VOC content in kg VOC/liter coating, as applied, less water, for the ED Body and ED Chassis Coating Tanks**
  - ~~(3)~~**(2)** Average coating volume % solids **as applied**
  - ~~(3)~~ Average kg VOC/liter of coating solids (if subject to a limit expressed on this basis)
  - (4) Average actual solids transfer efficiency (if subject to a limit expressed on a kg VOC/liter of applied solids basis)
  - (5) Overall thermal Thermal incinerator control efficiency, reflecting capture and destruction efficiency (if applicable)**
  - (6) Average kg VOC/liter of applied solids, based on actual transfer efficiency (if subject to a limit expressed on this basis)
  - (7) Coating usage in liters

When more than one coating has been averaged for compliance purposes, the average shall be determined on a weighted average by volume basis. All data necessary to verify weighted averages shall be included in the report.

- ~~(c)~~ The makeup of the solvents used by the Permittee shall be reviewed on an annual basis. By January 31 of each year, a list of all solvents, by compound, used during the previous calendar year shall be submitted to IDEM, OAQ. This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The solvent makeup reporting requirements established in Conditions D.1.20(b), D.2.25(c), D.3.19(b) and D.4.19(b) comprise one reporting requirement.
- ~~(d)~~ Reports of monthly production totals by vehicle model shall be submitted to IDEM, OAQ on a quarterly basis, to comply with Condition D.2.3(a). This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The vehicle production reporting

requirements established in Conditions D.1.20(c), D.2.25(d), D.3.19(e), D.4.19(e), D.5.12(a) and D.6.11(a) comprise one reporting requirement.

- ~~(e) A quarterly summary of the information to document compliance with Conditions D.2.3(d) and D.2.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the month period being reported. The natural gas usage reporting requirements established in Conditions D.1.20(d), D.2.25(e), D.3.19(d), D.4.19(d) and D.6.11(b) comprise one reporting requirement.~~
- ~~(f) Based on records required by Conditions D.1.19(a), D.2.24(a), D.3.18(a), D.4.18(a), and D.5.11(a), reports of monthly VOC emissions from surface coating operations and associated purge solvent operations and storage shall be submitted to IDEM, OAG on a quarterly basis, to comply with Condition D.2.5(e). This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The VOC emission reporting requirements established in Conditions D.1.20(e), D.2.25(f), D.3.19(e), D.4.19(e) and D.5.12(b) comprise one reporting requirement.~~
- ~~(g) Based on records required by Conditions D.1.19(a), D.2.24(a), D.3.18(a), D.4.18(a), and D.6.10(a), reports of monthly source-wide particulate (PM/PM10) emissions shall be submitted to IDEM, OAG on a quarterly basis, to comply with Condition D.2.3(b). This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The particulate emission reporting requirements established in Conditions D.1.20(f), D.2.25(g), D.3.19(f), D.4.19(f) and D.6.11(c) comprise one reporting requirement.~~

### D.3.3

**D.4.2** National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products: **Limitations and Requirements** [40 CFR Part 63, Subpart Mmmm][40 CFR 63.3882][40 CFR 63.3882][40 CFR 63.3883][40 CFR 63.3890]

---

...

- (c) The surface coating of metal parts in the various coating operations described in this Section ~~D.3~~ **D.4** meets the applicability criteria of both 40 CFR Part 63, Subpart Mmmm (Surface Coating of Miscellaneous Metal Parts and Products) and 40 CFR Part 63, Subpart IIII (Surface Coating of Automobiles and Light-Duty Trucks); ~~which has not yet been promulgated. The Permittee may elect, pursuant to 40 CFR 63.3881(d), to comply with Subpart IIII (once it is promulgated) for the surface coating of metal parts or products used in its manufacturing of automobiles and/or light-duty trucks in lieu of complying with each rule separately. As a result, the Permittee must select and implement a valid option for complying with this rule, and any other applicable rules of 40 CFR Part 63, pursuant to 40 CFR 63.3881(d) and (e).~~
- (d) Consistent with 40 CFR 63.3881(a), the emission units described in this Section ~~D.3~~ **D.4** which also meet one or more of the descriptions listed below, to the extent employed in the surface coating of metal parts or products...

...

### D.3.4

**D.4.3 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products: Limitations and Requirements [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482]**

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...

- (c) The surface coating of plastic parts in the various coating operations described in this Section ~~D.3~~ **D.4** meets the applicability criteria of both 40 CFR Part 63, Subpart PPPP (Surface Coating of Plastic Parts and Products) and 40 CFR Part 63, Subpart IIII (Surface Coating of Automobiles and Light-Duty Trucks), ~~which has not yet been promulgated. The Permittee may elect, pursuant to 40 CFR 63.4481(d), to comply with Subpart IIII (once it is promulgated) for the surface coating of plastic bumpers used in its manufacturing of automobiles and/or light-duty trucks in lieu of complying with each rule separately. As a result, the Permittee must select and implement a valid option for complying with this rule, and any other applicable rules of 40 CFR Part 63, pursuant to 40 CFR 63.4481(d) and (e).~~
- (d) Consistent with 40 CFR 63.4481, the emission units described in this Section ~~D.3~~ **D.4** which also meet one or more of the descriptions listed below, to the extent employed in the surface coating of plastic parts and products...

~~D.3.5 Prevention of Significant Deterioration (PSD) - Particulate Matter [326 IAC 2-2] [40 CFR 52.21]~~

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~~Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, CP 157-4485-00050, issued September 13, 1995, CP 157-9619-00050, issued February 11, 1999, and as revised by this Part 70 permit:~~

- ~~(a) The source shall not produce greater than 262,000 vehicles per twelve (12) consecutive month period with compliance determined at the end of each month.~~
- ~~(b) The particulate (PM/PM10) emissions from the entire source shall not exceed 23.1 tons per twelve (12) consecutive month period with compliance determined at the end of each month.~~
- ~~(c) The visible emissions from all stacks and emission points associated with the facilities described in this section shall not exceed 10% opacity.~~
- ~~(d) The total natural gas combustion at the source shall not exceed 2,380 million standard cubic feet per 12 consecutive month period with compliance determined at the end of each month.~~

~~Compliance with these limitations, and those contained in Conditions D.1.3, D.2.3, D.4.3, D.5.5, and D.6.1, will render the requirements of 326 IAC 2-2 and 40 CFR 52.21 not applicable.~~

~~D.3.6 Prevention of Significant Deterioration (PSD) - Carbon Monoxide and Sulfur Dioxide [326 IAC 2-2] [40 CFR 52.21]~~

---

~~Compliance with the total natural gas combustion limitation contained in Condition D.3.5(d) is equivalent to CO and SO<sub>2</sub> emissions of less than 100 tons per year, and 40 tons per year respectively, and will render the requirements of 326 IAC 2-2 not applicable.~~

~~D.3.7~~

**D.4.5 Prevention of Significant Deterioration (PSD) - Best Available Control Technology for Volatile Organic Compounds (VOC) [326 IAC 2-2] [40 CFR 52.21]**

---

Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, and 326 IAC 2-2-3, BACT for VOC for the Final Repair (Touchup) Operation is the following:

- (a) The daily VOC emissions from the Final Repair booths (Touchup IPC Booth and Touchup Trim Booth) shall not exceed 4.84 ...

Compliance with this limit shall be demonstrated pursuant to Condition ~~D.3.14~~ **D.4.12**.

...

- ~~(d)~~ The total VOC emissions from source-wide surface coating operations and associated purge solvent operations and storage shall not exceed 1,128 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with these limitations, and those contained in Conditions **D.1.3, D.2.4, D.3.4, D.5.4, D.6.5 and D.7.1**, will satisfy the requirements of 326 IAC 2-2, 326 IAC 8-1-6 and 40 CFR 52.21.

~~D.3.9~~

**D.4.7** Volatile Organic Compound (VOC) Limitations [326 IAC 8-2-2]

...

Compliance with this limit shall be demonstrated pursuant to Condition ~~D.3.14~~ **D.4.12**.

~~D.3.13~~ Prevention of Significant Deterioration (PSD) [326 IAC 2-2] [40 CFR 52.21]

~~Compliance with the source-wide particulate (PM/PM10) emission limit in Condition D.3.5(b) shall be determined by using the following equation, which calculates pounds of particulate emissions per month, and adding the result to the calculated particulate emissions from the previous eleven months:~~

~~$$\text{Total Particulate Emissions (lb/month)} = \text{PVC \#1 Coating PM/PM10} + \text{Topcoat \#1 Coating PM/PM10} + \text{Topcoat \#2 Coating PM/PM10} + \text{Twotone and Repair Coating PM/PM10} + \text{Intermediate (Surfacer) Coating PM/PM10} + \text{Plastic Bumper Coating PM/PM10} + \text{Black Coat and Wax Coating PM/PM10} + \text{Anticorrosion Coating PM/PM10} + \text{Touchup Trim Coating PM/PM10} + \text{Touchup IPC Coating PM/PM10} + \text{Natural Gas Combustion PM/PM10} + \text{Insignificant PM/PM10 Sources}$$~~

~~Where:~~

~~$$\text{PVC \#1 Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.80) * (1-0.85);$$~~

~~$$\text{Topcoat \#1 Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85);$$~~

~~$$\text{Topcoat \#2 Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85);$$~~

~~$$\text{Twotone and Repair Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85);$$~~

~~$$\text{Intermediate (Surfacer) Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.516) * (1-0.85);$$~~

~~$$\text{Plastic Bumper Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.423) * (1-0.85);$$~~

~~$$\text{Black Coat and Wax Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85);$$~~

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$$\text{Anticorrosion Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.80) * (1-0.85);$$

---

$$\text{Touchup Trim Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85);$$

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$$\text{Touchup IPC Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85);$$

---

$$\text{Natural Gas Combustion PM/PM10} = \text{natural gas usage (MMCF/month)} * 7.6 \text{ lb PM/MMCF};$$

---

Insignificant PM/PM10 Sources = PM/PM10 emissions in lb/month from insignificant facilities that were permitted by the PSD (79) 1651 Revision;

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$C_i$  = usage of coating  $i$  in gallons per month; and

---

$S_i$  = solids content of coating  $i$  in pounds of solids per gallon of coating.

D.3.14

**D.4.12** Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Compliance with the VOC emission limits in Conditions ~~D.3.7 and D.3.9~~ **D.4.5 and D.4.7** shall be determined with the following equation:

$$\text{VOC emissions (lb VOC/gal coating less water)} = [ 3 (C \times U) / 3 U ]$$

Where:

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

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

D.3.18

**D.4.16** Record Keeping Requirements

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(a) To document compliance with Conditions ~~D.3.5(b), D.3.5(d), D.3.6, D.3.7 and D.3.9~~ **D.4.5 and D.4.7**, the Permittee shall maintain records in accordance with (1) through ~~(6)~~ **(3)** below. Records maintained for (1) through ~~(6)~~ **(3)** shall be taken as stated below and shall be complete and sufficient to establish compliance with ~~the particulate emission limit established in Condition D.3.5(b), the natural gas combustion limit established in Conditions D.3.5(d) and D.3.6, and the VOC emission limits established in Conditions D.3.7 and D.3.9~~ **D.4.5 and D.4.7**. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The VOC content of each coating material (**as applied, less water**) and **the VOC content of each** solvent (including purge solvents and thinners) used less water.

~~(2) The solids content of each coating material used.~~

~~(2)(3)~~ (2) The amount of coating material and solvent (including purge solvents and thinners) used on a 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 solvent.

**(C) Records shall be sufficient to demonstrate that the Touchup Trim Booth uses less than five gallons of coating per day.**

- (3)(4)** The volume weighted average VOC content of the coatings used **(as applied)** for each day.
- ~~(5) The total VOC emissions from coatings and solvents (including purge solvents and thinners) for each day.~~
- ~~(6) The plant-wide metered natural gas usage for each month.~~
- ~~(b) To document compliance with Condition D.3.5(a) the Permittee shall maintain records of monthly vehicle production.~~
- (b)(c)** To document compliance with Condition ~~D.3.12~~ **D.4.10**, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) To document compliance with Condition D.4.13, the Permittee shall maintain copies of the training program, and the list of trained operators. Training records shall be maintained on site or available within 1 hour for inspection by IDEM.**
- ~~(d) To document compliance with Condition D.3.15, the Permittee shall maintain a log of monthly and weekly overspray observations, and weekly observations of the placement, integrity, and particle loading of the filter.~~
- (d) To document compliance with Condition D.4.3, the Permittee shall collect and keep records of the data and information specified in 40 CFR 63.4530, paragraphs (c) through (h). Failure to collect and keep these records is a deviation from the applicable standard.**
- (1) These records shall be in a form suitable and readily available for expeditious review. Where appropriate, the records may be maintained as electronic spreadsheets or as a database.**
- (2) The Permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee shall keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee may keep the records off-site for the remaining 3 years.**
- (3) Compliance with the record keeping requirements of 40 CFR Part 63, Subpart IIII satisfies these record keeping requirements.**
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

~~D.3.19~~

**D.4.17 Reporting Requirements**

- ~~(a) To document compliance with Conditions D.3.7 and D.3.9~~ **D.4.5 and D.4.7**, compliance reports shall be submitted on a calendar monthly basis within 21 days of the end of each month. The reports shall contain the following data for each operation on a monthly basis, based on actual daily coating usage:
- (1) Average coating VOC content in kg VOC/liter coating minus water**

- ~~(2) Average coating volume % solids~~
- ~~(3) Average kg VOC/liter of coating solids (if subject to a limit expressed on this basis)~~
- ~~(4) Average actual solids transfer efficiency (if subject to a limit expressed on a kg VOC/liter of applied solids basis)~~
- ~~(5) Thermal incinerator control efficiency (if applicable)~~
- ~~(6) Average kg VOC/liter of applied solids, based on actual transfer efficiency (if subject to a limit expressed on this basis)~~

~~(2)(7) Coating usage in liters~~

When more than one coating has been averaged for compliance purposes, the average shall be determined on a weighted average by volume basis. All data necessary to verify weighted averages shall be included in the report.

- (b) In order to demonstrate compliance with Condition D.4.3, the Permittee shall submit semiannual compliance reports for each affected source according to the requirements of 40 CFR 63.4520(a), paragraphs (1) through (7). The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in 40 CFR 63.4520, paragraph (a)(2). Compliance with the reporting requirements of 40 CFR Part 63, Subpart III satisfies this reporting requirement.**
- ~~(b) The makeup of the solvents used by the Permittee shall be reviewed on an annual basis. By January 31 of each year, a list of all solvents, by compound, used during the previous calendar year shall be submitted to IDEM, OAQ. This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The solvent makeup reporting requirements established in Conditions D.1.20(b), D.2.25(c), D.3.19(b) and D.4.19(b) comprise one reporting requirement.~~
- ~~(c) Reports of monthly production totals by vehicle model shall be submitted to IDEM, OAQ on a quarterly basis, to comply with Condition D.3.5(a). This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The vehicle production reporting requirements established in Conditions D.1.20(c), D.2.25(d), D.3.19(c), D.4.19(c), D.5.12(a) and D.6.11(a) comprise one reporting requirement.~~
- ~~(d) A quarterly summary of the information to document compliance with Conditions D.3.5(d) and D.3.6 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the month period being reported. The natural gas usage reporting requirements established in Conditions D.1.20(d), D.2.25(e), D.3.19(d), D.4.19(d) and D.6.11(b) comprise one reporting requirement.~~
- ~~(e) Based on records required by Conditions D.1.19(a), D.2.24(a), D.3.18(a), D.4.18(a), and D.5.11(a), reports of monthly VOC emissions from surface coating operations and associated purge solvent operations and storage shall be submitted to IDEM, OAQ on a quarterly basis, to comply with Condition D.3.7(d). This report shall be submitted to the~~

~~address listed in Section C – General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The VOC emission reporting requirements established in Conditions D.1.20(e), D.2.25(f), D.3.19(e), D.4.19(e) and D.5.12(b) comprise one reporting requirement.~~

- ~~(f) Based on records required by Conditions D.1.19(a), D.2.24(a), D.3.18(a), D.4.18(a), and D.6.10(a), reports of monthly source-wide particulate (PM/PM10) emissions shall be submitted to IDEM, OAG on a quarterly basis, to comply with Condition D.3.5(b). This report shall be submitted to the address listed in Section C – General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The particulate emission reporting requirements established in Conditions D.1.20(f), D.2.25(g), D.3.19(f), D.4.19(f) and D.6.11(c) comprise one reporting requirement.~~

#### ~~D.4.2~~

~~D.5.2 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products: **Limitations and Requirements** [40 CFR Part 63, Subpart MMMM][40 CFR 63.3882][40 CFR 63.3882][40 CFR 63.3883][40 CFR 63.3890]~~

~~...~~

- ~~(c) The surface coating of metal parts in the various coating operations described in this Section ~~D.4~~ **D.5** meets the applicability criteria of both 40 CFR Part 63, Subpart MMMM (Surface Coating of Miscellaneous Metal Parts and Products) and 40 CFR Part 63, Subpart IIII (Surface Coating of Automobiles and Light-Duty Trucks), which has not yet been promulgated. The Permittee may elect, pursuant to 40 CFR 63.3881(d), to comply with Subpart IIII (once it is promulgated) for the surface coating of metal parts or products used in its manufacturing of automobiles and/or light-duty trucks in lieu of complying with each rule separately. **As a result, the Permittee must select and implement a valid option for complying with this rule, and any other applicable rules of 40 CFR Part 63, pursuant to 40 CFR 63.3881(d) and (e).**~~
- ~~(d) Consistent with 40 CFR 63.3881(a), the emission units described in this Section ~~D.4~~ **D.5** which also meet one or more of the descriptions listed below, to the extent employed in the surface coating of metal parts or products ...~~

~~D.4.3 Prevention of Significant Deterioration (PSD) – Particulate Matter [326 IAC 2-2] [40 CFR 52.21] Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, CP 157-4485-00050, issued September 13, 1995, CP 157-9619-00050, issued February 11, 1999, and as revised by this Part 70 permit:~~

- ~~(a) The source shall not produce greater than 262,000 vehicles per twelve (12) consecutive month period with compliance determined at the end of each month.~~
- ~~(b) The particulate (PM/PM10) emissions from the entire source shall not exceed 23.1 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.~~
- ~~(c) The visible emissions from all stacks and emission points associated with the facilities described in this section shall not exceed 10% opacity.~~
- ~~(d) The total natural gas combustion at the source shall not exceed 2,380 million standard cubic feet per 12 consecutive month period with compliance determined at the end of each month.~~

~~Compliance with these limitations, and those contained in Conditions D.1.3, D.2.3, D.3.5, and D.6.1, will render the requirements of 326 IAC 2-2 and 40 CFR 52.21 not applicable.~~

~~D.4.4 Prevention of Significant Deterioration (PSD) – Carbon Monoxide and Sulfur Dioxide [326 IAC 2-2] [40 CFR 52.21]~~

~~Compliance with the total natural gas combustion limitation contained in Condition D.4.3(d) is equivalent to CO and SO<sub>2</sub> emissions of less than 100 tons per year, and 40 tons per year respectively, and will render the requirements of 326 IAC 2-2 and 40 CFR 52.21 not applicable.~~

~~D.4.5~~

**D.5.4** Volatile Organic Compounds (VOC) Best Available Control Technology for Volatile Organic Compounds (VOC) [326 IAC 2-2] [40 CFR 52.21]

Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, and 326 IAC 2-2-3, BACT for VOC for the facilities described in this section is the following:

- (a) The daily VOC emissions from each facility shall not exceed the corresponding limits in the following table. Compliance with these limits shall be demonstrated pursuant to Condition ~~D.4.13~~ **D.5.11** ...

Facility	lb VOC/gal coating solids	kg VOC/liter coating solids
PVC Coating #1 Booth #1	0.25	0.03
...	...	...

- (b) The following spray application methods must be used whenever applying the following coatings:

- ~~(1)~~(A) PVC Undercoat - Airless  
(in PVC Coating #1 Booth #1)
- ~~(2)~~(B) Underfloor Wax - Airless  
(in Anticorrosion Booth)
- ~~(3)~~(C) Inner Panel Wax - Air or Airless with minimum transfer efficiency of 80%  
(in Black and Wax Booth)

- (c) Pretreatment Cleaning shall utilize only VOC free detergents, conditioners, and rinses in the body and chassis pre-treatment cleaning operations.

- (d) Pertaining to purge solvent use:

- ~~(1)~~(A) Purge solvent capture systems will be utilized each time that any coating application equipment is purged. The purge solvent capture systems shall have a minimum overall capture efficiency of at least eighty percent (80%). Collected purge solvent shall be retained in closed containers until such time as they are shipped offsite for disposal or recycled.
- ~~(2)~~(B) Block painting will be utilized whenever possible to minimize color changes and the resulting purge.

- ~~(e) The total VOC emissions from source-wide surface coating operations and associated purge solvent operations and storage shall not exceed 1,128 tons per twelve consecutive month period with compliance determined at the end of each month.~~

Compliance with these limitations, **and those contained in Conditions D.1.3, D.2.4, D.3.4, D.4.5, D.6.5 and D.7.1**, will satisfy the requirements of 326 IAC 2-2, 326 IAC 8-1-6 and 40 CFR 52.21.

D.4.12 Prevention of Significant Deterioration (PSD) [326 IAC 2-2] [40 CFR 52.21]

Compliance with the source-wide particulate (PM/PM10) emission limit in Condition D.4.3(b) shall be determined by using the following equation, which calculates pounds of particulate emissions per month, and adding the result to the calculated particulate emissions from the previous eleven months:

$$\text{Total Particulate Emissions (lb/month)} = \text{PVC \#1 Coating PM/PM10} + \text{Topcoat \#1 Coating PM/PM10} + \text{Topcoat \#2 Coating PM/PM10} + \text{Twotone and Repair Coating PM/PM10} + \text{Intermediate (Surfacer) Coating PM/PM10} + \text{Plastic Bumper Coating PM/PM10} + \text{Black Coat and Wax Coating PM/PM10} + \text{Anticorrosion Coating PM/PM10} + \text{Touchup Trim Coating PM/PM10} + \text{Touchup IPC Coating PM/PM10} + \text{Natural Gas Combustion PM/PM10} + \text{Insignificant PM/PM10 Sources}$$

Where:

$$\text{PVC \#1 Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.80) * (1-0.85);$$

$$\text{Topcoat \#1 Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85);$$

$$\text{Topcoat \#2 Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85);$$

$$\text{Twotone and Repair Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85);$$

$$\text{Intermediate (Surfacer) Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.516) * (1-0.85);$$

$$\text{Plastic Bumper Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.423) * (1-0.85);$$

$$\text{Black Coat and Wax Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85);$$

$$\text{Anticorrosion Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.80) * (1-0.85);$$

$$\text{Touchup Trim Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85);$$

$$\text{Touchup IPC Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85);$$

$$\text{Natural Gas Combustion PM/PM10} = \text{natural gas usage (MMCF/month)} * 7.6 \text{ lb PM/MMCF};$$

$$\text{Insignificant PM/PM10 Sources} = \text{PM/PM10 emissions in lb/month from insignificant facilities that were permitted by the PSD (79) 1651 Revision};$$

$C_i$  = usage of coating  $i$  in gallons per month; and

$S_i$  = solids content of coating  $i$  in pounds of solids per gallon of coating.

~~D.4.13~~

**D.5.11** Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Compliance with the VOC emission limits in Conditions ~~D.4.5 and D.4.7~~ **D.5.4 and D.5.6** shall be determined with the following equations (as applicable):

$$\text{VOC emissions (lb VOC/gal coating solids)} = [ 3 (C \times U) / 3 U ]$$

Where:

C is the VOC content of the coating in pounds of VOC per gallon of coating solids, **as applied**; and  
U is the usage rate of the coating in gallons per day.

Or, if the emission limit is in units of pounds of VOC per gallon of coating less water:

$$\text{VOC emissions (lb VOC/gal coating less water)} = [ 3 (C \times U) / 3 U ]$$

Where:

C is the VOC content of the coating in pounds of VOC per gallon of coating less water, **as applied**;  
U is the usage rate of the coating in gallons per day

~~D.4.18~~

**D.5.15** Record Keeping Requirements

(a) To document compliance with Conditions ~~D.4.3(b), D.4.3(d), D.4.4, D.4.5 and D.4.7~~ **D.5.4 and D.5.6**, the Permittee shall maintain records in accordance with (1) through ~~(6)~~ **(4)** below. Records maintained for (1) through ~~(6)~~ **(4)** shall be taken as stated below and shall be complete and sufficient to establish compliance with ~~the particulate emission limit established in Condition D.4.3(b), the natural gas combustion limit established in Conditions D.4.3(d) and D.4.4, and the VOC emission limits established in Conditions D.4.5 and D.4.7~~ **D.5.4 and D.5.6**. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The VOC content of each coating material (**as applied, less water**) and **the VOC content of each** solvent (including purge solvents and thinners) used less water.
- (2) The solids content of each coating material used (**as applied**).
- (3) The amount of coating material and solvent (including purge solvents and thinners) used on a 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 solvent.
- (4) The volume weighted average VOC content of the coatings used (**as applied**) for each day.
- ~~(5) The total VOC emissions from coatings and solvents (including purge solvents and thinners) for each day.~~
- ~~(6) The plant-wide metered natural gas usage for each month.~~

- ~~(b)~~ To document compliance with Condition D.4.3(a), the Permittee shall maintain records of monthly vehicle production. The vehicle production record keeping requirements established in Conditions D.1.19(b), D.2.24(b), D.3.18(b), D.4.18(b), D.5.11(c) and D.6.10(b) comprise one record keeping requirement.
- ~~(b)(e)~~ To document compliance with Condition ~~D.4.14~~ **D.5.10**, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) To document compliance with Condition D.5.12, the Permittee shall maintain copies of the training program, and the list of trained operators. Training records shall be maintained on site or available within 1 hour for inspection by IDEM.**
- ~~(d)~~ To document compliance with Conditions D.4.14 and D.4.15, the Permittee shall maintain a log of weekly and monthly overspray observations, daily observations of the water level in the pans, and weekly observations of the placement and configuration of baffle panels, and weekly observations of the placement, integrity, and particle loading of the filters.
- ~~(d)(e)~~ All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

~~D.4.19~~

**D.5.16 Reporting Requirements**

- ~~(a)~~ To document compliance with Conditions ~~D.4.5 and D.4.7~~ **D.5.4 and D.5.6**, compliance reports shall be submitted on a calendar monthly basis within 21 days of the end of each month. The reports shall contain the following data for each operation on a monthly basis, based on actual daily coating usage:
- ~~(1)~~ Average coating VOC content in kg VOC/liter coating ~~minus water~~ **as applied**
  - (2) Average coating VOC content in kg VOC/liter coating, as applied, less water**
  - ~~(3)(2)~~ Average coating volume % solids **as applied**
  - ~~(4)(3)~~ Average kg VOC/liter of coating solids, **as applied** ~~(if subject to a limit expressed on this basis)~~
  - ~~(4)~~ Average actual solids transfer efficiency (if subject to a limit expressed on a kg VOC/liter of applied solids basis)
  - ~~(5)~~ Thermal incinerator control efficiency (if applicable)
  - ~~(6)~~ Average kg VOC/liter of applied solids, based on actual transfer efficiency (if subject to a limit expressed on this basis)
  - (5)(7) Coating usage in liters**

When more than one coating has been averaged for compliance purposes, the average shall be determined on a weighted average by volume basis. All data necessary to verify weighted averages shall be included in the report.

- ~~(b)~~ The makeup of the solvents used by the Permittee shall be reviewed on an annual basis. By January 31 of each year, a list of all solvents, by compound, used during the previous calendar year shall be submitted to IDEM, OAQ. This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit,

using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The solvent makeup reporting requirements established in Conditions D.1.20(b), D.2.25(c), D.3.19(b) and D.4.19(b) comprise one reporting requirement.

~~(c) Reports of monthly production totals by vehicle model shall be submitted to IDEM, OAQ on a quarterly basis, to comply with Condition D.4.3(a). This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The vehicle production reporting requirements established in Conditions D.1.20(c), D.2.25(d), D.3.19(c), D.4.19(c), D.5.12(a) and D.6.11(a) comprise one reporting requirement.~~

~~(d) A quarterly summary of the information to document compliance with Conditions D.4.3(d) and D.4.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the month period being reported. The natural gas usage reporting requirements established in Conditions D.1.20(d), D.2.25(e), D.3.19(d), D.4.19(d) and D.6.11(b) comprise one reporting requirement.~~

~~(e) Based on records required by Conditions D.1.19(a), D.2.24(a), D.3.18(a), D.4.18(a), and D.5.11(a), reports of monthly VOC emissions from surface coating operations and associated purge solvent operations and storage shall be submitted to IDEM, OAQ on a quarterly basis, to comply with Condition D.4.5(e). This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The VOC emission reporting requirements established in Conditions D.1.20(e), D.2.25(f), D.3.19(e), D.4.19(e) and D.5.12(b) comprise one reporting requirement.~~

~~(f) Based on records required by Conditions D.1.19(a), D.2.24(a), D.3.18(a), D.4.18(a), and D.6.10(a), reports of monthly source-wide particulate (PM/PM10) emissions shall be submitted to IDEM, OAQ on a quarterly basis, to comply with Condition D.4.3(b). This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The particulate emission reporting requirements established in Conditions D.1.20(f), D.2.25(g), D.3.19(f), D.4.19(f) and D.6.11(c) comprise one reporting requirement.~~

### ~~D.5.3~~

~~**D.6.2** National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products: **Limitations and Requirements** [40 CFR Part 63, Subpart MMMM][40 CFR 63.3882][40 CFR 63.3882][40 CFR 63.3883][40 CFR 63.3890]~~

~~...~~

~~(c) The **application of adhesives to metal parts and the purge solvent recovery system** surface coating of metal parts in the various coating operations described in this Section ~~D.5~~ **D.6** ~~meets~~ **meet** the applicability criteria of both 40 CFR Part 63, Subpart MMMM (Surface Coating of Miscellaneous Metal Parts and Products) and 40 CFR Part 63, Subpart IIII (Surface Coating of Automobiles and Light-Duty Trucks), which has not yet been promulgated. The Permittee may elect, pursuant to 40 CFR 63.3881(d), to comply with Subpart IIII (once it is promulgated) for the surface coating of metal parts or products used in its manufacturing of automobiles and/or light-duty trucks in lieu of complying with each rule separately. **As a result, the Permittee must select and implement a valid option for complying with this rule, and any other applicable rules of 40 CFR Part 63, pursuant to 40 CFR 63.3881(d) and (e).**~~

- (d) Consistent with 40 CFR 63.3881(a), the emission units described in this Section ~~D-5~~ **D.6** which also meet one or more of the descriptions listed below, to the extent employed in the surface coating of metal parts or products...

~~D-5-4~~

**D.6.3** National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products: Limitations and Requirements [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482]

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...

- (c) **The application of adhesives to plastic parts and the purge solvent recovery system surface coating of plastic parts in the various coating operations described in this Section ~~D-5~~ D.6 meets meet the applicability criteria of both 40 CFR Part 63, Subpart PPPP (Surface Coating of Plastic Parts and Products) and 40 CFR Part 63, Subpart IIII (Surface Coating of Automobiles and Light-Duty Trucks), which has not yet been promulgated. The Permittee may elect, pursuant to 40 CFR 63.4481(d), to comply with Subpart IIII (once it is promulgated) for the surface coating of plastic bumpers used in its manufacturing of automobiles and/or light-duty trucks in lieu of complying with each rule separately. As a result, the Permittee must select and implement a valid option for complying with this rule, and any other applicable rules of 40 CFR Part 63, pursuant to 40 CFR 63.4481(d) and (e).**

- (d) Consistent with 40 CFR 63.4481, the emission units described in this Section ~~D-5~~ **D.6** which also meet one or more of the descriptions listed below...

~~D-5.5~~ Prevention of Significant Deterioration (PSD) - Particulate Matter [326 IAC 2-2] [40 CFR 52.21]

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~~Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, CP 157-4485-00050, issued September 13, 1995, CP 157-9619-00050, issued February 11, 1999, and as revised by this Part 70 permit, the source shall not produce greater than 262,000 vehicles per twelve (12) consecutive month period with compliance determined at the end of each month:~~

~~Compliance with this limitation, and those contained in Conditions D.1.3, D.2.3, D.3.5, D.4.3, and D.6.1, is equivalent to PM and PM-10 emissions of less than 23.1 tons per year and will render the requirements of 326 IAC 2-2 and 40 CFR 52.21 not applicable.~~

~~D-5.6~~

**D.6.5** Prevention of Significant Deterioration (PSD) - Best Available Control Technology for Volatile Organic Compounds (VOC) [326 IAC 2-2] [40 CFR 52.21]

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~~Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, and 326 IAC 2-2-3, BACT for VOC for the facilities described in this section is the following:~~

...

- ~~(c) The total VOC emissions from source-wide surface coating operations and associated purge solvent operations and storage shall not exceed 1,128 tons per twelve consecutive month period with compliance determined at the end of each month.~~

~~Compliance with these limitations, and those contained in Conditions D.1.3, D.2.4, D.3.4, D.4.5, D.5.4 and D.7.1, will satisfy the requirements of 326 IAC 2-2, 326 IAC 8-1-6 and 40 CFR 52.21.~~

~~D-5.11~~

**D.6.9** Record Keeping Requirements

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- ~~(a) To document compliance with Condition D-5.6(c), the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with~~

~~the annual VOC emission limit established in Condition D.5.6(c). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.~~

- ~~(1) The VOC content of each coating material and solvent (including purge solvents and thinners) used less water.~~
- ~~(2) The amount of coating material and solvent (including purge solvents and thinners) used on a 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 solvent.~~
- ~~(3) The total VOC emissions from coatings and solvents (including purge solvents and thinners) for each day.~~
- ~~(4) The amount of coating material and solvent (including purge solvents and thinners) transferred off-site for disposal or recycling for each day.~~

**(a)(b)** Pursuant to 326 IAC 12, the Permittee shall maintain records of the dimensions and an analysis showing the capacity of the 15,000-gallon gasoline storage tank. These records shall be maintained for the life of the source.

~~(c) To document compliance with Condition D.5.5 the Permittee shall maintain records of monthly vehicle production. The vehicle production record keeping requirements established in Conditions D.1.19(b), D.2.24(b), D.3.18(b), D.4.18(b), D.5.11(c) and D.6.10(b) comprise one record keeping requirement.~~

**(b)(d)** To document compliance with Condition ~~D.5.8~~ **D.6.6**, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

**(c)** **To document compliance with Condition D.6.3, the Permittee shall collect and keep records of the data and information specified in 40 CFR 63.4530, paragraphs (c) through (h). Failure to collect and keep these records is a deviation from the applicable standard.**

**(1)** **These records shall be in a form suitable and readily available for expeditious review. Where appropriate, the records may be maintained as electronic spreadsheets or as a database.**

**(2)** **The Permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee shall keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee may keep the records off-site for the remaining 3 years.**

**(3)** **Compliance with the record keeping requirements of 40 CFR Part 63, Subpart IIII satisfies these record keeping requirements.**

**(d)(e)** All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

~~D.5.12~~

~~D.6.10 Reporting Requirements~~

~~In order to demonstrate compliance with Condition D.6.3, the Permittee shall submit semiannual compliance reports for each affected source according to the requirements of 40 CFR 63.4520(a), paragraphs (1) through (7). The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in 40 CFR 63.4520, paragraph (a)(2). Compliance with the reporting requirements of 40 CFR Part 63, Subpart IIII satisfies this reporting requirement.~~

~~(a) Reports of monthly production totals by vehicle model shall be submitted to IDEM, OAQ on a quarterly basis, to comply with Condition D.5.5. This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The vehicle production reporting requirements established in Conditions D.1.20(c), D.2.25(d), D.3.19(c), D.4.19(c), D.5.12(a) and D.6.11(a) comprise one reporting requirement.~~

~~(b) Based on records required by Conditions D.1.19(a), D.2.24(a), D.3.18(a), D.4.18(a), and D.5.11(a), reports of monthly VOC emissions from surface coating operations and associated purge solvent operations and storage shall be submitted to IDEM, OAQ on a quarterly basis, to comply with Condition D.5.6(c). This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The VOC emission reporting requirements established in Conditions D.1.20(e), D.2.25(f), D.3.19(e), D.4.19(e) and D.5.12(b) comprise one reporting requirement.~~

~~D.6.1 Prevention of Significant Deterioration (PSD) - Particulate Matter [326 IAC 2-2] [40 CFR 52.21]~~  
~~Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, CP 157-4485-00050, issued September 13, 1995, CP 157-9619-00050, issued February 11, 1999, and as revised by this Part 70 permit:~~

~~(a) The source shall not produce greater than 262,000 vehicles per twelve (12) consecutive month period with compliance determined at the end of each month.~~

~~(b) The particulate (PM/PM10) emissions from the entire source shall not exceed 23.1 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.~~

~~(c) The visible emissions from all stacks and emission points associated with the facilities described in this section shall not exceed 10% opacity.~~

~~(d) The total natural gas combustion at the source shall not exceed 2,380 million standard cubic feet per 12 consecutive month period with compliance determined at the end of each month.~~

~~Compliance with these limitations, and those contained in Conditions D.1.3, D.2.3, D.3.5, D.4.3 and D.5.5, will render the requirements of 326 IAC 2-2 and 40 CFR 52.21 not applicable.~~

~~D.6.2 Prevention of Significant Deterioration (PSD) - Carbon Monoxide and Sulfur Dioxide [326 IAC 2-2] [40 CFR 52.21]~~

~~Compliance with the total natural gas combustion limitation contained in Condition D.6.1(d) is equivalent to CO and SO<sub>2</sub> emissions of less than 100 tons per year, and 40 tons per year respectively, and will render the requirements of 326 IAC 2-2 and 40 CFR 52.21 not applicable.~~

~~D.6.9 Prevention of Significant Deterioration (PSD) [326 IAC 2-2] [40 CFR 52.21]~~

Compliance with the source-wide particulate emission limit in Condition D.6.1(b) shall be determined by using the following equation, which calculates pounds of particulate emissions per month, and adding the result to the calculated particulate emissions from the previous eleven months:

$$\text{Total Particulate Emissions (lb/month)} = \text{PVC \#1 Coating PM/PM10} + \text{Topcoat \#1 Coating PM/PM10} + \text{Topcoat \#2 Coating PM/PM10} + \text{Twotone and Repair Coating PM/PM10} + \text{Intermediate (Surfacer) Coating PM/PM10} + \text{Plastic Bumper Coating PM/PM10} + \text{Black Coat and Wax Coating PM/PM10} + \text{Anticorrosion Coating PM/PM10} + \text{Touchup Trim Coating PM/PM10} + \text{Touchup IPC Coating PM/PM10} + \text{Natural Gas Combustion PM/PM10} + \text{Insignificant PM/PM10 Sources}$$

Where:

$$\text{PVC \#1 Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.80) * (1-0.85);$$

$$\text{Topcoat \#1 Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85);$$

$$\text{Topcoat \#2 Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85);$$

$$\text{Twotone and Repair Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85);$$

$$\text{Intermediate (Surfacer) Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.516) * (1-0.85);$$

$$\text{Plastic Bumper Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.423) * (1-0.85);$$

$$\text{Black Coat and Wax Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85);$$

$$\text{Anticorrosion Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.80) * (1-0.85);$$

$$\text{Touchup Trim Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85);$$

$$\text{Touchup IPC Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85);$$

$$\text{Natural Gas Combustion PM/PM10} = \text{natural gas usage (MMCF/month)} * 7.6 \text{ lb PM/MMCF};$$

Insignificant PM/PM10 Sources = PM/PM10 emissions in lb/month from insignificant facilities that were permitted by the PSD (79) 1651 Revision;

$C_i$  = usage of coating  $i$  in gallons per month; and

$S_i$  = solids content of coating  $i$  in pounds of solids per gallon of coating.

### **D.7.7 Record Keeping Requirements**

- ~~(a)~~ To document compliance with Conditions ~~D.6.1(b), D.6.1(d), D.6.2, D.6.6 and D.6.7~~, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the particulate emission limits established in Conditions ~~D.6.1(b), D.6.6 and D.6.7~~ and the natural gas combustion limit established in Conditions ~~D.6.1(d) and D.6.2~~. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period:
- ~~(1)~~ The plant-wide metered natural gas usage for each month.
- ~~(2)~~ The process weight rate of the insignificant robotic welding, brazing equipment, cutting torches, soldering equipment, grinding equipment, and machining equipment. Records shall include purchase orders, invoices, and material safety data sheets (MSDS).
- ~~(3)~~ Any process information necessary to calculate particulate (PM/PM10) emissions from other insignificant operations described in this Section D.6 (e.g., deburring, buffing, polishing, abrasive blasting activities, pneumatic conveying, woodworking operations, etc.).
- ~~(4)~~ A log of the dates of use.
- ~~(b)~~ To document compliance with Condition ~~D.6.1(a)~~, the Permittee shall maintain records of monthly vehicle production. The vehicle production record keeping requirements established in Conditions ~~D.1.19(b), D.2.24(b), D.3.18(b), D.4.18(b), D.5.11(c) and D.6.10(b)~~ comprise one record keeping requirement.
- ~~(a)(e)~~ To document compliance with Condition ~~D.6.8~~ **D.7.6**, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- ~~(b)(d)~~ All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### **D.6.11 Reporting Requirements**

- ~~(a)~~ Reports of monthly production totals by vehicle model shall be submitted to IDEM, OAQ on a quarterly basis, to comply with Condition ~~D.6.1(a)~~. This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The vehicle production reporting requirements established in Conditions ~~D.1.20(c), D.2.25(d), D.3.19(c), D.4.19(c), D.5.12(a) and D.6.11(a)~~ comprise one reporting requirement.
- ~~(b)~~ A quarterly summary of the information to document compliance with Conditions ~~D.6.1(d) and D.6.2~~ shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the month period being reported. The natural gas usage reporting requirements established in Conditions ~~D.1.20(d), D.2.25(e), D.3.19(d), D.4.19(d) and D.6.11(b)~~ comprise one reporting requirement.
- ~~(c)~~ Based on records required by Conditions ~~D.1.19(a), D.2.24(a), D.3.18(a), D.4.18(a), and D.6.10(a)~~, reports of monthly source-wide particulate (PM/PM10) emissions shall be submitted to IDEM, OAQ on a quarterly basis, to comply with Condition ~~D.6.1(b)~~. This report shall be submitted to the address listed in Section C - General Reporting

~~Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The particulate emission reporting requirements established in Conditions D.1.20(f), D.2.25(g), D.3.19(f), D.4.19(f) and D.6.11(e) comprise one reporting requirement.~~

**Comment No. 8:**

The reference in the last, unnumbered paragraph of Condition D.1.3 (Prevention of Significant Deterioration (PSD) - Particulate Matter) to "40 CFR 52.2" should be corrected to refer to "40 CFR 52.21".

**Response to Comment No. 8:**

This condition has been removed from the draft Section D.1 of the permit and placed in a new Section D.1 for conditions of source-wide applicability. This condition has also been revised such that it refers to 40 CFR 52.21 instead of 40 CFR 52.2. See Comment No. 7 and IDEM's response for more information.

**Comment No. 9:**

Regarding Condition D.1.5 (Prevention of Significant Deterioration (PSD) - Best Available Control Technology for Volatile Organic Compounds (VOC)), Subaru finds the proposed limit on total VOC emissions from source-wide coating and associated purge solvent and storage operations to be acceptable and appropriate. While Subaru has questions concerning some aspects of the netting calculations included in Appendix A to the TSD, these do not detract from its support of the proposed limit as an acceptable one for the Subaru plant.

**Response to Comment No. 9:**

IDEM has made no revisions to the permit in response to this comment.

**Comment No. 10: (duplicated by Comment Nos. 18, 28, 35 and 43)**

The general concept for calculating total PM emissions set forth in Conditions D.1.10, D.2.14, D.3.13, D.4.12 and D.6.9 seems appropriate. However, it seems more straightforward to calculate the PM emissions from a given coating operation on the basis of:

$$[(\text{Gallons of coating used/unit time}) \times (\text{density of coating}) \times (\text{weight \% solids of coating as a decimal})] \times (1-\text{TE}) \times (1-\text{control efficiency})$$

This form of the calculation is essentially what Subaru presently uses in its reporting under existing permit requirements. Subaru agrees that the unit of time to be used should be a month.

**Response to Comment No. 10: (and Comment Nos. 18, 28, 35 and 43)**

IDEM agrees that the suggested revision to the equation used to calculate surface coating PM emissions is appropriate, given the types of records that are kept by the source. In addition to reworking the equation such that it includes the coating density and the weight percent of solids for each coating, IDEM has removed the specific transfer efficiencies and control efficiencies that were included in the draft equation. In calculating the PM emissions from spray coating operations, the Permittee shall use the results of transfer efficiency determination tests to determine the appropriate transfer efficiency for each spray booth. The Permittee shall use manufacturer data to determine the appropriate control efficiencies for the dry filters and water washes. IDEM is requiring the Permittee to maintain records of the transfer and control efficiencies used in the PM compliance determination equation, along with an explanation of how these efficiencies were determined. Note that, because the specific transfer and control

efficiencies have been removed, the PM equations for all surface coating booths are now identical.

Accordingly, IDEM has made the following revisions to the particulate compliance determination equation and the record keeping requirements (note that some of the revisions indicated below were made in response to source comments addressed elsewhere in this document):

~~D.1.10 Prevention of Significant Deterioration (PSD) [326 IAC 2-2] [40 CFR 52.21]~~

~~Compliance with the source-wide particulate (PM/PM10) emission limit in Condition D.1.3(b) shall be determined by using the following equation, which calculates pounds of particulate emissions per month, and adding the result to the calculated particulate emissions from the previous eleven months:~~

~~$$\text{Total Particulate Emissions (lb/month)} = \text{PVC \#1 Coating PM/PM10} + \text{Topcoat \#1 Coating PM/PM10} + \text{Topcoat \#2 Coating PM/PM10} + \text{Twotone and Repair Coating PM/PM10} + \text{Intermediate (Surfacer) Coating PM/PM10} + \text{Plastic Bumper Coating PM/PM10} + \text{Black Coat and Wax Coating PM/PM10} + \text{Anticorrosion Coating PM/PM10} + \text{Touchup Trim Coating PM/PM10} + \text{Touchup IPC Coating PM/PM10} + \text{Natural Gas Combustion PM/PM10} + \text{Insignificant PM/PM10 Sources}$$~~

~~Where:~~

~~$$\text{PVC \#1 Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.80) * (1-0.85);$$~~

~~$$\text{Topcoat \#1 Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85);$$~~

~~$$\text{Topcoat \#2 Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85);$$~~

~~$$\text{Twotone and Repair Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85);$$~~

~~$$\text{Intermediate (Surfacer) Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.516) * (1-0.85);$$~~

~~$$\text{Plastic Bumper Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.423) * (1-0.85);$$~~

~~$$\text{Black Coat and Wax Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85);$$~~

~~$$\text{Anticorrosion Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.80) * (1-0.85);$$~~

~~$$\text{Touchup Trim Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85);$$~~

~~$$\text{Touchup IPC Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85);$$~~

~~$$\text{Natural Gas Combustion PM/PM10} = \text{natural gas usage (MMCF/month)} * 7.6 \text{ lb PM/MMCF};$$~~

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Insignificant PM/PM10 Sources = PM/PM10 emissions in lb/month from insignificant facilities that were permitted by the PSD (79) 1651 Revision;

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$C_i$  = usage of coating  $i$  in gallons per month; and

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$S_i$  = solids content of coating  $i$  in pounds of solids per gallon of coating.

#### D.1.4 Prevention of Significant Deterioration (PSD) [326 IAC 2-2] [40 CFR 52.21]

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Compliance with the source-wide particulate (PM/PM10) emission limit in Condition D.1.1(b) shall be determined by using the following equation, which calculates pounds of particulate emissions per month, and adding the result to the calculated particulate emissions from the previous eleven months:

**Total Particulate Emissions (lb/month) = PVC #1 Coating PM/PM10 + Topcoat #1 Coating PM/PM10 + Topcoat #2 Coating PM/PM10 + Twotone and Repair Coating PM/PM10 + Intermediate (Surfacer) Coating PM/PM10 + Plastic Bumper Coating PM/PM10 + Black Coat and Wax Coating PM/PM10 + Anticorrosion Coating PM/PM10 + Touchup Trim Coating PM/PM10 + Touchup IPC Coating PM/PM10 + Natural Gas Combustion PM/PM10 + Insignificant PM/PM10 Sources**

Where:

PM/PM10 emissions from each coating booth =  $\sum_{i=1}^n (C_i * D_i * S_i) * (1-TE) * (1-CE)$ ;

Natural Gas Combustion PM/PM10 = natural gas usage (MMCF/month) \* 7.6 lb PM/MMCF;

Insignificant PM/PM10 Sources = PM/PM10 emissions in lb/month from insignificant facilities that were permitted by the PSD (79) 1651 Revision;

$C_i$  = usage of coating  $i$  in gallons per month;

$D_i$  = density of coating  $i$  in pounds per gallon;

$S_i$  = solids content of coating  $i$ , expressed as a decimal weight percent;

TE = solids transfer efficiency of the applicator for each booth, based on transfer efficiency determination tests; and

CE = overall particulate control efficiency for each booth, based on manufacturer data.

#### D.1.5 Record Keeping Requirements

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- (a) To document compliance with Conditions D.1.1, D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (11) below. Records maintained for (1) through (11) shall be taken as stated below and shall be complete and sufficient to establish compliance with the particulate emission limit established in Condition D.1.1(b), the natural gas combustion limit established in Conditions D.1.1(d) and D.1.2 and the VOC emission limit established in Condition D.1.3. Records necessary to demonstrate compliance shall be available within 30

**days of the end of each compliance period.**

- (1) The VOC content of each coating material and solvent (including purge solvents and thinners) used less water.**
  - (2) The amount of coating material and solvent (including purge solvents and thinners) used on a 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 solvent.**
  - (3) The total VOC emissions from coatings and solvents (including purge solvents and thinners) for each day.**
  - (4) The amount of coating material and solvent (including purge solvents and thinners) transferred off-site for disposal or recycling for each day.**
  - (5) The density of each coating.**
  - (6) The solids content of each coating, expressed as a decimal weight percent.**
  - (7) The particulate transfer efficiency and particulate control efficiency for each surface coating booth, kept on a monthly basis, and an explanation of how these figures were determined.**
  - (8) The process weight rate of the insignificant robotic welding, brazing equipment, cutting torches, soldering equipment, grinding equipment, and machining equipment.**
  - (9) Any process information necessary to calculate particulate (PM/PM10) emissions from other insignificant operations described in Section D.7 (e.g., deburring, buffing, polishing, abrasive blasting activities, pneumatic conveying, woodworking operations, etc.).**
  - (10) A log of the dates of use.**
  - (11) The plant-wide metered natural gas usage for each month.**
- (b) To document compliance with Condition D.1.1(a), the Permittee shall maintain records of daily vehicle production.**
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

**Comment No. 11: (Duplicated by Comment No. 19)**

Subaru recommends that the calculations used in Conditions D.1.11 and D.2.15 (Compliance Determination: Volatile Organic Compounds (VOC)) be restated as follows to determine the VOC emissions in lbs VOC/gal applied solids for each coating material:

$$\text{VOC emissions (lbs VOC/gal applied solids)} = [(\text{lbs VOC/gal of coating}) \times (\text{gallons used per day}) / (\text{gallons of solids per day} \times \text{TE})] \times (1 - (\text{CE} \times \text{DE}))$$

Again, this form of the calculation is essentially what Subaru presently uses in its reporting under existing permit requirements.

### Response to Comment No. 11: (and Comment No. 19)

IDEM agrees that the suggested revision to the equation used to calculate surface coating VOC emissions is appropriate, given the types of records that are kept by the source. Accordingly, IDEM has revised the permit language as follows (note that some of the revisions indicated below were made in response to source comments addressed elsewhere in this document):

~~D.1.14~~

#### **D.2.9** Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Compliance with the VOC emission limit in Condition ~~D.1.5~~ **D.2.4** shall be determined with the following equation:

$$\text{VOC emissions (lb VOC/gal applied solids)} = [3 (C \times U) / 3 U] \times [(1/TE) \times (1 - (CE \times DE))]$$

$$\text{VOC emissions (lb VOC/gal applied solids)} = [3 (C \times U) / 3 (S \times TE)] \times [1 - (CE \times DE)]$$

Where:

C is the VOC content of the coating in pounds of VOC per gallon of ~~applied solids~~  
**coating, as applied;**

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

**S is the usage rate of coating solids in gallons per day;**

TE is the transfer efficiency of the applicator;

CE is the minimum capture efficiency of the incinerator required in Condition ~~D.1.5~~  
**D.2.4;** and

DE is the minimum destruction efficiency of the incinerator required in Condition ~~D.1.5~~  
**D.2.4.**

~~D.2.15~~

#### **D.3.13** Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Compliance with the VOC emission limits in Conditions ~~D.2.5, D.2.7, and D.2.10~~ **D.3.4, D.3.6 and D.3.9** shall be determined with the following equations (as applicable):

$$\text{VOC emissions (lb VOC/gal applied solids)} = [3 (C \times U) / 3 U] \times [(1/TE) \times (1 - (CE \times DE))]$$

$$\text{VOC emissions (lb VOC/gal applied solids)} = [3 (C \times U) / 3 (S \times TE)] \times [1 - (CE \times DE)]$$

Where:

C is the VOC content of the coating in pounds of VOC per gallon of ~~applied solids~~  
**coating, as applied;**

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

**S is the usage rate of coating solids in gallons per day;**

TE is the transfer efficiency of the applicator;

CE is the minimum capture efficiency of the incinerator required in Condition ~~D.2.5~~  
**D.3.4;** and

DE is the minimum destruction efficiency of the incinerator required in Condition ~~D.2.5~~  
**D.3.4.**

Or, if the emission limit is in units of pounds of VOC per gallon of coating less water:

$$\text{VOC emissions (lb VOC/gal coating less water)} = [3 (C \times U) / 3 U] \times [(1 - (CE \times DE))]$$

Where:

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

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

CE is the minimum capture efficiency of the incinerator required in Condition ~~D.2.5~~ **D.3.4**; and

DE is the minimum destruction efficiency of the incinerator required in Condition ~~D.2.5~~ **D.3.4**.

**Comment No. 12: (duplicated by Comment No. 20)**

Subaru objects to the proposed requirement of Condition D.1.13 (Testing Requirements) and similar conditions in Sections D.2 and D.3 to conduct a performance test on each thermal incinerator within 180 days after permit issuance and to repeat such tests on a five-year periodicity. Subaru performed tests to verify the VOC destruction efficiency of each of the thermal incinerators in the early 1990s pursuant to the terms of the PSD permit, as revised in 1989. There should be no need to reestablish destruction efficiencies of the incinerators unless Subaru makes substantial modifications to or replaces the incinerators. Subaru should not have to incur the costs of such unnecessary tests.

If IDEM does not agree with the foregoing objection to repetitive performance tests, Subaru respectfully requests that it be allowed to conduct the performance test on a representative thermal incinerator and apply those results to all thermal incinerators in use at Subaru's plant instead of testing each incinerator.

**Response to Comment No. 12: (and Comment No. 20)**

As discussed in the TSD and during telephone conversations with the source's consultant, IDEM is requiring testing of the thermal incinerators within 180 days after permit issuance and is requiring the source to repeat such tests every two and one half years (30 months). This was incorrectly stated in the draft permit.

IDEM is requiring testing of the thermal incinerators based on the magnitude of the allowable VOC emissions for the associated surface coating operations. IDEM has determined that testing at a frequency of twice per permit term is necessary to demonstrate compliance for certain types of operations, including surface coating operations, that have significant potential VOC emissions. Additionally, because these controls are necessary to meet PSD BACT provisions, it is important to ensure compliance with these provisions on a frequent basis.

The source has not demonstrated to IDEM that the thermal incinerators and the emissions controlled thereby are similar enough to justify a reduction in the testing requirement to a representative incinerator(s). Therefore, the Permittee is still required to test each of the seven (7) thermal incinerators. If the Permittee still believes that the coating operations and their respective controls are identical in nature, the Permittee can submit this information to IDEM, OAQ in the form of a permit modification. The IDEM, OAQ can then render a decision as to the units in question being considered identical.

In order to reflect the appropriate thermal incinerator testing requirements, IDEM has revised the permit language as follows (note that some of the revisions indicated below were made in response to source comments addressed elsewhere in this document):

~~D.1.13~~

**D.2.11** Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

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Within one hundred and eighty (180) days after issuance, the Permittee shall conduct a performance test to verify VOC control efficiency as per Condition ~~D.1.5~~ **D.2.4** for the thermal incinerator (~~BPR~~) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every ~~five years~~ **thirty (30) months (2.5 years)** from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

~~D.2.17~~

**D.3.15** Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

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Within one hundred and eighty (180) days after issuance, the Permittee shall conduct a performance test to verify VOC control efficiency (pursuant to Condition ~~D.2.5~~ **D.3.4**) for each incinerator utilizing methods as approved by the Commissioner. This test shall be repeated at least once every ~~five years~~ **thirty (30) months (2.5 years)** from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

**Comment No. 13: (duplicated by Comment No. 21)**

Paragraph (a) of both Conditions D.1.14 and D.2.18 (Thermal Incinerator Temperature) requires continuous monitoring of the operating temperature of each incinerator. The control instrumentation for the incinerators at Subaru's plant performs a continuous monitoring of the operating temperature. However, Subaru is uncertain at this point whether that control instrumentation can be readily modified to calculate and record hourly averages of operating temperature. Subaru is investigating this point.

This Permit Condition would more properly be considered a Compliance Monitoring Requirement than a Compliance Determination Requirement.

**Response to Comment No. 13: (and Comment No. 21)**

IDEM considers it necessary to determine a three-hour average operating temperature for each incinerator. However, IDEM will more thoroughly respond to the issue of how to calculate and record these average operating temperatures once the source has provided more information to demonstrate the difficulty involved.

In regards to the placement of the permit condition, IDEM considers incinerator temperature monitoring to be a Compliance Determination requirement when the incinerator is required pursuant to BACT. In cases where the use of an incinerator is not part of BACT, this condition is considered a Compliance Monitoring requirement. IDEM has made no revisions in response to this comment.

**Comment No. 14: (duplicate of Comment No. 22)**

Conditions D.1.15 and D.2.19 (Parametric Monitoring) would require monitoring once per day of the duct pressure or fan amperage associated with each incinerator. Subaru respectfully objects to these proposed conditions as unnecessary and burdensome for the specific reasons set forth below.

- (1) It is redundant with the continuous temperature monitoring requirement set in Conditions D.1.14 and D.2.18 (Thermal Incinerator Temperature), which generates much more intensive data on the key parameter affecting incinerator operation.
- (2) Moreover, the monitoring required by these draft conditions would be redundant with the fail-safe features of the incinerators installed at the source, which automatically shut

down an incinerator if either duct pressure or fan amperage deviates from a preset range based on manufacturer's specifications.

- (3) Considerable modifications to the control instrumentation for each incinerator would be required to provide read-outs of duct pressure or fan amperage as needed to implement the monitoring specified by these proposed conditions.

#### **Response to Comment No. 14: (and Comment No. 22)**

Upon consultation with an inspector, IDEM has determined that the source's current monitoring setup is sufficient to monitor the duct pressure and fan amperage of the thermal incinerators. Accordingly, IDEM has deleted draft Conditions D.1.15 and D.2.19 (Parametric Monitoring) from the permit and replaced them with conditions that require the Permittee to continue to use thermal incinerators with the shut down mechanisms described. IDEM has revised the permit language as follows:

#### **D.2.13**

##### **~~D.1.15~~ Parametric Monitoring [326 IAC 2-7-5(3)]**

- ~~(a) The Permittee shall determine the appropriate duct pressure or fan amperage associated with the incinerator (BPR) from the most recent valid stack test that demonstrates compliance with Condition D.1.5. This determination must be approved by IDEM.~~
- ~~(b) The Permittee shall observe the duct pressure or fan amperage at least once per day when the thermal incinerator (BPR) is in operation. The incinerator duct pressure or fan amperage shall be maintained within the normal range as established in the most recent compliant stack test. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A duct pressure or fan amperage reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.~~

**The thermal incinerator on the PBL Line shall be equipped with a mechanism that automatically shuts down the incinerator if either the duct pressure or the fan amperage deviates from a preset range. This preset range shall be based on the normal range as established in the most recent compliant stack test. This shut-down mechanism shall be functional at all times that the incinerator is in use. If, at any time, an incinerator is shut down because of a deviation from these preset ranges, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. An incinerator shutdown is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.**

#### **D.3.17**

##### **~~D.2.19~~ Parametric Monitoring [326 IAC 2-7-5(3)]**

- ~~(a) The Permittee shall determine the appropriate duct pressure or fan amperage associated with each incinerator (B-ED, GH, TC1, TC-2, TUT, and SUR) from the most recent valid stack test that demonstrates compliance with limits in Conditions D.2.5, D.2.7 and D.2.9, as approved by IDEM.~~

~~(b) The Permittee shall observe the duct pressure or fan amperage at least once per day when a thermal incinerator is in operation. The incinerator duct pressure or fan amperage shall be maintained within the normal range as established in the most recent compliant stack test. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A duct pressure or fan amperage reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.~~

**Each incinerator (B-ED, CH, TC1, TC-2, TUT, and SUR) shall be equipped with a mechanism that automatically shuts down the incinerator if either the duct pressure or the fan amperage deviates from a preset range. This preset range shall be based on the normal range as established in the most recent compliant stack test. These shut-down mechanisms shall be functional at all times that the associated incinerator is in use. If, at any time, an incinerator is shut down because of a deviation from these preset ranges, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. An incinerator shutdown is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.**

**Comment No. 15: (duplicated by Comment Nos. 23 and 36)**

Subaru objects to the proposed requirement of permit Conditions D.1.16, D.2.21, D.4.14 and D.4.15 (Particulate Compliance Monitoring) to perform weekly observations of the overspray from stacks for the various surface coating operations. Subaru believes this monitoring requirement is stated incorrectly and that IDEM actually intended to specify observations of overspray from the booth instead of from the booth stacks. Consequently, Subaru requests that these conditions be revised to read as follows:

Condition D.1.16:

“(b) In addition, weekly observations shall be made of the overspray from the **PBL** surface coating booth ~~stacks BPR-1, BPR-2, and BPR-JR~~ while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps . . . .”

Condition D.2.21:

“(b) In addition, weekly observations shall be made of the overspray from the **Topcoat surface coating booths, the Twotone and Repair Booth, and the Intermediate Coating Booth** ~~stacks TC1-1 through TC1-10, TC2-1 through TC2-10, TUT-1 through TUT-5, and SUR-2 through SUR-7~~ while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps . . . .”

Condition D.4.14:

“(a) Daily inspections shall be performed to verify . . . To monitor the performance of the dry filters, weekly observations shall be made of the overspray from **PVC Coating Booth #1 and the Black Coat and Wax Booth** ~~the surface coating booth stacks BCW Stack, PVC-1-2~~ while one or more of the booths are in operation. The Compliance Response Plan shall be followed . . . .”

Condition D.4.15:

- “(b) In addition, weekly observations shall be made of the overspray from **PVC Coating Booth #2 and the Anticorrosion Coating Booth** ~~surface coating booth stacks Anticorrosion Stack and PVC Booth-2~~ while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps . . . .”

On the other hand, if it is intended by the draft permit that the weekly observations be conducted of the stacks for the surface coating booths, this would be a burdensome requirement since it would require access to the roof to obtain meaningful observations. In such a case, Subaru requests that the frequency of the required observations be changed to monthly.

**Response to Comment No. 15: (and Comment Nos. 23 and 36)**

The requirements in the draft permit for overspray emission observations were included to ensure proper operation of the particulate controls that are necessary for compliance with 326 IAC 6-3-2. IDEM notes that such observations must be made on a regular basis of the emissions downstream of the control unit. Observations of the overspray within the booths would not be useful in determining whether the particulate controls are being used properly.

For some sources, IDEM has considered an alternative requirement for an operator training program that would take the place of the model compliance monitoring requirements for dry filters and water washes. This program would replace the weekly/monthly emission observation requirements to which Subaru has objected, as well as the current requirements for inspections and record keeping of dry filter placement, water levels, etc.

The Permittee indicated that they would prefer an operator training program requirement in lieu of the compliance monitoring requirements in the draft permit. Accordingly, IDEM has made the following revisions to the permit:

~~D.1.16 Particulate Compliance Monitoring~~

- ~~(a) Daily inspections shall be performed to verify that the water level of the water pans for the PBL Paint Booth's particulate control system meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer.~~
- ~~(b) In addition, weekly observations shall be made of the overspray from the surface coating booth stacks BPR-1, BPR-2, and BPR-JR while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.~~
- ~~(c) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.~~
- ~~(d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

#### **D.2.14 Operator Training Program**

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The Permittee shall implement an operator training program.

- (a) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the water wash control system on the Plastic Bumper Coating Line. All existing operators shall be trained upon permit issuance. All new operators shall be trained upon hiring or transfer.
- (b) Training shall include proper water level of the water pans, proper placement and configuration of baffle panels, other factors that affect water pan capture efficiency (e.g., debris in the water pans), and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.
- (c) All operators shall be given refresher training annually.

~~D.1.19~~

#### **D.2.17 Record Keeping Requirements**

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- (a) To document compliance with Conditions ~~D.1.3(b), D.1.3(d), D.1.4, D.1.5, D.1.14 and D.1.15~~ **D.2.4, D.2.12 and D.2.13**, the Permittee shall maintain records in accordance with (1) through ~~(8)~~ **(6)** below. Records maintained for (1) through ~~(8)~~ **(6)** shall be taken as stated below and shall be complete and sufficient to establish compliance with ~~the particulate emission limit established in Condition D.1.3(b), the natural gas combustion limit established in Conditions D.1.3(d) and D.1.4, the VOC emission limits established in Condition D.1.5, D.2.4 and the compliance determination requirements established in Conditions D.1.14 and D.1.15~~ **D.2.12 and D.2.13**. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
  - (1) The VOC content of each coating material (**as applied**) and **the VOC content of each** solvent (including purge solvents and thinners) used less water.
  - (2) The solids content of each coating material used (**as applied**).
  - (3) The amount of coating material and solvent (including purge solvents and thinners) used on a 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 solvent.
  - (4) The volume weighted average VOC content of the coatings used (**as applied**) for each day.
  - ~~(5) The total VOC emissions from coatings and solvents (including purge solvents and thinners) for each day.~~
  - ~~(5)~~**(6)** The continuous temperature records (on a three-hour average basis) for the thermal incinerator and the three-hour average temperature used to demonstrate compliance during the most recent compliant stack test.

- (6) Records of any thermal incinerator shutdowns due to duct pressure or fan amperage deviations.**
- ~~(7) Daily records of the duct pressure or fan amperage.~~
- ~~(8) The plant-wide metered natural gas usage for each month.~~
- ~~(b) To document compliance with Condition D.1.3(a), the Permittee shall maintain records of daily vehicle production. The vehicle production record keeping requirements established in Conditions D.1.19(b), D.2.24(b), D.3.18(b), D.4.18(b), D.5.11(c) and D.6.10(b) comprise one record keeping requirement.~~
- ~~(b)(e) To document compliance with Condition ~~D.1.9~~ **D.2.8**, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.~~
- (c) To document compliance with Condition D.2.14, the Permittee shall maintain copies of the training program, and the list of trained operators. Training records shall be maintained on site or available within 1 hour for inspection by IDEM.**
- ~~(d) To document compliance with Condition D.1.16, the Permittee shall maintain a log of weekly and monthly overspray observations, daily observations of the water level in the pans, and weekly observations of the placement and configuration of baffle panels.~~
- (d) To document compliance with Condition D.2.2, the Permittee shall collect and keep records of the data and information specified in 40 CFR 63.4530, paragraphs (c) through (h). Failure to collect and keep these records is a deviation from the applicable standard.**
- (1) These records shall be in a form suitable and readily available for expeditious review. Where appropriate, the records may be maintained as electronic spreadsheets or as a database.**
- (2) The Permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee shall keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee may keep the records off-site for the remaining 3 years.**
- (3) Compliance with the record keeping requirements of 40 CFR Part 63, Subpart IIII satisfies these record keeping requirements.**
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

~~D.2.21 Particulate Compliance Monitoring~~

- ~~(a) Daily inspections shall be performed to verify that the water level of the water pans employed for particulate control in each spray coating booth described in this Section D.2 meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer.~~

- ~~(b) In addition, weekly observations shall be made of the overspray from the surface coating booth stacks TC1-1 through TC1-10, TC2-1 through TC2-10, TUT-1 through TUT-5, and SUR-2 through SUR-7 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.~~
- ~~(c) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.~~
- ~~(d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

#### **D.3.19 Operator Training Program**

**The Permittee shall implement an operator training program.**

- (a) **All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the water wash control systems on the Topcoat #1, Topcoat #2, Twotone and Repair, and Intermediate Coating lines. All existing operators shall be trained upon permit issuance. All new operators shall be trained upon hiring or transfer.**
- (b) **Training shall include proper water level of the water pans, proper placement and configuration of baffle panels, other factors that affect water pan capture efficiency (e.g., debris in the water pans), and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.**
- (c) **All operators shall be given refresher training annually.**

**Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.**

~~D.2-24~~

#### **D.3.22 Record Keeping Requirements**

- (a) **To document compliance with Conditions ~~D.2.3(b), D.2.3(d), D.2.4, D.2.5, D.2.7, D.2.9, D.2.10, D.2.18 and D.2.19~~ **D.3.4, D.3.6, D.3.8, D.3.9 and D.3.16**, the Permittee shall maintain records in accordance with (1) through (8) **(7)** below. Records maintained for (1) through (8) **(7)** shall be taken as stated below and shall be complete and sufficient to establish compliance with ~~the particulate emission limit established in Condition D.2.3(b), the natural gas combustion limit established in Conditions D.2.3(d) and D.2.4,~~ the VOC emission limits established in Conditions ~~D.2.5, D.2.7, D.2.9 and D.2.10~~, **D.3.4, D.3.6, D.3.8 and D.3.9** and the compliance determination requirements established in Conditions ~~D.2.18 and D.2.19~~ **D.3.16**. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.**

- (1) The VOC content of each coating material (**as applied**) and **the VOC content of each** solvent (including purge solvents and thinners) used less water.
- (2) **The VOC content of each coating material used in the ED Body and ED Chassis Coating Tanks, as applied, less water.**
- ~~(3)(2)~~ The solids content of each coating material used (**as applied**).
- ~~(4)(3)~~ The amount of coating material and solvent (including purge solvents and thinners) used on a 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 solvent.
- ~~(5)(4)~~ The volume weighted average VOC content of the coatings used (**as applied**) for each day.
- ~~(5)~~ ~~The total VOC emissions from coatings and solvents (including purge solvents and thinners) for each day.~~
- (6) The continuous temperature records (on a three-hour average basis) for **the each** thermal incinerator and the three-hour average temperature used to demonstrate compliance during the most recent compliant stack test.
- (7) Records of any thermal incinerator shutdowns due to duct pressure or fan amperage deviations.**
- ~~(7)~~ ~~Daily records of the duct pressure or fan amperage.~~
- ~~(8)~~ ~~The plant-wide metered natural gas usage for each month.~~
- ~~(b)~~ ~~To document compliance with Condition D.2.3(a), the Permittee shall maintain records of monthly vehicle production. The vehicle production record keeping requirements established in Conditions D.1.19(b), D.2.24(b), D.3.18(b), D.4.18(b), D.5.11(c) and D.6.10(b) comprise one record keeping requirement.~~
- (b)(e)** To document compliance with Condition ~~D.2.13(a)~~ **D.3.12**, the Permittee shall maintain ~~of~~ records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) To document compliance with Condition D.3.19, the Permittee shall maintain copies of the training program, and the list of trained operators. Training records shall be maintained on site or available within 1 hour for inspection by IDEM.**
- ~~(d)~~ ~~To document compliance with Condition D.2.21, the Permittee shall maintain a log of weekly and monthly overspray observations, daily observations of the water level in the pans, and weekly observations of the placement and configuration of baffle panels.~~
- ~~(d)(e)~~ All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.4.13

#### ~~D.3.15~~ Particulate Compliance Monitoring Operator Training Program

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- ~~(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filter on the Touchup Trim Booth. To monitor the performance of the dry filter, weekly observations shall be made of the overspray from the stack while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, 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. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.~~
- ~~(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

**The Permittee shall implement an operator training program.**

- (a) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the dry filter on the Touchup Trim coating operation. All existing operators shall be trained upon permit issuance. All new operators shall be trained upon hiring or transfer.**
- (b) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.**
- (c) All operators shall be given refresher training annually.**

~~D.3-18~~

**D.4.16 Record Keeping Requirements**

- ~~(a) To document compliance with Conditions D.3.5(b), D.3.5(d), D.3.6, D.3.7 and D.3.9~~  
**D.4.5 and D.4.7**, the Permittee shall maintain records in accordance with (1) through (6) ~~(6)~~ **(3)** below. Records maintained for (1) through ~~(6)~~ **(3)** shall be taken as stated below and shall be complete and sufficient to establish compliance with ~~the particulate emission limit established in Condition D.3.5(b), the natural gas combustion limit established in Conditions D.3.5(d) and D.3.6, and the VOC emission limits established in Conditions D.3.7 and D.3.9~~ **D.4.5 and D.4.7**. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- ~~(1) The VOC content of each coating material (as applied, less water) and the VOC content of each solvent (including purge solvents and thinners) used less water.~~
- ~~(2) The solids content of each coating material used.~~

- (2)(3)** The amount of coating material and solvent (including purge solvents and thinners) used on a 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 solvent.
  - (C) Records shall be sufficient to demonstrate that the Touchup Trim Booth uses less than five gallons of coating per day.**
- (3)(4)** The volume weighted average VOC content of the coatings used **(as applied)** for each day.
- ~~(5) The total VOC emissions from coatings and solvents (including purge solvents and thinners) for each day.~~
- ~~(6) The plant-wide metered natural gas usage for each month.~~
- ~~(b) To document compliance with Condition D.3.5(a) the Permittee shall maintain records of monthly vehicle production.~~
- (b)(e)** To document compliance with Condition ~~D.3.12~~ **D.4.10**, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) To document compliance with Condition D.4.13, the Permittee shall maintain copies of the training program, and the list of trained operators. Training records shall be maintained on site or available within 1 hour for inspection by IDEM.**
- ~~(d) To document compliance with Condition D.3.15, the Permittee shall maintain a log of monthly and weekly overspray observations, and weekly observations of the placement, integrity, and particle loading of the filter.~~
- (d) To document compliance with Condition D.4.3, the Permittee shall collect and keep records of the data and information specified in 40 CFR 63.4530, paragraphs (c) through (h). Failure to collect and keep these records is a deviation from the applicable standard.**

  - (1) These records shall be in a form suitable and readily available for expeditious review. Where appropriate, the records may be maintained as electronic spreadsheets or as a database.**
  - (2) The Permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee shall keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee may keep the records off-site for the remaining 3 years.**
  - (3) Compliance with the record keeping requirements of 40 CFR Part 63, Subpart IIII satisfies these record keeping requirements.**
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.4.14 Particulate Compliance Monitoring (Dry Filters)

- ~~(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters employed for particulate control on the PVC Coating #1 Booth and the Black Coat and Wax Booth. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks BCW Stack, PVC-1-2 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.~~
- ~~(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.~~
- ~~(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

#### D.4.15 Particulate Compliance Monitoring (Water Washes)

- ~~(a) Daily inspections shall be performed to verify that the water level of the water pans employed for particulate control on the PVC Coating #2 Booth and the Anticorrosion Coating Booth meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer.~~
- ~~(b) In addition, weekly observations shall be made of the overspray from the surface coating booth stacks Anticorrosion Stack and PVC Booth 2 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.~~
- ~~(c) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.~~
- ~~(d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

#### D.5.12 Operator Training Program

**The Permittee shall implement an operator training program.**

- (a) **All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the dry filters on the PVC Booth #1 and Black Coat and Wax Coating operations, and of the water wash control systems on the PVC Booth #2 and Anticorrosion Coating operations. All existing operators shall be trained upon permit issuance. All new operators shall be trained upon hiring or transfer.**
- (b) **Training shall include proper filter alignment, filter inspection and maintenance, proper water level of the water pans, proper placement and configuration of baffle panels, other factors that affect water pan capture efficiency (e.g., debris in the water pans), and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.**
- (c) **All operators shall be given refresher training annually.**

D.4.18

**D.5.15** Record Keeping Requirements

- (a) To document compliance with Conditions ~~D.4.3(b), D.4.3(d), D.4.4, D.4.5 and D.4.7~~ **D.5.4 and D.5.6**, the Permittee shall maintain records in accordance with (1) through ~~(6)~~ **(4)** below. Records maintained for (1) through ~~(6)~~ **(4)** shall be taken as stated below and shall be complete and sufficient to establish compliance with ~~the particulate emission limit established in Condition D.4.3(b), the natural gas combustion limit established in Conditions D.4.3(d) and D.4.4, and the VOC emission limits established in Conditions D.4.5 and D.4.7~~ **D.5.4 and D.5.6**. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
  - (1) The VOC content of each coating material (**as applied, less water**) and **the VOC content of each** solvent (including purge solvents and thinners) used less water.
  - (2) The solids content of each coating material used (**as applied**).
  - (3) The amount of coating material and solvent (including purge solvents and thinners) used on a 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 solvent.
  - (4) The volume weighted average VOC content of the coatings used (**as applied**) for each day.
  - ~~(5) The total VOC emissions from coatings and solvents (including purge solvents and thinners) for each day.~~
  - ~~(6) The plant-wide metered natural gas usage for each month.~~
- ~~(b) To document compliance with Condition D.4.3(a), the Permittee shall maintain records of monthly vehicle production. The vehicle production record keeping requirements~~

~~established in Conditions D.1.19(b), D.2.24(b), D.3.18(b), D.4.18(b), D.5.11(e) and D.6.10(b) comprise one record keeping requirement.~~

- ~~(b)(e)~~ To document compliance with Condition ~~D.4.14~~ **D.5.10**, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) To document compliance with Condition D.5.12, the Permittee shall maintain copies of the training program, and the list of trained operators. Training records shall be maintained on site or available within 1 hour for inspection by IDEM.**
- ~~(d)~~ ~~To document compliance with Conditions D.4.14 and D.4.15, the Permittee shall maintain a log of weekly and monthly overspray observations, daily observations of the water level in the pans, and weekly observations of the placement and configuration of baffle panels, and weekly observations of the placement, integrity, and particle loading of the filters.~~
- ~~(d)(e)~~ All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**Comment No. 16: (Duplicated by Comment Nos. 24, 30, 37 and 40)**

Subaru's Plant will be subject to the Auto/Truck MACT, 40 CFR Part 63, Subpart IIII, when promulgated or as a result of operation of Section 112(j) of the Clean Air Act. This rule is projected to be finally adopted in the next month or two.

The Metal Parts MACT (40 CFR Part 63, Subpart MMMM) and the Plastic Parts MACT (40 CFR Part 63, Subpart PPPP) contain two provisions within 40 CFR 63.3881 and 40 CFR 63.4481, respectively, which are relevant to the potential overlap between the Auto/Truck MACT and the Metal Parts MACT and Plastic Parts MACT. First, under subsections (c)(17) and (c)(16), respectively, of the cited regulatory sections, neither the Metal Parts MACT nor the Plastic Parts MACT applies to an operation performing surface coating of miscellaneous metal parts or plastic components of automobiles and light-duty trucks that meet the applicability criteria for the Auto/Truck MACT. Second, under subsection (d) of the respective cited regulations, a person who performs surface coating of miscellaneous metal parts or plastic parts that meets the applicability criteria of either the Metal Parts MACT or the Plastic Parts MACT and the Auto/Truck MACT may elect to comply with the Auto/Truck MACT for the surface coating of all metal parts or plastic parts used in automobile or light-duty truck manufacturing in lieu of complying with the Auto/Truck MACT and the other MACT(s) separately and redundantly.

Thus, the final adoption of Subpart IIII, the Auto/Truck MACT, will present a situation in which the surface coating of miscellaneous metal parts or plastic parts at Subaru's facility which are components of vehicles produced there will either (i) be excluded automatically by operation of law from Subpart MMMM and/or Subpart PPPP, or (ii) may be excluded from an obligation to comply with Subpart MMMM and/or Subpart PPPP at the discretion of Subaru if it were to decide to comply with Subpart IIII in lieu of complying with Subpart MMMM or Subpart PPPP. We read "in lieu of complying" with Subpart MMMM and Subpart PPPP to be a total exclusion, including an exclusion from the initial notifications otherwise required if Subpart MMMM or Subpart PPPP were to remain applicable.

Consequently, Subaru suggests that the notification requirement conditions of the draft permit (Conditions D.1.17, D.2.22, D.3.16, D.4.16 and D.5.9) should each include a paragraph which acknowledges the prospective redundant applicability of the Auto/Truck MACT with the other two MACTs and addresses the contingency in which Subpart MMMM and/or Subpart PPPP were ultimately not to be applicable to Subaru's operations as a result of adoption of the Auto/Truck MACT. The following language is proposed for this purpose:

“(c) The surface coating of metal parts or products by the operations described in this section meets the applicability criteria of both the Metal Parts MACT and the Auto/Truck MACT. Similarly, the surface coating of plastic parts or products by the operations described in this section meets the applicability criteria of both the Plastic Parts MACT and the proposed Auto/Truck MACT. In the event that (1) the Auto/Truck MACT becomes effective before the deadline for submittal of the initial notification required under the Metal Parts MACT and/or the Plastic Parts MACT and (2) adoption of the Auto/Truck MACT renders the Metal Parts MACT and/or the Plastic Parts MACT inapplicable to Subaru, whether due to an affirmative election by Subaru or by operation of law, then Subaru shall make the initial notification and notification of compliance status in accordance with the Auto/Truck MACT and shall not be required to make such notifications under the Metal Parts MACT and/or the Plastic Parts MACT.”

Consistent with the above comment, the last line of paragraph (a) of these conditions should be revised to read “. . . except as provided in paragraphs (b) and (c) below.” Also, the first line of current paragraph (c), which should be renumbered paragraph (d), should be revised to read as follows:

“(d) All notifications required by paragraphs (a), and (b) or (c), above, must be submitted to: . . . .”

#### **Response to Comment No. 16: (and Comment Nos. 24, 30, 37 and 40)**

The NESHAP for Surface Coating of Automobiles and Light-Duty Trucks (40 CFR Part 63, Subpart IIII) became final on February 28, 2004. This rule is applicable to the coating operations performed at Subaru. As noted in the above comment, compliance with the requirements of Subpart IIII for the coating operations at Subaru is sufficient to demonstrate compliance with the requirements of Subparts MMMM and PPPP. Pursuant to 40 CFR 63.3910(b) and 63.4510(b), Subaru is required to submit notifications for Subparts MMMM and PPPP, respectively, even if opting to comply with the requirements of Subpart IIII. However, these notifications only need to include a statement to the effect that Subaru intends to comply with Subpart IIII. The notification requirement for Subpart IIII will still apply as described in that rule. IDEM has revised the permit such that the notification conditions include language for all applicable NESHAPs, describe what Subaru must do if intending to use Subpart IIII to demonstrate compliance with the other NESHAPs, and include the deadlines for submittal of the various notifications.

In addition to the revisions to the notification requirements discussed above, IDEM incorporated the limitations and requirements for Subpart IIII into the permit. IDEM has also revised the NESHAP General Provision conditions such that they: a) include language for Subpart IIII; and b) are consolidated into one condition instead of having separate General Provision conditions for each NESHAP.

Accordingly, the permit has been revised as follows (note that some of the revisions indicated below were made in response to source comments addressed elsewhere in this document):

#### ~~D.1.1~~

#### **D.2.1 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A][Table 2 to 40 CFR Part 63, Subpart IIII][Table 2 to 40 CFR Part 63, Subpart PPPP][40 CFR 63.3101][40 CFR 63.4501]**

- 
- (a) The provisions of 40 CFR Part 63, Subpart A - General Provisions (which are incorporated by reference as 326 IAC 20-1-1):
- (1) Apply to the affected source to the extent expressly specified by Table 2 to 40 CFR Part 63, Subpart PPPP and Table 2 to 40 CFR Part 63, Subpart IIII; and
  - (2) To the extent applicable to the affected source, are incorporated in this condition

by reference. The Permittee must comply with these requirements on and after ~~the effective date of 40 CFR Part 63, Subpart PPPP~~ **April 19, 2007 (for 40 CFR Part 63, Subpart PPPP) and June 25, 2007 (for 40 CFR Part 63, Subpart IIII).**

- (b) Since the applicable requirements addressed by paragraph (a) of this condition are included and specifically identified (by reference) in this permit, the permit shield established by Section B of this permit in the condition titled Permit Shield, and authorized by 326 IAC 2-7-15, applies to paragraph (a) of this condition.

~~D.1.2~~

**D.2.2** National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products: Limitations and Requirements [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482]

- 
- (a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source (as defined in ~~(e)~~ **(d)** below). A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after ~~three years following the effective date of 40 CFR Part 63, Subpart PPPP~~ **April 19, 2007.**
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The surface coating of plastic bumpers on the Plastic Bumper Coating Line meets the applicability criteria of both 40 CFR Part 63, Subpart PPPP (Surface Coating of Plastic Parts and Products) and 40 CFR Part 63, Subpart IIII (Surface Coating of Automobiles and Light-Duty Trucks), ~~which has not yet been promulgated. The Permittee may elect, pursuant to 40 CFR 63.4481(d), to comply with Subpart IIII (once it is promulgated) for the surface coating of plastic bumpers used in its manufacturing of automobiles and/or light-duty trucks in lieu of complying with each rule separately. As a result, the Permittee must select and implement a valid option for complying with this rule, and any other applicable rules of 40 CFR Part 63, pursuant to 40 CFR 63.4481(d) and (e).~~
- (d) Consistent with 40 CFR 63.4481, the emission units described in this Section ~~D.1~~ **D.2** which also meet one or more of the descriptions listed below, to the extent employed in the surface coating of plastic parts and products as defined in 40 CFR Part 63, Subpart PPPP, comprise the affected source that is subject to 40 CFR Part 63, Subpart PPPP:
- (1) All coating operations as defined in 40 CFR 63.4581;
  - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
  - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (e) Definitions of terms used in this section that are contained in 40 CFR 63.2 or in 40 CFR 63.4581 are incorporated herein by reference.

**D.2.3 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Automobiles and Light Duty Trucks: Limitations and Requirements [40 CFR Part 63, Subpart IIII] [40 CFR 63.3081] [40 CFR 63.3082] [40 CFR 63.3176]**

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- (a) The provisions of 40 CFR Part 63, Subpart IIII (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Automobiles and Light Duty Trucks) apply to the affected source (as defined in (c) below). A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/auto/autopg.html>. Pursuant to 40 CFR 63.3083(b), the Permittee must comply with these requirements on and after June 25, 2007.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) Consistent with 40 CFR 63.3081, the emission units described in this Section D.2 which also meet one or more of the descriptions listed below, to the extent employed in the surface coating of automobiles and light-duty trucks as defined in 40 CFR Part 63, Subpart IIII, comprise the affected source that is subject to 40 CFR Part 63, Subpart IIII:
- (1) All coating operations as defined in 40 CFR 63.3176;
  - (2) All storage containers and mixing vessels in which coatings, thinners, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings, thinners, and cleaning materials; and
  - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Definitions of terms used in this section that are contained in 40 CFR 63.2 or in 40 CFR 63.3176 are incorporated herein by reference.

~~D.1.17~~

**D.2.15 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products and Surface Coating of Automobiles and Light Duty Trucks - Notifications [40 CFR 63.4510] [40 CFR 63.3110]**

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- (a) The Permittee must submit the applicable notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, ~~except~~ and as provided in paragraphs (b) and (c) below.
- (b) With respect to 40 CFR Part 63, Subpart PPPP, the Permittee must submit the:
- (1) Initial notification required by 40 CFR 63.9(b) and 40 CFR 63.4510 **no later than April 19, 2005. If using compliance with the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (40 CFR Part 63, Subpart IIII) as provided for under 40 CFR 63.4881(d) to constitute compliance with this subpart for any or all of the plastic parts coating operations, then the Permittee must include a statement to this effect in the initial notification, and no other notifications are required under this subpart in regard to those plastic parts coating operations.** ~~and~~

- (2) Notification Of Compliance Status required by 40 CFR 63.9(h) and 40 CFR 63.4510 **no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source.** The notification of compliance status must contain the information specified in 40 CFR 63.4510(c), paragraphs (e)(1) through (11) and **any additional information specified** in 40 CFR 63.9(h).
- (c) **With respect to 40 CFR Part 63, Subpart IIII, the Permittee must submit the:**
- (1) **Initial notification required by 40 CFR 63.9(b) and 40 CFR 63.3110 no later than the date one (1) year following promulgation of Subpart IIII. Existing sources that have previously submitted notifications of applicability of this rule pursuant to Section 112(j) of the CAA are not required to submit an initial notification under 40 CFR 63.9(b) except to identify and describe all additions to the affected source made pursuant to 40 CFR 63.3082(c).**
- (2) **Notification Of Compliance Status required by 40 CFR 63.9(h) and 40 CFR 63.3110 no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3160. The notification of compliance status must contain the information specified in 40 CFR 63.3110(c), paragraphs (1) through (12) and in 40 CFR 63.9(h).**
- (d)(e) All notifications, required by (a), ~~and~~ (b) and (c) above, must be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Director, Air and Radiation Division  
77 Jackson Boulevard  
Chicago, Illinois 60604-3590

~~D.2.1~~

**D.3.1** General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A][**Table 2 to 40 CFR Part 63, Subpart IIII**][Table 2 to 40 CFR Part 63, Subpart MMMM][**40 CFR 63.3101**][40 CFR 63.3901]

- 
- (a) The provisions of 40 CFR Part 63, Subpart A - General Provisions (which are incorporated by reference as 326 IAC 20-1-1):
- (1) apply to the affected source to the extent expressly specified by Table 2 to 40 CFR Part 63, Subpart MMMM **and Table 2 to 40 CFR Part 63, Subpart IIII**; and
- (2) to the extent applicable to the affected source, are incorporated in this condition by reference. The Permittee must comply with these requirements on and after ~~the effective date of 40 CFR Part 63, Subpart MMMM~~ **January 2, 2007 (for 40 CFR Part 63, Subpart MMMM) and June 25, 2007 (for 40 CFR Part 63, Subpart IIII).**
- (b) Since the applicable requirements addressed by paragraph (a) of this condition are included and specifically identified (by reference) in this permit, the permit shield established by Section B of this permit in the condition titled Permit Shield, and

authorized by 326 IAC 2-7-15, applies to paragraph (a) of this condition.

~~D.2.2~~

**D.3.2 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products: Limitations and Requirements [40 CFR Part 63, Subpart M MMMM][40 CFR 63.3882][40 CFR 63.3882][40 CFR 63.3883][40 CFR 63.3890]**

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- (a) The provisions of 40 CFR Part 63, Subpart M MMMM (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source (as defined in ~~(c)~~ (d) below). A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.3891, the Permittee must comply with these requirements on and after ~~three years following the effective date of 40 CFR Part 63, Subpart M MMMM~~ **January 2, 2007**.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The surface coating of metal parts in the various coating operations described in this Section ~~D.2~~ **D.3** meets the applicability criteria of both 40 CFR Part 63, Subpart M MMMM (Surface Coating of Miscellaneous Metal Parts and Products) and 40 CFR Part 63, Subpart IIII (Surface Coating of Automobiles and Light-Duty Trucks), ~~which has not yet been promulgated. The Permittee may elect, pursuant to 40 CFR 63.3881(d), to comply with Subpart IIII (once it is promulgated) for the surface coating of metal parts or products used in its manufacturing of automobiles and/or light-duty trucks in lieu of complying with each rule separately. As a result, the Permittee must select and implement a valid option for complying with this rule, and any other applicable rules of 40 CFR Part 63, pursuant to 40 CFR 63.3881(d) and (e).~~
- (d) Consistent with 40 CFR 63.3881(a), the emission units described in this Section ~~D.2~~ **D.3** which also meet one or more of the descriptions listed below, to the extent employed in the surface coating of metal parts or products as defined in 40 CFR Part 63, Subpart M MMMM, comprise the affected source that is subject to 40 CFR Part 63, Subpart M MMMM:
- (1) All coating operations as defined in 40 CFR 63.3981;
  - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings thinners and/or other additives, and cleaning materials; and
  - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (e) Definitions of terms used in this section that are contained in 40 CFR 63.2 or in 40 CFR ~~63.3980~~**63.3981** are incorporated herein by reference.

**D.3.3 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Automobiles and Light Duty Trucks: Limitations and Requirements [40 CFR Part 63, Subpart IIII] [40 CFR 63.3081] [40 CFR 63.3082] [40 CFR 63.3176]**

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- (a) The provisions of 40 CFR Part 63, Subpart IIII (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Automobiles and Light Duty Trucks) apply to the affected source (as defined in (c) below). A copy of this rule

is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/auto/autopg.html>. Pursuant to 40 CFR 63.3083(b), the Permittee must comply with these requirements on and after June 25, 2007.

- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) Consistent with 40 CFR 63.3081, the emission units described in this Section D.3 which also meet one or more of the descriptions listed below, to the extent employed in the surface coating of automobiles and light-duty trucks as defined in 40 CFR Part 63, Subpart IIII, comprise the affected source that is subject to 40 CFR Part 63, Subpart IIII:
  - (1) All coating operations as defined in 40 CFR 63.3176;
  - (2) All storage containers and mixing vessels in which coatings, thinners, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings, thinners, and cleaning materials; and
  - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Definitions of terms used in this section that are contained in 40 CFR 63.2 or in 40 CFR 63.3176 are incorporated herein by reference.

~~D.2.22~~

**D.3.20** National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products **and Surface Coating of Automobiles and Light Duty Trucks - Notifications [40 CFR 63.3910] [40 CFR 63.3110]**

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- (a) The Permittee must submit the applicable notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, ~~except~~ **and** as provided in paragraphs (b) **and** (c) below.
- (b) With respect to 40 CFR Part 63, Subpart Mmmm, the Permittee must submit the:
  - (1) Initial notification required by 40 CFR 63.9(b) and 40 CFR 63.3910 **no later than January 2, 2005. If using compliance with the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (40 CFR Part 63, Subpart IIII) as provided for under 40 CFR 63.3881(d) to constitute compliance with this subpart for any or all of the metal parts coating operations, then the Permittee must include a statement to this effect in the initial notification, and no other notifications are required under this subpart in regard to those metal parts coating operations.** ~~and~~
  - (2) Notification Of Compliance Status required by 40 CFR 63.9(h) and 40 CFR 63.3910 **no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source.** The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).

**(c) With respect to 40 CFR Part 63, Subpart IIII, the Permittee must submit the:**

- (1) Initial notification required by 40 CFR 63.9(b) and 40 CFR 63.3110 no later than June 25, 2005. Existing sources that have previously submitted notifications of applicability of this rule pursuant to Section 112(j) of the CAA are not required to submit an initial notification under 40 CFR 63.9(b) except to identify and describe all additions to the affected source made pursuant to 40 CFR 63.3082(c).**
- (2) Notification Of Compliance Status required by 40 CFR 63.9(h) and 40 CFR 63.3110 no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3160. The notification of compliance status must contain the information specified in 40 CFR 63.3110(c), paragraphs (1) through (12) and in 40 CFR 63.9(h).**

**(d)(e)** All notifications, required by (a), ~~and~~ (b) and (c) above, must be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Director, Air and Radiation Division  
77 Jackson Boulevard  
Chicago, Illinois 60604-3590

~~D.3.1~~

~~D.4.1~~ **General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A][Table 2 to 40 CFR Part 63, Subpart IIII][Table 2 to 40 CFR Part 63, Subpart MMMM][Table 2 to 40 CFR Part 63, Subpart PPPP][40 CFR 63.3101][40 CFR 63.3901][40 CFR 63.4501]**

- 
- (a) The provisions of 40 CFR Part 63, Subpart A - General Provisions (which are incorporated by reference as 326 IAC 20-1-1):**
    - (1) apply to the affected source to the extent expressly specified by Table 2 to 40 CFR Part 63, Subpart MMMM, Table 2 to 40 CFR Part 63, Subpart PPPP and Table 2 to 40 CFR Part 63, Subpart IIII; and**
    - (2) to the extent applicable to the affected source, are incorporated in this condition by reference. The Permittee must comply with these requirements on and after the effective date of 40 CFR Part 63, Subpart MMMM January 2, 2007 (for 40 CFR Part 63, Subpart MMMM), April 19, 2007 (for 40 CFR Part 63, Subpart PPPP) and June 25, 2007 (for 40 CFR Part 63, Subpart IIII).**
  - (b) Since the applicable requirements addressed by paragraph (a) of this condition are included and specifically identified (by reference) in this permit, the permit shield established by Section B of this permit in the condition titled Permit Shield, and authorized by 326 IAC 2-7-15, applies to paragraph (a) of this condition.**

~~D.3.2~~ **General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A][Table 2 to 40 CFR Part 63, Subpart PPPP]**

- 
- ~~(a) The provisions of 40 CFR Part 63, Subpart A - General Provisions (which are incorporated by reference as 326 IAC 20-1-1):~~

- 
- (1) ~~Apply to the affected source to the extent expressly specified by Table 2 to 40 CFR Part 63, Subpart PPPP; and~~
- 
- (2) ~~To the extent applicable to the affected source, are incorporated in this condition by reference. The Permittee must comply with these requirements on and after the effective date of 40 CFR Part 63, Subpart PPPP.~~
- 
- (b) ~~Since the applicable requirements addressed by paragraph (a) of this condition are included and specifically identified (by reference) in this permit, the permit shield established by Section B of this permit in the condition titled Permit Shield, and authorized by 326 IAC 2-7-15, applies to paragraph (a) of this condition.~~

~~D.3.3~~

**D.4.2 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products: Limitations and Requirements** [40 CFR Part 63, Subpart MMMM][40 CFR 63.3882][40 CFR 63.3882][40 CFR 63.3883][40 CFR 63.3890]

- 
- (a) The provisions of 40 CFR Part 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source (as defined in ~~(e)~~(d) below). A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.3891, the Permittee must comply with these requirements on and after ~~three years following the effective date of 40 CFR Part 63, Subpart MMMM.~~ **January 2, 2007.**
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The surface coating of metal parts in the various coating operations described in this Section ~~D.3~~ **D.4** meets the applicability criteria of both 40 CFR Part 63, Subpart MMMM (Surface Coating of Miscellaneous Metal Parts and Products) and 40 CFR Part 63, Subpart IIII (Surface Coating of Automobiles and Light-Duty Trucks), ~~which has not yet been promulgated. The Permittee may elect, pursuant to 40 CFR 63.3881(d), to comply with Subpart IIII (once it is promulgated) for the surface coating of metal parts or products used in its manufacturing of automobiles and/or light-duty trucks in lieu of complying with each rule separately. As a result, the Permittee must select and implement a valid option for complying with this rule, and any other applicable rules of 40 CFR Part 63, pursuant to 40 CFR 63.3881(d) and (e).~~
- (d) Consistent with 40 CFR 63.3881(a), the emission units described in this Section ~~D.3~~ **D.4** which also meet one or more of the descriptions listed below, to the extent employed in the surface coating of metal parts or products as defined in 40 CFR Part 63, Subpart MMMM, comprise the affected source that is subject to 40 CFR Part 63, Subpart MMMM:
- (1) All coating operations as defined in 40 CFR 63.3981;
  - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings thinners and/or other additives, and cleaning materials; and
  - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

- (e) Definitions of terms used in this section that are contained in 40 CFR 63.2 or in 40 CFR 63.3980**3981** are incorporated herein by reference.

~~D.3.4~~

**D.4.3 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products: Limitations and Requirements [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482]**

---

- (a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source (as defined in ~~(c)~~**(d)** below). A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after ~~three years following the effective date of 40 CFR Part 63, Subpart PPPP~~ **April 19, 2007**.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The surface coating of plastic parts in the various coating operations described in this Section ~~D.3~~ **D.4** meets the applicability criteria of both 40 CFR Part 63, Subpart PPPP (Surface Coating of Plastic Parts and Products) and 40 CFR Part 63, Subpart IIII (Surface Coating of Automobiles and Light-Duty Trucks); ~~which has not yet been promulgated. The Permittee may elect, pursuant to 40 CFR 63.4481(d), to comply with Subpart IIII (once it is promulgated) for the surface coating of plastic bumpers used in its manufacturing of automobiles and/or light-duty trucks in lieu of complying with each rule separately. As a result, the Permittee must select and implement a valid option for complying with this rule, and any other applicable rules of 40 CFR Part 63, pursuant to 40 CFR 63.4481(d) and (e).~~
- (d) Consistent with 40 CFR 63.4481, the emission units described in this Section ~~D.3~~ **D.4** which also meet one or more of the descriptions listed below, to the extent employed in the surface coating of plastic parts and products as defined in 40 CFR Part 63, Subpart PPPP, comprise the affected source that is subject to 40 CFR Part 63, Subpart PPPP:
- (1) All coating operations as defined in 40 CFR 63.4581;
  - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
  - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (e) Definitions of terms used in this section that are contained in 40 CFR 63.2 or in 40 CFR 63.4581 are incorporated herein by reference.

**D.4.4 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Automobiles and Light Duty Trucks: Limitations and Requirements [40 CFR Part 63, Subpart IIII] [40 CFR 63.3081] [40 CFR 63.3082] [40 CFR 63.3176]**

---

- (a) The provisions of 40 CFR Part 63, Subpart IIII (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Automobiles and Light Duty Trucks) apply to the affected source (as defined in (c) below). A copy of this rule

is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/auto/autopg.html>. Pursuant to 40 CFR 63.3083(b), the Permittee must comply with these requirements on and after June 25, 2007.

- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) Consistent with 40 CFR 63.3081, the emission units described in this Section D.4 which also meet one or more of the descriptions listed below, to the extent employed in the surface coating of automobiles and light-duty trucks as defined in 40 CFR Part 63, Subpart IIII, comprise the affected source that is subject to 40 CFR Part 63, Subpart IIII:
  - (1) All coating operations as defined in 40 CFR 63.3176;
  - (2) All storage containers and mixing vessels in which coatings, thinners, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings, thinners, and cleaning materials; and
  - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Definitions of terms used in this section that are contained in 40 CFR 63.2 or in 40 CFR 63.3176 are incorporated herein by reference.

#### D.3.16

**D.4.14 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products, and Surface Coating of Plastic Parts and Products and Surface Coating of Automobiles and Light Duty Trucks - Notifications [40 CFR 63.3910] [40 CFR 63.4510] [40 CFR 63.3110]**

- 
- (a) The Permittee must submit the applicable notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, ~~except~~ **and** as provided in paragraphs (b) **and** (c) below.
  - (b) With respect to 40 CFR Part 63, Subparts MMMM and PPPP, the Permittee must submit the:
    - (1) Initial notifications required by 40 CFR 63.9(b), 40 CFR 63.3910, and 40 CFR 63.4510 **no later than January 2, 2005 (for 40 CFR Part 63, Subpart MMMM) and April 19, 2005 (for 40 CFR Part 63, Subpart PPPP). If using compliance with the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (40 CFR Part 63, Subpart IIII) as provided for under 40 CFR 63.3881(d) and 63.4881(d) to constitute compliance with these subparts for any or all of the metal or plastic parts coating operations, then the Permittee must include a statement to this effect in the initial notifications, and no other notifications are required under these subparts in regard to those metal or plastic parts coating operations.**; ~~and~~
    - (2) Notification Of Compliance Status required by 40 CFR 63.9(h), 40 CFR 63.3910, and 40 CFR 63.4510 **no later than 30 calendar days following the end of the**

**initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, 63.3960, 63.4540, 63.4550 or 63.4560 that applies to the affected source.** The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11), 40 CFR 63.4510(c), paragraphs (1) through (11), and any additional information specified in 40 CFR 63.9(h).

**(c) With respect to 40 CFR Part 63, Subpart IIII, the Permittee must submit the:**

- (1) Initial notification required by 40 CFR 63.9(b) and 40 CFR 63.3110 no later than June 25, 2005. Existing sources that have previously submitted notifications of applicability of this rule pursuant to Section 112(j) of the CAA are not required to submit an initial notification under 40 CFR 63.9(b) except to identify and describe all additions to the affected source made pursuant to 40 CFR 63.3082(c).**
- (2) Notification Of Compliance Status required by 40 CFR 63.9(h) and 40 CFR 63.3110 no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3160. The notification of compliance status must contain the information specified in 40 CFR 63.3110(c), paragraphs (1) through (12) and in 40 CFR 63.9(h).**

**(d)(e)** All notifications, required by (a), ~~and (b)~~ **and (c)** above, must be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Director, Air and Radiation Division  
77 Jackson Boulevard  
Chicago, Illinois 60604-3590

~~D.4.1~~

**D.5.1** General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A][**Table 2 to 40 CFR Part 63, Subpart IIII**][Table 2 to 40 CFR Part 63, Subpart MMMM][**40 CFR 63.3101**][40 CFR 63.3901]

- 
- (a) The provisions of 40 CFR Part 63, Subpart A - General Provisions (which are incorporated by reference as 326 IAC 20-1-1):
- (1) apply to the affected source to the extent expressly specified by Table 2 to 40 CFR Part 63, Subpart MMMM **and Table 2 to 40 CFR Part 63, Subpart IIII**; and
  - (2) to the extent applicable to the affected source, are incorporated in this condition by reference. The Permittee must comply with these requirements on and after ~~the effective date of 40 CFR Part 63, Subpart MMMM~~ **January 2, 2007 (for 40 CFR Part 63, Subpart MMMM) and June 25, 2007 (for 40 CFR Part 63, Subpart IIII).**
- (b) Since the applicable requirements addressed by paragraph (a) of this condition are included and specifically identified (by reference) in this permit, the permit shield established by Section B of this permit in the condition titled Permit Shield, and authorized by 326 IAC 2-7-15, applies to paragraph (a) of this condition.

~~D.4.2~~

**D.5.2 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products: Limitations and Requirements [40 CFR Part 63, Subpart MMMM][~~40 CFR 63.3882~~][40 CFR 63.3882][40 CFR 63.3883][40 CFR 63.3890]**

---

- (a) The provisions of 40 CFR Part 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source (as defined in ~~(c)~~(d) below). A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.3891, the Permittee must comply with these requirements on and after ~~three years following the effective date of 40 CFR Part 63, Subpart MMMM~~ **January 2, 2007**.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The surface coating of metal parts in the various coating operations described in this Section ~~D.4~~ **D.5** meets the applicability criteria of both 40 CFR Part 63, Subpart MMMM (Surface Coating of Miscellaneous Metal Parts and Products) and 40 CFR Part 63, Subpart IIII (Surface Coating of Automobiles and Light-Duty Trucks), ~~which has not yet been promulgated. The Permittee may elect, pursuant to 40 CFR 63.3881(d), to comply with Subpart IIII (once it is promulgated) for the surface coating of metal parts or products used in its manufacturing of automobiles and/or light-duty trucks in lieu of complying with each rule separately. As a result, the Permittee must select and implement a valid option for complying with this rule, and any other applicable rules of 40 CFR Part 63, pursuant to 40 CFR 63.3881(d) and (e).~~
- (d) Consistent with 40 CFR 63.3881(a), the emission units described in this Section ~~D.4~~ **D.5** which also meet one or more of the descriptions listed below, to the extent employed in the surface coating of metal parts or products as defined in 40 CFR Part 63, Subpart MMMM, comprise the affected source that is subject to 40 CFR Part 63, Subpart MMMM:
- (1) All coating operations as defined in 40 CFR 63.3981;
  - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings thinners and/or other additives, and cleaning materials; and
  - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (e) Definitions of terms used in this section that are contained in 40 CFR 63.2 or in 40 CFR ~~63.3980~~**3981** are incorporated herein by reference.

**D.5.3 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Automobiles and Light Duty Trucks: Limitations and Requirements [40 CFR Part 63, Subpart IIII] [40 CFR 63.3081] [40 CFR 63.3082] [40 CFR 63.3176]**

---

- (a) The provisions of 40 CFR Part 63, Subpart IIII (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Automobiles and Light Duty Trucks) apply to the affected source (as defined in (c) below). A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/auto/autopg.html>. Pursuant to 40 CFR 63.3083(b), the

**Permittee must comply with these requirements on and after June 25, 2007.**

- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.**
- (c) Consistent with 40 CFR 63.3081, the emission units described in this Section D.5 which also meet one or more of the descriptions listed below, to the extent employed in the surface coating of automobiles and light-duty trucks as defined in 40 CFR Part 63, Subpart IIII, comprise the affected source that is subject to 40 CFR Part 63, Subpart IIII:**
  - (1) All coating operations as defined in 40 CFR 63.3176;**
  - (2) All storage containers and mixing vessels in which coatings, thinners, and cleaning materials are stored or mixed;**
  - (3) All manual and automated equipment and containers used for conveying coatings, thinners, and cleaning materials; and**
  - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.**
- (d) Definitions of terms used in this section that are contained in 40 CFR 63.2 or in 40 CFR 63.3176 are incorporated herein by reference.**

**D.4.16**

**D.5.13 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products and Surface Coating of Automobiles and Light Duty Trucks - Notifications [40 CFR 63.3910] [40 CFR 63.3110]**

---

- (a) The Permittee must submit the applicable notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, ~~except~~ and as provided in paragraphs (b) and (c) below.**
- (b) With respect to 40 CFR Part 63, Subpart M, the Permittee must submit the:**
  - (1) Initial notification required by 40 CFR 63.9(b) and 40 CFR 63.3910 no later than January 2, 2005. If using compliance with the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (40 CFR Part 63, Subpart IIII) as provided for under 40 CFR 63.3881(d) to constitute compliance with this subpart for any or all of the metal parts coating operations, then the Permittee must include a statement to this effect in the initial notification, and no other notifications are required under this subpart in regard to those metal parts coating operations. ~~and~~**
  - (2) Notification Of Compliance Status required by 40 CFR 63.9(h) and 40 CFR 63.3910 no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).**
- (c) With respect to 40 CFR Part 63, Subpart IIII, the Permittee must submit the:**

- (1) **Initial notification required by 40 CFR 63.9(b) and 40 CFR 63.3110 no later than June 25, 2005. Existing sources that have previously submitted notifications of applicability of this rule pursuant to Section 112(j) of the CAA are not required to submit an initial notification under 40 CFR 63.9(b) except to identify and describe all additions to the affected source made pursuant to 40 CFR 63.3082(c).**
  - (2) **Notification Of Compliance Status required by 40 CFR 63.9(h) and 40 CFR 63.3110 no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3160. The notification of compliance status must contain the information specified in 40 CFR 63.3110(c), paragraphs (1) through (12) and in 40 CFR 63.9(h).**
- (d)(e) All notifications, required by (a), and (b) and (c) above, must be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Director, Air and Radiation Division  
77 Jackson Boulevard  
Chicago, Illinois 60604-3590

~~D.5.1~~

~~D.6.1~~ **General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A][Table 2 to 40 CFR Part 63, Subpart IIII][Table 2 to 40 CFR Part 63, Subpart MMMM][Table 2 to 40 CFR Part 63, Subpart PPPP][40 CFR 63.3101][40 CFR 63.3901][40 CFR 63.4501]**

- 
- (a) The provisions of 40 CFR Part 63, Subpart A - General Provisions (which are incorporated by reference as 326 IAC 20-1-1):
- (1) apply to the affected source to the extent expressly specified by Table 2 to 40 CFR Part 63, Subpart MMMM, **Table 2 to 40 CFR Part 63, Subpart PPPP and Table 2 to 40 CFR Part 63, Subpart IIII**; and
  - (2) to the extent applicable to the affected source, are incorporated in this condition by reference. The Permittee must comply with these requirements on and after ~~the effective date of 40 CFR Part 63, Subpart MMMM~~ **January 2, 2007 (for 40 CFR Part 63, Subpart MMMM), April 19, 2007 (for 40 CFR Part 63, Subpart PPPP) and June 25, 2007 (for 40 CFR Part 63, Subpart IIII).**
- (b) Since the applicable requirements addressed by paragraph (a) of this condition are included and specifically identified (by reference) in this permit, the permit shield established by Section B of this permit in the condition titled Permit Shield, and authorized by 326 IAC 2-7-15, applies to paragraph (a) of this condition.

~~D.5.2~~ **General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A][Table 12 to 40 CFR Part 63, Subpart PPPP]**

- 
- (a) ~~The provisions of 40 CFR Part 63, Subpart A - General Provisions (which are incorporated by reference as 326 IAC 20-1-1):~~
- (1) ~~apply to the affected source to the extent expressly specified by Table 2 to 40 CFR Part 63, Subpart PPPP; and~~

- ~~(2) to the extent applicable to the affected source, are incorporated in this condition by reference. The Permittee must comply with these requirements on and after the effective date of 40 CFR Part 63, Subpart PPPP.~~
- ~~(b) Since the applicable requirements addressed by paragraph (a) of this condition are included and specifically identified (by reference) in this permit, the permit shield established by Section B of this permit in the condition titled Permit Shield, and authorized by 326 IAC 2-7-15, applies to paragraph (a) of this condition.~~

~~D.5.3~~

**D.6.2** National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products: **Limitations and Requirements** [40 CFR Part 63, Subpart MMMM][40 CFR 63.3882][~~40 CFR 63.3882~~][40 CFR 63.3883][40 CFR 63.3890]

- (a) The provisions of 40 CFR Part 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source (as defined in ~~(e)~~**(d)** below). A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/mispcpg.html>. Pursuant to 40 CFR 63.3891, the Permittee must comply with these requirements on and after three years following the effective date of 40 CFR Part 63, Subpart MMMM **January 2, 2007**.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) **The application of adhesives to metal parts and the purge solvent recovery system surface coating of metal parts in the various coating operations described in this Section D.5 D.6 meets meet** the applicability criteria of both 40 CFR Part 63, Subpart MMMM (Surface Coating of Miscellaneous Metal Parts and Products) and 40 CFR Part 63, Subpart IIII (Surface Coating of Automobiles and Light-Duty Trucks), ~~which has not yet been promulgated. The Permittee may elect, pursuant to 40 CFR 63.3881(d), to comply with Subpart IIII (once it is promulgated) for the surface coating of metal parts or products used in its manufacturing of automobiles and/or light-duty trucks in lieu of complying with each rule separately. As a result, the Permittee must select and implement a valid option for complying with this rule, and any other applicable rules of 40 CFR Part 63, pursuant to 40 CFR 63.3881(d) and (e).~~
- (d) Consistent with 40 CFR 63.3881(a), the emission units described in this Section ~~D.5 D.6~~ which also meet one or more of the descriptions listed below, to the extent employed in the surface coating of metal parts or products as defined in 40 CFR Part 63, Subpart MMMM, comprise the affected source that is subject to 40 CFR Part 63, Subpart MMMM:
- (1) All coating operations as defined in 40 CFR 63.3981;
  - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings thinners and/or other additives, and cleaning materials; and
  - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (e) Definitions of terms used in this section that are contained in 40 CFR 63.2 or in 40 CFR

63.39803981 are incorporated herein by reference.

~~D.5.4~~

**D.6.3 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products: Limitations and Requirements [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482]**

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- (a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source (as defined in ~~(e)~~(d) below). A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after **April 19, 2007**.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) **The application of adhesives to plastic parts and the purge solvent recovery system surface coating of plastic parts in the various coating operations described in this Section ~~D.5 D.6~~ meets meet** the applicability criteria of both 40 CFR Part 63, Subpart PPPP (Surface Coating of Plastic Parts and Products) and 40 CFR Part 63, Subpart IIII (Surface Coating of Automobiles and Light-Duty Trucks), ~~which has not yet been promulgated. The Permittee may elect, pursuant to 40 CFR 63.4481(d), to comply with Subpart IIII (once it is promulgated) for the surface coating of plastic bumpers used in its manufacturing of automobiles and/or light-duty trucks in lieu of complying with each rule separately. As a result, the Permittee must select and implement a valid option for complying with this rule, and any other applicable rules of 40 CFR Part 63, pursuant to 40 CFR 63.4481(d) and (e).~~
- (d) Consistent with 40 CFR 63.4481, the emission units described in this Section ~~D.5 D.6~~ which also meet one or more of the descriptions listed below, to the extent employed in the surface coating of plastic parts and products as defined in 40 CFR Part 63, Subpart PPPP, comprise the affected source that is subject to 40 CFR Part 63, Subpart PPPP:
- (1) All coating operations as defined in 40 CFR 63.4581;
  - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
  - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (e) Definitions of terms used in this section that are contained in 40 CFR 63.2 or in 40 CFR 63.4581 are incorporated herein by reference.

**D.6.4 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Automobiles and Light Duty Trucks: Limitations and Requirements [40 CFR Part 63, Subpart IIII] [40 CFR 63.3081] [40 CFR 63.3082] [40 CFR 63.3176]**

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- (a) The provisions of 40 CFR Part 63, Subpart IIII (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Automobiles and Light Duty Trucks) apply to the affected source (as defined in (c) below). A copy of this rule is available on the US EPA Air Toxics Website at

<http://www.epa.gov/ttn/atw/auto/autopg.html>. Pursuant to 40 CFR 63.3083(b), the Permittee must comply with these requirements on and after the date three (3) years following promulgation of 40 CFR Part 63, Subpart IIII.

- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) Consistent with 40 CFR 63.3081, the emission units described in this Section D.6 which also meet one or more of the descriptions listed below, to the extent employed in the surface coating of automobiles and light-duty trucks as defined in 40 CFR Part 63, Subpart IIII, comprise the affected source that is subject to 40 CFR Part 63, Subpart IIII:
  - (1) All coating operations as defined in 40 CFR 63.3176;
  - (2) All storage containers and mixing vessels in which coatings, thinners, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings, thinners, and cleaning materials; and
  - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (d) Definitions of terms used in this section that are contained in 40 CFR 63.2 or in 40 CFR 63.3176 are incorporated herein by reference.

~~D.5.9~~

**D.6.7 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products, and Surface Coating of Plastic Parts and Products and Surface Coating of Automobiles and Light Duty Trucks - Notifications [40 CFR 63.3910] [40 CFR 63.4510] [40 CFR 63.3110]**

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- (a) The Permittee must submit the applicable notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, ~~except~~ **and** as provided in paragraphs (b) **and** (c) below.
  - (b) With respect to 40 CFR Part 63, Subparts MMMM and PPPP, the Permittee must submit the:
    - (1) Initial notifications required by 40 CFR 63.9(b), 40 CFR 63.3910, and 40 CFR 63.4510 **no later than January 2, 2005 (for 40 CFR Part 63, Subpart MMMM) and April 19, 2005 (for 40 CFR Part 63, Subpart IIII). If using compliance with the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (40 CFR Part 63, Subpart IIII) as provided for under 40 CFR 63.3881(d) and 63.4881(d) to constitute compliance with these subparts for any or all of the metal or plastic parts coating operations, then the Permittee must include a statement to this effect in the initial notifications, and no other notifications are required under these subparts in regard to those metal or plastic parts coating operations.**; ~~and~~
    - (2) Notification Of Compliance Status required by 40 CFR 63.9(h), 40 CFR 63.3910, and 40 CFR 63.4510 **no later than 30 calendar days following the end of the**

**initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, 63.3960, 63.4540, 63.4550 or 63.4560 that applies to the affected source.** The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11), 40 CFR 63.4510(c), paragraphs (1) through (11), and any additional information specified in 40 CFR 63.9(h).

**(c) With respect to 40 CFR Part 63, Subpart IIII, the Permittee must submit the:**

- (1) Initial notification required by 40 CFR 63.9(b) and 40 CFR 63.3110 no later than June 25, 2005. Existing sources that have previously submitted notifications of applicability of this rule pursuant to Section 112(j) of the CAA are not required to submit an initial notification under 40 CFR 63.9(b) except to identify and describe all additions to the affected source made pursuant to 40 CFR 63.3082(c).**
- (2) Notification Of Compliance Status required by 40 CFR 63.9(h) and 40 CFR 63.3110 no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3160. The notification of compliance status must contain the information specified in 40 CFR 63.3110(c), paragraphs (1) through (12) and in 40 CFR 63.9(h).**

**(d)(e)** All notifications, required by (a), ~~and~~ (b) and (c) above, must be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Director, Air and Radiation Division  
77 Jackson Boulevard  
Chicago, Illinois 60604-3590

**Comment No. 17: (duplicated by Comment Nos. 25, 31, 38 and 41)**

The surface coating of metal parts and/or plastic parts by the operations described in this section will be subject to the currently proposed NESHAP for Surface Coating of Automobiles and Light Trucks, 40 CFR Part 63, Subpart IIII, once promulgated, as well as the NESHAPs for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR Part 63, Subpart MMMM, and/or for Surface Coating of Plastic Parts and Products, 40 CFR Part 63, Subpart PPPP. Depending upon when Subpart IIII becomes effective, Subaru may have the option of complying with Subpart IIII in lieu of Subparts MMMM and PPPP. Consequently, the conditions of this draft permit which require the submittal of a significant permit modification (Conditions D.1.18, D.2.23, D.3.17, D.4.17 and D.5.10) should each be revised to read as follows to reflect this contingency:

“Consistent with the following provisions, the Permittee shall submit to IDEM, OAQ an application for a significant permit modification to this permit to include the applicable requirements for 40 CFR Part 63, Subpart MMMM (Surface Coating of Miscellaneous Metal Parts and Products) and/or 40 CFR Part 63, Subpart PPPP (Surface Coating of Plastic Parts and Products). **If 40 CFR Part 63, Subpart IIII (Surface Coating of Automobiles and Light Trucks) is promulgated prior to the date on which an application for a significant permit modification concerning Subparts MMMM and PPPP is required and the Permittee elects, as provided in Condition D.1.2(c), to**

**comply with Subpart IIII in lieu of complying with Subparts MMMM and PPPP, then the application for a significant permit modification may address incorporation of applicable requirements of Subpart IIII instead of Subparts MMMM and PPPP.**

- “(a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including (i) sufficient information from the Notification of Compliance Status and other sources as needed for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR Part 63, Subparts MMMM and/or PPPP **or Subpart IIII, if promulgated and elected by Permittee**, (ii) a description of the affected source and activities subject to the standard, and (iii) a description of how the Permittee will meet the applicable requirements of the standard.”

**Response to Comment No. 17: (and Comment Nos. 25, 31, 38 and 41)**

IDEM agrees that compliance with the requirements of Subpart IIII for the coating operations at Subaru is sufficient to demonstrate compliance with the requirements of Subparts MMMM and PPPP. However, IDEM believes that the permit language needs to clearly indicate that Subparts MMMM and PPPP remain applicable to the source, and that Subaru must submit notifications and permit modification applications accordingly.

In order to consolidate the Permittee’s requirements for submitting permit modification applications for these three NESHAPs, IDEM has revised the permit to require one permit modification application which will include the required information for all three NESHAPs. This application will be submitted no later than the earliest submittal deadline of the three NESHAPs. If the application indicates that the source will comply with Subpart IIII for all of their coating operations, then the application must still include all required information for Subparts MMMM and PPPP; in this case, the description of how the Permittee will meet the applicable requirements of these two NESHAPs need only indicate that the source will comply with Subpart IIII.

Accordingly, the permit has been revised as follows (note that some of the revisions indicated below were made in response to source comments addressed elsewhere in this document):

~~D.1.18~~

**D.2.16** Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

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~~Consistent with the following provisions, the Permittee shall submit to IDEM, OAQ an application for a significant permit modification to this permit to include the applicable requirements for 40 CFR Part 63, Subpart PPPP (Surface Coating of Plastic Parts and Products):~~ **The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information from the Notification Of Compliance Status (NOCS) in the Title V permit.**

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including ~~(1) sufficient and include:~~ information from the Notification of Compliance Status and other sources as needed **sufficient** for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR Part 63, Subpart PPPP **and Subpart IIII**, ~~(2)~~ a description of the affected source and activities subject to the standards, and ~~(3)~~ a description of how the Permittee will meet the applicable requirements of the standards.

- (b) **The significant permit modification application shall be submitted no later than July 19, 2006 and shall be submitted to:**

**Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality**

**100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015**

~~D.2.23~~

**D.3.21** Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

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Consistent with the following provisions, the Permittee shall submit to IDEM, OAQ an application for a significant permit modification to this permit to include the applicable requirements for 40 CFR Part 63, Subpart M (Surface Coating of Miscellaneous Metal Parts and Products). **The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information from the Notification Of Compliance Status (NOCS) in the Title V permit.**

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including ~~(1) sufficient and include:~~ information from the Notification of Compliance Status and other sources as needed **sufficient** for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR Part 63, Subpart M **and Subpart III**, ~~(2)~~ a description of the affected source and activities subject to the standards, and ~~(3)~~ a description of how the Permittee will meet the applicable requirements of the standards.
- (b) **The significant permit modification application shall be submitted no later than April 2, 2006 and shall be submitted to:**

**Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015**

~~D.3.17~~

**D.4.15** Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

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Consistent with the following provisions, the Permittee shall submit to IDEM, OAQ an application for a significant permit modification to this permit to include the applicable requirements for 40 CFR Part 63, Subparts M (Surface Coating of Miscellaneous Metal Parts and Products) and P (Surface Coating of Plastic Parts and Products). **The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information from the Notification Of Compliance Status (NOCS) in the Title V permit.**

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including ~~(1) sufficient and include:~~ information from the Notification of Compliance Status and other sources as needed **sufficient** for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR Part 63, Subparts M, **Subpart P and Subpart III**, ~~(2)~~ a description of the affected source and activities subject to the standards, and ~~(3)~~ a description of how the Permittee will meet the applicable requirements of the standards.
- (b) The significant permit modification application shall be submitted no later than **April 2, 2006** ~~27 months following the effective date of 40 CFR Part 63, Subpart M, or Subpart P (whichever is later)~~ and shall be submitted to:

**Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015**

~~D.4.17~~

**D.5.14** Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

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~~Consistent with the following provisions, the Permittee shall submit to IDEM, OAQ an application for a significant permit modification to this permit to include the applicable requirements for 40 CFR Part 63, Subpart M MMM (Surface Coating of Miscellaneous Metal Parts and Products).~~ **The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information from the Notification Of Compliance Status (NOCS) in the Title V permit.**

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, ~~including (1) sufficient and include: information from the Notification of Compliance Status and other sources as needed sufficient~~ for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR Part 63, Subpart M ~~MMM and Subpart III~~, (2) a description of the affected source and activities subject to the standards, and (3) a description of how the Permittee will meet the applicable requirements of the standards.
- (b) The significant permit modification application shall be submitted no later than ~~27 months following the effective date of 40 CFR Part 63, Subpart M MMM~~, **April 2, 2006** and shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

~~D.5.18~~

**D.6.8** Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

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~~Consistent with the following provisions, the Permittee shall submit to IDEM, OAQ an application for a significant permit modification to this permit to include the applicable requirements for 40 CFR Part 63, Subparts M MMM (Surface Coating of Miscellaneous Metal Parts and Products) and P PPP (Surface Coating of Plastic Parts and Products).~~ **The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information from the Notification Of Compliance Status (NOCS) in the Title V permit.**

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, ~~including (1) sufficient and include: information from the Notification of Compliance Status and other sources as needed sufficient~~ for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR Part 63, Subparts M ~~MMM~~, **Subpart** and P ~~PPP and Subpart III~~, (2) a description of the affected source and activities subject to the standards, and (3) a description of how the Permittee will meet the applicable requirements of the standards.
- (b) The significant permit modification application shall be submitted no later than **April 2, 2006** ~~27 months following the effective date of 40 CFR Part 63, Subpart M MMM, or Subpart P PPP (whichever is later)~~ and shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

**Comment Nos. 18 through 25:**

These are all duplicate comments that have been addressed previously in this addendum.

(Respectively, comments No. 10, 11, 12, 13, 14, 15, 16 and 17).

**Comment No. 26:**

Subparagraph (a)(6) of Condition D.2.24 (Record Keeping Requirements) should be revised to specify the temperature records for **each** thermal incinerator.

**Response to Comment No. 26:**

IDEM agrees with the source and has made the suggested revision. See revised Condition D.3.22 (note that some of the revisions indicated below were made in response to source comments addressed elsewhere in this document):

~~D.2.24~~

**D.3.22** Record Keeping Requirements

- (a) To document compliance with Conditions ~~D.2.3(b), D.2.3(d), D.2.4, D.2.5, D.2.7, D.2.9, D.2.10, D.2.18 and D.2.19~~ **D.3.4, D.3.6, D.3.8, D.3.9 and D.3.16**, the Permittee shall maintain records in accordance with (1) through ~~(8)~~ **(7)** below. Records maintained for (1) through ~~(8)~~ **(7)** shall be taken as stated below and shall be complete and sufficient to establish compliance with ~~the particulate emission limit established in Condition D.2.3(b), the natural gas combustion limit established in Conditions D.2.3(d) and D.2.4,~~ the VOC emission limits established in Conditions ~~D.2.5, D.2.7, D.2.9 and D.2.10,~~ **D.3.4, D.3.6, D.3.8 and D.3.9** and the compliance determination requirements established in Conditions ~~D.2.18 and D.2.19~~ **D.3.16**. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each coating material **(as applied)** and **the VOC content of each** solvent (including purge solvents and thinners) used less water.
  - (2) **The VOC content of each coating material used in the ED Body and ED Chassis Coating Tanks, as applied, less water.**
  - ~~(3)(2)~~ The solids content of each coating material used **(as applied)**.
  - ~~(4)(3)~~ The amount of coating material and solvent (including purge solvents and thinners) used on a 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 solvent.
  - ~~(5)(4)~~ The volume weighted average VOC content of the coatings used **(as applied)** for each day.
  - ~~(5)~~ ~~The total VOC emissions from coatings and solvents (including purge solvents and thinners) for each day.~~
  - (6) The continuous temperature records (on a three-hour average basis) for ~~the~~ **each** thermal incinerator and the three-hour average temperature used to demonstrate compliance during the most recent compliant stack test.
  - (7) **Records of any thermal incinerator shutdowns due to duct pressure or fan amperage deviations.**

- ~~(7) Daily records of the duct pressure or fan amperage.~~
- ~~(8) The plant-wide metered natural gas usage for each month.~~
- ~~(b) To document compliance with Condition D.2.3(a), the Permittee shall maintain records of monthly vehicle production. The vehicle production record keeping requirements established in Conditions D.1.19(b), D.2.24(b), D.3.18(b), D.4.18(b), D.5.11(c) and D.6.10(b) comprise one record keeping requirement.~~
- ~~(b)(e)~~ To document compliance with Condition ~~D.2.13(a)~~ **D.3.12**, the Permittee shall maintain ~~of~~ records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) To document compliance with Condition D.3.19, the Permittee shall maintain copies of the training program, and the list of trained operators. Training records shall be maintained on site or available within 1 hour for inspection by IDEM.**
- ~~(d) To document compliance with Condition D.2.21, the Permittee shall maintain a log of weekly and monthly overspray observations, daily observations of the water level in the pans, and weekly observations of the placement and configuration of baffle panels.~~
- ~~(d)(e)~~ All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**Comment No. 27:**

Condition D.3.11 (Particulate) should be deleted. The draft permit indicates that it is based on 326 IAC 6-3-2(d). However, under subdivision (4) of this rule section, surface coating operations that use less than five (5) gallons of coating per day are exempted from the requirements of 326 IAC 6-3-2(d). Subaru uses far less than five gallons of coating per day in the Touchup Trim Booth. Actual usage of coating material in this booth is closer to a gallon or so per month.

**Response to Comment No. 27:**

IDEM agrees that the Touchup Trim Booth should be exempt from the requirements of 326 IAC 6-3-2 because of the small amount of coating used by the operation. Accordingly, this condition has been replaced with a condition that requires the Permittee to notify IDEM if this booth is ever operated in such a manner as to use at least five gallons of coating per day. Also, the Permittee must maintain records of coating usage sufficient to demonstrate that the Touchup Trim Booth uses less than five gallons of coating per day.

The draft Condition D.3.11 required the source to use dry filters for particulate control on the Touchup Trim Booth, pursuant to 326 IAC 6-3-2. This requirement is also pursuant to PSD (79) 1651, issued on July 30, 1987. Therefore, while the booth is no longer subject to 326 IAC 6-3-2, it is still required to use dry filters. Accordingly, IDEM has added a compliance determination condition indicating that the dry filters are required pursuant to PSD (79) 1651.

The following revisions have been made to the permit:

~~D.3.11~~

**D.4.9** Particulate [326 IAC 6-3-2(d)]

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~~Pursuant to 326 IAC 6-3-2(d), particulate emissions from the Touchup Trim Booth shall be controlled by a dry filter and the Permittee shall operate the control device in accordance with manufacturer's specifications. The Touchup Trim Booth uses less than five (5) gallons of coating per day. The Permittee shall notify IDEM, OAQ of any changes in operation that could result in the Touchup Trim Booth using five (5) gallons or more of coating per day.~~

#### D.4.11 Particulate

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**Pursuant to PSD (79) 1651, issued on July 30, 1987, particulate emissions from the Touchup Trim Booth shall be controlled by a dry filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.**

~~D.3.18~~

#### D.4.16 Record Keeping Requirements

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- (a) To document compliance with Conditions ~~D.3.5(b), D.3.5(d), D.3.6, D.3.7 and D.3.9~~ **D.4.5 and D.4.7**, the Permittee shall maintain records in accordance with (1) through ~~(6)~~ **(3)** below. Records maintained for (1) through ~~(6)~~ **(3)** shall be taken as stated below and shall be complete and sufficient to establish compliance with ~~the particulate emission limit established in Condition D.3.5(b), the natural gas combustion limit established in Conditions D.3.5(d) and D.3.6, and the VOC emission limits established in Conditions D.3.7 and D.3.9~~ **D.4.5 and D.4.7**. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each coating material (**as applied, less water**) and **the VOC content of each** solvent (including purge solvents and thinners) used less water.
- ~~(2) The solids content of each coating material used.~~
- ~~(3)~~ **(2)** The amount of coating material and solvent (including purge solvents and thinners) used on a 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 solvent.
- (C) Records shall be sufficient to demonstrate that the Touchup Trim Booth uses less than five gallons of coating per day.**
- ~~(3)~~ **(4)** The volume weighted average VOC content of the coatings used (**as applied**) for each day.
- ~~(5) The total VOC emissions from coatings and solvents (including purge solvents and thinners) for each day.~~
- ~~(6) The plant-wide metered natural gas usage for each month.~~
- ~~(b) To document compliance with Condition D.3.5(a) the Permittee shall maintain records of monthly vehicle production.~~
- ~~(b)~~ **(c)** To document compliance with Condition ~~D.3.12~~ **D.4.10**, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) To document compliance with Condition D.4.13, the Permittee shall maintain copies of the training program, and the list of trained operators. Training records shall be maintained on site or available within 1 hour for inspection by IDEM.**
- ~~(d) To document compliance with Condition D.3.15, the Permittee shall maintain a log of monthly and weekly overspray observations, and weekly observations of the placement, integrity, and particle loading of the filter.~~

- (d) **To document compliance with Condition D.4.3, the Permittee shall collect and keep records of the data and information specified in 40 CFR 63.4530, paragraphs (c) through (h). Failure to collect and keep these records is a deviation from the applicable standard.**
- (1) **These records shall be in a form suitable and readily available for expeditious review. Where appropriate, the records may be maintained as electronic spreadsheets or as a database.**
- (2) **The Permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee shall keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee may keep the records off-site for the remaining 3 years.**
- (3) **Compliance with the record keeping requirements of 40 CFR Part 63, Subpart IIII satisfies these record keeping requirements.**
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**Comment No. 28:**

Duplicate of Comment No. 10.

**Comment No. 29: (duplicated by Comment No. 36)**

The proposed Conditions D.3.15 and D.4.14 (Particulate Compliance Monitoring) would require daily inspections of the dry filters used as particulate controls in the surface coating booths described in Section D.3. Subaru respectfully objects to this proposed requirement and proposes a weekly inspection frequency in the alternative for the following reasons.

Subaru currently employs a weekly schedule for inspection and replacement of dry filter elements used at the booths in question. This schedule is incorporated in Subaru's Preventive Maintenance Plan for these facilities and experience has shown the weekly frequency to be adequate to maintain satisfactory operation of the dry filters. Thus, no need exists for a daily inspection frequency.

**Response to Comment No. 29: (and Comment No. 36)**

See IDEM's response to Comment No. 15

**Comment Nos. 30 through 31:**

These are all duplicate comments that have been addressed previously in this addendum. (Respectively, comments No. 16 and 17).

**Comment No. 32: (duplicated by Comment No. 39)**

The record keeping requirements specified in paragraph (d) of Conditions D.3.18 and D.4.18 (Record Keeping Requirements) do not, in all respects, accurately track the observation and inspection requirements of Conditions D.3.15 and D.4.14, respectively, which require daily rather than weekly inspections of the placement, integrity, and particle loading of dry filters. Subaru, however, has requested a weekly periodicity for these inspections.

**Response to Comment No. 32: (and Comment No. 39)**

See IDEM's response to Comment No. 15

**Comment No. 33:**

The facility description of the PVC Undercoating Line in Section D.4 should be revised to be consistent with the revisions proposed to Condition A.2(b) of the draft permit.

**Response to Comment No. 33:**

See IDEM's response to Comment No. 1.

**Comment No. 34:**

The limit on PM emissions contained in paragraph (a) of Condition D.4.6 (Prevention of Significant Deterioration - Best Available Control Technology for Nitrogen Oxides (NO<sub>x</sub>)), 0.12 lb/mmBtu heat input, is in error and should be restated as 0.10 lb/mmBtu heat input in order to remain consistent with the conditions of the PSD permit, as revised in 1989.

**Response to Comment No. 34:**

IDEM agrees that the PM limit in draft Condition D.4.6 was erroneously stated as 0.12 lb/mmBtu heat input and should be restated as 0.10 lb/mmBtu heat input. Accordingly, IDEM has revised this condition as follows (note that some of the revisions indicated below were made in response to source comments addressed elsewhere in this document):

~~D.4.6~~

**D.5.5** Prevention of Significant Deterioration - Best Available Control Technology for Nitrogen Oxides (NO<sub>x</sub>) [40 CFR 52.21] [326 IAC 2-2]

---

Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, and 326 IAC 2-2-3, BACT for NO<sub>x</sub> for the natural gas combustion facilities described in this section is the following:

- (a) The NO<sub>x</sub> emissions from the PVC Coating #1 Booth Preheat Burner, the Black and Wax Coat Booth burner, the two (2) insignificant PVC Seal #1 Oven burners, the two (2) insignificant natural gas-fired burners, and the insignificant Anticorrosion Booth burner shall not exceed ~~0.12~~ **0.10** pounds per million Btu (lb/MMBtu) heat input each; and

...

**Comment No. 35:**

This is a duplicate comment and has been addressed in comment 10.

**Comment No. 36:**

See Comment Nos. 15 and 29.

**Response to Comment No. 36:**

See IDEM's response to Comment No. 15 regarding observations of overspray from surface coating stacks.

See IDEM's response to Comment No. 29 regarding the frequency of dry filter inspections.

**Comment Nos. 37 and 38:**

See Comment Nos. 16 and 17, respectively.

**Response to Comment Nos. 37 and 38:**

See IDEM's response to Comment Nos. 16 and 17, respectively.

**Comment No. 39:**

See Comment No. 32.

**Response to Comment No. 39:**

See IDEM's response to Comment No. 29 regarding the frequency of dry filter inspections.

See IDEM's response to Comment No. 32 regarding the record keeping requirements associated with dry filter inspections.

**Comment Nos. 40 and 41:**

See Comment Nos. 16 and 17, respectively.

**Response to Comment Nos. 41:**

See IDEM's response to Comment Nos. 16 and 17, respectively.

**Comment No. 42:**

In the facility descriptions for Section D.6, the reference in item (e) to Tert-butyl Methyl Ether in relation to gasoline fill operations is incorrect and should be revised to read "Methyl Tert-butyl Ether."

**Response to Comment No. 42:**

IDEM has made the following revisions to the permit in response to this comment and to make the facility descriptions in Condition A.3 consistent with those in the new Section D.7:

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

---

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

...

(e) Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO<sub>2</sub>; 5 lb/hr or 25 lb/day NO<sub>x</sub>; 3 lb/hr or 15 lb/day VOC; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

(1) Gasoline Fill Operations (Benzene, Naphthalene, Ethylbenzene, Styrene, Toluene, Hexane, Xylene, ~~Tert-butyl Methyl Ether~~ **Methyl Tert-butyl Ether**) [40 CFR 52.21] [326 IAC 2-2]

...

**SECTION D.6 D.7**

**FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)]:**

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

...

(e) Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO<sub>2</sub>; 5 lb/hr or 25 lb/day NO<sub>x</sub>; 3 lb/hr or 15 lb/day VOC; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:

(1) Gasoline Fill Operations (Benzene, Naphthalene, Ethylbenzene, Styrene, Toluene, Hexane, Xylene, ~~Tert-butyl Methyl Ether~~ **Methyl Tert-butyl Ether**) [40 CFR 52.21] [326 IAC 2-2]

...

**Comment No. 43:**

See comment and response No. 10.

**Comment No. 44:**

As a general matter, Subaru incorporates in its comments on the draft TSD all comments concerning the draft permit which are also relevant to the TSD. This avoids the physical reiteration of all such comments herein.

**Response to Comment No. 44:**

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support document and its appendices that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

No changes have been made to the permit as a result of this comment.

On May 26, 2004, EPA Region 5 submitted comments on the proposed Part 70 Permit. The following is a summary of the comments and responses to those comments. Bold language has been added and language with a line through it has been deleted. The Table Of Contents has been modified, if applicable, to reflect any changes.

**EPA Comment No. 1:**

Conditions D.2.12, D.2.13, D.3.16, D.3.17: Please provide an origin and authority for these permit conditions.

**Response to EPA Comment No. 1:**

These monitoring requirements for the thermal incinerators were included pursuant to the general requirement for monitoring in Part 70 permits in 326 IAC 2-7-5(3). IDEM has therefore revised the permit language such that these conditions indicate the source of authority (note that

some of the revisions indicated below were made in response to source comments addressed elsewhere in this document):

~~D.1.14~~

**D.2.12 Thermal Incinerator Temperature [326 IAC 2-7-5(3)]**

---

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal incinerator ~~(BPR)~~ for measuring operating temperature. For the purposes of this condition, continuous monitoring shall mean no less often than once per minute. The output of this system shall be recorded as a three-hour average. If the continuous monitoring system is not in operation, the temperature will be recorded manually once in a 15-minute period. Nothing in this permit shall excuse the Permittee from complying with the requirement to continuously monitor the temperature of the thermal incinerator.
- (b) From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate the thermal incinerator ~~(BPR)~~ at or above the three-hour average temperature of 1,400 °F. The Permittee shall determine the minimum three-hour average operating temperature from the most recent valid stack test that demonstrates compliance with Condition ~~D.1.5~~ **D.2.4**. This determination must be approved by IDEM.
- (c) The Permittee shall then operate the thermal incinerator ~~(BPR)~~ at or above the minimum three-hour average temperature as observed during the most recent compliant stack test following approval of that temperature.
- (d) The Permittee take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the three-hour average temperature of the thermal incinerator ~~(BPR)~~ is below the compliant three-hour average temperature. A three-hour average temperature that is below the compliant three-hour average temperature is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

**D.2.13**

~~D.1.15~~ **Parametric Monitoring [326 IAC 2-7-5(3)]**

---

- ~~(a) The Permittee shall determine the appropriate duct pressure or fan amperage associated with the incinerator (BPR) from the most recent valid stack test that demonstrates compliance with Condition D.1.5. This determination must be approved by IDEM.~~
- ~~(b) The Permittee shall observe the duct pressure or fan amperage at least once per day when the thermal incinerator (BPR) is in operation. The incinerator duct pressure or fan amperage shall be maintained within the normal range as established in the most recent compliant stack test. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A duct pressure or fan amperage reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.~~

**The thermal incinerator on the PBL Line shall be equipped with a mechanism that automatically shuts down the incinerator if either the duct pressure or the fan amperage deviates from a preset range. This preset range shall be based on the normal range as**

**established in the most recent compliant stack test. This shut-down mechanism shall be functional at all times that the incinerator is in use. If, at any time, an incinerator is shut down because of a deviation from these preset ranges, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. An incinerator shutdown is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.**

~~D.2.18~~

**D.3.16 Thermal Incinerator Temperature [326 IAC 2-7-5(3)]**

---

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on each thermal incinerator (B-ED, CH, TC-1, TC-2, TUT, and SUR) for measuring operating temperature. For the purposes of this condition, continuous monitoring shall mean no less often than once per minute. The output of this system shall be recorded as a three-hour average. If the continuous monitoring system is not in operation, the temperature will be recorded manually once in a 15-minute period. Nothing in this permit shall excuse the Permittee from complying with the requirement to continuously monitor the temperature of each thermal incinerator.
- (b) From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate each thermal incinerator **at** or above the hourly average temperature of 1,400 °F (except for the ED Chassis Oven thermal incinerator (CH), which shall be operated at or above the three-hour average temperature of 1,325 °F). The Permittee shall determine the minimum three-hour average operating temperature from the most recent valid stack test that demonstrates compliance with Conditions ~~D.2.5, D.2.7, and D.2.9~~ **D.3.4, D.3.6 and D.3.8**. This determination must be approved by IDEM.
- (c) The Permittee shall then operate each thermal incinerator at or above the minimum three-hour average temperature as observed during the most recent compliant stack test following approval of that temperature.
- (d) The Permittee take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the three-hour average temperature of a thermal incinerator is below the compliant three-hour average temperature. A three-hour average temperature that is below the compliant ~~hourly~~ **three-hour** average temperature is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

**D.3.17**

~~D.2.19~~ **Parametric Monitoring [326 IAC 2-7-5(3)]**

---

- ~~(a) The Permittee shall determine the appropriate duct pressure or fan amperage associated with each incinerator (B-ED, CH, TC1, TC-2, TUT, and SUR) from the most recent valid stack test that demonstrates compliance with limits in Conditions D.2.5, D.2.7 and D.2.9, as approved by IDEM.~~
- ~~(b) The Permittee shall observe the duct pressure or fan amperage at least once per day when a thermal incinerator is in operation. The incinerator duct pressure or fan amperage shall be maintained within the normal range as established in the most recent compliant stack test. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A~~

~~duct pressure or fan amperage reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.~~

**Each incinerator (B-ED, CH, TC1, TC-2, TUT, and SUR) shall be equipped with a mechanism that automatically shuts down the incinerator if either the duct pressure or the fan amperage deviates from a preset range. This preset range shall be based on the normal range as established in the most recent compliant stack test. These shut-down mechanisms shall be functional at all times that the associated incinerator is in use. If, at any time, an incinerator is shut down because of a deviation from these preset ranges, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. An incinerator shutdown is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.**

**EPA Comment No. 2:**

Conditions D.2.2(a), D.2.3(a), D.2.16(b), D.3.3(a), D.4.3(a), D.4.4(a), D.4.14(b)(1), D.4.14(c), D.6.3: Since the effective dates for Subparts PPPP and IIII are both known, it is suggested that an actual date be inserted in these conditions.

**Response to EPA Comment No. 2:**

IDEM has revised the permit language such that the requirements of the various surface coating NESHAPs include the actual compliance dates and deadlines for submittal of notifications and permit modification applications. The following changes were made to the permit in response to this comment (note that some of the revisions indicated below were made in response to source comments addressed elsewhere in this document):

~~D.1.1~~

**D.2.1** General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A][**Table 2 to 40 CFR Part 63, Subpart IIII**][Table 2 to 40 CFR Part 63, Subpart PPPP][**40 CFR 63.3101**][**40 CFR 63.4501**]

- 
- (a) The provisions of 40 CFR Part 63, Subpart A - General Provisions (which are incorporated by reference as 326 IAC 20-1-1):
- (1) Apply to the affected source to the extent expressly specified by Table 2 to 40 CFR Part 63, Subpart PPPP **and Table 2 to 40 CFR Part 63, Subpart IIII**; and
  - (2) To the extent applicable to the affected source, are incorporated in this condition by reference. The Permittee must comply with these requirements on and after ~~the effective date of 40 CFR Part 63, Subpart PPPP~~ **April 19, 2007 (for 40 CFR Part 63, Subpart PPPP) and June 25, 2007 (for 40 CFR Part 63, Subpart IIII)**.
- (b) Since the applicable requirements addressed by paragraph (a) of this condition are included and specifically identified (by reference) in this permit, the permit shield established by Section B of this permit in the condition titled Permit Shield, and authorized by 326 IAC 2-7-15, applies to paragraph (a) of this condition.

~~D.1.2~~

**D.2.2** National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products: Limitations and Requirements [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482]

- 
- (a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source (as defined in ~~(e)~~ (d) below). A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after ~~three years following the effective date of 40 CFR Part 63, Subpart PPPP~~ **April 19, 2007**.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The surface coating of plastic bumpers on the Plastic Bumper Coating Line meets the applicability criteria of both 40 CFR Part 63, Subpart PPPP (Surface Coating of Plastic Parts and Products) and 40 CFR Part 63, Subpart IIII (Surface Coating of Automobiles and Light-Duty Trucks), ~~which has not yet been promulgated. The Permittee may elect, pursuant to 40 CFR 63.4481(d), to comply with Subpart IIII (once it is promulgated) for the surface coating of plastic bumpers used in its manufacturing of automobiles and/or light-duty trucks in lieu of complying with each rule separately.~~ **As a result, the Permittee must select and implement a valid option for complying with this rule, and any other applicable rules of 40 CFR Part 63, pursuant to 40 CFR 63.4481(d) and (e).**
- (d) Consistent with 40 CFR 63.4481, the emission units described in this Section ~~D.1~~ **D.2** which also meet one or more of the descriptions listed below, to the extent employed in the surface coating of plastic parts and products as defined in 40 CFR Part 63, Subpart PPPP, comprise the affected source that is subject to 40 CFR Part 63, Subpart PPPP:
- (1) All coating operations as defined in 40 CFR 63.4581;
  - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
  - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (e) Definitions of terms used in this section that are contained in 40 CFR 63.2 or in 40 CFR 63.4581 are incorporated herein by reference.

~~D.1.17~~

**D.2.15 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products and Surface Coating of Automobiles and Light Duty Trucks - Notifications [40 CFR 63.4510] [40 CFR 63.3110]**

---

- (a) The Permittee must submit the applicable notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, ~~except~~ **and** as provided in paragraphs (b) **and** (c) below.
- (b) With respect to 40 CFR Part 63, Subpart PPPP, the Permittee must submit the:
- (1) Initial notification required by 40 CFR 63.9(b) and 40 CFR 63.4510 **no later than April 19, 2005. If using compliance with the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (40 CFR Part 63, Subpart IIII)**

**as provided for under 40 CFR 63.4881(d) to constitute compliance with this subpart for any or all of the plastic parts coating operations, then the Permittee must include a statement to this effect in the initial notification, and no other notifications are required under this subpart in regard to those plastic parts coating operations. and**

- (2) Notification Of Compliance Status required by 40 CFR 63.9(h) and 40 CFR 63.4510 **no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source.** The notification of compliance status must contain the information specified in 40 CFR 63.4510(c), paragraphs ~~(e)~~(1) through (11) and **any additional information specified** in 40 CFR 63.9(h).

(c) **With respect to 40 CFR Part 63, Subpart IIII, the Permittee must submit the:**

- (1) **Initial notification required by 40 CFR 63.9(b) and 40 CFR 63.3110 no later than June 25, 2005. Existing sources that have previously submitted notifications of applicability of this rule pursuant to Section 112(j) of the CAA are not required to submit an initial notification under 40 CFR 63.9(b) except to identify and describe all additions to the affected source made pursuant to 40 CFR 63.3082(c).**
- (2) **Notification Of Compliance Status required by 40 CFR 63.9(h) and 40 CFR 63.3110 no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3160. The notification of compliance status must contain the information specified in 40 CFR 63.3110(c), paragraphs (1) through (12) and in 40 CFR 63.9(h).**

(d)~~(e)~~ All notifications, required by (a), ~~and~~(b) and (c) above, must be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Director, Air and Radiation Division  
77 Jackson Boulevard  
Chicago, Illinois 60604-3590

~~D.1.18~~

**D.2.16** Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

~~Consistent with the following provisions, the Permittee shall submit to IDEM, OAQ an application for a significant permit modification to this permit to include the applicable requirements for 40 CFR Part 63, Subpart PPPP (Surface Coating of Plastic Parts and Products):~~ **The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information from the Notification Of Compliance Status (NOCS) in the Title V permit.**

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including ~~(1) sufficient and include:~~ information from the Notification of Compliance Status and other sources as needed **sufficient** for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR Part 63, Subpart PPPP **and**

**Subpart IIII**, ~~(2)~~ a description of the affected source and activities subject to the standards, and ~~(3)~~ a description of how the Permittee will meet the applicable requirements of the standards.

- (b) The significant permit modification application shall be submitted no later than July 19, 2006 and shall be submitted to:**

**Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015**

~~D.2.4~~

**D.3.1** General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A][**Table 2 to 40 CFR Part 63, Subpart IIII**][Table 2 to 40 CFR Part 63, Subpart MMMM][**40 CFR 63.3101**][40 CFR 63.3901]

---

- (a) The provisions of 40 CFR Part 63, Subpart A - General Provisions (which are incorporated by reference as 326 IAC 20-1-1):
- (1) apply to the affected source to the extent expressly specified by Table 2 to 40 CFR Part 63, Subpart MMMM and **Table 2 to 40 CFR Part 63, Subpart IIII**; and
  - (2) to the extent applicable to the affected source, are incorporated in this condition by reference. The Permittee must comply with these requirements on and after ~~the effective date of 40 CFR Part 63, Subpart MMMM~~ **January 2, 2007 (for 40 CFR Part 63, Subpart MMMM), and June 25, 2007 (for 40 CFR Part 63, Subpart IIII)**.
- (b) Since the applicable requirements addressed by paragraph (a) of this condition are included and specifically identified (by reference) in this permit, the permit shield established by Section B of this permit in the condition titled Permit Shield, and authorized by 326 IAC 2-7-15, applies to paragraph (a) of this condition.

~~D.2.22~~

**D.3.20** National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products **and Surface Coating of Automobiles and Light Duty Trucks - Notifications** [40 CFR 63.3910] [**40 CFR 63.3110**]

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- (a) The Permittee must submit the applicable notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, ~~except and~~ as provided in paragraphs (b) and (c) below.
- (b) With respect to 40 CFR Part 63, Subpart MMMM, the Permittee must submit the:
- (1) Initial notification required by 40 CFR 63.9(b) and 40 CFR 63.3910 **no later than January 2, 2005. If using compliance with the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (40 CFR Part 63, Subpart IIII) as provided for under 40 CFR 63.3881(d) to constitute compliance with this subpart for any or all of the metal parts coating operations, then the Permittee must include a statement to this effect in the initial notification, and no other notifications are required under this subpart in regard to those metal parts coating operations.** ~~and~~
  - (2) Notification Of Compliance Status required by 40 CFR 63.9(h) and 40 CFR 63.3910 **no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source.** The notification of compliance

status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).

**(c) With respect to 40 CFR Part 63, Subpart IIII, the Permittee must submit the:**

- (1) Initial notification required by 40 CFR 63.9(b) and 40 CFR 63.3110 no later than June 25, 2005. Existing sources that have previously submitted notifications of applicability of this rule pursuant to Section 112(j) of the CAA are not required to submit an initial notification under 40 CFR 63.9(b) except to identify and describe all additions to the affected source made pursuant to 40 CFR 63.3082(c).**
- (2) Notification Of Compliance Status required by 40 CFR 63.9(h) and 40 CFR 63.3110 no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3160. The notification of compliance status must contain the information specified in 40 CFR 63.3110(c), paragraphs (1) through (12) and in 40 CFR 63.9(h).**

**(d)(e)** All notifications, required by (a), ~~and~~ (b) and (c) above, must be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency - Region V  
Director, Air and Radiation Division  
77 Jackson Boulevard  
Chicago, Illinois 60604-3590

~~D.3.4~~

**D.4.1** General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A][**Table 2 to 40 CFR Part 63, Subpart IIII**][Table 2 to 40 CFR Part 63, Subpart MMMM][**Table 2 to 40 CFR Part 63, Subpart PPPP**][**40 CFR 63.3101**][40 CFR 63.3901][**40 CFR 63.4501**]

(a) The provisions of 40 CFR Part 63, Subpart A - General Provisions (which are incorporated by reference as 326 IAC 20-1-1):

- (1) apply to the affected source to the extent expressly specified by Table 2 to 40 CFR Part 63, Subpart MMMM, **Table 2 to 40 CFR Part 63, Subpart PPPP and Table 2 to 40 CFR Part 63, Subpart IIII**; and
- (2) to the extent applicable to the affected source, are incorporated in this condition by reference. The Permittee must comply with these requirements on and after ~~the effective date of 40 CFR Part 63, Subpart MMMM~~ **January 2, 2007 (for 40 CFR Part 63, Subpart MMMM), April 19, 2007 (for 40 CFR Part 63, Subpart PPPP) and June 25, 2007 (for 40 CFR Part 63, Subpart IIII).**

(b) Since the applicable requirements addressed by paragraph (a) of this condition are included and specifically identified (by reference) in this permit, the permit shield established by Section B of this permit in the condition titled Permit Shield, and authorized by 326 IAC 2-7-15, applies to paragraph (a) of this condition.

~~D.3.4~~

**D.4.3** National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and

Products: Limitations and Requirements [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482]

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- (a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source (as defined in ~~(c)~~(d) below). A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after ~~three years following the effective date of 40 CFR Part 63, Subpart PPPP~~ **April 19, 2007**.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The surface coating of plastic parts in the various coating operations described in this Section ~~D.3~~ **D.4** meets the applicability criteria of both 40 CFR Part 63, Subpart PPPP (Surface Coating of Plastic Parts and Products) and 40 CFR Part 63, Subpart IIII (Surface Coating of Automobiles and Light-Duty Trucks), ~~which has not yet been promulgated. The Permittee may elect, pursuant to 40 CFR 63.4481(d), to comply with Subpart IIII (once it is promulgated) for the surface coating of plastic bumpers used in its manufacturing of automobiles and/or light-duty trucks in lieu of complying with each rule separately. As a result, the Permittee must select and implement a valid option for complying with this rule, and any other applicable rules of 40 CFR Part 63, pursuant to 40 CFR 63.4481(d) and (e).~~
- (d) Consistent with 40 CFR 63.4481, the emission units described in this Section ~~D.3~~ **D.4** which also meet one or more of the descriptions listed below, to the extent employed in the surface coating of plastic parts and products as defined in 40 CFR Part 63, Subpart PPPP, comprise the affected source that is subject to 40 CFR Part 63, Subpart PPPP:
- (1) All coating operations as defined in 40 CFR 63.4581;
  - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
  - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (e) Definitions of terms used in this section that are contained in 40 CFR 63.2 or in 40 CFR 63.4581 are incorporated herein by reference.

~~D.3.16~~

**D.4.14** National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products, ~~and~~ Surface Coating of Plastic Parts and Products **and Surface Coating of Automobiles and Light Duty Trucks** - Notifications [40 CFR 63.3910] [40 CFR 63.4510] **[40 CFR 63.3110]**

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- (a) The Permittee must submit the applicable notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, ~~except~~ **and** as provided in paragraphs (b) **and** (c) below.
- (b) With respect to 40 CFR Part 63, Subparts MMMM and PPPP, the Permittee must submit the:

- (1) Initial notifications required by 40 CFR 63.9(b), 40 CFR 63.3910, and 40 CFR 63.4510 **no later than January 2, 2005 (for 40 CFR Part 63, Subpart M MMM) and April 19, 2005 (for 40 CFR Part 63, Subpart P PPP). If using compliance with the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (40 CFR Part 63, Subpart III) as provided for under 40 CFR 63.3881(d) and 63.4881(d) to constitute compliance with these subparts for any or all of the metal or plastic parts coating operations, then the Permittee must include a statement to this effect in the initial notifications, and no other notifications are required under these subparts in regard to those metal or plastic parts coating operations.** ~~and~~
- (2) Notification Of Compliance Status required by 40 CFR 63.9(h), 40 CFR 63.3910, and 40 CFR 63.4510 **no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, 63.3960, 63.4540, 63.4550 or 63.4560 that applies to the affected source.** The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11), 40 CFR 63.4510(c), paragraphs (1) through (11), and any additional information specified in 40 CFR 63.9(h).

(c) **With respect to 40 CFR Part 63, Subpart III, the Permittee must submit the:**

- (1) **Initial notification required by 40 CFR 63.9(b) and 40 CFR 63.3110 no later than June 25, 2005. Existing sources that have previously submitted notifications of applicability of this rule pursuant to Section 112(j) of the CAA are not required to submit an initial notification under 40 CFR 63.9(b) except to identify and describe all additions to the affected source made pursuant to 40 CFR 63.3082(c).**
- (2) **Notification Of Compliance Status required by 40 CFR 63.9(h) and 40 CFR 63.3110 no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3160. The notification of compliance status must contain the information specified in 40 CFR 63.3110(c), paragraphs (1) through (12) and in 40 CFR 63.9(h).**

(d)~~(e)~~ All notifications, required by (a), ~~and~~ (b) and (c) above, must be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Director, Air and Radiation Division  
77 Jackson Boulevard  
Chicago, Illinois 60604-3590

D.4.1

D.5.1 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A][**Table 2 to 40 CFR Part 63, Subpart III**][Table 2 to 40 CFR Part 63, Subpart M MMM][**40 CFR 63.3101**][40 CFR 63.3901]

- 
- (a) The provisions of 40 CFR Part 63, Subpart A - General Provisions (which are incorporated by reference as 326 IAC 20-1-1):

- (1) apply to the affected source to the extent expressly specified by Table 2 to 40 CFR Part 63, Subpart M MMM and **Table 2 to 40 CFR Part 63, Subpart III**; and
  - (2) to the extent applicable to the affected source, are incorporated in this condition by reference. The Permittee must comply with these requirements on and after ~~the effective date of 40 CFR Part 63, Subpart M MMM~~ **January 2, 2007 (for 40 CFR Part 63, Subpart M MMM) and June 25, 2007 (for 40 CFR Part 63, Subpart III)**.
- (b) Since the applicable requirements addressed by paragraph (a) of this condition are included and specifically identified (by reference) in this permit, the permit shield established by Section B of this permit in the condition titled Permit Shield, and authorized by 326 IAC 2-7-15, applies to paragraph (a) of this condition.

~~D.4.16~~

**D.5.13 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products and Surface Coating of Automobiles and Light Duty Trucks - Notifications [40 CFR 63.3910] [40 CFR 63.3110]**

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- (a) The Permittee must submit the applicable notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, ~~except and~~ as provided in paragraphs (b) and (c) below.
- (b) With respect to 40 CFR Part 63, Subpart M MMM, the Permittee must submit the:
  - (1) Initial notification required by 40 CFR 63.9(b) and 40 CFR 63.3910 **no later than January 2, 2005. If using compliance with the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (40 CFR Part 63, Subpart III) as provided for under 40 CFR 63.3881(d) to constitute compliance with this subpart for any or all of the metal parts coating operations, then the Permittee must include a statement to this effect in the initial notification, and no other notifications are required under this subpart in regard to those metal parts coating operations.** ~~and~~
  - (2) Notification Of Compliance Status required by 40 CFR 63.9(h) and 40 CFR 63.3910 **no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source.** The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).
- (c) **With respect to 40 CFR Part 63, Subpart III, the Permittee must submit the:**
  - (1) **Initial notification required by 40 CFR 63.9(b) and 40 CFR 63.3110 no later than June 25, 2005. Existing sources that have previously submitted notifications of applicability of this rule pursuant to Section 112(j) of the CAA are not required to submit an initial notification under 40 CFR 63.9(b) except to identify and describe all additions to the affected source made pursuant to 40 CFR 63.3082(c).**
  - (2) **Notification Of Compliance Status required by 40 CFR 63.9(h) and 40 CFR 63.3110 no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3160. The notification of compliance status must contain the information specified in 40 CFR 63.3110(c), paragraphs (1) through (12) and in 40 CFR 63.9(h).**
- (d)(e) All notifications, required by (a), ~~and (b) and (c)~~ and (c) above, must be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Director, Air and Radiation Division  
77 Jackson Boulevard  
Chicago, Illinois 60604-3590

~~D.5.1~~

**D.6.1** General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A][**Table 2 to 40 CFR Part 63, Subpart III**][Table 2 to 40 CFR Part 63, Subpart M][**Table 2 to 40 CFR Part 63, Subpart PPPP**][**40 CFR 63.3101**][40 CFR 63.3901][**40 CFR 63.4501**]

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- (a) The provisions of 40 CFR Part 63, Subpart A - General Provisions (which are incorporated by reference as 326 IAC 20-1-1):
- (1) apply to the affected source to the extent expressly specified by Table 2 to 40 CFR Part 63, Subpart M, **Table 2 to 40 CFR Part 63, Subpart PPPP and Table 2 to 40 CFR Part 63, Subpart III**; and
  - (2) to the extent applicable to the affected source, are incorporated in this condition by reference. The Permittee must comply with these requirements on and after ~~the effective date of 40 CFR Part 63, Subpart M~~ **January 2, 2007 (for 40 CFR Part 63, Subpart M), April 19, 2007 (for 40 CFR Part 63, Subpart PPPP) and June 25, 2007 (for 40 CFR Part 63, Subpart III)**.
- (b) Since the applicable requirements addressed by paragraph (a) of this condition are included and specifically identified (by reference) in this permit, the permit shield established by Section B of this permit in the condition titled Permit Shield, and authorized by 326 IAC 2-7-15, applies to paragraph (a) of this condition.

~~D.5.4~~

**D.6.3** National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products: Limitations and Requirements [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482]

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- (a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the affected source (as defined in ~~(e)~~**(d)** below). A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after ~~three years following the effective date of 40 CFR Part 63, Subpart PPPP~~ **April 19, 2007**.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The **application of adhesives to plastic parts and the purge solvent recovery system** ~~surface coating of plastic parts in the various coating operations~~ described in this Section ~~D.5 D.6~~ **meets** the applicability criteria of both 40 CFR Part 63, Subpart PPPP (Surface Coating of Plastic Parts and Products) and 40 CFR Part 63, Subpart III (Surface Coating of Automobiles and Light-Duty Trucks), ~~which has not yet~~

~~been promulgated. The Permittee may elect, pursuant to 40 CFR 63.4481(d), to comply with Subpart IIII (once it is promulgated) for the surface coating of plastic bumpers used in its manufacturing of automobiles and/or light-duty trucks in lieu of complying with each rule separately. As a result, the Permittee must select and implement a valid option for complying with this rule, and any other applicable rules of 40 CFR Part 63, pursuant to 40 CFR 63.4481(d) and (e).~~

- (d) Consistent with 40 CFR 63.4481, the emission units described in this Section ~~D.5~~ **D.6** which also meet one or more of the descriptions listed below, to the extent employed in the surface coating of plastic parts and products as defined in 40 CFR Part 63, Subpart PPPP, comprise the affected source that is subject to 40 CFR Part 63, Subpart PPPP:
- (1) All coating operations as defined in 40 CFR 63.4581;
  - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
  - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (e) Definitions of terms used in this section that are contained in 40 CFR 63.2 or in 40 CFR 63.4581 are incorporated herein by reference.

~~D.5-9~~

**D.6.7 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products, and Surface Coating of Plastic Parts and Products and Surface Coating of Automobiles and Light Duty Trucks - Notifications [40 CFR 63.3910] [40 CFR 63.4510] [40 CFR 63.3110]**

- 
- (a) The Permittee must submit the applicable notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, ~~except~~ **and** as provided in paragraphs (b) **and** (c) below.
- (b) With respect to 40 CFR Part 63, Subparts MMMM and PPPP, the Permittee must submit the:
- (1) Initial notifications required by 40 CFR 63.9(b), 40 CFR 63.3910, and 40 CFR 63.4510 **no later than January 2, 2005 (for 40 CFR Part 63, Subpart MMMM) and April 19, 2005 (for 40 CFR Part 63, Subpart PPPP). If using compliance with the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (40 CFR Part 63, Subpart IIII) as provided for under 40 CFR 63.3881(d) and 63.4881(d) to constitute compliance with these subparts for any or all of the metal or plastic parts coating operations, then the Permittee must include a statement to this effect in the initial notifications, and no other notifications are required under these subparts in regard to those metal or plastic parts coating operations.** ~~and~~
  - (2) Notification Of Compliance Status required by 40 CFR 63.9(h), 40 CFR 63.3910, and 40 CFR 63.4510 **no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, 63.3960, 63.4540, 63.4550 or 63.4560 that applies to the affected source.** The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11), 40 CFR 63.4510(c), paragraphs (1) through (11), and any additional information

specified in 40 CFR 63.9(h).

**(c) With respect to 40 CFR Part 63, Subpart IIII, the Permittee must submit the:**

- (1) Initial notification required by 40 CFR 63.9(b) and 40 CFR 63.3110 no later than June 25, 2005. Existing sources that have previously submitted notifications of applicability of this rule pursuant to Section 112(j) of the CAA are not required to submit an initial notification under 40 CFR 63.9(b) except to identify and describe all additions to the affected source made pursuant to 40 CFR 63.3082(c).**
- (2) Notification Of Compliance Status required by 40 CFR 63.9(h) and 40 CFR 63.3110 no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3160. The notification of compliance status must contain the information specified in 40 CFR 63.3110(c), paragraphs (1) through (12) and in 40 CFR 63.9(h).**

**(d)(e) All notifications, required by (a), and (b) and (c) above, must be submitted to:**

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Director, Air and Radiation Division  
77 Jackson Boulevard  
Chicago, Illinois 60604-3590

**EPA Comment No. 3:**

Stating that the citation 326 IAC 12 is applicable is not generally sufficient, the permit should either incorporate each applicable NSPS requirement or clarify by citation (i.e. 40 CFR 60.112b(a)(1)(i)) which specific NSPS provisions are applicable to this unit.

**Response to EPA Comment No. 3:**

Draft Condition D.5.7 was included in the permit to indicate that the storage tank is subject to the requirements of the version of 40 CFR Part 60, Subpart Kb that is included in Indiana's SIP. The only requirements of this rule that apply to the storage tank are the record keeping requirements of Condition D.6.10(a). Because there are no requirements pursuant to this rule that need to be included in the Emission Limitations and Standards section of the permit, IDEM believes that draft Condition D.5.7 is superfluous and can be removed.

The following change was made to the permit in response to this comment:

~~D.5.7 Volatile Organic Compound Storage Vessels [326 IAC 12]  
The 15,000-gallon gasoline storage tank is subject to 326 IAC 12.~~

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified, if applicable, to reflect these changes.

1. The solvent "makeup" reporting requirements of draft Conditions D.1.20(b), D.2.25(c), D.3.19(b)

and D.4.19(b) have been removed because IDEM determined that these reports are not necessary to determine compliance with any of the applicable VOC standards or limitations.

~~D.1.20~~

~~D.2.18 Reporting Requirements~~

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~~...~~

~~(b) — The makeup of the solvents used by the Permittee shall be reviewed on an annual basis. By January 31 of each year, a list of all solvents, by compound, used during the previous calendar year shall be submitted to IDEM, OAQ. This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The solvent makeup reporting requirements established in Conditions D.1.20(b), D.2.25(c), D.3.19(b) and D.4.19(b) comprise one reporting requirement.~~

~~...~~

~~D.2.25~~

~~D.3.23 Reporting Requirements~~

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~~...~~

~~(c) — The makeup of the solvents used by the Permittee shall be reviewed on an annual basis. By January 31 of each year, a list of all solvents, by compound, used during the previous calendar year shall be submitted to IDEM, OAQ. This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The solvent makeup reporting requirements established in Conditions D.1.20(b), D.2.25(c), D.3.19(b) and D.4.19(b) comprise one reporting requirement.~~

~~...~~

~~D.3.19~~

~~D.4.17 Reporting Requirements~~

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~~...~~

~~(b) — The makeup of the solvents used by the Permittee shall be reviewed on an annual basis. By January 31 of each year, a list of all solvents, by compound, used during the previous calendar year shall be submitted to IDEM, OAQ. This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The solvent makeup reporting requirements established in Conditions D.1.20(b), D.2.25(c), D.3.19(b) and D.4.19(b) comprise one reporting requirement.~~

~~...~~

~~D.4.19~~

~~D.5.16 Reporting Requirements~~

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~~...~~

~~(b) — The makeup of the solvents used by the Permittee shall be reviewed on an annual basis. By January 31 of each year, a list of all solvents, by compound, used during the previous calendar year shall be submitted to IDEM, OAQ. This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The solvent makeup reporting requirements established in Conditions D.1.20(b), D.2.25(c), D.3.19(b) and D.4.19(b) comprise one reporting requirement.~~

...

2. IDEM has revised the record keeping requirements of draft Conditions D.1.19, D.2.24, D.3.18, D.4.18, D.5.11 and D.6.10 by removing requirements that were either determined to be more appropriate in the new Section D.1 or were otherwise determined to be superfluous. IDEM has further revised some of these conditions by incorporating record keeping requirements that IDEM believes are appropriate for determining compliance with the applicable rules. Also, IDEM has incorporated the record keeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart PPPP (Surface Coating of Plastic Parts and Products).

Accordingly, IDEM has made the following revisions to the draft permit (note that some of the revisions indicated below were made in response to source comments addressed elsewhere in this document):

~~D.1.19~~

**D.2.17** Record Keeping Requirements

- (a) To document compliance with Conditions ~~D.1.3(b), D.1.3(d), D.1.4, D.1.5, D.1.14 and D.1.15~~ **D.2.4, D.2.12 and D.2.13**, the Permittee shall maintain records in accordance with (1) through ~~(8)~~ **(6)** below. Records maintained for (1) through ~~(8)~~ **(6)** shall be taken as stated below and shall be complete and sufficient to establish compliance with ~~the particulate emission limit established in Condition D.1.3(b), the natural gas combustion limit established in Conditions D.1.3(d) and D.1.4, the VOC emission limits established in Condition D.1.5, D.2.4 and the compliance determination requirements established in Conditions D.1.14 and D.1.15~~ **D.2.12 and D.2.13**. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each coating material **(as applied)** and **the VOC content of each** solvent (including purge solvents and thinners) used less water.
  - (2) The solids content of each coating material used **(as applied)**.
  - (3) The amount of coating material and solvent (including purge solvents and thinners) used on a 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 solvent.
  - (4) The volume weighted average VOC content of the coatings used **(as applied)** for each day.
  - ~~(5) The total VOC emissions from coatings and solvents (including purge solvents and thinners) for each day.~~
  - ~~(5)~~**(6)** The continuous temperature records (on a three-hour average basis) for the thermal incinerator and the three-hour average temperature used to demonstrate compliance during the most recent compliant stack test.
  - (6) Records of any thermal incinerator shutdowns due to duct pressure or fan amperage deviations.**
  - ~~(7) Daily records of the duct pressure or fan amperage.~~
  - ~~(8) The plant-wide metered natural gas usage for each month.~~

- ~~(b)~~ To document compliance with Condition D.1.3(a), the Permittee shall maintain records of daily vehicle production. The vehicle production record keeping requirements established in Conditions D.1.19(b), D.2.24(b), D.3.18(b), D.4.18(b), D.5.11(c) and D.6.10(b) comprise one record keeping requirement.
- ~~(b)(e)~~ To document compliance with Condition ~~D.1.9~~ **D.2.8**, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) To document compliance with Condition D.2.14, the Permittee shall maintain copies of the training program, and the list of trained operators. Training records shall be maintained on site or available within 1 hour for inspection by IDEM.**
- ~~(d)~~ To document compliance with Condition D.1.16, the Permittee shall maintain a log of weekly and monthly overspray observations, daily observations of the water level in the pans, and weekly observations of the placement and configuration of baffle panels.
- (d) To document compliance with Condition D.2.2, the Permittee shall collect and keep records of the data and information specified in 40 CFR 63.4530, paragraphs (c) through (h). Failure to collect and keep these records is a deviation from the applicable standard.**
- (1) These records shall be in a form suitable and readily available for expeditious review. Where appropriate, the records may be maintained as electronic spreadsheets or as a database.**
- (2) The Permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee shall keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee may keep the records off-site for the remaining 3 years.**
- (3) Compliance with the record keeping requirements of 40 CFR Part 63, Subpart IIII satisfies these record keeping requirements.**
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

~~D.2.24~~

**D.3.22** Record Keeping Requirements

- (a) To document compliance with Conditions ~~D.2.3(b), D.2.3(d), D.2.4, D.2.5, D.2.7, D.2.9, D.2.10, D.2.18 and D.2.19~~ **D.3.4, D.3.6, D.3.8, D.3.9 and D.3.16**, the Permittee shall maintain records in accordance with (1) through ~~(8)~~ **(7)** below. Records maintained for (1) through ~~(8)~~ **(7)** shall be taken as stated below and shall be complete and sufficient to establish compliance with ~~the particulate emission limit established in Condition D.2.3(b), the natural gas combustion limit established in Conditions D.2.3(d) and D.2.4,~~ the VOC emission limits established in Conditions ~~D.2.5, D.2.7, D.2.9 and D.2.10,~~ **D.3.4, D.3.6, D.3.8 and D.3.9** and the compliance determination requirements established in Conditions ~~D.2.18 and D.2.19~~ **D.3.16**. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each coating material (as applied) and the VOC content of each solvent (including purge solvents and thinners) used less water.**
- (2) The VOC content of each coating material used in the ED Body and ED Chassis Coating Tanks, as applied, less water.**

- ~~(3)~~(2) The solids content of each coating material used **(as applied)**.
- ~~(4)~~(3) The amount of coating material and solvent (including purge solvents and thinners) used on a 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 solvent.
- ~~(5)~~(4) The volume weighted average VOC content of the coatings used **(as applied)** for each day.
- ~~(5)~~ ~~The total VOC emissions from coatings and solvents (including purge solvents and thinners) for each day.~~
- (6) The continuous temperature records (on a three-hour average basis) for the **each** thermal incinerator and the three-hour average temperature used to demonstrate compliance during the most recent compliant stack test.
- (7) Records of any thermal incinerator shutdowns due to duct pressure or fan amperage deviations.**
- ~~(7)~~ ~~Daily records of the duct pressure or fan amperage.~~
- ~~(8)~~ ~~The plant-wide metered natural gas usage for each month.~~
- ~~(b)~~ ~~To document compliance with Condition D.2.3(a), the Permittee shall maintain records of monthly vehicle production. The vehicle production record keeping requirements established in Conditions D.1.19(b), D.2.24(b), D.3.18(b), D.4.18(b), D.5.11(c) and D.6.10(b) comprise one record keeping requirement.~~
- ~~(b)~~(e) To document compliance with Condition ~~D.2.13(a)~~ **D.3.12**, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) To document compliance with Condition D.3.19, the Permittee shall maintain copies of the training program, and the list of trained operators. Training records shall be maintained on site or available within 1 hour for inspection by IDEM.**
- ~~(d)~~ ~~To document compliance with Condition D.2.21, the Permittee shall maintain a log of weekly and monthly overspray observations, daily observations of the water level in the pans, and weekly observations of the placement and configuration of baffle panels.~~
- ~~(d)~~(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### ~~D.3.18~~

#### **D.4.16** Record Keeping Requirements

- (a) To document compliance with Conditions ~~D.3.5(b), D.3.5(d), D.3.6, D.3.7 and D.3.9~~ **D.4.5 and D.4.7**, the Permittee shall maintain records in accordance with (1) through ~~(6)~~ **(3)** below. Records maintained for (1) through ~~(6)~~ **(3)** shall be taken as stated below and shall be complete and sufficient to establish compliance with ~~the particulate emission limit established in Condition D.3.5(b), the natural gas combustion limit established in Conditions D.3.5(d) and D.3.6, and the VOC emission limits established in Conditions D.3.7 and D.3.9~~ **D.4.5 and D.4.7**. Records necessary to demonstrate compliance shall

be available within 30 days of the end of each compliance period.

- (1) The VOC content of each coating material **(as applied, less water)** and **the VOC content of each** solvent (including purge solvents and thinners) used less water.
- ~~(2) The solids content of each coating material used.~~
- (2)(3)** The amount of coating material and solvent (including purge solvents and thinners) used on a 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 solvent.
  - (C) Records shall be sufficient to demonstrate that the Touchup Trim Booth uses less than five gallons of coating per day.**
- (3)(4)** The volume weighted average VOC content of the coatings used **(as applied)** for each day.
- ~~(5) The total VOC emissions from coatings and solvents (including purge solvents and thinners) for each day.~~
- ~~(6) The plant-wide metered natural gas usage for each month.~~
- ~~(b) To document compliance with Condition D.3.5(a) the Permittee shall maintain records of monthly vehicle production.~~
- (b)(e)** To document compliance with Condition ~~D.3.12~~ **D.4.10**, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) To document compliance with Condition D.4.13, the Permittee shall maintain copies of the training program, and the list of trained operators. Training records shall be maintained on site or available within 1 hour for inspection by IDEM.**
- ~~(d) To document compliance with Condition D.3.15, the Permittee shall maintain a log of monthly and weekly overspray observations, and weekly observations of the placement, integrity, and particle loading of the filter.~~
- (d) To document compliance with Condition D.4.3, the Permittee shall collect and keep records of the data and information specified in 40 CFR 63.4530, paragraphs (c) through (h). Failure to collect and keep these records is a deviation from the applicable standard.**
  - (1) These records shall be in a form suitable and readily available for expeditious review. Where appropriate, the records may be maintained as electronic spreadsheets or as a database.**
  - (2) The Permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee shall keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee may keep the records off-site for**

**the remaining 3 years.**

**(3) Compliance with the record keeping requirements of 40 CFR Part 63, Subpart IIII satisfies these record keeping requirements.**

- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

~~D.4.18~~

**D.5.15 Record Keeping Requirements**

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- (a) To document compliance with Conditions ~~D.4.3(b), D.4.3(d), D.4.4, D.4.5 and D.4.7~~ **D.5.4 and D.5.6**, the Permittee shall maintain records in accordance with (1) through (6) **(4)** below. Records maintained for (1) through (6) **(4)** shall be taken as stated below and shall be complete and sufficient to establish compliance with ~~the particulate emission limit established in Condition D.4.3(b), the natural gas combustion limit established in Conditions D.4.3(d) and D.4.4, and the VOC emission limits established in Conditions D.4.5 and D.4.7~~ **D.5.4 and D.5.6**. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each coating material (**as applied, less water**) and **the VOC content of each** solvent (including purge solvents and thinners) used less water.
- (2) The solids content of each coating material used (**as applied**).
- (3) The amount of coating material and solvent (including purge solvents and thinners) used on a 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 solvent.
- (4) The volume weighted average VOC content of the coatings used (**as applied**) for each day.
- ~~(5) The total VOC emissions from coatings and solvents (including purge solvents and thinners) for each day.~~
- ~~(6) The plant-wide metered natural gas usage for each month.~~
- ~~(b)~~ To document compliance with Condition ~~D.4.3(a)~~, the Permittee shall maintain records of monthly vehicle production. The vehicle production record keeping requirements established in Conditions ~~D.1.19(b), D.2.24(b), D.3.18(b), D.4.18(b), D.5.11(c) and D.6.10(b)~~ comprise one record keeping requirement.
- ~~(b)(e)~~ To document compliance with Condition ~~D.4.14~~ **D.5.10**, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) To document compliance with Condition D.5.12, the Permittee shall maintain copies of the training program, and the list of trained operators. Training records shall be maintained on site or available within 1 hour for inspection by IDEM.**
- ~~(d)~~ To document compliance with Conditions ~~D.4.14 and D.4.15~~, the Permittee shall

maintain a log of weekly and monthly overspray observations, daily observations of the water level in the pans, and weekly observations of the placement and configuration of baffle panels, and weekly observations of the placement, integrity, and particle loading of the filters.

- (d)(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

~~D.5.11~~

**D.6.10** Record Keeping Requirements

- ~~(a) To document compliance with Condition D.5.6(c), the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the annual VOC emission limit established in Condition D.5.6(c). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.~~
- ~~(1) The VOC content of each coating material and solvent (including purge solvents and thinners) used less water.~~
- ~~(2) The amount of coating material and solvent (including purge solvents and thinners) used on a 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 solvent.~~
- ~~(3) The total VOC emissions from coatings and solvents (including purge solvents and thinners) for each day.~~
- ~~(4) The amount of coating material and solvent (including purge solvents and thinners) transferred off-site for disposal or recycling for each day.~~
- (a)(b) Pursuant to 326 IAC 12, the Permittee shall maintain records of the dimensions and an analysis showing the capacity of the 15,000-gallon gasoline storage tank. These records shall be maintained for the life of the source.
- (c) ~~To document compliance with Condition D.5.5 the Permittee shall maintain records of monthly vehicle production. The vehicle production record keeping requirements established in Conditions D.1.19(b), D.2.24(b), D.3.18(b), D.4.18(b), D.5.11(c) and D.6.10(b) comprise one record keeping requirement.~~
- (b)(d) To document compliance with Condition ~~D.5.8~~ **D.6.6**, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) **To document compliance with Condition D.6.3, the Permittee shall collect and keep records of the data and information specified in 40 CFR 63.4530, paragraphs (c) through (h). Failure to collect and keep these records is a deviation from the applicable standard.**
- (1) **These records shall be in a form suitable and readily available for expeditious review. Where appropriate, the records may be maintained as electronic spreadsheets or as a database.**

- (2) The Permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee shall keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee may keep the records off-site for the remaining 3 years.**
- (3) Compliance with the record keeping requirements of 40 CFR Part 63, Subpart IIII satisfies these record keeping requirements.**

**(d)(e)** All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### **D.6.10**

#### **D.7.7 Record Keeping Requirements**

- ~~(a) To document compliance with Conditions D.6.1(b), D.6.1(d), D.6.2, D.6.6 and D.6.7, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the particulate emission limits established in Conditions D.6.1(b), D.6.6 and D.6.7 and the natural gas combustion limit established in Conditions D.6.1(d) and D.6.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.~~
- ~~(1) The plant-wide metered natural gas usage for each month.~~
  - ~~(2) The process weight rate of the insignificant robotic welding, brazing equipment, cutting torches, soldering equipment, grinding equipment, and machining equipment. Records shall include purchase orders, invoices, and material safety data sheets (MSDS).~~
  - ~~(3) Any process information necessary to calculate particulate (PM/PM10) emissions from other insignificant operations described in this Section D.6 (e.g., deburring, buffing, polishing, abrasive blasting activities, pneumatic conveying, woodworking operations, etc.).~~
  - ~~(4) A log of the dates of use.~~
- ~~(b) To document compliance with Condition D.6.1(a), the Permittee shall maintain records of monthly vehicle production. The vehicle production record keeping requirements established in Conditions D.1.19(b), D.2.24(b), D.3.18(b), D.4.18(b), D.5.11(c) and D.6.10(b) comprise one record keeping requirement.~~
- (a)(c)** To document compliance with Condition ~~D.6.8~~ **D.7.6**, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (b)(d)** All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
3. In addition to the revisions described in (1) above, IDEM has revised the reporting requirements of draft Conditions D.1.20, D.2.25, D.3.19, D.4.19, D.5.12 and D.6.11 by removing requirements that were determined to be superfluous. IDEM has further revised some of these conditions by incorporating reporting requirements that IDEM believes are appropriate for determining compliance with the applicable rules. Also, IDEM has incorporated the reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart PPPP (Surface Coating of Plastic Parts and Products).

Accordingly, IDEM has made the following revisions to the draft permit (note that some of the

revisions indicated below were made in response to source comments addressed elsewhere in this document):

~~D.1.20~~

**D.2.18 Reporting Requirements**

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- (a) To document compliance with Condition ~~D.1.5~~ **D.2.4**, compliance reports shall be submitted on a calendar monthly basis within 21 days of the end of each month. The reports shall contain the following data for each operation on a monthly basis, based on actual daily coating usage:
- (1) Average coating VOC content in kg VOC/liter coating ~~minus water~~ **as applied**;
  - (2) Average coating volume % solids **as applied**;
  - ~~(3) Average kg VOC/liter of coating solids (if subject to a limit expressed on this basis);~~
  - ~~(3)~~**(4)** Average actual solids transfer efficiency (if subject to a limit expressed on a kg VOC/liter of applied solids basis);
  - ~~(4)~~**(5)** **Overall thermal** Thermal incinerator control efficiency, **reflecting capture and destruction efficiency** (if applicable);
  - ~~(5)~~**(6)** Average kg VOC/liter of applied solids, based on actual transfer efficiency (if subject to a limit expressed on this basis); and
  - ~~(6)~~**(7)** Coating usage in liters.

When more than one coating has been averaged for compliance purposes, the average shall be determined on a weighted average by volume basis. All data necessary to verify weighted averages shall be included in the report.

- (b) In order to demonstrate compliance with Condition D.2.2, the Permittee shall submit semiannual compliance reports for each affected source according to the requirements of 40 CFR 63.4520(a), paragraphs (1) through (7). The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in 40 CFR 63.4520, paragraph (a)(2). Compliance with the reporting requirements of 40 CFR Part 63, Subpart III satisfies this reporting requirement.**
- ~~(b) The makeup of the solvents used by the Permittee shall be reviewed on an annual basis. By January 31 of each year, a list of all solvents, by compound, used during the previous calendar year shall be submitted to IDEM, OAQ. This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The solvent makeup reporting requirements established in Conditions D.1.20(b), D.2.25(c), D.3.19(b) and D.4.19(b) comprise one reporting requirement.~~
- ~~(c) Reports of monthly production totals shall be submitted to IDEM, OAQ on a quarterly basis, to comply with Condition D.1.3(a). This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The vehicle production reporting requirements established in Conditions D.1.20(c), D.2.25(d), D.3.19(c), D.4.19(c), D.5.12(a) and D.6.11(a) comprise one reporting requirement.~~

- ~~(d) A quarterly summary of the information to document compliance with Conditions D.1.3(d) and D.1.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the month period being reported. The natural gas usage reporting requirements established in Conditions D.1.20(d), D.2.25(e), D.3.19(d), D.4.19(d) and D.6.11(b) comprise one reporting requirement.~~
- ~~(e) Based on records required by Conditions D.1.19(a), D.2.24(a), D.3.18(a), D.4.18(a), and D.5.11(a), reports of monthly VOC emissions from surface coating operations and associated purge solvent operations and storage shall be submitted to IDEM, OAG on a quarterly basis, to comply with Condition D.1.5(e). This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The VOC emission reporting requirements established in Conditions D.1.20(e), D.2.25(f), D.3.19(e), D.4.19(e) and D.5.12(b) comprise one reporting requirement.~~
- ~~(f) Based on records required by Conditions D.1.19(a), D.2.24(a), D.3.18(a), D.4.18(a), and D.6.10(a), reports of monthly source-wide particulate (PM/PM10) emissions shall be submitted to IDEM, OAG on a quarterly basis, to comply with Condition D.1.3(b). This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The particulate emission reporting requirements established in Conditions D.1.20(f), D.2.25(g), D.3.19(f), D.4.19(f) and D.6.11(c) comprise one reporting requirement.~~

~~D.2.25~~

**D.3.23 Reporting Requirements**

- (a) Monthly NSPS performance tests for the operations listed in Condition ~~D.2.7~~ **D.3.6** shall be submitted as required by 40 CFR 60.395.
- (b) To document compliance with Conditions ~~D.2.5, D.2.9 and D.2.10~~ **D.3.4, D.3.8 and D.3.9**, compliance reports shall be submitted on a calendar monthly basis within 21 days of the end of each month. The reports shall contain the following data for each operation on a monthly basis, based on actual daily coating usage:
- (1) Average coating VOC content in kg VOC/liter coating ~~minus water~~ **as applied**
  - (2) **Average coating VOC content in kg VOC/liter coating, as applied, less water, for the ED Body and ED Chassis Coating Tanks**
  - (3)~~(2)~~ Average coating volume % solids **as applied**
  - (3) ~~Average kg VOC/liter of coating solids (if subject to a limit expressed on this basis)~~
  - (4) ~~Average actual solids transfer efficiency (if subject to a limit expressed on a kg VOC/liter of applied solids basis)~~
  - (5) **Overall thermal Thermal incinerator control efficiency, reflecting capture and destruction efficiency (if applicable)**
  - (6) ~~Average kg VOC/liter of applied solids, based on actual transfer efficiency (if subject to a limit expressed on this basis)~~

(7) Coating usage in liters

When more than one coating has been averaged for compliance purposes, the average shall be determined on a weighted average by volume basis. All data necessary to verify weighted averages shall be included in the report.

- ~~(c) The makeup of the solvents used by the Permittee shall be reviewed on an annual basis. By January 31 of each year, a list of all solvents, by compound, used during the previous calendar year shall be submitted to IDEM, OAQ. This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The solvent makeup reporting requirements established in Conditions D.1.20(b), D.2.25(c), D.3.19(b) and D.4.19(b) comprise one reporting requirement.~~
- ~~(d) Reports of monthly production totals by vehicle model shall be submitted to IDEM, OAQ on a quarterly basis, to comply with Condition D.2.3(a). This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The vehicle production reporting requirements established in Conditions D.1.20(c), D.2.25(d), D.3.19(c), D.4.19(c), D.5.12(a) and D.6.11(a) comprise one reporting requirement.~~
- ~~(e) A quarterly summary of the information to document compliance with Conditions D.2.3(d) and D.2.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the month period being reported. The natural gas usage reporting requirements established in Conditions D.1.20(d), D.2.25(e), D.3.19(d), D.4.19(d) and D.6.11(b) comprise one reporting requirement.~~
- ~~(f) Based on records required by Conditions D.1.19(a), D.2.24(a), D.3.18(a), D.4.18(a), and D.5.11(a), reports of monthly VOC emissions from surface coating operations and associated purge solvent operations and storage shall be submitted to IDEM, OAQ on a quarterly basis, to comply with Condition D.2.5(e). This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The VOC emission reporting requirements established in Conditions D.1.20(e), D.2.25(f), D.3.19(e), D.4.19(e) and D.5.12(b) comprise one reporting requirement.~~
- ~~(g) Based on records required by Conditions D.1.19(a), D.2.24(a), D.3.18(a), D.4.18(a), and D.6.10(a), reports of monthly source-wide particulate (PM/PM10) emissions shall be submitted to IDEM, OAQ on a quarterly basis, to comply with Condition D.2.3(b). This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The particulate emission reporting requirements established in Conditions D.1.20(f), D.2.25(g), D.3.19(f), D.4.19(f) and D.6.11(c) comprise one reporting requirement.~~

~~D.3.19~~

~~D.4.17 Reporting Requirements~~

- ~~(a) To document compliance with Conditions ~~D.3.7 and D.3.9~~ **D.4.5 and D.4.7**, compliance reports shall be submitted on a calendar monthly basis within 21 days of the end of each month. The reports shall contain the following data for each operation on a monthly basis, based on actual daily coating usage:~~

- (1) Average coating VOC content in kg VOC/liter coating minus water
- ~~(2) Average coating volume % solids~~
- ~~(3) Average kg VOC/liter of coating solids (if subject to a limit expressed on this basis)~~
- ~~(4) Average actual solids transfer efficiency (if subject to a limit expressed on a kg VOC/liter of applied solids basis)~~
- ~~(5) Thermal incinerator control efficiency (if applicable)~~
- ~~(6) Average kg VOC/liter of applied solids, based on actual transfer efficiency (if subject to a limit expressed on this basis)~~
- (2)(7) Coating usage in liters**

When more than one coating has been averaged for compliance purposes, the average shall be determined on a weighted average by volume basis. All data necessary to verify weighted averages shall be included in the report.

- (b) In order to demonstrate compliance with Condition D.4.3, the Permittee shall submit semiannual compliance reports for each affected source according to the requirements of 40 CFR 63.4520(a), paragraphs (1) through (7). The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in 40 CFR 63.4520, paragraph (a)(2). Compliance with the reporting requirements of 40 CFR Part 63, Subpart III satisfies this reporting requirement.**
- ~~(b) The makeup of the solvents used by the Permittee shall be reviewed on an annual basis. By January 31 of each year, a list of all solvents, by compound, used during the previous calendar year shall be submitted to IDEM, OAQ. This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The solvent makeup reporting requirements established in Conditions D.1.20(b), D.2.25(c), D.3.19(b) and D.4.19(b) comprise one reporting requirement.~~
- ~~(c) Reports of monthly production totals by vehicle model shall be submitted to IDEM, OAQ on a quarterly basis, to comply with Condition D.3.5(a). This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The vehicle production reporting requirements established in Conditions D.1.20(c), D.2.25(d), D.3.19(c), D.4.19(c), D.5.12(a) and D.6.11(a) comprise one reporting requirement.~~
- ~~(d) A quarterly summary of the information to document compliance with Conditions D.3.5(d) and D.3.6 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the month period being reported. The natural gas usage reporting requirements established in Conditions D.1.20(d), D.2.25(e), D.3.19(d), D.4.19(d) and D.6.11(b) comprise one reporting requirement.~~
- ~~(e) Based on records required by Conditions D.1.19(a), D.2.24(a), D.3.18(a), D.4.18(a), and D.5.11(a), reports of monthly VOC emissions from surface coating operations and~~

associated purge solvent operations and storage shall be submitted to IDEM, OAQ on a quarterly basis, to comply with Condition D.3.7(d). This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The VOC emission reporting requirements established in Conditions D.1.20(e), D.2.25(f), D.3.19(e), D.4.19(e) and D.5.12(b) comprise one reporting requirement.

- ~~(f) Based on records required by Conditions D.1.19(a), D.2.24(a), D.3.18(a), D.4.18(a), and D.6.10(a), reports of monthly source-wide particulate (PM/PM10) emissions shall be submitted to IDEM, OAQ on a quarterly basis, to comply with Condition D.3.5(b). This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The particulate emission reporting requirements established in Conditions D.1.20(f), D.2.25(g), D.3.19(f), D.4.19(f) and D.6.11(c) comprise one reporting requirement.~~

#### D.4.19

#### D.5.16 Reporting Requirements

- (a) To document compliance with Conditions ~~D.4.5 and D.4.7~~ **D.5.4 and D.5.6**, compliance reports shall be submitted on a calendar monthly basis within 21 days of the end of each month. The reports shall contain the following data for each operation on a monthly basis, based on actual daily coating usage:

(1) Average coating VOC content in kg VOC/liter coating ~~minus water~~ **as applied**

(2) **Average coating VOC content in kg VOC/liter coating, as applied, less water**

~~(3)~~(2) Average coating volume % solids **as applied**

~~(4)~~(3) Average kg VOC/liter of coating solids, **as applied** (if subject to a limit expressed on this basis)

~~(4)~~ Average actual solids transfer efficiency (if subject to a limit expressed on a kg VOC/liter of applied solids basis)

~~(5)~~ Thermal incinerator control efficiency (if applicable)

~~(6)~~ Average kg VOC/liter of applied solids, based on actual transfer efficiency (if subject to a limit expressed on this basis)

~~(5)~~(7) Coating usage in liters

When more than one coating has been averaged for compliance purposes, the average shall be determined on a weighted average by volume basis. All data necessary to verify weighted averages shall be included in the report.

- ~~(b) The makeup of the solvents used by the Permittee shall be reviewed on an annual basis. By January 31 of each year, a list of all solvents, by compound, used during the previous calendar year shall be submitted to IDEM, OAQ. This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The solvent makeup reporting requirements established in Conditions D.1.20(b), D.2.25(c), D.3.19(b) and D.4.19(b) comprise one reporting requirement.~~

- (c) — Reports of monthly production totals by vehicle model shall be submitted to IDEM, OAQ on a quarterly basis, to comply with Condition D.4.3(a). This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The vehicle production reporting requirements established in Conditions D.1.20(c), D.2.25(d), D.3.19(c), D.4.19(c), D.5.12(a) and D.6.11(a) comprise one reporting requirement.
- (d) — A quarterly summary of the information to document compliance with Conditions D.4.3(d) and D.4.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the month period being reported. The natural gas usage reporting requirements established in Conditions D.1.20(d), D.2.25(e), D.3.19(d), D.4.19(d) and D.6.11(b) comprise one reporting requirement.
- (e) — Based on records required by Conditions D.1.19(a), D.2.24(a), D.3.18(a), D.4.18(a), and D.5.11(a), reports of monthly VOC emissions from surface coating operations and associated purge solvent operations and storage shall be submitted to IDEM, OAQ on a quarterly basis, to comply with Condition D.4.5(e). This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The VOC emission reporting requirements established in Conditions D.1.20(e), D.2.25(f), D.3.19(e), D.4.19(e) and D.5.12(b) comprise one reporting requirement.
- (f) — Based on records required by Conditions D.1.19(a), D.2.24(a), D.3.18(a), D.4.18(a), and D.6.10(a), reports of monthly source-wide particulate (PM/PM10) emissions shall be submitted to IDEM, OAQ on a quarterly basis, to comply with Condition D.4.3(b). This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The particulate emission reporting requirements established in Conditions D.1.20(f), D.2.25(g), D.3.19(f), D.4.19(f) and D.6.11(c) comprise one reporting requirement.

#### D.5.12

#### D.6.10 Reporting Requirements

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**In order to demonstrate compliance with Condition D.6.3, the Permittee shall submit semiannual compliance reports for each affected source according to the requirements of 40 CFR 63.4520(a), paragraphs (1) through (7). The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in 40 CFR 63.4520, paragraph (a)(2). Compliance with the reporting requirements of 40 CFR Part 63, Subpart IIII satisfies this reporting requirement.**

- (a) — Reports of monthly production totals by vehicle model shall be submitted to IDEM, OAQ on a quarterly basis, to comply with Condition D.5.5. This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The vehicle production reporting requirements established in Conditions D.1.20(c), D.2.25(d), D.3.19(c), D.4.19(c), D.5.12(a) and D.6.11(a) comprise one reporting requirement.
- (b) — Based on records required by Conditions D.1.19(a), D.2.24(a), D.3.18(a), D.4.18(a), and D.5.11(a), reports of monthly VOC emissions from surface coating operations and associated purge solvent operations and storage shall be submitted to IDEM, OAQ on a quarterly basis, to comply with Condition D.5.6(c). This report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the

~~reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The VOC emission reporting requirements established in Conditions D.1.20(e), D.2.25(f), D.3.19(e), D.4.19(e) and D.5.12(b) comprise one reporting requirement.~~

3. Upon further review of the permit, IDEM has made the following revisions to the permit language to correct typographical errors, revise citations, and include specific compliance deadlines:

**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. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable. *[addition of period]*

~~D.1.5~~

**D.2.4** Prevention of Significant Deterioration (PSD) - Best Available Control Technology for Volatile Organic Compounds (VOC) [326 IAC 2-2][326 IAC 8-1-6] [40 CFR 52.21]

Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, 326 IAC 2-2-3, and 326 IAC 8-1-6, BACT for the Plastic Bumper Coating Line is the following:

- (a) The daily VOC emissions from the PBL Coating Booth shall not exceed 38.2 pounds of VOC per gallon of applied solids (4.57 kilograms of VOC per liter of applied solids). This limit ~~applied applies~~ **applies** to the weighted average of all plastics bumper coatings. Compliance with this limit shall be demonstrated pursuant to Condition ~~D.1.14~~ **D.2.9**.

~~D.1.12~~

**D.2.10** Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

- (a) Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the incinerator at all times the PBL Oven is in operation to ensure compliance with Condition ~~D.1.5~~ **D.2.4**.
- (b) The incinerator on the ~~PBL~~ **PBL** Oven shall be operated such that it achieves the minimum capture and destruction efficiencies specified in Condition ~~D.1.5~~ **D.2.4**.

~~D.2.2~~

**D.3.2** National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products: **Limitations and Requirements** [40 CFR Part 63, Subpart M] ~~[40 CFR 63.3882]~~ [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3890]

- (a) The provisions of 40 CFR Part 63, Subpart M (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source (as defined in ~~(e)~~ **(d)** below). A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.3891, the Permittee must comply with these requirements on and after ~~three years following the effective date of 40 CFR Part 63, Subpart M~~ **January 2, 2007**.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The surface coating of metal parts in the various coating operations described in this Section ~~D.2~~ **D.3** meets the applicability criteria of both 40 CFR Part 63, Subpart M (Surface Coating of Miscellaneous Metal Parts and Products) and 40 CFR Part 63, Subpart III (Surface Coating of Automobiles and Light-Duty Trucks), ~~which has not yet been promulgated. The Permittee may elect, pursuant to 40 CFR 63.3881(d), to comply with Subpart III (once it is promulgated) for the surface coating of metal parts or~~

~~products used in its manufacturing of automobiles and/or light-duty trucks in lieu of complying with each rule separately.~~ **As a result, the Permittee must select and implement a valid option for complying with this rule, and any other applicable rules of 40 CFR Part 63, pursuant to 40 CFR 63.3881(d) and (e).**

- (d) Consistent with 40 CFR 63.3881(a), the emission units described in this Section ~~D.2~~ **D.3** which also meet one or more of the descriptions listed below, to the extent employed in the surface coating of metal parts or products as defined in 40 CFR Part 63, Subpart M MMM, comprise the affected source that is subject to 40 CFR Part 63, Subpart M MMM:
- (1) All coating operations as defined in 40 CFR 63.3981;
  - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings thinners and/or other additives, and cleaning materials; and
  - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (e) Definitions of terms used in this section that are contained in 40 CFR 63.2 or in 40 CFR ~~63.3980~~ **63.3981** are incorporated herein by reference.

~~D.2.18~~

**D.3.16 Thermal Incinerator Temperature [326 IAC 2-7-5(3)]**

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on each thermal incinerator (B-ED, CH, TC-1, TC-2, TUT, and SUR) for measuring operating temperature. For the purposes of this condition, continuous monitoring shall mean no less often than once per minute. The output of this system shall be recorded as a three-hour average. If the continuous monitoring system is not in operation, the temperature will be recorded manually once in a 15-minute period. Nothing in this permit shall excuse the Permittee from complying with the requirement to continuously monitor the temperature of each thermal incinerator.
- (b) From the date of issuance of this permit until the approved stack test results are available, the Permittee shall operate each thermal incinerator **at** or above the hourly average temperature of 1,400 °F (except for the ED Chassis Oven thermal incinerator (CH), which shall be operated at or above the three-hour average temperature of 1,325 °F). The Permittee shall determine the minimum three-hour average operating temperature from the most recent valid stack test that demonstrates compliance with Conditions ~~D.2.5, D.2.7, and D.2.9~~ **D.3.4, D.3.6 and D.3.8**. This determination must be approved by IDEM.
- (c) The Permittee shall then operate each thermal incinerator at or above the minimum three-hour average temperature as observed during the most recent compliant stack test following approval of that temperature.
- (d) The Permittee take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the three-hour average temperature of a thermal incinerator is below the compliant three-hour average temperature. A three-hour average temperature that is below the compliant ~~hourly~~ **three-hour** average temperature is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be

considered a deviation from this permit.

~~D.3.3~~

**D.4.2** National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products: **Limitations and Requirements** [40 CFR Part 63, Subpart MMMM]~~[40 CFR 63.3882][40 CFR 63.3882][40 CFR 63.3883][40 CFR 63.3890]~~

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- (a) The provisions of 40 CFR Part 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source (as defined in ~~(c)~~(d) below). A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.3891, the Permittee must comply with these requirements on and after ~~three years following the effective date of 40 CFR Part 63, Subpart MMMM.~~ **January 2, 2007.**
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The surface coating of metal parts in the various coating operations described in this Section ~~D.3~~ **D.4** meets the applicability criteria of both 40 CFR Part 63, Subpart MMMM (Surface Coating of Miscellaneous Metal Parts and Products) and 40 CFR Part 63, Subpart IIII (Surface Coating of Automobiles and Light-Duty Trucks), ~~which has not yet been promulgated. The Permittee may elect, pursuant to 40 CFR 63.3881(d), to comply with Subpart IIII (once it is promulgated) for the surface coating of metal parts or products used in its manufacturing of automobiles and/or light-duty trucks in lieu of complying with each rule separately. As a result, the Permittee must select and implement a valid option for complying with this rule, and any other applicable rules of 40 CFR Part 63, pursuant to 40 CFR 63.3881(d) and (e).~~
- (d) Consistent with 40 CFR 63.3881(a), the emission units described in this Section ~~D.3~~ **D.4** which also meet one or more of the descriptions listed below, to the extent employed in the surface coating of metal parts or products as defined in 40 CFR Part 63, Subpart MMMM, comprise the affected source that is subject to 40 CFR Part 63, Subpart MMMM:
- (1) All coating operations as defined in 40 CFR 63.3981;
  - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings thinners and/or other additives, and cleaning materials; and
  - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (e) Definitions of terms used in this section that are contained in 40 CFR 63.2 or in 40 CFR ~~63.3980~~ **63.3981** are incorporated herein by reference.

~~D.4.2~~

**D.5.2** National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products: **Limitations and Requirements** [40 CFR Part 63, Subpart MMMM]~~[40 CFR 63.3882][40 CFR 63.3882][40 CFR 63.3883][40 CFR 63.3890]~~

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- (a) The provisions of 40 CFR Part 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products)

apply to the affected source (as defined in ~~(e)~~(d) below). A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.3891, the Permittee must comply with these requirements on and after ~~three years following the effective date of 40 CFR Part 63, Subpart M~~ **January 2, 2007**.

- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The surface coating of metal parts in the various coating operations described in this Section ~~D-4~~ **D.5** meets the applicability criteria of both 40 CFR Part 63, Subpart M (Surface Coating of Miscellaneous Metal Parts and Products) and 40 CFR Part 63, Subpart III (Surface Coating of Automobiles and Light-Duty Trucks); ~~which has not yet been promulgated. The Permittee may elect, pursuant to 40 CFR 63.3881(d), to comply with Subpart III (once it is promulgated) for the surface coating of metal parts or products used in its manufacturing of automobiles and/or light-duty trucks in lieu of complying with each rule separately. As a result, the Permittee must select and implement a valid option for complying with this rule, and any other applicable rules of 40 CFR Part 63, pursuant to 40 CFR 63.3881(d) and (e).~~
- (d) Consistent with 40 CFR 63.3881(a), the emission units described in this Section ~~D-4~~ **D.5** which also meet one or more of the descriptions listed below, to the extent employed in the surface coating of metal parts or products as defined in 40 CFR Part 63, Subpart M, comprise the affected source that is subject to 40 CFR Part 63, Subpart M:
- (1) All coating operations as defined in 40 CFR 63.3981;
  - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings thinners and/or other additives, and cleaning materials; and
  - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (e) Definitions of terms used in this section that are contained in 40 CFR 63.2 or in 40 CFR ~~63.3980~~ **63.3981** are incorporated herein by reference.

### ~~D-5.3~~

### **D.6.2** National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products: **Limitations and Requirements** [40 CFR Part 63, Subpart M] ~~[40 CFR 63.3882][40 CFR 63.3882][40 CFR 63.3883][40 CFR 63.3890]~~

- 
- (a) The provisions of 40 CFR Part 63, Subpart M (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source (as defined in ~~(e)~~(d) below). A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Pursuant to 40 CFR 63.3891, the Permittee must comply with these requirements on and after ~~three years following the effective date of 40 CFR Part 63, Subpart M~~ **January 2, 2007**.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B

section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

- (c) The **application of adhesives to metal parts and the purge solvent recovery system** ~~surface coating of metal parts in the various coating operations~~ described in this Section ~~D.5~~ **D.6** ~~meets meet~~ the applicability criteria of both 40 CFR Part 63, Subpart Mmmm (Surface Coating of Miscellaneous Metal Parts and Products) and 40 CFR Part 63, Subpart IIII (Surface Coating of Automobiles and Light-Duty Trucks), ~~which has not yet been promulgated. The Permittee may elect, pursuant to 40 CFR 63.3881(d), to comply with Subpart IIII (once it is promulgated) for the surface coating of metal parts or products used in its manufacturing of automobiles and/or light-duty trucks in lieu of complying with each rule separately.~~ **As a result, the Permittee must select and implement a valid option for complying with this rule, and any other applicable rules of 40 CFR Part 63, pursuant to 40 CFR 63.3881(d) and (e).**
- (d) Consistent with 40 CFR 63.3881(a), the emission units described in this Section ~~D.5~~ **D.6** which also meet one or more of the descriptions listed below, to the extent employed in the surface coating of metal parts or products as defined in 40 CFR Part 63, Subpart Mmmm, comprise the affected source that is subject to 40 CFR Part 63, Subpart Mmmm:
- (1) All coating operations as defined in 40 CFR 63.3981;
  - (2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
  - (3) All manual and automated equipment and containers used for conveying coatings thinners and/or other additives, and cleaning materials; and
  - (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (e) Definitions of terms used in this section that are contained in 40 CFR 63.2 or in 40 CFR ~~63.3980~~ **63.3981** are incorporated herein by reference.

*[Between Conditions D.6.6 and D.6.7:]*

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]** *[addition of "s" to the word "Requirements"]*

4. Upon further review of the permit, IDEM has made the following revisions to the permit language to list the conditions whose requirements must be met in order to satisfy BACT and PSD requirements or render them non-applicable (note that some of the revisions indicated below were made in response to source comments addressed elsewhere in this document):

**D.1.6**

**D.2.5** Prevention of Significant Deterioration - Best Available Control Technology for Nitrogen Oxides (NO<sub>x</sub>) [40 CFR 52.21] [326 IAC 2-2]

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Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, and 326 IAC 2-2-3, BACT for NO<sub>x</sub> for the natural gas combustion equipment described in this section is the following:

- (a) The NO<sub>x</sub> emissions from the PBL Oven shall not exceed 0.10 pounds per million Btu (lb/MMBtu) heat input;
- (b) The NO<sub>x</sub> emissions from the PBL Booth Preheat Burner, insignificant PBL Oven thermal

incinerator, and the two (2) insignificant PBL Booth Reheat burners shall not exceed 0.12 pounds per million Btu (lb/MMBtu) heat input each; and

- (c) The PBL Preheat burner, Reheat burners, and Oven shall use low-NO<sub>x</sub> natural gas burners.

Compliance with these limitations, **and those contained in Conditions D.3.5, D.4.6, D.5.5 and D.7.2**, will satisfy the requirements of 40 CFR 52.21 and 326 IAC 2-2.

~~D.2.6~~

**D.3.5** Prevention of Significant Deterioration - Best Available Control Technology for Nitrogen Oxides (NO<sub>x</sub>) [40 CFR 52.21] [326 IAC 2-2]

---

Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, and 326 IAC 2-2-3, BACT for NO<sub>x</sub> for the natural gas combustion equipment described in this section is the following:

- (a) NO<sub>x</sub> emissions from the following facilities:  
...
- (b) All combustion operations listed above shall use low-NO<sub>x</sub> natural gas burners.

Compliance with these limitations, **and those contained in Conditions D.2.5, D.4.6, D.5.5 and D.7.2**, will satisfy the requirements of 40 CFR 52.21 and 326 IAC 2-2.

~~D.3.8~~

**D.4.6** Prevention of Significant Deterioration - Best Available Control Technology for Nitrogen Oxides (NO<sub>x</sub>) [40 CFR 52.21] [326 IAC 2-2]

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Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, and 326 IAC 2-2-3, BACT for NO<sub>x</sub> for the natural gas combustion equipment described in this section is the following:

- (a) The NO<sub>x</sub> emissions from the Touchup Trim Booth burner shall not exceed 0.10 pounds per million Btu (lb/MMBtu) heat input; and
- (b) All combustion facilities listed in this section shall use low-NO<sub>x</sub> natural gas burners.

Compliance with these limitations, **and those contained in Conditions D.2.5, D.3.5, D.5.5 and D.7.2**, will satisfy the requirements of 40 CFR 52.21 and 326 IAC 2-2.

~~D.4.6~~

**D.5.5** Prevention of Significant Deterioration - Best Available Control Technology for Nitrogen Oxides (NO<sub>x</sub>) [40 CFR 52.21] [326 IAC 2-2]

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Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, and 326 IAC 2-2-3, BACT for NO<sub>x</sub> for the natural gas combustion facilities described in this section is the following:

- (a) The NO<sub>x</sub> emissions from the PVC Coating #4 Booth #1 Preheat Burner, the Black and Wax Coat Booth burner, the two (2) insignificant PVC Seal-#1-Oven burners, the two (2) insignificant natural gas-fired burners, and the insignificant Anticorrosion Booth burner shall not exceed 0.12 pounds per million Btu (lb/MMBtu) heat input each; and
- (b) All combustion facilities listed in this section shall use low-NO<sub>x</sub> natural gas burners.

Compliance with these limitations, **and those contained in Conditions D.2.5, D.3.5, D.4.6 and D.7.2**, will satisfy the requirements of 40 CFR 52.21 and 326 IAC 2-2.

**D.6.3**

**D.7.1** Prevention of Significant Deterioration (PSD) - Best Available Control Technology for Volatile Organic Compounds (VOC) [326 IAC 2-2] [40 CFR 52.21]

Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, and 326 IAC 2-2-3, BACT for VOC for the insignificant vehicle gasoline fueling operation is the use of a Stage II vapor balance control system. This system shall be in operation whenever vehicles are being fueled.

Compliance with this limitation, **and those contained in Conditions D.1.5, D.2.4, D.3.4, D.4.5, D.5.4 and D.6.5**, will satisfy the requirements of 326 IAC 2-2 and 40 CFR 52.21.

**D.6.4**

**D.7.2** Prevention of Significant Deterioration - Best Available Control Technology for Nitrogen Oxides (NO<sub>x</sub>) [40 CFR 52.21] [326 IAC 2-2]

Pursuant to PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, and 326 IAC 2-2-3, BACT for NO<sub>x</sub> for the insignificant natural gas combustion equipment described in this section is the following:

(a) The NO<sub>x</sub> emissions from the following insignificant natural gas combustion facilities shall not exceed 0.10 pounds per million Btu (lb/MMBtu) heat input each:

...

(b) All combustion operations at the source shall use low-NO<sub>x</sub> natural gas burners.

Compliance with these limitations, **and those contained in Conditions D.2.5, D.3.5, D.4.6 and D.5.5**, will satisfy the requirements of 40 CFR 52.21 and 326 IAC 2-2.

5. IDEM has deleted draft Condition C.22 (Application Requirements for Section 112(j)) from the permit because the MACTs for all source categories affected by the Section 112(j) MACT Hammer date have been signed by EPA. Accordingly, the permit has been revised as follows:

**Part 2 MACT Application Submittal Requirement**

~~C.22 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)] [40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]~~

~~(a) The Permittee shall submit a Part 2 MACT Application in accordance with 40 CFR 63.52(e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).~~

~~(b) Notwithstanding paragraph (a), the Permittee is not required to submit a Part 2 MACT Application if the Permittee no longer meets the applicability criteria of 40 CFR 63.50 by the application deadline in 40 CFR 63.52(e)(1). For example, the Permittee would not have to submit a Part 2 MACT Application if, by the application deadline:~~

~~(1) The source is no longer a major source of hazardous air pollutants, as defined in 40 CFR 63.2;~~

~~(2) The source no longer includes one or more units in an affected source category for which the U.S. EPA failed to promulgate an emission standard by May 15, 2002; or~~

~~(3) The MACT standard or standards for the affected source categories included at the source are promulgated.~~

~~(c) Notwithstanding paragraph (a), pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule~~

provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The initial notification shall be submitted to:

\_\_\_\_\_ Indiana Department of Environmental Management  
\_\_\_\_\_ Compliance Data Section, Office of Air Quality  
\_\_\_\_\_ 100 North Senate Avenue, P.O. Box 6015  
\_\_\_\_\_ Indianapolis, Indiana 46206-6015

\_\_\_\_\_ and

\_\_\_\_\_ United States Environmental Protection Agency, Region V  
\_\_\_\_\_ Director, Air and Radiation Division  
\_\_\_\_\_ 77 West Jackson Boulevard  
\_\_\_\_\_ Chicago, Illinois 60604-3590

6. IDEM has revised the reporting forms that are attached to the end of the permit. The Semi-Annual Natural Gas Fired Boiler Certification reporting form was removed from the permit because the source is not required to submit any reports for their insignificant boilers. The Part 70 Usage Reports for reporting of VOC emissions for each of the surface coating booths have been removed because these reporting forms are not consistent with any of the VOC reporting requirements in the permit. The Part 70 Quarterly Report for source-wide PM emissions has been revised to indicate that the PM/PM10 limit applies to only those operations that were included in PSD (79) 1651, issued July 26, 1989. This form has also been revised to indicate that compliance shall be determined pursuant to Condition D.1.4 in the permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
Compliance Data Section**

**PART 70 OPERATING PERMIT  
SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: \_\_\_\_\_ Subaru of Indiana Automotive, Inc.  
Source Address: \_\_\_\_\_ 5500 State Road 38 East, Lafayette, Indiana 47903  
Mailing Address: \_\_\_\_\_ 5500 State Road 38 East, Lafayette, Indiana 47903  
Part 70 Permit No.: \_\_\_\_\_ T157-5906-00050

<input checked="" type="checkbox"/> Natural Gas Only <input checked="" type="checkbox"/> Alternate Fuel burned From: _____ To: _____
--

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: _____

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 Compliance Data Section**

**Part 70 Usage Report**  
 (Submit Report Quarterly)

Source Name: \_\_\_\_\_ Subaru of Indiana Automotive, Inc.  
 Source Address: \_\_\_\_\_ 5500 State Road 38 East, Lafayette, Indiana 47903  
 Mailing Address: \_\_\_\_\_ 5500 State Road 38 East, Lafayette, Indiana 47903  
 Part 70 Permit No.: \_\_\_\_\_ T157-5906-00050  
 Facility: \_\_\_\_\_ ED Body Coating Tank, Unit 001  
 Parameter: \_\_\_\_\_ VOC  
 Limit: \_\_\_\_\_ Less than 0.52 pounds of VOC per gallon of applied solids

Month: \_\_\_\_\_ Year: \_\_\_\_\_

Day				Day			
1				17			
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6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				no. of deviations			

\_\_\_\_\_ 9 No deviation occurred in this month.

\_\_\_\_\_ 9 Deviation/s occurred in this month.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
 Title/Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

\_\_\_\_\_ Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 Compliance Data Section**

**Part 70 Usage Report**  
 (Submit Report Quarterly)

Source Name: \_\_\_\_\_ Subaru of Indiana Automotive, Inc.  
 Source Address: \_\_\_\_\_ 5500 State Road 38 East, Lafayette, Indiana 47903  
 Mailing Address: \_\_\_\_\_ 5500 State Road 38 East, Lafayette, Indiana 47903  
 Part 70 Permit No.: \_\_\_\_\_ T157-5906-00050 \_\_\_\_\_  
 Facility: \_\_\_\_\_ ED Chassis Coating Tank, Unit 001  
 Parameter: \_\_\_\_\_ VOC  
 Limit: \_\_\_\_\_ Less than 0.41 pounds of VOC per gallon of applied solids

Month: \_\_\_\_\_ Year: \_\_\_\_\_

Day				Day			
1				17			
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7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				no. of deviations			

\_\_\_\_\_ 9 \_\_\_\_\_ No deviation occurred in this month.

\_\_\_\_\_ 9 \_\_\_\_\_ Deviation/s occurred in this month.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
 Title/Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

\_\_\_\_\_ Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 Compliance Data Section**

**Part 70 Usage Report**  
 (Submit Report Quarterly)

Source Name: \_\_\_\_\_ Subaru of Indiana Automotive, Inc.  
 Source Address: \_\_\_\_\_ 5500 State Road 38 East, Lafayette, Indiana 47903  
 Mailing Address: \_\_\_\_\_ 5500 State Road 38 East, Lafayette, Indiana 47903  
 Part 70 Permit No.: \_\_\_\_\_ T157-5906-00050 \_\_\_\_\_  
 Facility: \_\_\_\_\_ PVC Coating Booth, Unit 002  
 Parameter: \_\_\_\_\_ VOC  
 Limit: \_\_\_\_\_ Less than 0.25 pounds of VOC per gallon of coating solids

Month: \_\_\_\_\_ Year: \_\_\_\_\_

Day				Day			
1				17			
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3				19			
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8				24			
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10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				no. of deviations			

\_\_\_\_\_ 9 \_\_\_\_\_ No deviation occurred in this month.

\_\_\_\_\_ 9 \_\_\_\_\_ Deviation/s occurred in this month.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
 Title/Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

\_\_\_\_\_ Attach a signed certification to complete this report.

## ~~INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT~~ ~~OFFICE OF AIR QUALITY~~ Compliance Data Section

### ~~Part 70 Usage Report~~ (Submit Report Quarterly)

Source Name: \_\_\_\_\_ Subaru of Indiana Automotive, Inc.  
 Source Address: \_\_\_\_\_ 5500 State Road 38 East, Lafayette, Indiana 47903  
 Mailing Address: \_\_\_\_\_ 5500 State Road 38 East, Lafayette, Indiana 47903  
 Part 70 Permit No.: \_\_\_\_\_ T157-5906-00050  
 Facility: \_\_\_\_\_ Topcoat booths (Topcoat #1 Booth, Topcoat #2 Booth, Twotone and Repair Booth), Unit 003 (average of all Topcoat coatings)  
 Parameter: \_\_\_\_\_ VOC  
 Limit: \_\_\_\_\_ Less than 12.3 pounds of VOC per gallon of applied solids

Month: \_\_\_\_\_ Year: \_\_\_\_\_

Day				Day			
1				17			
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4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				no. of deviations			

\_\_\_\_\_  No deviation occurred in this month.

\_\_\_\_\_  Deviation/s occurred in this month.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
 Title/Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

\_\_\_\_\_ Attach a signed certification to complete this report.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY Compliance Data Section

### Part 70 Usage Report (Submit Report Quarterly)

Source Name: \_\_\_\_\_ Subaru of Indiana Automotive, Inc.  
 Source Address: \_\_\_\_\_ 5500 State Road 38 East, Lafayette, Indiana 47903  
 Mailing Address: \_\_\_\_\_ 5500 State Road 38 East, Lafayette, Indiana 47903  
 Part 70 Permit No.: \_\_\_\_\_ T157-5906-00050  
 Facility: \_\_\_\_\_ Intermediate Coating Booth, Unit 004  
 Parameter: \_\_\_\_\_ VOC  
 Limit: \_\_\_\_\_ Less than 8.76 pounds of VOC per gallon of applied solids (average of all  
 Intermediate coatings)

Month: \_\_\_\_\_ Year: \_\_\_\_\_

Day				Day			
1				17			
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9				25			
10				26			
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12				28			
13				29			
14				30			
15				31			
16				no. of deviations			

\_\_\_\_\_  No deviation occurred in this month.

\_\_\_\_\_  Deviation/s occurred in this month:  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
 Title/Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

\_\_\_\_\_ Attach a signed certification to complete this report.

## ~~INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT~~ ~~OFFICE OF AIR QUALITY~~ Compliance Data Section

### ~~Part 70 Usage Report~~ (Submit Report Quarterly)

Source Name: \_\_\_\_\_ Subaru of Indiana Automotive, Inc.  
 Source Address: \_\_\_\_\_ 5500 State Road 38 East, Lafayette, Indiana 47903  
 Mailing Address: \_\_\_\_\_ 5500 State Road 38 East, Lafayette, Indiana 47903  
 Part 70 Permit No.: \_\_\_\_\_ T157-5906-00050 \_\_\_\_\_  
 Facility: \_\_\_\_\_ PBL Paint Booth, Unit 005  
 Parameter: \_\_\_\_\_ VOC  
 Limit: \_\_\_\_\_ Less than 38.2 pounds of VOC per gallon of applied solids (average of all Plastic Bumper coatings)

Month: \_\_\_\_\_ Year: \_\_\_\_\_

Day				Day			
1				17			
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12				28			
13				29			
14				30			
15				31			
16				no. of deviations			

\_\_\_\_\_  No deviation occurred in this month.

\_\_\_\_\_  Deviation/s occurred in this month.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
 Title/Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

\_\_\_\_\_ Attach a signed certification to complete this report.

## ~~INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT~~ ~~OFFICE OF AIR QUALITY~~ Compliance Data Section

### ~~Part 70 Usage Report~~ (Submit Report Quarterly)

Source Name: \_\_\_\_\_ Subaru of Indiana Automotive, Inc.  
 Source Address: \_\_\_\_\_ 5500 State Road 38 East, Lafayette, Indiana 47903  
 Mailing Address: \_\_\_\_\_ 5500 State Road 38 East, Lafayette, Indiana 47903  
 Part 70 Permit No.: \_\_\_\_\_ T157-5906-00050 \_\_\_\_\_  
 Facility: \_\_\_\_\_ Black and Wax Booth, Unit 006  
 Parameter: \_\_\_\_\_ VOC  
 Limit: \_\_\_\_\_ Less than 17.9 pounds of VOC per gallon of coating solids for Black Phthalic Resin

Month: \_\_\_\_\_ Year: \_\_\_\_\_

Day				Day			
1				17			
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10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				no. of deviations			

\_\_\_\_\_  No deviation occurred in this month.

\_\_\_\_\_  Deviation/s occurred in this month.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
 Title/Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

\_\_\_\_\_ Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 Compliance Data Section**

**Part 70 Usage Report**  
 (Submit Report Quarterly)

Source Name: \_\_\_\_\_ Subaru of Indiana Automotive, Inc.  
 Source Address: \_\_\_\_\_ 5500 State Road 38 East, Lafayette, Indiana 47903  
 Mailing Address: \_\_\_\_\_ 5500 State Road 38 East, Lafayette, Indiana 47903  
 Part 70 Permit No.: \_\_\_\_\_ T157-5906-00050 \_\_\_\_\_  
 Facility: \_\_\_\_\_ Black and Wax Booth, Unit 006  
 Parameter: \_\_\_\_\_ VOC  
 Limit: \_\_\_\_\_ Less than 6.43 pounds of VOC per gallon of coating solids for Inner Panel Wax

Month: \_\_\_\_\_ Year: \_\_\_\_\_

Day				Day			
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13				29			
14				30			
15				31			
16				no. of deviations			

\_\_\_\_\_ 9 \_\_\_\_\_ No deviation occurred in this month.

\_\_\_\_\_ 9 \_\_\_\_\_ Deviation/s occurred in this month.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
 Title/Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

\_\_\_\_\_ Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 Compliance Data Section**

**Part 70 Usage Report**  
 (Submit Report Quarterly)

Source Name: \_\_\_\_\_ Subaru of Indiana Automotive, Inc.  
 Source Address: \_\_\_\_\_ 5500 State Road 38 East, Lafayette, Indiana 47903  
 Mailing Address: \_\_\_\_\_ 5500 State Road 38 East, Lafayette, Indiana 47903  
 Part 70 Permit No.: \_\_\_\_\_ T157-5906-00050 \_\_\_\_\_  
 Facility: \_\_\_\_\_ Anticorrosion Coating Booth, Unit 006  
 Parameter: \_\_\_\_\_ VOC  
 Limit: \_\_\_\_\_ Less than 3.59 pounds of VOC per gallon of coating solids for Underfloor Wax

Month: \_\_\_\_\_ Year: \_\_\_\_\_

Day				Day			
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12				28			
13				29			
14				30			
15				31			
16				no. of deviations			

\_\_\_\_\_ 9 \_\_\_\_\_ No deviation occurred in this month.

\_\_\_\_\_ 9 \_\_\_\_\_ Deviation/s occurred in this month.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
 Title/Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

\_\_\_\_\_ Attach a signed certification to complete this report.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY Compliance Data Section

### Part 70 Usage Report (Submit Report Quarterly)

Source Name: \_\_\_\_\_ Subaru of Indiana Automotive, Inc.  
 Source Address: \_\_\_\_\_ 5500 State Road 38 East, Lafayette, Indiana 47903  
 Mailing Address: \_\_\_\_\_ 5500 State Road 38 East, Lafayette, Indiana 47903  
 Part 70 Permit No.: \_\_\_\_\_ T157-5906-00050 \_\_\_\_\_  
 Facility: \_\_\_\_\_ Final Repair operation (Touchup IPC Booth, Touchup Trim Booth), Unit 007  
 Parameter: \_\_\_\_\_ VOC  
 Limit: \_\_\_\_\_ Less than 4.84 pounds of VOC per gallon of coating less water (average of all Final Repair coatings and solvents)

Month: \_\_\_\_\_ Year: \_\_\_\_\_

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12				28			
13				29			
14				30			
15				31			
16				no. of deviations			

\_\_\_\_\_  No deviation occurred in this month.

\_\_\_\_\_  Deviation/s occurred in this month.

\_\_\_\_\_ Deviation has been reported on: \_\_\_\_\_

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

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

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

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

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

\_\_\_\_\_ Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**Compliance Data Section**  
  
**Part 70 Quarterly Report**

Source Name: Subaru of Indiana Automotive, Inc.  
Source Address: 5500 State Road 38 East, Lafayette, Indiana 47903  
Mailing Address: 5500 State Road 38 East, Lafayette, Indiana 47903  
Part 70 Permit No.: T157-5906-00050  
Facility: ~~Source-wide~~ **PVC #1 Coating Booth, Topcoat #1 Coating Booth, Topcoat #2 Coating Booth, Twotone and Repair Coating Booth, Intermediate (Surfacer) Coating Booth, Plastic Bumper Coating Booth, Black Coat and Wax Coating Booth, Anticorrosion Coating Booth, Touchup Trim Coating Booth, Touchup IPC Coating Booth, source-wide natural gas combustion, and all insignificant facilities that were permitted by the PSD (79) 1651 Revision.**  
Parameter: PM  
Limit: Less than 23.1 tons PM/PM10 per twelve (12) consecutive month period with compliance determined at the end of each month, using the equation contained in Condition ~~D.1.10~~ **D.1.4** of this permit.

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

Month	PM/PM10 emissions This Month (tons)	PM/PM10 emissions for Past 11 Months (tons)	Total PM/PM10 emissions for 12 Month Period (tons)
Month 1			
Month 2			
Month 3			

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

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

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

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

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

Attach a signed certification to complete this report.

7. In accordance with the credible evidence rule (62 Fed. Reg. 8314, Feb 24, 1997); Section 113(a) of the Clean Air Act, 42 U.S. C. § 7413 (a); and a letter from the United States Environmental Protection Agency (USEPA) to IDEM, OAQ dated May, 18 2004, all permits must address the use of credible evidence; otherwise, USEPA will object to the permits. The following language will be incorporated into the permit to address credible evidence:

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

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**Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.**

Issued June 28, 2004

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Part 70 Operating Permit

#### Source Background and Description

<b>Source Name:</b>	Subaru of Indiana Automotive, Inc.
<b>Source Location:</b>	5500 State Road 38 East, Lafayette, Indiana 47903
<b>County:</b>	Tippecanoe
<b>SIC Code:</b>	3171
<b>Operation Permit No.:</b>	T157-5906-00050
<b>Permit Reviewer:</b>	ERG/PG

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Subaru of Indiana Automotive, Inc. (SIA) (formerly Subaru-Isuzu Automotive, Inc.) relating to the operation of an automotive and light-duty truck assembly plant.

This Part 70 permit contains provisions intended to satisfy the requirements of the construction permit rules.

#### Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) Electrodeposition Coating of Vehicle Bodies and Chassis (ED Coating Line), identified as Unit 001, with a capacity of 60 units per hour, constructed in 1989, consisting of the following units:
  - (1) One (1) ED Body Pretreatment area;
  - (2) One (1) ED Pretreatment Drying Oven, with one (1) insignificant natural gas-fired burner with a heat input capacity of 5.55 MMBtu/hr;
  - (3) One (1) insignificant boiler for paint temperature control, with a heat input capacity of 4.0 MMBtu/hr;
  - (4) Two (2) insignificant pretreatment boilers for warming water surrounding the ED Body Coating Tank, each with a heat input capacity of 1.045 MMBtu/hr;
  - (5) One (1) ED Body Coating Tank, utilizing dipping as the method of application;
  - (6) One (1) ED Body Oven, with five (5) natural gas-fired burners totaling 13.7 MMBtu/hr, using a 6.0 MM Btu/hr natural gas-fired thermal incinerator (B-ED) as VOC control, and exhausting to one (1) stack, identified as B-ED Inc. (emissions from the entrance to, and exit from, the ED Body Oven use no controls and exhaust to one (1) stack, identified as B-ED Hood Exhaust);
  - (7) One (1) Body Cool Down area;
  - (8) One (1) ED Chassis Pretreatment area;
  - (9) One (1) ED Chassis Coating Tank, utilizing dipping as the method of application;

- (10) One (1) insignificant hot water boiler for the ED Chassis Coating Tank, with a heat input capacity of 5.0 MMBtu/hr;
  - (11) One (1) ED Chassis Oven, with two (2) natural gas-fired burners totaling 4.37 MMBtu/hr, using a 2.25 MM Btu/hr natural gas-fired thermal incinerator (CH) as VOC control, and exhausting to one (1) stack, identified as CH Inc. (emissions from the entrance to, and exit from, the ED Chassis Oven use no controls and exhaust to one (1) stack, identified as CH Hood Exhaust); and
  - (12) One (1) Chassis Cool Down area.
- (b) Sealing and PVC Undercoating Line, identified as Unit 002, with a capacity of 60 units per hour, consisting of the following units:
- (1) One (1) PVC Coating #1 Booth, constructed in 1989, utilizing the airless spray method of application, using a dry filter as particulate matter control, and exhausting to one (1) stack, identified as PVC-1-2;
  - (2) One (1) PVC Coating #1 Booth Preheat, constructed in 1989, with one (1) natural gas-fired burner with a heat input capacity of 16.8 MMBtu/hr;
  - (3) One (1) PVC Seal #1 Oven, constructed in 1989, with two (2) insignificant natural gas-fired burners totaling 6.94 MMBtu/hr, using no controls, and exhausting to one (1) stack, identified as PVC-Oven Exhaust;
  - (4) One (1) PVC Cool Down #1 area, constructed in 1989, using no controls, and exhausting to one (1) stack, identified as PVC Cooling;
  - (5) One (1) PVC Coating #2 Booth, constructed in 1999, utilizing the airless spray method of application, using a water wash as particulate matter control, and exhausting to stack PVC-Booth2;
  - (6) One (1) PVC Coating #2 Booth Preheat, constructed in 1999, with one (1) natural gas-fired burner with a heat input capacity of 16.8 MMBtu/hr;
  - (7) One (1) PVC Seal #2 Oven, constructed in 1999, with two (2) insignificant natural gas-fired burners totaling 6.94 MMBtu/hr, using no controls, and exhausting to one (1) stack, identified as PVC-Oven Exhaust; and
  - (8) One (1) PVC Cool Down #2 area, constructed in 1999.
- (c) Topcoat System, identified as Unit 003, with a capacity of 60 units per hour, constructed in 1989, consisting of the following units:
- (1) One (1) Topcoat #1 Booth, utilizing the electrostatic air atomized, electrostatic bell method of application, using a water wash as particulate matter control, and exhausting to ten (10) stacks, identified as TC1-1 through TC1-10;
  - (2) One (1) Topcoat #1 Booth Preheat, with three (3) natural gas-fired burners, each with a heat input capacity of 20.57 MMBtu/hr;
  - (3) One (1) Topcoat #1 Booth Reheat, with three (3) insignificant natural gas-fired burners;
  - (4) One (1) Topcoat #1 Oven, with three (3) insignificant natural gas-fired burners, using a 3.46 MMBtu/hr natural gas-fired thermal incinerator (TC-1) as VOC control, and exhausting to one (1) stack, identified as TC-1 Inc. (emissions from

- the entrance to and exit from the Topcoat #1 Oven use no controls and exhaust to one (1) stack, identified as TC-1 Ex.);
- (5) One (1) Topcoat #1 Cool Down area, using no controls, and exhausting to one (1) stack, identified as TC-1 O.Cl.;
  - (6) One (1) Topcoat #2 Booth, utilizing the electrostatic air atomized, electrostatic bell method of application, using a water wash as particulate matter control, and exhausting to ten (10) stacks, identified as TC2-1 through TC2-10;
  - (7) One (1) Topcoat #2 Booth Preheat, with three (3) natural gas-fired burners, each with a heat input capacity of 20.57 MMBtu/hr;
  - (8) One (1) Topcoat #2 Booth Reheat, with three (3) insignificant natural gas-fired burners;
  - (9) One (1) Topcoat #2 Oven, with three (3) insignificant natural gas-fired burners, using a 3.46 MMBtu/hr natural gas-fired thermal incinerator (TC-2) as VOC control, and exhausting to one (1) stack, identified as TC-2 Inc. (emissions from the entrance to and exit from the Topcoat #1 Oven use no controls and exhaust to one (1) stack, identified as TC-2 Ex.);
  - (10) One (1) Topcoat #2 Cool Down area, using no controls, and exhausting to one (1) stack, identified as TC-2 O.Cl.;
  - (11) One (1) Twotone and Repair Booth, utilizing the electrostatic air atomized, electrostatic bell method of application, using a water wash as particulate matter control, and exhausting to five (5) stacks, identified as TUT-1 through TUT-5;
  - (12) One (1) Twotone and Repair Booth Preheat, with two (2) natural gas-fired burners, each with a heat input capacity of 16.26 MMBtu/hr;
  - (13) One (1) Twotone and Repair Booth Reheat, with one (1) insignificant natural gas-fired burner;
  - (14) One (1) Twotone and Repair Oven, with three (3) insignificant natural gas-fired burners, using a 2.41 MMBtu/hr natural gas-fired thermal incinerator (TUT) as VOC control, and exhausting to one (1) stack, identified as TUT-O-1-2;
  - (15) One (1) Twotone and Repair Cool Down area; and
  - (16) One (1) Wet Sand Repair Dryoff Oven, with one (1) insignificant natural gas-fired burner with a heat input capacity of 1.49 MMBtu/hr.
- (d) Intermediate (Surfacer) Coating Line, identified as Unit 004, with a capacity of 60 units per hour, constructed in 1989, consisting of the following units:
- (1) One (1) Intermediate Working Stage burner, with a heat input capacity of 19.74 MMBtu/hr;
  - (2) One (1) Intermediate Coating Booth, utilizing the electrostatic air atomized, electrostatic bell method of application, using a water wash as particulate matter control, and exhausting to six (6) stacks, identified as SUR-2 through SUR-7;
  - (3) One (1) Intermediate Booth Preheat, with two (2) natural gas-fired burners, each with a heat input capacity of 28.275 MMBtu/hr;

- (4) One (1) Intermediate Booth Reheat burner, with two (2) insignificant natural gas-fired burners;
  - (5) One (1) Intermediate Coating Oven, with four (4) insignificant natural gas-fired burners totaling 9.92 MMBtu/hr, using a 4.15 MMBtu/hr natural gas-fired thermal incinerator (SUR) as VOC control, and exhausting to one (1) stack, identified as SUR Inc. (emissions from the entrance to and exit from the Intermediate Coating Oven use no controls and exhaust to one (1) stack, identified as Surfacer Hood Exhaust); and
  - (6) One (1) Intermediate Cool Down area, using no controls, and exhausting to one (1) stack, identified as Surfacer Cooling.
- (e) Plastic Bumper Coating Line (PBL), identified as Unit 005, with a capacity of 60 units per hour, constructed in 1989, consisting of the following units:
- (1) One (1) PBL Paint Booth, utilizing the air atomization method of spraying, using a water wash as particulate matter control, and exhausting to three (3) stacks, identified as BPR-1, BPR-2, and BPR-JR;
  - (2) One (1) PBL Booth Preheat, with one (1) natural gas-fired burner with a heat input capacity of 17.10 MMBtu/hr;
  - (3) One (1) PBL Booth Reheat, with two (2) insignificant natural gas-fired burners;
  - (4) One (1) PBL Oven, using a 2.0 MMBtu/hr natural gas-fired thermal incinerator (BPR) as VOC control, and exhausting to one (1) stack, identified as BPR Inc.; and
  - (5) One (1) PBL Cool Down area.
- (f) Anticorrosion Coating, identified as Unit 006, with a capacity of 60 units per hour, constructed in 1989, and including the following equipment:
- (1) One (1) Black Coat and Wax Booth, utilizing the air-assisted method of spraying, using a dry filter as particulate matter control, exhausting to BCW Stack;
  - (2) One (1) Black and Wax Coat natural gas-fired burner, with a heat input capacity of 24.0 MMBtu/hr;
  - (3) One (1) Anticorrosion Coating Booth, utilizing the air-assisted method of spraying, using a water wash as particulate matter control, exhausting to Anticorrosion Stack; and
  - (4) One (1) insignificant Anticorrosion Coating natural gas-fired burner.
- (g) Final Repair (Touchup) painting, identified as Unit 007, with a capacity of 10 units per hour, constructed in 1989, and including the following equipment:
- (1) One (1) Touchup IPC Booth, located in the In-Process Control area, utilizing the air atomization method of spraying;
  - (2) One (1) Touchup Trim Booth, located in the Trim area, utilizing the air atomization method of spraying, using a dry filter as particulate matter control; and
  - (3) One (1) insignificant Touchup Trim natural gas-fired burner.

- (h) One (1) paint mixing room for the Plastic Bumper Coating Line, identified as Unit 008, constructed in 1989, using no controls, and exhausting to three (3) vents, identified as Mix-1, Mix-2, and Mix-3.
- (i) One (1) paint storage room for the ED Coating Line, identified as Unit 009, constructed in 1989.
- (j) Application of adhesives to various vehicle parts, identified as Unit 010, constructed in 1989.
- (k) Three (3) storage tanks, identified collectively as Unit 011, and including the following equipment:
  - (1) Gasoline storage tank, with a capacity of 15,000 gallons, constructed in 1988, using a certified vapor collection and control system;
  - (2) Purge thinner storage tank, with a capacity of 5,000 gallons, constructed in 1988, using a certified vapor collection and control system; and
  - (3) Waste purge thinner storage tank, with a capacity of 6,000 gallons, constructed in 1992.
- (l) Purge solvent recovery system, identified as Unit 012, with a maximum throughput of 168,000 gallons per year, constructed in 2001, and including the following equipment:
  - (1) Dirty purge Tank A, with a capacity of 1,096 gallons;
  - (2) Distillation overs Tank B, with a capacity of 1,096 gallons;
  - (3) Clean solvent Tank C, with a capacity of 1,096 gallons;
  - (4) Methanol Tank E, with a capacity of 1,096 gallons;
  - (5) Xylene Tank, with a capacity of 1,096 gallons;
  - (6) Acetone Tank, with a capacity of 1,096 gallons;
  - (7) Clean purge Tank OK, with a capacity of 1,949 gallons; and
  - (8) One (1) distillation unit.

### **Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted facilities operating at this source during this review process.

### **New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval**

There are no facilities receiving prior approval at this source during this review process.

### **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Space heaters, process heaters, or boilers using the following fuels: Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:

- (1) Six (6) general hot water boilers with a combined heat input capacity of 23.08 MMBtu/hr. [40 CFR 52.21] [326 IAC 2-2] [326 IAC 6-2-4]
- (2) Other insignificant natural gas combustion units: [40 CFR 52.21] [326 IAC 2-2]
  - (A) Stamping Shop Steam Cleaner
  - (B) Distillation Room Heater
  - (C) Makeup Air Units (7)
  - (D) Unit Heaters (50)
  - (E) Door Heaters (14)
  - (F) Air Handling Units (44)
  - (G) Heating and Ventilation Units (6)
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment: [40 CFR 52.21] [326 IAC 2-2] [40 CFR Part 52 Subpart P]
  - (1) One (1) Stamping Shop; and
  - (2) One (1) Body Shop.
- (c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (d) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: [326 IAC 6-3-2] [40 CFR Part 52 Subpart P]
  - (1) Grinding and machining operations occurring in the engine manufacturing facility; and
  - (2) Other deburring; buffing; polishing; abrasive blasting activities; pneumatic conveying; and woodworking operations.
- (e) Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO<sub>2</sub>; 5 lb/hr or 25 lb/day NO<sub>x</sub>; 3 lb/hr or 15 lb/day VOC; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:
  - (1) Gasoline Fill Operations (Benzene, Naphthalene, Ethylbenzene, Styrene, Toluene, Hexane, Xylene, Tert-butyl Methyl Ether) [40 CFR 52.21] [326 IAC 2-2]
  - (2) The following storage tanks permitted under OP 79-09-93-0454, issued on July 26, 1989:
    - (A) One (1) double-walled fixed-roof engine oil storage tank, with a capacity of 10,000 gallons; and
    - (B) One (1) double-walled fixed-roof gear oil storage tank, with a capacity of 10,000 gallons;

- (3) The following activities permitted under E 157-14535-00050, issued on October 10, 2001: assembly and testing (including engine test stands);
- (4) Manual solvent wipedown.
- (f) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (g) The following VOC and HAP storage containers:
  - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
  - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (h) Equipment used exclusively for the following: Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.
- (i) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.
- (j) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (k) Cleaners and solvents characterized as follows:
  - (1) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or;
  - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (l) Any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs.
- (m) Water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPs.
- (n) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).
- (o) Activities or categories of activities with individual HAP emissions not previously identified: Any unit emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP:
  - (1) Windshield Wash Fluid Fill Operations (Methyl Alcohol)
  - (2) Antifreeze Fluid Fill Operations (Ethylene Glycol)
- (p) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.
- (q) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (r) Infrared cure equipment.

- (s) Noncontact cooling tower systems with natural draft cooling towers not regulated under a NESHAP.
- (t) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (u) Heat exchanger cleaning and repair.
- (v) Process vessel degassing and cleaning to prepare for internal repairs.
- (w) Purging of gas lines and vessels that is related to routing 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.
- (x) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (y) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (z) On-site fire and emergency response training approved by the department.
- (aa) Emergency generators as follows: Diesel generators not exceeding 1600 horsepower.
- (bb) Other emergency equipment as follows: Stationary fire pumps.
- (cc) A laboratory as defined in 326 IAC 2-7(21)(D).

### Existing Approvals

The source has constructed or has been operating under the following previous approvals:

- (a) PSD (79) 1651, issued on July 30, 1987 (superseded in part by PSD (79) 1651 Revision, issued on July 26, 1989);
- (b) PSD (79) 1651 Revision, issued on July 26, 1989 (superseded in part by CP 157-4485-00050, issued on September 13, 1995);
- (c) OP 79-09-93-0442, issued on July 26, 1989;
- (d) OP 79-09-93-0443, issued on July 26, 1989;
- (e) OP 79-09-93-0444, issued on July 26, 1989;
- (f) OP 79-09-93-0445, issued on July 26, 1989;
- (g) OP 79-09-93-0446, issued on July 26, 1989;
- (h) OP 79-09-93-0447, issued on July 26, 1989;
- (i) OP 79-09-93-0448, issued on July 26, 1989;
- (j) OP 79-09-93-0449, issued on July 26, 1989;
- (k) OP 79-09-93-0450, issued on July 26, 1989;
- (l) OP 79-09-93-0451, issued on July 26, 1989;

- (m) OP 79-09-93-0452, issued on July 26, 1989;
- (n) OP 79-09-93-0453, issued on July 26, 1989;
- (o) OP 79-09-93-0454, issued on July 26, 1989;
- (p) CP 157-4485-00050, issued on September 13, 1995 (superseded in whole by CP 157-9619-00050);
- (q) CP 157-9619-00050, issued on February 11, 1999; and
- (r) E 157-14535-00050, issued on October 10, 2001.

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

The following terms and conditions from previous approvals have not been incorporated in this Part 70 permit:

- (a) Condition No. 6, PSD (79) 1651, issued July 30, 1987, concerning the solvent recovery system to be used on the 1,1,1-trichloroethane degreaser on the Plastic Bumper Coating Line (Unit 005).

Reason not revised or not incorporated: The 1,1,1-trichloroethane degreaser has been removed from the source.

- (b) Condition D.1.4 from CP 157-9619-00050, issued February 11, 1999: Pursuant to 326 IAC 6-3-2, the PM emissions from the vehicle production shall be limited to 11.91 pounds per hour.

Reason not revised or not incorporated: PSD (79) 1651, issued July 30, 1987 and revised July 26, 1989, included various operation-specific lb/hr, kg/kL, and kg/day PM emission limitations. Compliance with these limits, and an established production limit, was equivalent to PM emissions of less than 25 tons per year and was incorporated to render the requirements of 326 IAC 2-2 not applicable. CP 157-4485-00050, issued September 13, 1995, inappropriately removed the operation-specific emission limitations and replaced them with a 14.6 lb PM/hr limit that was not associated with 326 IAC 2-2. The failure of CP 157-4485-00050 to properly identify the legal basis of the limit consequently allowed for a further revision of the limit by CP 157-9619-00050, issued February 11, 1999. The removal of operation-specific emission limitations allowed for operational flexibility, but the replacement source-wide lb PM/hr limit was not practically enforceable. During the Part 70 review process, IDEM determined that, in order to ensure that the requirements of 326 IAC 2-2 remain not applicable, and to allow for operational flexibility, the source-wide lb PM/hr limit should be removed from the permit and replaced with requirements for record keeping and reporting sufficient to demonstrate annual particulate emissions of less than 25 tons per year. The limit was also revised to 23.1 tons per year to take into account other modifications. See discussion of 326 IAC 2-2 in the State Applicability section of this document.

The following terms and conditions from previous approvals have been revised in this Part 70 permit:

- (a) Condition No. 1 from PSD (79) 1651 Revision, issued on July 26, 1989, concerning coating VOC content limits for the ED Body Coating Tank (one of the facilities identified as Unit 001).

This condition stated that, pursuant to the New Source Performance Standard, 326 IAC 12, 40 CFR 60.390 through 60.398, Subpart MM (Automobile and Light Duty Truck Surface Coating Standard), the ED Body Coating Tank is limited to 1.34 pounds of VOC per gallon of applied solids (0.16 kilograms VOC per liter of applied solids). The limit is actually 1.42 pounds per gallon (0.17 kilograms per liter), therefore, this error has been corrected.

- (b) Condition No. 39 from PSD (79) 1651 Revision, issued on July 26, 1989, concerning the BACT NO<sub>x</sub> emission limits for natural gas combustion units.

This condition established a NO<sub>x</sub> emission limit of 0.10 pounds per MMBtu of heat input for several combustion units at the source, including the boiler for the 1,1,1-trichloroethane degreaser on the Plastic Bumper Coating Line (Unit 005). This degreaser and its boiler have been removed from the source. Therefore, the condition has been revised accordingly.

This condition also established a NO<sub>x</sub> emission limit of 0.10 pounds per MMBtu of heat input for the Final Repair Oven. This oven has been removed from the source. Therefore, the condition has been revised accordingly.

- (c) Condition No. 1 from PSD (79) 1651 Revision, issued on July 26, 1989, concerning coating VOC content limits for the Anticorrosion Coating Line (Unit 006).

This condition established a BACT VOC emission limit for the application of engine clearcoat on the Anticorrosion Coating Line. This limit was equal to 0.46 kilograms of VOC per liter of coating solids. The source no longer applies engine clearcoat. Therefore, the condition has been revised accordingly.

- (d) Condition No. 1 from PSD (79) 1651 Revision, issued on July 26, 1989, concerning booth VOC emission limits and the coatings to which they apply.

This condition includes footnotes on several VOC limits that indicate which coatings should be averaged together to determine compliance with the respective limits. For example, the 326 IAC 8-1-6 VOC limit for the Plastic Coating Booth is footnoted as the "average of all plastic coatings (adhesion promoter, enamel, metal basecoat, and clearcoat)." During the Part 70 review process, IDEM determined that the VOC emission limits should not specify which coatings are subject to the limits, but should instead apply to VOC emissions from any and all coatings used in the booth specified by each limit. As a result, this condition has been revised such that the footnotes indicate that the VOC emission limits apply to the average of all coatings used in the respective booth.

- (e) Condition No. 2, PSD (79) 1651 Revision, issued on July 26, 1989, concerning the application methods required for the Anticorrosion Coating Line (Unit 006).

This condition established that airless spray application must be used when applying engine clearcoat in the Anticorrosion Booth. The source no longer applies engine clearcoat. Therefore, this condition has been revised accordingly.

This condition also established that airless spray application must be used when applying inner panel wax in the Anticorrosion Booth. Recent information from the source indicates that inner panel wax is only applied in the Black and Wax Booth. Therefore, this condition has been revised accordingly.

- (f) Condition No. 43 from PSD (79) 1651 Revision, issued on July 26, 1989, concerning the source-wide natural gas combustion limit.

This condition established a source-wide (as it existed in 1989) natural gas combustion limit of 2,752 MMCF per any twelve (12) consecutive month period as a BACT requirement for NO<sub>x</sub>. However, during the Part 70 review process, and using the most current AP-42 emission factors, IDEM determined that natural gas combustion at this limit would result in CO emissions of 115.6 tons per year, which is in excess of the 100 ton per year CO emission limit contained in that permit. Therefore, this condition has been reduced to 2,380 MMCF per any twelve (12) consecutive month period. Compliance with this limitation will render the requirements of 326 IAC 2-2 not applicable with respect to CO.

Pursuant to E 157-14535-00050, issued October 10, 2001, the source added several insignificant natural gas-fired combustion units. With the addition of these units, the existing natural gas limit no longer applied to the "entire source." Therefore, to facilitate compliance demonstration and ease record keeping requirements, the limit now applies to those units permitted via E 157-14535-00050 and remains a source-wide limit.

- (g) Condition D.1.1 from CP 157-9619-00050, issued February 11, 1999:  
The source is subject to the following limitations: 1) the volatile organic compound (VOC) emissions from the plant shall not exceed 1,421 tons per 12 consecutive month period rolled on a monthly basis, 2) production shall not exceed 1,200 vehicles per day, and 3) VOC emissions shall not exceed 14,352 pounds per day.

Revised condition:

The total VOC emissions from surface coating operations and associated purge solvent operations and storage shall not exceed 1,128 tons per twelve consecutive month period with compliance determined at the end of each month.

Reason revised:

During the Part 70 review process, IDEM determined that the PSD netting analyses completed for CP 157-4485-00050, issued September 13, 1995, overestimated the magnitude of emission reductions and failed to make the credited reductions federally enforceable. As a result, the PSD netting calculations have been re-calculated and the allowable source-wide VOC emission limit has been reduced from 1,421 tons per year to 1,128 tons per year to account for the increase in production and reflect the creditable VOC emission reductions. While the creditable contemporaneous reductions are not specifically limited, they are federally enforceable as their impact is included in the revised 1,128 ton per year source-wide limit. See Appendix A for the revised PSD netting calculations. Since this revision results in a reduction of the source-wide VOC PSD emission limit, BACT does not have to be re-evaluated. Based on reported actual emissions, IDEM does not believe that the source ever emitted more than 1,128 tons of VOC per year. The daily production limit has been removed because the source's design capacity is 1,200 vehicles per day and the retention of such a limit would be superfluous. The yearly vehicle production limit remains in this permit. The daily emission limit on surface coating operations of 14,352 lb VOC has been removed because if the source was to operate at maximum capacity (1,200 vehicles per day) the daily VOC emissions would be less than 12,000 lb VOC (based on average emission rate of 9.28 lb VOC per vehicle). As a result, the removal of the daily vehicle production and VOC emission limits do not increase emissions and facilitate compliance demonstration. Additionally, the scope of the source-wide VOC limit has been clarified such that it applies only to the total source-wide VOC emissions from surface coating operations and associated purge solvent operations and storage. This clarification is based on a review of language in the TSDs that accompany PSD (79) 1651 and its revision, and calculations using the VOC lb/day limits on coating operations. VOC emissions from other sources, such as natural gas combustion, are not subject to this limit.

- (h) Condition No. 12 from PSD (79) 1651 Revision, issued on July 26, 1989, concerning the operating temperatures and retention times for the incinerators.

This condition has been revised such that the required temperatures and retention times for each incinerator are no longer required. These parameters have been removed because it has not been demonstrated through recent testing that these operating conditions will achieve the destruction efficiency required to meet the BACT VOC emission limitations. Once testing is completed as required by this permit, the Permittee will operate the incinerators at the temperatures and retention times that achieve compliance with the required destruction efficiency.

This condition has also been revised to specify the required capture efficiency for each incinerator. Capture efficiencies have been added to ensure that overall control efficiency (the product of capture and destruction efficiency) is sufficient to meet the BACT VOC emission limitations provided in this Part 70 permit.

**Enforcement Issue**

There are no enforcement actions pending.

**Recommendation**

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on May 21, 1996. Additional information was received on January 17, 1997, September 10, 2003, and October 23, 2003.

A notice of completeness letter was mailed to the source on January 29, 1997.

**Potential To Emit**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source 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.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	greater than 250
PM-10	greater than 250
SO <sub>2</sub>	less than 100
VOC	greater than 250
CO	greater than 100 and less than 250
NO <sub>x</sub>	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Combined	greater than 25
TOTAL	greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM10, CO, and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

**Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the 2001 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	8.14
PM-10	8.14
SO <sub>2</sub>	0.24
VOC	706.66
CO	33.5
NO <sub>x</sub>	39.88
HAP (specify)	not reported

**Potential to Emit After Issuance**

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

Limited Potential to Emit (tons/year)							
Process/facility	PM <sup>(a)</sup>	PM-10 <sup>(a)</sup>	SO <sub>2</sub>	VOC <sup>(b)</sup>	CO <sup>(c)</sup>	NO <sub>x</sub> <sup>(d)</sup>	HAPs <sup>(b)</sup>
Unit 1: ED Coating Line	less than 23.1	less than 23.1	0	less than 1,128	0	0	greater than 25
Unit 2: Sealing and PVC Undercoating Line							
Unit 3: Topcoat System							
Unit 4: Intermediate Coating Line							
Unit 5: Plastic Bumper Coating Line							
Unit 6: Anticorrosion Coating							
Unit 7: Final Repair (Touchup) painting							
Unit 8: PBL Paint Mixing Room							
Unit 9: ED Paint Storage Room							
Unit 10: Adhesives application							
Unit 11: Purge Thinner Storage Tanks (2)							
Unit 12: Purge Solvent Recovery System							
Unit 11: Gasoline Storage Tank				Negl.			
Natural Gas Combustion (from entire source, including coating lines)	less than 40	less than 6.5 <sup>(c)</sup>	less than 100	less than 40			
Insignificant Activities (including fugitive emissions) (excluding natural gas combustion)	0	Negl.	0	0	Negl.		
Total Source Emissions	less than 23.1	less than 23.1	less than 40	less than 1,134.5	less than 100	less than 40	greater than 25

Negl. - Negligible (emissions less than 0.01 tpy)

Unless otherwise footnoted, the emissions presented are equal to the controlled emissions because the controls are federally enforceable following the issuance of this Part 70 permit.

(a) Pursuant to PSD (79) 1651, issued on July 30, 1987, and as revised on July 26, 1989, CP 157-4485-00050, issued on September 13, 1995, CP 157-9619-00050, issued on February 11, 1999, as revised by this Part 70 permit, and in order to render the requirements of 326 IAC 2-2 not applicable, the Permittee must limit overall vehicle production to no greater than 262,000 vehicles per twelve (12) consecutive month period and 1,200 vehicles per day, shall not combust more than 2,380 MMCF of natural gas per twelve consecutive month period, and shall perform record keeping and reporting to demonstrate that particulate emissions do not exceed 25 tons per twelve consecutive month period. This Part 70 permit

- revises the limit to 23.1 tons per twelve consecutive month period and extends to PM10. See the discussion in the State Rule Applicability section of this document under the discussion of 326 IAC 2-2.
- (b) Pursuant to PSD (79) 1651, issued on July 30, 1987, and as revised on July 26, 1989, CP 157-4485-00050, issued on September 13, 1995, CP 157-9619-00050, issued on February 11, 1999, and as revised by this Part 70 permit, and in order to satisfy the requirements of 326 IAC 2-2, VOC emissions from surface coating operations and associated purge solvent operations and storage shall not exceed 1,128 tons per twelve consecutive month period.
  - (c) Pursuant to PSD (79) 1651, issued on July 30, 1987, and as revised by this Part 70 permit, and in order to render the requirements of 326 IAC 2-2 not applicable, the source shall not combust more than 2,380 MMCF of natural gas per twelve consecutive month period. Compliance with this limitation will limit the source's CO emissions to less than 100 tons per twelve consecutive month period. This limitation will also limit the VOC emissions from natural gas combustion to less than 6.5 tons per twelve consecutive month period.
  - (d) Pursuant to PSD (79) 1651, issued on July 30, 1987, and as revised by this Part 70 permit, and in order to satisfy the requirements of 326 IAC 2-2, the combustion units at the source shall use only low-NO<sub>x</sub> natural gas and shall comply with various lb NO<sub>x</sub>/MMBtu heat input limits. Compliance with these operation limitations, combined with the limitation on natural gas combustion, will limit the source's NO<sub>x</sub> emissions to less than 59.5 tons per year.

### County Attainment Status

The source is located in Tippecanoe County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Tippecanoe County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Tippecanoe County has been classified as attainment or unclassifiable for criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and applicability.

### Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

### Federal Rule Applicability

- (a) The thermal incinerators are not subject to the requirements of 40 CFR Part 60, Subpart E (Standards of Performance for Incinerators) because none of the incinerators at the source burns or combusts solid waste as defined in 40 CFR 60.51(b).
  - (b) The ED Body Coating Tank (one of the facilities identified as Unit 001), the coating booths of the Topcoat System (identified as 003), and the Intermediate Coating Booth (one of the facilities identified as Unit 004) are subject to the New Source Performance Standard, 326 IAC 12, 40 CFR 60.390 through 60.398, Subpart MM (Automobile and Light Duty Truck Surface Coating Standard) because they perform prime coating, guide coating, and top coating of automobile and light-duty truck bodies at a source that was constructed after October 5, 1979. The requirements of this rule are as follows:
    - (1) The daily VOC emissions from the ED Body Coating Tank shall not exceed 1.42 pounds of VOC per gallon of applied solids (0.17 kilograms of VOC per liter of applied solids).
    - (2) The daily VOC emissions from the Topcoat booths (Topcoat #1 Booth, Topcoat #2 Booth, and Twotone and Repair Booth) shall not exceed 12.3 pounds of VOC per gallon of applied solids (1.47 kilograms of VOC per liter of applied solids). This limit applies to the weighted average of all Topcoat coatings.
    - (3) The daily VOC emissions from the Intermediate Coating Booth shall not exceed 11.7 pounds of VOC per gallon of applied solids (1.40 kilograms of VOC per liter of applied solids). This limit applies to the weighted average of all Intermediate coatings.
- The ED Chassis Coating Tank (one of the facilities identified as Unit 001), the Sealing and PVC Undercoating Line (identified as Unit 002), the Plastic Bumper Coating Line (identified as Unit 005), the Anticorrosion Coating operation (identified as Unit 006), and the Final Repair operation (identified as Unit 007) are not subject to the requirements of Subpart MM because they apply only to prime coat, guide coat, and topcoat operations and do not apply to coating of vehicle chassis or plastic body components.
- (c) The insignificant boilers are not subject to the requirements of 40 CFR Part 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) because they each have a maximum heat input capacity of less than ten (10) million Btu per hour (MMBtu/hr).
  - (d) The storage tanks identified as Unit 011 (15,000-gallon gasoline storage tank, 5,000-gallon purge thinner tank and 6,000-gallon waste purge thinner tank), the seven solvent recovery system storage tanks from Unit 012 (1,096-gallon dirty purge Tank A, 1,096-gallon distillation overs Tank B, 1,096-gallon clean solvent Tank C, 1,096-gallon methanol Tank E, 1,096-gallon xylene tank, 1,096-gallon acetone tank, and 1,949-gallon clean purge Tank OK), and the insignificant engine oil and gear oil storage tanks (both with capacities of 10,000 gallons) are not subject to the requirements of the New Source Performance Standards (NSPS) for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (40 CFR 60, Subpart Kb) because none of the storage vessels at the source have storage capacities greater than or equal to 19,813 gallons (75 m<sup>3</sup>).
  - (e) The thermal incinerators are not subject to the requirements of 40 CFR Part 60, Subpart CCCC (Standards of Performance for Commercial and Industrial Solid Waste Incineration Units) because none of the incinerators at the source is a new incineration unit as defined in 40 CFR 60.2015.

- (f) The insignificant degreasing operations are not subject to the requirements of 40 CFR Part 63, Subpart T (National Emission Standard for Halogenated Solvent Cleaning) because they do not use any halogenated HAP solvents.
  
- (g) The following facilities, along with any associated purge operations, are subject to the requirements of 40 CFR Part 63, Subpart M (National Emission Standard for Surface Coating of Miscellaneous Metal Parts and Products) because they perform surface coating of metal parts and cleaning of equipment used in the surface coating of metal parts at a source that is major for HAPs:
  - (1) ED Body Coating Tank (from Unit 001)
  - (2) ED Chassis Coating Tank (from Unit 001)
  - (3) PVC Coating #1 Booth (from Unit 002)
  - (4) PVC Coating #2 Booth (from Unit 002)
  - (5) Topcoat #1 Booth (from Unit 003)
  - (6) Topcoat #2 Booth (from Unit 003)
  - (7) Twotone and Repair Booth (from Unit 003)
  - (8) Intermediate Coating Booth (from Unit 004)
  - (9) Black Coat and Wax Booth (from Unit 006)
  - (10) Anticorrosion Coating Booth (from Unit 006)
  - (11) Touchup IPC Booth (from Unit 007)
  - (12) Touchup Trim Booth (from Unit 007)
  - (13) Application of adhesives (Unit 010)

The following facilities are subject to the requirements of 40 CFR Part 63, Subpart M (National Emission Standard for Surface Coating of Miscellaneous Metal Parts and Products) because they perform drying and/or curing of surface coatings applied to metal parts at a source that is major for HAPs:

- (1) ED Body Oven (from Unit 001)
- (2) ED Chassis Oven (from Unit 001)
- (3) PVC Seal #1 Oven (from Unit 002)
- (4) PVC Seal #2 Oven (from Unit 002)
- (5) Topcoat #1 Oven (from Unit 003)
- (6) Topcoat #2 Oven (from Unit 003)
- (7) Twotone and Repair Oven (from Unit 003)
- (8) Intermediate Coating Oven (from Unit 004)

The following facilities are subject to the requirements of 40 CFR Part 63, Subpart M MMM (National Emission Standard for Surface Coating of Miscellaneous Metal Parts and Products) because they perform surface preparation of metal parts for surface coating at a source that is major for HAPs:

- (1) ED Body Pretreatment area (from Unit 001)
- (2) ED Chassis Pretreatment area (from Unit 001)

The paint storage room for the ED Coating Line (identified as Unit 009) is subject to the requirements of 40 CFR Part 63, Subpart M MMM (National Emission Standard for Surface Coating of Miscellaneous Metal Parts and Products) because it performs storage of coatings for application to metal parts at a source that is major for HAPs.

The purge thinner and waste purge thinner storage tanks (two of the tanks identified as Unit 011) and the purge solvent recovery system (identified as Unit 012) are subject to the requirements of 40 CFR Part 63, Subpart M MMM (National Emission Standard for Surface Coating of Miscellaneous Metal Parts and Products) because they perform handling and conveyance of waste materials from the surface coating of metal parts at a source that is major for HAPs.

A copy of the MACT is available on the U.S. EPA website, <http://www.epa.gov/ttn/atw/misc/miscpg.html>. Note that the surface coating operations fall under the "general use" coating subcategory of 40 CFR Part 63, Subpart M MMM.

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the affected facilities except when otherwise specified in 40 CFR Part 63, Subpart M MMM.

This rule has a future compliance date; therefore, the specific details of the rule and how the Permittee will demonstrate compliance are not provided in the permit. The Permittee shall submit an application for a significant permit modification no later than twenty-seven months after the effective date of 40 CFR Part 63, Subpart M MMM that will specify the option or options for the emission limitations and standards and methods for determining compliance chosen by the Permittee. At that time, IDEM, OAQ will include the specific details of the rule and how the Permittee will demonstrate compliance. In addition, pursuant to 40 CFR Part 63, Subpart M MMM, the Permittee shall submit the:

- (1) Applicable notifications in 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in paragraphs (2) and (3) below.
- (2) Initial Notification required by 40 CFR 63.9(b) no later than 1 year after the effective date of 40 CFR Part 63, Subpart M MMM.
- (3) Notification Of Compliance Status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).

The surface coating of metal parts in the various coating operations described above meets the applicability criteria of both 40 CFR Part 63, Subpart M MMM (Surface Coating of Miscellaneous Metal Parts and Products) and 40 CFR Part 63, Subpart IIII (Surface Coating of Automobiles and Light-Duty Trucks), which has not yet been promulgated. The Permittee may elect, pursuant to 40 CFR 63.3881(d), to comply with Subpart IIII (once it is promulgated) for the surface

coating of metal parts or products used in its manufacturing of automobiles and/or light-duty trucks in lieu of complying with each rule separately. The Permittee must submit a significant permit modification application for Subpart M MMM no later than 27 months following the effective date of the rule. If Subpart III becomes promulgated before the Permittee submits the significant permit modification application for Subpart M MMM, the Permittee may then elect to describe in said permit modification how it intends to comply with the applicable requirements of Subpart III in lieu of Subpart M MMM. Promulgation of Subpart III does not excuse the Permittee from submitting the significant permit modification application for Subpart M MMM within 27 months of the effective date of Subpart M MMM.

(h) The following facilities, along with any associated purge operations, are subject to the requirements of 40 CFR Part 63, Subpart P PPP (National Emission Standard for Surface Coating of Plastic Parts and Products) because they perform surface coating of plastic parts and cleaning of equipment used in the surface coating of plastic parts at a source that is major for HAPs:

- (1) PBL Coating Booth (from Unit 005)
- (2) Touchup IPC Booth (from Unit 007)
- (3) Touchup Trim Booth (from Unit 007)
- (4) Application of adhesives (Unit 010)

The PBL Oven, one of the facilities identified as Unit 005, is subject to the requirements of 40 CFR Part 63, Subpart P PPP (National Emission Standard for Surface Coating of Plastic Parts and Products) because it performs drying and/or curing of surface coatings applied to plastic parts at a source that is major for HAPs.

The paint mixing room for the Plastic Bumper Coating Line (identified as Unit 008) is subject to the requirements of 40 CFR Part 63, Subpart P PPP (National Emission Standard for Surface Coating of Plastic Parts and Products) because it performs preparation of coatings for application to plastic parts at a source that is major for HAPs.

The purge thinner and waste purge thinner storage tanks (two of the tanks identified as Unit 011) and the purge solvent recovery system (identified as Unit 012) are subject to the requirements of 40 CFR Part 63, Subpart P PPP (National Emission Standard for Surface Coating of Plastic Parts and Products) because they perform handling and conveyance of waste materials from the surface coating of plastic parts at a source that is major for HAPs.

A copy of the MACT is available on the U.S. EPA website, <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Note that the surface coating operations fall under the "general use coating" subcategory of 40 CFR Part 63, Subpart P PPP.

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the affected facilities except when otherwise specified in 40 CFR Part 63, Subpart P PPP.

This rule has a future compliance date; therefore, the specific details of the rule and how the Permittee will demonstrate compliance are not provided in the permit. The Permittee shall submit an application for a significant permit modification no later than twenty-seven months after the effective date of 40 CFR 63, Subpart P PPP, that will specify the option or options for the emission limitations and standards and methods for

determining compliance chosen by the Permittee. At that time, IDEM, OAQ will include the specific details of the rule and how the Permittee will demonstrate compliance. In addition, pursuant to 40 CFR Part 63, Subpart PPPP, the Permittee shall submit the:

- (1) Applicable notifications in 40 CFR 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in paragraphs (2) and (3) of this section.
- (2) Initial Notification required by 40 CFR 63.9(b) no later than 1 year after the effective date of 40 CFR Part 63, Subpart PPPP.
- (3) Notification Of Compliance Status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to your affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510, paragraphs (c)(1) through (11) and in 40 CFR 63.9(h).

The surface coating of plastic parts in the various coating operations described above meets the applicability criteria of both 40 CFR Part 63, Subpart PPPP (Surface Coating of Plastic Parts and Products) and 40 CFR Part 63, Subpart IIII (Surface Coating of Automobiles and Light-Duty Trucks), which has not yet been promulgated. The Permittee may elect, pursuant to 40 CFR 63.4481(d), to comply with Subpart IIII (once it is promulgated) for the surface coating of plastic parts or products used in its manufacturing of automobiles and/or light-duty trucks in lieu of complying with each rule separately. The Permittee must submit a significant permit modification application for Subpart PPPP no later than 27 months following the effective date of the rule. If Subpart IIII becomes promulgated before the Permittee submits the significant permit modification application for Subpart PPPP, the Permittee may then elect to describe in said permit modification how it intends to comply with the applicable requirements of Subpart IIII in lieu of Subpart PPPP. Promulgation of Subpart IIII does not excuse the Permittee from submitting the significant permit modification application for Subpart PPPP within 27 months of the effective date of Subpart PPPP.

- (i) The insignificant engine test stands are not subject to the requirements of 40 CFR Part 63, Subpart PPPPP (National Emission Standards for Hazardous Air Pollutants for Engine Test Cells/Stands) because construction of each engine test stand facility at the source commenced in October 2000. Because this construction date is prior to May 14, 2002, SIA is an existing affected source as defined in 40 CFR 63.9290(a)(1), and therefore has no applicable requirements under this Subpart, pursuant to 40 CFR 63.9290(b).
- (j) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are applicable to this source because the source is a major source of HAPs (i.e., the source has the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs) and the source includes one or more units that belong to one or more source categories affected by the Section 112(j) Maximum Achievable Control Technology (MACT) Hammer date of May 15, 2002.
  - (1) This rule requires the source to:
    - (A) Submit a Part 1 MACT Application by May 15, 2002; and
    - (B) Submit a Part 2 MACT Application within twenty-four (24) months after the Permittee submitted a Part 1 MACT Application.

- (2) The Permittee submitted a Part 1 MACT Application on May 15, 2002. Therefore, the Permittee is required to submit the Part 2 MACT Application on or before May 15, 2004. Note that on April 25, 2002, Earthjustice filed a lawsuit against the US EPA regarding the April 5, 2002 revisions to the rules implementing Section 112(j) of the Clean Air Act. In particular, Earthjustice is challenging the US EPA's 24-month period between the Part 1 and Part 2 MACT Application due dates. Therefore, the Part 2 MACT Application due date may be changed as a result of the suit. Based on a proposed settlement published in the August 26, 2002 *Federal Register*, it appears that US EPA intends to revise the rule so that the due date of the Part 2 MACT Application will be within twelve (12) months after the Permittee submitted the Part 1 MACT application.
- (3) Pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The MACT and the General Provisions of 40 CFR 63, Subpart A will become new applicable requirements, as defined by 326 IAC 2-7-1(6), that must be incorporated into the Part 70 permit. After IDEM, OAQ receives the initial notification, any of the following will occur:
  - (A) If three or more years remain on the Part 70 permit term at the time the MACT is promulgated, IDEM, OAQ will notify the source that IDEM, OAQ will reopen the permit to include the MACT requirements pursuant to 326 IAC 2-7-9; or
  - (B) If less than three years remain on the Part 70 permit term at the time the MACT is promulgated, the Permittee must include information regarding the MACT in the renewal application, including the information required in 326 IAC 2-7-4(c); or
  - (C) The Permittee may submit an application for a significant permit modification under 326 IAC 2-7-12 to incorporate the MACT requirements. The application may include information regarding which portions of the MACT are applicable to the emission units at the source and which compliance options will be followed.
- (k) This source may be subject to the provisions of 40 CFR Part 64, Compliance Assurance Monitoring. In order for this rule to apply, a pollutant specific emissions unit must meet three criteria for a given pollutant: 1) the unit is subject to an emission limitation or standard for the applicable regulated air pollutant, 2) the unit uses a control device to achieve compliance with any such emission limitation or standard, and 3) the unit has the potential to emit, of the applicable regulated air pollutant, equal or greater than 100 percent of the amount required for a source to be classified as a major source.

The Part 70 application was submitted prior to April 20, 1998. Pursuant to 40 CFR 64.5, the provisions of CAM will be reviewed at the time that the Part 70 permit is renewed.

#### **State Rule Applicability - Entire Source**

##### 326 IAC 2-2 (Prevention of Significant Deterioration)

On July 30, 1987, the OAQ issued construction permit PSD (79) 1651 to SIA. This permit authorized the initial construction of the source, consisting of a stamping shop, body shop, paint

shop, trim shop and final assembly shop. Based on a source-wide maximum capacity of 1,000 vehicles per day and 240,000 vehicles per year, the VOC and NO<sub>x</sub> emissions from this source were reviewed pursuant to the requirements of 40 CFR 52.21 and 326 IAC 2-2 (PSD). BACT for VOC was determined to be a combination of daily and coating emissions limits, a source-wide emission limit, specific application methods, and the use of afterburners. BACT for NO<sub>x</sub> was determined to be a combination of lb NO<sub>x</sub> per MMBtu emission limits, the use of only low-NO<sub>x</sub> natural gas burners, and a limit on source-wide natural gas combustion. Source-wide PM emissions were limited to less than 25 tons per year through the inclusion of lb/hr and kg/kL emission limits for each operation and a source-wide production limit of 240,000 vehicles per year. The specific BACT and PSD minor limits have not been included here for clarity because they were revised by several subsequent permits. These revisions are discussed in the following paragraphs. Note that the PTE of SO<sub>2</sub> and CO were less than the respective PSD significance thresholds. However, the permit limited the source-wide emissions of these pollutants to less than 40 and 100 tons per year, respectively. PM10 was not reviewed for this permit because it was not a regulated pollutant at the time this permit was issued.

On March 23, 1989, SIA submitted a permit application to revise PSD (79) 1651. This application contained proposed changes to the permit application for PSD (79) 1651 and included several requests for revisions of limitations included in PSD (79) 1651. These changes were necessary to ensure that PSD (79) 1651 correctly reflected expected operations and addressed the equipment that was actually installed. On July 26, 1989, the OAQ issued a revision to PSD (79) 1651 to: change the allowable production rate; add new coatings; change coating application methods; change anticipated control efficiencies and emission rates; increase the allowable amount of gasoline handled; add natural gas combustion units; and revise the design heat input capacities of the combustion units. More specifically:

The general BACT requirements for VOC were unchanged, although some specific coating limits and requirements for afterburners were modified. Limits on the allowable VOC content of coatings were revised for some coating operations. The allowable daily VOC emissions from each manufacturing operation were also revised, but the total source-wide VOC emission limit of 1,506 tons per year was not changed. As a result, the VOC BACT from PSD (79) 1651, issued July 30, 1987, was not re-evaluated.

The general BACT requirements for NO<sub>x</sub> were unchanged, although the specific lb/MMBtu limits for each natural gas combustion unit were revised based on a re-evaluation of BACT for the combustion facilities installed. Several combustion units were also added but the limit on total natural gas usage was unchanged. As a result, the potential NO<sub>x</sub> emissions increased by 1.1 tons per year to 167.8 tons per year and an Ambient Air Quality Impact Analysis was performed for NO<sub>x</sub>.

To account for changes to the coating operations, the lb/hr and kg/kL PM emission limits for nearly all operations were revised and new PM emission limits were added for the Touchup (Paint) operation. In addition, the source-wide production limit was reduced to less than 917 vehicles per day and 200,000 vehicles per year. As a result, the source-wide potential PM emissions increased by 0.8 tons but remained less than 25 tons per year. Because the new source-wide PM PTE remained less than 25 tons per year, the requirements of 40 CFR 52.21 and 326 IAC 2-2 (PSD) remained not applicable with respect to PM. Although PM10 was a regulated pollutant in 1989, it was not reviewed for the revision to the PSD permit because no physical or operational modification was being made that increased emissions significantly.

The source-wide emission limits for SO<sub>2</sub> and CO (40 and 100 tons per year, respectively) were not changed so the requirements of 40 CFR 52.21 and 326 IAC 2-2 (PSD) remained not applicable with respect to SO<sub>2</sub> and CO.

On September 13, 1995, the source was issued CP 157-4485-00050 to increase SIA's production from 200,000 vehicles per year (and 917 vehicles per day) to 240,000 vehicles per year (and 1,092 vehicles per day). No new units were added by this permit. To accommodate the increase

in production and increase operational flexibility, the existing source-wide VOC emission limit of 1,503 tons per year was increased to 1,536 tons per year, individual operation-specific PM limits were combined into a total pound per hour limit (with no increase in PM emissions), and various operation-specific daily VOC limits were consolidated into a single 13,705 pound per day source-wide VOC limit. Note that IDEM has since determined that the incorporation of a source-wide lb PM/hr emission limitation was inappropriate; therefore, this limit has been removed from the Part 70 permit and replaced with requirements for record keeping and reporting sufficient to demonstrate annual particulate emissions of less than 25 tons per year. IDEM has also determined that the PSD netting analysis completed for CP 157-4485-00050 overestimated the magnitude of emissions reductions and failed to make the credited reductions federally enforceable. See the Existing Approvals section of this document for additional information.

PM10 was not reviewed in the CP 157-4485-00050 permit, although it should have been. Based on the data available average actual PM10 emissions for 1993 and 1994 were calculated to be 8.1 tons per year. Since a 15 ton per year increase would be allowed, the source could emit up to 23.1 tons of PM10 per year without triggering PSD. Therefore, a source-wide limit has been added to this Part 70 permit of 23.1 tons per year for PM10. Because there have been no distinctions made between PM and PM10 emissions and for ease of compliance and recordkeeping, the PM limit has also been revised to be 23.1 tons per year. The limit is provided in the form of an equation to allow flexibility to the source while still maintaining enforceability. See Appendix A for calculations regarding the 23.2 tons per year limit.

On May 21, 1996, the OAQ received a Part 70 permit application from Subaru of Indiana Automotive, Inc. (SIA) relating to the operation of an automotive and light-duty truck assembly plant.

On February 11, 1999, the source was issued CP 157-9619-00050 to permit: the construction of a new PVC Undercoating Booth, the physical separation between Isuzu and Subaru model lines, and the replacement of an electrostatic spray applicator with an air atomization spray coating system on the existing Plastic Bumper Coating Booth. This modification also permitted an increase in the production limit (from 240,000 to 262,000 vehicles per year) and an increase in the daily VOC limit from 13,705 to 14,352 pounds of VOC per day based on a netting analysis. Despite the production and daily VOC emission increase, the source-wide VOC emission limit (previously allowed by CP 157-4485-00050) was reduced by 115 tons to 1,421 tons per year to accommodate operational changes which had reduced the amount of VOC emitted per vehicle. In addition, the hourly PM emission limit was reduced to 11.91 pounds PM per hour, but the source-wide PM emission limit remained unchanged at less than 25 tons per year.

During the Part 70 review process, IDEM determined that the revisions to the PM limits made via CP 157-4485-00050, issued September 13, 1995, and CP 157-9619-00050, issued February 11, 1999, were inappropriate. Therefore, these limits have been removed from the Part 70 permit and replaced with requirements for record keeping and reporting sufficient to demonstrate annual particulate emissions of less than 25 tons per year. See the Existing Approvals section of this document for additional information. The source-wide NO<sub>x</sub>, SO<sub>2</sub>, and CO emission limits from CP 157-4485-00050, issued September 13, 1995, were unchanged. In addition, IDEM determined that the PSD netting analyses completed for CP 157-9619-00050 overestimated the magnitude of emission reductions and failed to make the credited reductions federally enforceable. As a result, the PSD netting calculations have been re-completed; see Appendix A. The revised netting analysis indicates that the source-wide VOC emission limit could be increased to accommodate the 22,000 vehicle per year production increase. However, because the source-wide VOC emission limit is a PSD BACT limitation, it can not be increased without re-evaluation of BACT. As a result, the source-wide VOC emission limit of 1,128 tons per year remains as the source-wide VOC emission limit. Additionally, it is clarified that this source-wide VOC limit applies only to the total source-wide VOC emissions from surface coating operations and associated purge solvent operations and storage. See the Existing Approvals section of this document for additional information.

The emissions increase of PM10 from this modification was less than 15 tons per year. Therefore, a change in the PM10 limit discussed above is not necessary.

On October 10, 2001, the source was issued E 157-14535-00050 to authorize the construction of the following facilities: a new engine manufacturing facility, a solvent recovery system (including five storage tanks) in the paint shop at the existing assembly plant, several insignificant natural gas combustion units, and robotic welding equipment in the existing body shop. The modification was not subject to the requirements of 40 CFR 52.21 and 326 IAC 2-2 (PSD) because the potential to emit was significantly less than the relevant PSD significance thresholds.

In summary, the following requirements apply to this source pursuant to PSD (79) 1651, issued July 30, 1987 and revised March 23, 1989, CP 157-4485-00050, issued September 13, 1995, CP 157-9619-00050, issued February 11, 1999, and 326 IAC 2-2, and revised through this Part 70 permit:

- (a) The daily VOC emissions from the ED Body Coating Tank, one of the facilities identified as Unit 001, shall not exceed 0.52 pounds of VOC per gallon of applied solids (0.062 kilograms of VOC per liter of applied solids).
- (b) The daily VOC emissions from the ED Chassis Coating Tank, one of the facilities identified as Unit 001, shall not exceed 0.41 pounds of VOC per gallon of applied solids (0.049 kilograms of VOC per liter of applied solids).
- (c) The daily VOC emissions from the PVC Coating #1 Booth, one of the facilities identified as Unit 002, shall not exceed 0.25 pounds of VOC per gallon of coating solids (0.03 kilograms of VOC per liter of coating solids).
- (d) The daily VOC emissions from the Topcoat booths (Topcoat #1 Booth, Topcoat #2 Booth, and Twotone and Repair Booth), identified as Unit 003, shall not exceed 12.3 pounds of VOC per gallon of applied solids (1.47 kilograms of VOC per liter of applied solids). This limit applies to the weighted average of all Topcoat coatings.
- (e) The daily VOC emissions from the Intermediate Coating Booth, one of the facilities identified as Unit 004, shall not exceed 8.76 pounds of VOC per gallon of applied solids (1.05 kilograms of VOC per liter of applied solids). This limit applies to the weighted average of all Intermediate coatings.
- (f) The daily VOC emissions from the PBL Paint Booth, one of the facilities identified as Unit 005, shall not exceed 38.2 pounds of VOC per gallon of applied solids (4.57 kilograms of VOC per liter of applied solids). This limit is equal to the limit for 326 IAC 8-1-6 (BACT) for this operation. This limit applies to the weighted average of all plastic bumper coatings.
- (g) The daily VOC emissions from the Anticorrosion Coating operation, identified as Unit 006, shall not exceed the following:
  - (1) 17.9 pounds of VOC per gallon of coating solids (2.14 kilograms of VOC per liter of coating solids) for Black Phthalic Resin in the Black and Wax Booth;
  - (2) 6.43 pounds of VOC per gallon of coating solids (0.77 kilograms of VOC per liter of coating solids) for Inner Panel Wax in the Black and Wax Booth; and
  - (3) 3.59 pounds of VOC per gallon of coating solids (0.43 kilograms of VOC per liter of coating solids) for Underfloor Wax in the Anticorrosion Coating Booth.

- (h) The daily VOC emissions from the Final Repair booths (Touchup IPC Booth and Touchup Trim Booth), identified as Unit 007, shall not exceed 4.84 pounds of VOC per gallon of coating less water (0.58 kilograms of VOC per liter of coating less water). This limit applies to the weighted average of all Final Repair coatings and solvents.
- (i) The following spray application methods must be used whenever applying the following coatings:
  - (1) PVC Undercoat - Airless  
(in PVC Coating #1 Booth)
  - (2) Underfloor Wax - Airless  
(in Anticorrosion Booth)
  - (3) Inner Panel Wax - Air or Airless with minimum transfer  
(in Black and Wax Booth) efficiency of 80%
- (j) Pretreatment Cleaning shall utilize only VOC free detergents, conditioners, and rinses in the body and chassis pre-treatment cleaning operations.
- (k) Purge Solvent
  - (1) Purge solvent capture systems will be utilized each time that any coating application equipment is purged. The purge solvent capture systems shall have a minimum overall capture efficiency of at least eighty percent (80%). Collected purge solvent shall be retained in closed containers until such time as they are shipped offsite for disposal or recycled.
  - (2) The makeup of the solvents used by the Permittee shall be reviewed on an annual basis. By January 31 of each year, a list of all solvents, by compound, used during the previous calendar year shall be submitted to IDEM, OAQ.
  - (3) Block painting will be utilized whenever possible to minimize color changes and the resulting purge.
- (l) The 15,000-gallon gasoline storage tank (one of three tanks identified as 011) shall be equipped with:
  - (1) a submerged fill pipe,
  - (2) pressure relief valve set to 0.7 psi or orifice of 0.5 inches in diameter, and
  - (3) a Stage I vapor balance system between the tank and transport.

Tank trucks shall not be unloaded unless they are properly equipped and connected to the vapor balance system and the system is in operation.
- (m) The insignificant vehicle gasoline fueling operation shall be equipped with a Stage II vapor balance control system. This system shall be in operation whenever vehicles are being fueled.
- (n) The natural gas combustion equipment shall result in a NO<sub>x</sub> emission rate listed as follows:
  - (1) no greater than 0.10 pounds per million Btu's of heat input for the equipment listed as follows:

- (A) the PVC Coating #1 Booth Preheat burner;
- (B) the three (3) Topcoat #1 Booth Preheat burners;
- (C) the three (3) Topcoat #2 Booth Preheat burners;
- (D) the two (2) Twotone and Repair Booth Preheat burners;
- (E) the Intermediate Working Stage burner;
- (F) the PBL Oven burner;
- (G) the Black and Wax Coat Booth burner;
- (H) the Touchup Trim Booth burner;
- (I) the two (2) insignificant PVC Oven #1 burners;
- (J) the insignificant Anticorrosion Booth burner;
- (K) the five (5) insignificant ED Body Oven burners;
- (L) the insignificant ED Body Oven thermal incinerator;
- (M) the two (2) insignificant ED Chassis Oven burners;
- (N) the insignificant ED Chassis Oven thermal incinerator;
- (O) the four (4) insignificant Intermediate Oven burners;
- (P) the three (3) insignificant Topcoat #1 Booth Reheat burners;
- (Q) the three (3) insignificant Topcoat #1 Oven burners;
- (R) the three (3) insignificant Topcoat #2 Booth Reheat burners;
- (S) the three (3) insignificant Topcoat #2 Oven burners;
- (T) the insignificant Two tone Booth Reheat burner;
- (U) the three (3) insignificant Two tone Oven burners;
- (V) the insignificant Stamping Shop Steam Cleaner;
- (W) the two (2) insignificant ED Pretreatment boilers;
- (X) the insignificant ED Pretreatment Drying Oven burner;
- (Y) the insignificant ED Chassis Hot Water boiler;
- (Z) the insignificant ED Paint Temperature Control boiler;
- (AA) the insignificant Wet Sand Repair Dryoff Oven burner;
- (BB) the six (6) insignificant general Hot Water boilers;
- (CC) the seven (7) insignificant Makeup Air Units;

- (DD) the thirty-three (33) insignificant Unit Heaters (does not include 17 unit heaters in new engine manufacturing facility);
  - (EE) the twelve (12) insignificant Door Heaters (does not include 2 door heaters in new engine manufacturing facility);
  - (FF) the thirty-eight (38) insignificant Air Handling Units (does not include 6 air handling units in new engine manufacturing facility); and
  - (GG) the six (6) insignificant Heating and Ventilation Units.
- (2) no greater than 0.12 pounds per million Btu's of heat input for the equipment listed as follows:
- (A) the PBL Booth Preheat burner;
  - (B) the two (2) Intermediate Booth Preheat burners;
  - (C) the insignificant PBL Oven thermal incinerator;
  - (D) the two (2) insignificant PBL Booth Reheat burners;
  - (E) the two (2) insignificant Intermediate (Surfacer) Booth Reheat burners;
  - (F) the insignificant Intermediate (Surfacer) Oven thermal incinerator;
  - (G) the insignificant Topcoat #1 Oven thermal incinerator;
  - (H) the insignificant Topcoat #2 Oven thermal incinerator; and
  - (I) the insignificant Two tone Oven thermal incinerator.
- (o) All combustion operations at the source shall use low-NO<sub>x</sub> natural gas burners.
- (p) The total VOC emissions from surface coating operations and associated purge solvent operations and storage shall not exceed 1,128 tons per twelve consecutive month period with compliance determined at the end of each month.

Compliance with the above limits (a) through (p) will satisfy the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration).

The following requirements apply to this source pursuant to PSD (79) 1651, issued July 30, 1987 and revised March 23, 1989, CP 157-4485-00050, issued September 13, 1995, and CP 157-9619-00050, issued February 11, 1999, and revised through this Part 70 permit. Compliance with these limits is equivalent to PM and PM10 emissions of less than 23.1 tons per year, SO<sub>2</sub> emissions of less than 40 tons per year, and CO emissions of less than 100 tons per year, and will render the requirements of PSD not applicable:

- (a) Total vehicle production at the source shall not exceed 262,000 vehicles per twelve (12) consecutive month period with compliance determined at the end of the month.
- (b) The total natural gas usage by all natural gas combustion units at the source shall not exceed 2,380 million cubic feet per 12 consecutive month period with compliance determined at the end of each month.

- (c) The particulate matter emissions from the entire source shall not exceed 25 tons per 12 consecutive month period with compliance determined at the end of the month.
- (d) The visible emissions from any plant stack, vent, or other emission point shall be limited to 10% opacity as measured according to 40 CFR 60, Appendix A, Method 9. Compliance with this limit fulfills the requirements of 326 IAC 5-1-2 (Opacity Limitations).
- (e) The Permittee shall limit PM and PM10 emissions to less than 23.1 tons per twelve consecutive month period, with compliance determined at the end of the month. Compliance shall be determined by using the following equation, which calculates pounds of particulate emissions per month, and adding the result to the calculated particulate emissions from the previous eleven months:

$$\begin{aligned} \text{Total Particulate Emissions (lb/month)} = & \text{PVC \#1 Coating PM/PM10 +} \\ & \text{Topcoat \#1 Coating PM/PM10 +} \\ & \text{Topcoat \#2 Coating PM/PM10 +} \\ & \text{Twotone and Repair Coating} \\ & \text{PM/PM10 + Intermediate} \\ & \text{(Surfacer) Coating PM/PM10 +} \\ & \text{Plastic Bumper Coating} \\ & \text{PM/PM10 + Black Coat and} \\ & \text{Wax Coating PM/PM10 +} \\ & \text{Anticorrosion Coating PM/PM10} \\ & \text{+ Touchup Trim Coating} \\ & \text{PM/PM10 + Touchup IPC} \\ & \text{Coating PM/PM10 + Natural} \\ & \text{Gas Combustion PM/PM10 +} \\ & \text{Insignificant PM/PM10 Sources} \end{aligned}$$

Where:

$$\text{PVC \#1 Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.80) * (1-0.85);$$

$$\text{Topcoat \#1 Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85);$$

$$\text{Topcoat \#2 Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85);$$

$$\begin{aligned} \text{Twotone and Repair Coating PM/PM10} = & \sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1- \\ & 0.85); \end{aligned}$$

$$\begin{aligned} \text{Intermediate (Surfacer) Coating PM/PM10} = & \sum_{i=1}^n (C_i * S_i) * (1-0.516) * (1- \\ & 0.85); \end{aligned}$$

$$\text{Plastic Bumper Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.423) * (1-0.85);$$

$$\text{Black Coat and Wax Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85);$$

$$\text{Anticorrosion Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.80) * (1-0.85);$$

$$\text{Touchup Trim Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85);$$

$$\text{Touchup IPC Coating PM/PM10} = \sum_{i=1}^n (C_i * S_i) * (1-0.30) * (1-0.85);$$

$$\text{Natural Gas Combustion PM/PM10} = \text{natural gas usage (MMCF/month)} * 7.6 \text{ lb PM/MMCF};$$

Insignificant PM/PM10 Sources = PM/PM10 emissions in lb/month from insignificant facilities that were permitted by the PSD (79) 1651 Revision;

$C_i$  = usage of coating  $i$  in gallons per month; and

$S_i$  = solids content of coating  $i$  in pounds of solids per gallon of coating.

#### 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants)

The source has not performed any modifications since July 27, 1997 that resulted in the construction of a complete process. As a result, the requirements of 326 IAC 2-4.1 are not applicable to the source.

#### 326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of volatile organic compounds and nitrogen oxides. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

#### 326 IAC 5-1 (Opacity Limitations)

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

- (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.

#### 326 IAC 6-4 (Fugitive Dust Emissions)

The source is subject to 326 IAC 6-4 (Fugitive Dust Emissions) because the source maintains paved and unpaved roads and parking lots with public access. 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.

#### 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

The source has not added a facility after December 13, 1985 which has potential fugitive particulate emissions greater than 25 tons per year. As a result, the requirements of 326 IAC 6-5 are not applicable to this source.

### 326 IAC 12 (New Source Performance Standards)

The 15,000-gallon gasoline storage tank, one of three tanks identified as Unit 011, is subject to 326 IAC 12. This rule requires the source to maintain records of the capacity and dimension of this tank. The other two storage tanks identified as Unit 011 (5,000-gallon purge thinner tank and 6,000-gallon waste purge thinner tank), the seven solvent recovery system storage tanks from Unit 012 (1,096-gallon dirty purge Tank A, 1,096-gallon distillation overs Tank B, 1,096-gallon clean solvent Tank C, 1,096-gallon methanol Tank E, 1,096-gallon xylene tank, 1,096-gallon acetone tank, and 1,949-gallon clean purge Tank OK), and the insignificant engine oil and gear oil storage tanks (both with capacities of 10,000 gallons) are not subject to this standard because the tank capacities are less than 10,500 gallons each.

### State Rule Applicability - Individual Facilities

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirement from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain an applicable requirement until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

### 326 IAC 6-3-2 (Process Operations)

Pursuant to 40 CFR Part 52, Subpart P, the particulate matter (PM) from each surface coating booth shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Under the rule revision, particulate from the Black Coat and Wax Booth and the Anticorrosion Coating Booth (two of the facilities identified as Unit 006) shall be controlled by dry particulate filters. Particulate from the PVC Coating #1 Booth and PVC Coating #2 Booth (two of the facilities identified as Unit 002), the Topcoat #1 Booth, Topcoat #2 Booth, and Twotone and Repair Booth (three of the facilities identified as Unit 003), the Intermediate Coating Booth (one of the facilities identified as Unit 004), the PBL Paint Booth (one of the facilities identified as Unit 005), and the Touchup IPC Booth and Touchup Trim Booth (two of the facilities identified as Unit 007) shall be controlled by water washes. The Permittee shall operate the control devices in accordance with manufacturer's specifications.

The ED Body Coating Tank and the ED Chassis Coating Tank (two of the facilities identified as Unit 001), which are dip tanks, are not sources of particulate emissions; therefore, these facilities are not subject to the requirements of 326 IAC 6-3-2.

### 326 IAC 8-1-6 (Volatile Organic Compound (VOC) Limitations)

Pursuant to 326 IAC 8-1-6 and PSD (79) 1651, issued on July 30, 1987, daily VOC emissions from the PBL Coating Booth (one of the facilities identified as Unit 005) shall not exceed 38.2 pounds of VOC per gallon of applied solids (4.57 kilograms of VOC per liter of applied solids). This limit applies to the weighted average of all plastic bumper coatings.

### 326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations)

(a) Pursuant to 326 IAC 8-2-2, the Permittee shall not allow the discharge of VOC into the atmosphere in excess of the following limits:

- (1) The daily VOC emissions from the ED Body Coating Tank (one of the facilities identified as Unit 001) shall not exceed 1.17 pounds of VOC per gallon of coating less water (0.14 kilograms of VOC per liter of coating less water) (site-specific

RACT limit established pursuant to 325 IAC 8-1-5 (Petition for alternate controls)), delivered to the applicator from prime application, flash-off area, and oven operations. Compliance with this limit shall be achieved through the use of thermal incinerator control. The incinerator shall be operated at all times that the surface coating line is in operation.

- (2) The daily VOC emissions from the Topcoat booths (Topcoat #1 Booth, Topcoat #2 Booth, and Twotone and Repair Booth), identified as Unit 003, shall not exceed 15.3 pounds of VOC per gallon of applied solids (1.83 kilograms of VOC per liter of applied solids) (site-specific RACT limit established pursuant to 325 IAC 8-1-5 (Petition for alternate controls)), delivered to the applicator from prime application, flash-off area, and oven operations. This limit applies to the average of all Topcoat coatings. Compliance with this limit shall be achieved through the use of thermal incinerator control. The incinerator shall be operated at all times that the surface coating line is in operation.
- (3) The daily VOC emissions from the Intermediate Coating Booth (one of the facilities identified as Unit 004) shall not exceed 15.3 pounds of VOC per gallon of applied solids (1.83 kilograms of VOC per liter of applied solids) (site-specific RACT limit established pursuant to 325 IAC 8-1-5 (Petition for alternate controls)), delivered to the applicator from prime application, flash-off area, and oven operations. This limit applies to the average of all Intermediate coatings. Compliance with this limit shall be achieved through the use of thermal incinerator control. The incinerator shall be operated at all times that the surface coating line is in operation.
- (4) The daily VOC emissions from the Final Repair booths (Touchup IPC Booth and Touchup Trim Booth), identified as Unit 007, shall not exceed 4.84 pounds of VOC per gallon of coating less water (0.58 kilograms of VOC per liter of coating less water). This limit applies to the average of all Final Repair coatings and solvents.

Based on coating information provided by the source, the ED Body Coating Tank is in compliance with 326 IAC 8-2-2 without the use of the incinerator.

- (b) At this time, IDEM is collecting the coating information necessary to calculate the overall efficiency of the capture system and control device necessary to meet the limit above, pursuant to 326 IAC 8-1-2(c). Once this information is available, the OAQ will promptly reopen the permit using provisions of 326 IAC 2-7-9 (Permit Reopening) to include this information.

#### 326 IAC 8-2-9 (Miscellaneous Metal Coating)

- (a) Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge of VOC into the atmosphere in excess of the following limits:
  - (1) The daily VOC emissions from the ED Chassis Coating Tank (one of the facilities identified as Unit 001) shall not exceed 3.0 pounds of VOC per gallon of coating less water (0.36 kilograms of VOC per liter of coating less water).
  - (2) The daily VOC emissions from PVC Coating (PVC Coating #1 Booth and PVC Coating #2 Booth), identified as Unit 002, shall not exceed 3.5 pounds of VOC per gallon of coating less water (0.42 kilograms of VOC per liter of coating less water).
  - (3) The daily VOC emissions from Anticorrosion Coating (Black and Wax Booth and Anticorrosion Coating Booth), identified as Unit 006, shall not exceed 3.0 pounds of VOC per gallon of coating less water (0.36 kilograms of VOC per liter of coating less water). This limit applies to the average of all Anticorrosion coatings.

Based on coating information provided by the source, these facilities are in compliance with 326 IAC 8-2-9.

- (b) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

### State Rule Applicability - Insignificant Activities

#### 326 IAC 6-2-4 (Sources of Indirect Heating)

The ED Chassis Hot Water Boiler, the ED Paint Temperature Control Boiler, the two (2) ED Pretreatment Boilers, and the six (6) general Hot Water Boilers are subject to 326 IAC 6-2-4 because they were constructed after September 21, 1983.

Pursuant to 326 IAC 6-2-4, the particulate emissions from these units shall each not exceed 0.435 pounds of particulate matter per million Btu (lb/MMBtu) heat input.

This limitation is based on the following equation:

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

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.  
Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. (Q = 34.17 MMBtu/hr).

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirement from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain an applicable requirement until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

#### 326 IAC 6-3-2 (Process Operations)

Pursuant to 40 CFR Part 52, Subpart P, particulate emissions from the insignificant robotic welding, brazing equipment, cutting torches, soldering equipment, grinding equipment, or machining equipment (other than the metal machining of engine crankshaft) shall not exceed 0.551 pounds per hour when operating at a process weight rate of less than 100 pounds per hour.

#### 326 IAC 6-3-2 (Particulate Emissions from Manufacturing Processes)

Under the rule revision, pursuant to 326 IAC 6-3-2(b)(14), particulate emissions from the insignificant robotic welding, brazing equipment, cutting torches, soldering equipment, grinding equipment, or machining equipment (other than the metal machining of engine crankshaft) are exempt from the requirements of 326 IAC 6-3-2.

Pursuant to 326 IAC 6-3-2 and E 157-14535-00050, issued on October 10, 2001, the allowable particulate emission rate from the insignificant metal machining of engine crankshaft in the engine manufacturing facility shall not exceed 1.03 pounds per hour when operating at a process weight rate of 0.128 tons per hour. This limit was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour.  
= 14 kg/unit crankshaft \* 6,000 units/mo \*  
1 mo/30 days \* 1 day/24 hr \* 1 ton/907 kg  
= 0.128 ton/hr

### 326 IAC 8-3 (Organic Solvent Degreasing Operations)

All degreasing operations at the source are water based. As a result, the requirements of 326 IAC 8-3 are not applicable to this source.

## Testing Requirements

The source uses thermal incinerators on several spray coating booths to comply with 326 IAC 2-2, 326 IAC 8-1-6, 326 IAC 8-2-2 and 326 IAC 8-2-9. Pursuant to 326 IAC 2-2, the source shall perform the following testing for the thermal incinerators:

Within one hundred and eighty (180) days after issuance, the Permittee shall conduct a performance test to verify VOC capture and destruction efficiencies for the thermal incinerators, identified as B-ED, CH, TC-1, TC-2, TUT, and BPR, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every thirty (30) months from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing of this permit.

Testing for capture and destruction efficiency is being required for these incinerators because their respective facilities have VOC allowable emissions of greater than ten (10) pounds per hour by rule (based on the source-wide BACT VOC limit of 1,128 tons per twelve consecutive months). When testing is required for surface coating facilities, the testing will be conducted once every thirty months (2.5 years) if the facility meets the following conditions:

- (a) it has potential VOC emissions of greater than 100 tons per year;
- (b) it is subject to a VOC requirement;
- (c) it is located at a major source of VOC; and
- (d) it has actual VOC emissions of greater than 10 tons per year.

The surface coating facilities at SIA that are equipped with incinerators meet these conditions, and are therefore required to test once every thirty months.

After the Permittee has submitted a protocol for testing of the incinerators, the Permittee may submit a request to IDEM, OAQ that testing only be performed on certain representative facilities, if it is determined that the subject facilities are identical in nature.

## Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less 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 requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance,

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

The compliance monitoring requirements applicable to this source are as follows:

1. The PVC Coating #2 Booth (from Unit 002), the Topcoat #1, Topcoat #2, and Twotone and Repair Booths (from Unit 003), the Intermediate Coating Booth (from Unit 004), the PBL Paint Booth (from Unit 005), and the Anticorrosion Coating Booth (from Unit 006) have applicable compliance monitoring conditions as specified below:
  - (a) Daily inspections shall be performed to verify that the water levels of the water pans for these booths' particulate control systems meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the surface coating booth stacks PVC Booth 2, TC1-1 through TC1-10, TC2-1 through TC2-10, TUT-1 through TUT-5, SUR-2 through SUR-7, BPR-1, BPR-2, BPR-JR, and Anticorrosion Stack while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
  - (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
  - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
2. The PVC Coating #1 Booth (from Unit 002), the Black and Wax Booth (from Unit 006), and the Touchup Trim Booth (from Unit 007) have applicable compliance monitoring conditions as specified below:
  - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks PVC-1-2 and BCW Stack while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

### **Conclusion**

The operation of this automotive and light-duty truck assembly plant shall be subject to the conditions of the attached Part 70 Permit No. T157-5906-00050.

**Appendix A: Emissions Calculations**  
**Determination of Necessary PSD VOC Emission Reductions for 1995 Modification**  
**Company Name: Subaru-Isuzu Automotive, Inc.**  
**Address City IN Zip: 5500 State Road 38 East, Lafayette, Indiana 47903**  
**Permit #: T157-5906-00050**  
**Reviewer: ERG/PG**  
**Date: 18-Nov-03**

**Information**

Actual Production in 1993 =	131,122 vehicles
Actual Average Emission Rate in 1993 =	11.71 lb VOC per vehicle
Actual Production in 1994 =	164,611 vehicles
Actual Average Emission Rate in 1994 =	12.48 lb VOC per vehicle

Allowable Production (prior to 1995 modification) =	200,000 vehicles per year
Proposed Production (after 1995 modification) =	240,000 vehicles per year

Actual Average Emission Rate in 1990:	15.06 lb VOC per vehicle
Actual Average Emission Rate in 1994 =	<u>12.48</u> lb VOC per vehicle
Emission Rate Reduction from 1990 - 1995 =	2.58 lb VOC per vehicle

**Calculations**

1993 Actual Emissions =	Actual 1993 Production (vehicles) x Actual Average 1993 Emission Rate (lb VOC per vehicle) x 1/2000 ton/lb
=	767.7 tons VOC
1994 Actual Emissions =	Actual 1994 Production (vehicles) x Actual Average 1994 Emission Rate (lb VOC per vehicle) x 1/2000 ton/lb
=	1027.2 tons VOC

Average Actual Emissions =	(1993 Actual Emissions (tons VOC) + 1994 Actual Emissions (tons VOC))/2
=	<b>897.45 tons VOC per year</b>

Creditable Contemporaneous Reduction (tons per year) = Emission Rate Reduction (lb VOC per vehicle) x Average Production (vehicle/yr) x 1/2000 ton/lb

Creditable Contemporaneous Reduction =	<b>190.75 ton VOC per year</b>
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Net Change in Emissions (tons VOC) = Potential to Emit of 1995 Modification (tons VOC) - Average Actual Emissions of Existing Plant (tons VOC) - Creditable Contemporaneous Reductions (tons VOC)

Therefore:

Allowable Potential to Emit of 1995 Modification (tons VOC) = Creditable Contemporaneous Reductions (tons VOC) + Average Actual Emissions of Existing Plant (tons VOC) + Net Change in Emissions (tons VOC)

Net Change in Emissions must be less than the relevant PSD threshold of **40 tons of VOC per year**.

Therefore:

Maximum Allowable VOC Emissions/ Potential to Emit of 1995 Modification = **1128 tons VOC per year**

**Appendix A: Emissions Calculations**  
**Determination of Necessary PSD VOC Emission Reductions for 1999 Modification**  
**Company Name: Subaru-Isuzu Automotive, Inc.**  
**Address City IN Zip: 5500 State Road 38 East, Lafayette, Indiana 47903**  
**Permit #: T157-5906-00050**  
**Reviewer: ERG/PG**  
**Date: 18-Nov-03**

**Information**

Actual Production in 1997 =	187,096 vehicles
Actual Average Emission Rate in 1997 =	10.57 lb VOC per vehicle
Actual Production in 1998 =	216,217 vehicles
Actual Average Emission Rate in 1998 =	9.22 lb VOC per vehicle

Allowable Production (prior to 1999 modification) =	240,000 vehicles per year
Proposed Production (after 1995 modification) =	262,000 vehicles per year

Actual Average Emission Rate in 1995:	12.48 lb VOC per vehicle
Actual Average Emission Rate in 1998 =	<u>9.22</u> lb VOC per vehicle
Emission Rate Reduction from 1990 - 1995 =	3.26 lb VOC per vehicle

**Calculations**

$$\begin{aligned}
 1997 \text{ Actual Emissions} &= \text{Actual 1997 Production (vehicles)} \times \text{Actual Average 1997 Emission Rate (lb VOC per vehicle)} \times 1/2000 \text{ ton/lb} \\
 &= 988.8 \text{ tons VOC} \\
 1998 \text{ Actual Emissions} &= \text{Actual 1998 Production (vehicles)} \times \text{Actual Average 1998 Emission Rate (lb VOC per vehicle)} \times 1/2000 \text{ ton/lb} \\
 &= 996.8 \text{ tons VOC}
 \end{aligned}$$

Average Actual Emissions =	$(1997 \text{ Actual Emissions (tons VOC)} + 1998 \text{ Actual Emissions (tons VOC)})/2$
=	<b>992.78 tons VOC per year</b>

Creditable Contemporaneous Reduction (tons per year) = Emission Rate Reduction (lb VOC per vehicle) x Average Production (vehicle/yr) x 1/2000 ton/lb

Creditable Contemporaneous Reduction =	<b>328.70 ton VOC per year</b>
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Net Change in Emissions (tons VOC) = Potential to Emit of 1995 Modification (tons VOC) - Average Actual Emissions of Existing Plant (tons VOC) - Creditable Contemporaneous Reductions (tons VOC)

Therefore:

Allowable Potential to Emit of 1999 Modification (tons VOC) = Creditable Contemporaneous Reductions (tons VOC) + Average Actual Emissions of Existing Plant (tons VOC) + Net Change in Emissions (tons VOC)

Net Change in Emissions must be less than the relevant PSD threshold of **40 tons of VOC per year**.

Therefore:

Maximum Allowable VOC Emissions/ Potential to Emit of 1995 Modification = 1361 tons VOC per year

NOTE: This source-wide VOC emission limit is not permitted because it would allow for an increase in a PSD BACT limit.

**Appendix A: Emissions Calculations**  
**Determination of Necessary PSD PM/PM10 Limit**  
**Company Name: Subaru-Isuzu Automotive, Inc.**  
**Address City IN Zip: 5500 State Road 38 East, Lafayette, Indiana 47903**  
**Permit #: T157-5906-00050**  
**Reviewer: ERG/PG**  
**Date: 18-Dec-03**

**Information**

Assume PM = PM10.

Actual Production in 1993	=	131,122 vehicles
Actual Production in 1994	=	164,611 vehicles
Actual Production in 1997	=	187,096 vehicles
Actual PM Emissions in 1997	=	12 tons PM/PM10
Actual Production in 1998	=	216,217 vehicles
Actual PM Emissions in 1998	=	10 tons PM/PM10

**Calculations**

Actual emissions were not available for 1993 and 1994. Therefore the average pounds of PM10 per vehicle was determined using the two closest years in which actual emissions were available, 1997 and 1998.

$$\begin{aligned} 1997-1998 \text{ Actual Emissions} &= \text{Actual 1997 Emissions} + \text{Actual 1998 Emissions} \\ &= 22 \text{ tons PM/PM10} \\ 1997-1998 \text{ Actual Production} &= \text{Actual 1997 Production} + \text{Actual 1998 Production} \\ &= 403,313 \text{ vehicles} \end{aligned}$$

1997-1998 Average Actual Emission Rate	=	(1997-1998 Actual Emissions / 1997-1998 Actual Production) x 2000 lb/ton
	=	0.109 lb PM/PM10 per vehicle

1993-1994 Average Actual Production	=	(Actual 1993 Production + Actual 1994 Production) / 2
	=	147,867 vehicles per year

1993-1994 Actual Emissions	=	1993-1994 Average Actual Production x 1997-1998 Average Actual Emission Rate x 1/2000 ton/lb
	=	8.1 tons PM/PM10 per year

Therefore:

Allowable Potential to Emit (tons PM/PM10) = Average Actual Emissions of Existing Plant (tons PM/PM10) + Net Change in Emissions (tons PM/PM10)

Net Change in Emissions must be less than the relevant PSD threshold of **15 tons of PM10 per year**.

Therefore:

Maximum Allowable PM/PM10 Emissions/ Potential to Emit = **23.1 tons PM/PM10 per year**

**Appendix A: Emissions Calculations**  
**Evaluation of 1999 Modification PM Limit as a Valid PM10 PSD Limit**  
**Company Name: Subaru-Isuzu Automotive, Inc.**  
**Address City IN Zip: 5500 State Road 38 East, Lafayette, Indiana 47903**  
**Permit #: T157-5906-00050**  
**Reviewer: ERG/PG**  
**Date: 18-Dec-03**

**Information**

Assume PM = PM10.

Actual PM Emissions in 1997	=	12 tons PM/PM10
Actual PM Emissions in 1998	=	10 tons PM/PM10
PSD Limit from 1999 Modification	=	25 tons PM/PM10

**Calculations**

$$\begin{aligned} \text{1997-1998 Average Actual Emissions} &= (\text{Actual 1997 Emissions} + \text{Actual 1998 Emissions}) / 2 \\ &= 11 \text{ tons PM/PM10} \end{aligned}$$

$\begin{aligned} \text{Worst-Case Increase in Emissions Under 1999 Modification} &= \text{PSD Limit from 1999 Modification} - \text{1997-1998 Average Actual Emissions} \\ &= 14 \text{ tons PM/PM10} \end{aligned}$
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This worst-case increase in PM/PM10 emissions is less than the PM10 PSD modification threshold of 15 tons per year.

Therefore, the 1999 Modification did not allow an increase in PM/PM10 emissions that would violate PSD.