

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Meridian Automotive Systems
320 South Wabash Avenue
Ashley, Indiana 46705**

(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.

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

Operation Permit No.: T 033-5941-00017	
Issued by: Original signed by Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: July 31, 2001 Expiration Date: July 31, 2006

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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.4 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)]

The Permittee owns and operates a stationary high-pressure fiberglass-reinforced plastics manufacturing and painting source.

Responsible Official:	Rodney Schoon
Source Address:	320 South Wabash Avenue
Mailing Address:	320 South Wabash Avenue
General Source Phone Number:	219-587-9155
SIC Code:	3089
County Location:	Dekalb
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor 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)]

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

- (a) One (1) surface coating line, consisting of:
 - (1) One (1) prime booth and one (1) flashoff tunnel, identified as SB-1, PM overspray controlled by HVLP or electrostatic spray applicators, air atomization spray applicators and dry filters, installed in 1987, exhausted through Stack 2A, capacity: 10.25 gallons of coating per hour for SB-1, SB-2, and SB-3, total.
 - (2) One (1) first topcoat booth and one (1) flashoff tunnel, identified as SB-2, PM overspray controlled by HVLP or electrostatic spray applicators, air atomization spray applicators and dry filters, installed in 1987, exhausted through Stack 2B, capacity: 10.25 gallons of coating per hour for SB-1, SB-2, and SB-3, total.
 - (3) One (1) second topcoat booth and one (1) flashoff tunnel, identified as SB-3, PM overspray controlled by HVLP or electrostatic spray applicators, air atomization spray applicators and dry filters, installed in 1987, exhausted through Stack 2C, capacity: 10.25 gallons of coating per hour for SB-1, SB-2, and SB-3, total.
- (b) One (1) boiler, identified as BLRA, installed in 1979, using natural gas as a primary fuel and No. 2 fuel oil as a backup fuel, exhausted through Stack 5A, capacity: 8.4 million British thermal units per hour.
- (c) One (1) boiler, identified as BLRB, installed in 1975, using natural gas as a primary fuel and No. 2 fuel oil as a backup fuel, exhausted through Stack 5B, capacity: 4.2 million British thermal units per hour.

- (d) One (1) natural gas-fired pyrolysis cleaning furnace, identified as AFT-1, rated at 0.35 million British thermal units per hour, installed in 1987, exhausted through Stack 7, capacity: 10 pounds of waste per hour.
- (e) One reinforced plastic molding press, identified as PR-109, installed prior to 1980. This press is used to punch holes in the molded SMC. There are no air emissions from this press.
- (f) One (1) 200-ton Hannifin reinforced plastic molding press, identified as PR-204, installed prior to 1980, capacity: 534 pounds of SMC per hour.
- (g) One (1) 250-ton Version reinforced plastic molding press, identified as PR-234, installed prior to 1980, capacity: 534 pounds of SMC per hour.
- (h) One (1) 300-ton Erie reinforced plastic molding press, identified as PR-346, installed prior to 1980, capacity: 168 pounds of SMC per hour.
- (i) One (1) 300-ton Erie reinforced plastic molding press, identified as PR-347, installed prior to 1980, capacity: 168 pounds of SMC per hour.
- (j) One (1) 350-ton Lawton reinforced plastic molding press, identified as PR-365, installed prior to 1980, capacity: 168 pounds of SMC per hour.
- (k) One (1) 400-ton Lawton reinforced plastic molding press, identified as PR-437, installed prior to 1980, capacity: 86 pounds of SMC per hour.
- (l) One (1) 400-ton Dake reinforced plastic molding press, identified as PR-440, installed prior to 1980, capacity: 86 pounds of SMC per hour.
- (m) One (1) 600-ton RHML reinforced plastic molding press, identified as PR-651, installed prior to 1980, capacity: 12 pounds of SMC per hour.
- (n) One (1) 600-ton RHML reinforced plastic molding press, identified as PR-654, installed prior to 1980, capacity: 12 pounds of SMC per hour.
- (o) One (1) 800-ton French reinforced plastic molding press, identified as PR-845, installed prior to 1980, capacity: 195 pounds of SMC per hour.
- (p) One (1) 1,000-ton EEMCO reinforced plastic molding press, identified as PR-1039, installed prior to 1980, capacity: 442 pounds of SMC per hour.
- (q) One (1) 1,000-ton Clearing reinforced plastic molding press, identified as PR-1056, installed in 1986, capacity: 355 pounds of SMC per hour.
- (r) One (1) 1,200-ton Dominoon reinforced plastic molding press, identified as PR-1252, installed in 1987, capacity: 99 pounds of SMC per hour.
- (s) One (1) 2,000-ton W-W-M reinforced plastic molding press, identified as PR-2053, installed prior to 1980, capacity: 454 pounds of SMC per hour.
- (t) One (1) 2,500-ton W-W-M reinforced plastic molding press, identified as PR-2560, installed in 1984, capacity: 627 pounds of SMC per hour.
- (u) One (1) 3,000-ton Erie reinforced plastic molding press, identified as PR-3038, installed

prior to 1980, capacity: 1,098 pounds of SMC per hour.

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):

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. (326 IAC 6-3)
- (b) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone. (326 IAC 6-3)
- (c) 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 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. (326 IAC 6-3)

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)]

This permit is issued for a fixed term of five (5) years from the original date, 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 Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information 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 submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) 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 or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

(c) 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 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
- (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) 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.
- (c) 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.

B.9 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.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. 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 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
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.11 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]

- (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 and the PMP extension notification do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation 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 contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept 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.12 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, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and/or the Northern Regional Office 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

Telephone Number: 219-245-4870 (Northern Regional Office)

Facsimile Number: 219-245-4877 (Northern Regional Office)

- (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)(10) 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) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

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

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed 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) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.
- (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)(7)]

B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(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. 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.

The notification by the Permittee 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 or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 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.17 Permit Renewal [326 IAC 2-7-4]

- (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.

- (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.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

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

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

Indiana Department of Environmental Management
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)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision 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)(D)(i) 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.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (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 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), (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.21 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

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

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

Indiana Department of Environmental Management
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.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

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

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

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate 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.
- 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]
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.
- 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, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(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 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, 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) 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 that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

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

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

- (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 source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. 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 and record keeping 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.

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

C.13 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.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68,

including the registration and submission of a Risk Management Plan (RMP);

All documents submitted pursuant to this condition shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (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. Failure to take reasonable response steps may constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that 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 an administrative amendment 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) Records shall be kept of all instances in which the compliance related information was not met and of all response steps 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.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) At its discretion, IDEM may excuse the Permittee’s failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall 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 documents submitted pursuant to this condition do not 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.17 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]

- (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 other regulated pollutants (as defined by 326 IAC 2-7-1) 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.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required data, reports and support information 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 kept 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.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source 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.20 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

- (a) One (1) surface coating line, consisting of:
 - (1) One (1) prime booth and one (1) flashoff tunnel, identified as SB-1, HVLP or electrostatic spray applicators to be installed, equipped with air atomization spray applicators and dry filters for PM overspray control, installed in 1987, exhausted through Stack 2A, capacity: 10.25 gallons of coating per hour for SB-1, SB-2, and SB-3, total.
 - (2) One (1) first topcoat booth and one (1) flashoff tunnel, identified as SB-2, HVLP or electrostatic spray applicators to be installed, equipped with air atomization spray applicators and dry filters for PM overspray control, installed in 1987, exhausted through Stack 2B, capacity: 10.25 gallons of coating per hour for SB-1, SB-2, and SB-3, total.
 - (3) One (1) second topcoat booth and one (1) flashoff tunnel, identified as SB-3, HVLP or electrostatic spray applicators to be installed, equipped with air atomization spray applicators and dry filters for PM overspray control, installed in 1987, exhausted through Stack 2C, capacity: 10.25 gallons of coating per hour for SB-1, SB-2, and SB-3, total.
- (e) One reinforced plastic molding press, identified as PR-109, installed prior to 1980. This press is used to punch holes in the molded SMC. There are no air emissions from this press.
- (f) One (1) 200-ton Hannifin reinforced plastic molding press, identified as PR-204, installed prior to 1980, capacity: 534 pounds of SMC per hour.
- (g) One (1) 250-ton Version reinforced plastic molding press, identified as PR-234, installed prior to 1980, capacity: 534 pounds of SMC per hour.
- (h) One (1) 300-ton Erie reinforced plastic molding press, identified as PR-346, installed prior to 1980, capacity: 168 pounds of SMC per hour.
- (i) One (1) 300-ton Erie reinforced plastic molding press, identified as PR-347, installed prior to 1980, capacity: 168 pounds of SMC per hour.
- (j) One (1) 350-ton Lawton reinforced plastic molding press, identified as PR-365, installed prior to 1980, capacity: 168 pounds of SMC per hour.
- (k) One (1) 400-ton Lawton reinforced plastic molding press, identified as PR-437, installed prior to 1980, capacity: 86 pounds of SMC per hour.
- (l) One (1) 400-ton Dake reinforced plastic molding press, identified as PR-440, installed prior to 1980, capacity: 86 pounds of SMC per hour.
- (m) One (1) 600-ton RHML reinforced plastic molding press, identified as PR-651, installed prior to 1980, capacity: 12 pounds of SMC per hour.
- (n) One (1) 600-ton RHML reinforced plastic molding press, identified as PR-654, installed prior to 1980, capacity: 12 pounds of SMC per hour.
- (o) One (1) 800-ton French reinforced plastic molding press, identified as PR-845, installed prior to 1980, capacity: 195 pounds of SMC per hour.
- (p) One (1) 1,000-ton EEMCO reinforced plastic molding press, identified as PR-1039, installed prior to 1980, capacity: 442 pounds of SMC per hour.
- (q) One (1) 1,000-ton Clearing reinforced plastic molding press, identified as PR-1056, installed in 1986, capacity: 355 pounds of SMC per hour.
- (r) One (1) 1,200-ton Dominoon reinforced plastic molding press, identified as PR-1252, installed in 1987, capacity: 99 pounds of SMC per hour.
- (s) One (1) 2,000-ton W-W-M reinforced plastic molding press, identified as PR-2053, installed prior to 1980, capacity: 454 pounds of SMC per hour.
- (t) One (1) 2,500-ton W-W-M reinforced plastic molding press, identified as PR-2560, installed in 1984, capacity: 627 pounds of SMC per hour.
- (u) One (1) 3,000-ton Erie reinforced plastic molding press, identified as PR-3038, installed prior to 1980, capacity: 1,098 pounds of SMC per hour.

(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.1.1 Volatile Organic Compounds [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, Best Available Control Technology (BACT) for the three (3) surface coating booths, identified as SB-1 through SB-3, has been determined to be:

- (a) The potential VOC delivered to the applicators including cleanup solvents shall be limited to a total of no more than ninety-nine and nine tenths (99.9) tons per twelve (12) consecutive month period;
- (b) The method of application at the spray booths shall be done with high volume-low pressure (HVLP) spray applicators or electrostatic applicators;
- (c) The use of medium (41-50%) and high (no less than 51%) solids content coatings, except the use of coatings with a volume percent solids of no less than 38% can be used if required by military specifications; and
- (d) The following management and work practices shall apply:
 - (1) Operator training course.
 - (2) Spray gun cleaning.
 - (3) The cleanup solvent containers used to transport solvent from drums to work stations be closed containers having soft gasketed closures.
 - (4) The application equipment operators shall be instructed and trained on the methods and practices utilized to minimize spillage on the floor and over application.
 - (5) Storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.
 - (6) Cleanup solvents will be reused in the process as much as possible to reduce hazardous waste and the related impact on the environment.

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) The total potential to emit VOC from the fifteen (15) molding presses (PR-204, 234, 346, 347, 365, 437, 440, 651, 845, 1039, 1056, 1252, 2053, 2560, and 3038) shall be limited to no more than one hundred and thirty-nine (139) tons per twelve (12) consecutive month period.
- (b) Compliance with the VOC emission limit in Condition D.1.2(a) shall be determined with the use of a three (3.0%) percent VOC flashoff factor for each molding press.
- (c) This VOC emission limit combined with the BACT VOC usage limit in Condition D.1.1, the full potential to emit VOC from the combustion units and ten (10) tons per year from insignificant activities shall limit the total source-wide VOC emissions to less than two hundred and fifty (250) tons per twelve (12) consecutive month period. Compliance with this limit makes the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 40 CFR 52.21 not applicable.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the PM from the three (3) surface coating booths, identified as SB-1 through SB-3 shall not exceed the pound per hour emission rate established as E in the following

formula:

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:

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

D.1.4 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 any control devices.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.1.6 VOC Emissions

Compliance with Conditions D.1.1 and D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

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

D.1.7 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the three (3) surface coating booths, identified as SB-1 through SB-3 are in operation.

D.1.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth Stacks 2A, 2B and 2C 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 Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of 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 Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) 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.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1 and D.1.2
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.7 and D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 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 quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (b) One (1) boiler, identified as BLRA, installed in 1979, using natural gas as a primary fuel and No. 2 fuel oil as a backup fuel, exhausted through Stack 5A, capacity: 8.4 million British thermal units per hour.
- (c) One (1) boiler, identified as BLRB, installed in 1975, using natural gas as a primary fuel and No. 2 fuel oil as a backup fuel, exhausted through Stack 5B, capacity: 4.2 million British thermal units per hour.
- (d) One (1) natural gas-fired pyrolysis cleaning furnace, identified as AFT-1, rated at 0.35 million British thermal units per hour, installed in 1987, exhausted through Stack 7, capacity: 10 pounds of waste per hour.

(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 Particulate Matter (PM) [326 IAC 6-2-3]

- (a) Pursuant to 326 IAC 6-2-3(e), the allowable PM emission rate from the one (1) boiler, identified as BLRA, shall not exceed 0.6 pounds per million British thermal units per hour heat input.
- (b) Pursuant to 326 IAC 6-2-3(e), the allowable PM emission rate from the one (1) boiler, identified as BLRB, shall not exceed 0.6 pounds per million British thermal units heat input.

SECTION D.3

FACILITY OPERATION CONDITIONS

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

- (a) 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 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. (326 IAC 6-3)
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. (326 IAC 6-3)
- (c) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

(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 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the grinding and machining, brazing, cutting, soldering, welding and trimming operations shall not exceed allowable PM emission rate based on the following equations:

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

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Meridian Automotive Systems
Source Address: 320 South Wabash Avenue, Ashley, Indiana 46705
Mailing Address: 320 South Wabash Avenue, Ashley, Indiana 46705
Part 70 Permit No.: T 033-5941-00017

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:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE 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: Meridian Automotive Systems
Source Address: 320 South Wabash Avenue, Ashley, Indiana 46705
Mailing Address: 320 South Wabash Avenue, Ashley, Indiana 46705
Part 70 Permit No.: T 033-5941-00017

This form consists of 2 pages

Page 1 of 2

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- C** 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
 - C** The Permittee must submit notice in writing or by facsimile within two (2) 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 ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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: Meridian Automotive Systems
 Source Address: 320 South Wabash Avenue, Ashley, Indiana 46705
 Mailing Address: 320 South Wabash Avenue, Ashley, Indiana 46705
 Part 70 Permit No.: T 033-5941-00017
 Facility: Three (3) Paint Booths (SB-1 through SB-3)
 Parameter: VOC Usage
 Limit: Total of 99.9 tons per twelve (12) consecutive month period

YEAR: _____

Month	VOC (tons)	VOC (tons)	VOC (tons)
	This Month	Previous 11 Months	12 Month Total

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 Quarterly Report

Source Name: Meridian Automotive Systems
Source Address: 320 South Wabash Avenue, Ashley, Indiana 46705
Mailing Address: 320 South Wabash Avenue, Ashley, Indiana 46705
Part 70 Permit No.: T 033-5941-00017
Facility: Fifteen (15) Injection Molding Machines
Parameter: VOC emissions calculated with a three (3%) percent flashoff factor
Limit: Total of 139 tons per twelve (12) consecutive month period

YEAR: _____

Month	VOC (tons)	VOC (tons)	VOC (tons)
	This Month	Previous 11 Months	12 Month Total

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 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Meridian Automotive Systems
 Source Address: 320 South Wabash Avenue, Ashley, Indiana 46705
 Mailing Address: 320 South Wabash Avenue, Ashley, Indiana 46705
 Part 70 Permit No.: T 033-5941-00017

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

This report is an affirmation that the source has met all the requirements stated in this permit. 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".	
9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

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

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

Source Name: Meridian Automotive Systems
Source Location: 320 South Wabash Avenue, Ashley, Indiana 46705
County: Dekalb
SIC Code: 3089
Operation Permit No.: T 033-5941-00017
Permit Reviewer: Craig J. Friederich

On May 31, 2001, the Office of Air Quality (OAQ) had a notice published in the Auburn Evening Star, Auburn, Indiana, stating that Meridian Automotive Systems had applied for a Part 70 Operating Permit to operate a high-pressure fiberglass-reinforced plastics manufacturing and painting source. The notice also stated that OAQ proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating 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 Part 70 Operating Permit should be issued as proposed.

On June 26, 2001, Rod Schoon of Meridian Automotive Systems, Ashley Facility submitted comments on the proposed Part 70 Operating Permit. The comments are as follows: The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded**.

Comment 1:

The general information items recited in Parts A and D are correct as amended from the preliminary draft. We appreciate and support statements in the permit that identify which language is "informational" and not enforceable, that clarify which provisions are not federally enforceable, and that specify which submittals require or do not require certification.

Response 1:

Thank you for your commendation on IDEM, OAQ's permit language. Therefore, no changes to the proposed permit are necessary.

Comment 2:

Condition B.23 provides for the transfer of ownership or operational control. As we have discussed with you, the Permittee is currently negotiating the sale of this plant to a group of investors which includes the "Responsible Official" under the draft permit. Upon the closing of this sale, an administrative permit amendment will be requested. The Responsible Official is anticipated to remain the same after closing.

Response 2:

Upon completion of the sale of the source to a new owner, the new owner should submit a request to IDEM, OAQ for any changes in the pertinent company information, such as the mailing address, telephone numbers, etc. Therefore at this time, no changes to the proposed permit are required.

Comment 3:

The plant does not have threshold quantities of any regulated substances and consequently is not subject at this time to any requirements with respect to preparing a Risk Management Program (RMP) as required in Condition C.14.

Response 3:

Condition C.14 states that if a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit the items required under (a) and (b). Since Meridian Automotive Systems has stated that the source currently does not have threshold quantities of any regulated substances, the Permittee is not required to do anything further. However, if at a later time, the source does have more than a threshold quantity, this condition instructs the Permittee as to what needs to be submitted. Therefore, no changes are necessary to the proposed Condition C.14.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: Meridian Automotive Systems
Source Location: 320 South Wabash Avenue, Ashley, Indiana 46705
County: Dekalb
SIC Code: 3089
Operation Permit No.: T 033-5941-00017
Permit Reviewer: Craig J. Friederich

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Meridian Automotive Systems relating to the operation of a high-pressure fiberglass-reinforced plastics manufacturing and painting source.

History

Meridian Automotive Systems was previously Cambridge Industries and was permitted as Eagle Picher Plastics Division. Cambridge Industries submitted the Title V application on May 29, 2000.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) surface coating line, consisting of:
 - (1) One (1) prime booth and one (1) flashoff tunnel, identified as SB-1, PM overspray controlled by HVLP or electrostatic spray applicators, air atomization spray applicators and dry filters, installed in 1987, exhausted through Stack 2A, capacity: 10.25 gallons of coating per hour for SB-1, SB-2, and SB-3, total.
 - (2) One (1) first topcoat booth and one (1) flashoff tunnel, identified as SB-2, PM overspray controlled by HVLP or electrostatic spray applicators, air atomization spray applicators and dry filters, installed in 1987, exhausted through Stack 2B, capacity: 10.25 gallons of coating per hour for SB-1, SB-2, and SB-3, total.
 - (3) One (1) second topcoat booth and one (1) flashoff tunnel, identified as SB-3, PM overspray controlled by HVLP or electrostatic spray applicators, air atomization spray applicators and dry filters, installed in 1987, exhausted through Stack 2C, capacity: 10.25 gallons of coating per hour for SB-1, SB-2, and SB-3, total.
- (b) One (1) boiler, identified as BLRA, installed in 1979, using natural gas as a primary fuel and No. 2 fuel oil as a backup fuel, exhausted through Stack 5A, capacity: 8.4 million British thermal units per hour.
- (c) One (1) boiler, identified as BLRB, installed in 1975, using natural gas as a primary fuel and No. 2 fuel oil as a backup fuel, exhausted through Stack 5B, capacity: 4.2 million British

thermal units per hour.

- (d) One (1) natural gas-fired pyrolysis cleaning furnace, identified as AFT-1, rated at 0.35 million British thermal units per hour, installed in 1987, exhausted through Stack 7, capacity: 10 pounds of waste per hour.
- (e) One reinforced plastic molding press, identified as PR-109, installed prior to 1980. This press is used to punch holes in the molded SMC. There are no air emissions from this press.
- (f) One (1) 200-ton Hannifin reinforced plastic molding press, identified as PR-204, installed prior to 1980, capacity: 534 pounds of SMC per hour.
- (g) One (1) 250-ton Version reinforced plastic molding press, identified as PR-234, installed prior to 1980, capacity: 534 pounds of SMC per hour.
- (h) One (1) 300-ton Erie reinforced plastic molding press, identified as PR-346, installed prior to 1980, capacity: 168 pounds of SMC per hour.
- (i) One (1) 300-ton Erie reinforced plastic molding press, identified as PR-347, installed prior to 1980, capacity: 168 pounds of SMC per hour.
- (j) One (1) 350-ton Lawton reinforced plastic molding press, identified as PR-365, installed prior to 1980, capacity: 168 pounds of SMC per hour.
- (k) One (1) 400-ton Lawton reinforced plastic molding press, identified as PR-437, installed prior to 1980, capacity: 86 pounds of SMC per hour.
- (l) One (1) 400-ton Dake reinforced plastic molding press, identified as PR-440, installed prior to 1980, capacity: 86 pounds of SMC per hour.
- (m) One (1) 600-ton RHML reinforced plastic molding press, identified as PR-651, installed prior to 1980, capacity: 12 pounds of SMC per hour.
- (n) One (1) 600-ton RHML reinforced plastic molding press, identified as PR-654, installed prior to 1980, capacity: 12 pounds of SMC per hour.
- (o) One (1) 800-ton French reinforced plastic molding press, identified as PR-845, installed prior to 1980, capacity: 195 pounds of SMC per hour.
- (p) One (1) 1,000-ton EEMCO reinforced plastic molding press, identified as PR-1039, installed prior to 1980, capacity: 442 pounds of SMC per hour.
- (q) One (1) 1,000-ton Clearing reinforced plastic molding press, identified as PR-1056, installed in 1986, capacity: 355 pounds of SMC per hour.
- (r) One (1) 1,200-ton Dominoon reinforced plastic molding press, identified as PR-1252, installed in 1987, capacity: 99 pounds of SMC per hour.
- (s) One (1) 2,000-ton W-W-M reinforced plastic molding press, identified as PR-2053, installed prior to 1980, capacity: 454 pounds of SMC per hour.
- (t) One (1) 2,500-ton W-W-M reinforced plastic molding press, identified as PR-2560, installed

in 1984, capacity: 627 pounds of SMC per hour.

- (u) One (1) 3,000-ton Erie reinforced plastic molding press, identified as PR-3038, installed prior to 1980, capacity: 1,098 pounds of SMC per hour.

The following emission units were removed from service at the source:

- (v) One (1) reinforced plastic molding press, identified as PR-101.
- (w) One (1) cold cleaner, installed in 1987, exhausted through Stack 4.
- (x) One reinforced plastic molding press, identified as PR-324, installed prior to 1980.

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 new facilities proposed 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) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including:
 - (1) One (1) air make-up unit, identified as 60K, rated at 3.75 million British thermal units per hour, supplying heated air to the booths and flashoff tunnels.
 - (2) One (1) air make-up unit, identified as 100K, rated at 9.72 million British thermal units per hour supplying heated air to the booths and flashoff tunnels.
 - (3) One (1) air make-up unit, identified as 30K, rated at 2.64 million British thermal units per hour supplying heated air to the booths and flashoff tunnels.
 - (4) Two (2) water heaters, known as Tank #2 and #3 Water Heater, rated at 3.8 million British thermal units per hour, each.
 - (5) One (1) natural gas-fired topcoat bake oven, identified as SB-4, installed in 1987, exhausted through Stack 2D, rated at 2.5 million British thermal units per hour.
 - (6) One (1) natural gas-fired dry off oven, identified as DRY-OFF, rated at 2.2 million British thermal units per hour.
- (b) Combustion source flame safety purging on startup.
- (c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

- (d) The following VOC and HAP storage containers: vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
- (e) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (g) Heat exchanger cleaning and repair.
- (h) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (i) Paved and unpaved roads and parking lots with public access.
- (j) 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.
- (k) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (l) 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 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (m) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kiloPascals measured at 38EC).
- (n) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (o) One (1) five (5) stage parts washer, identified as WASHER, using non-VOC containing detergents to wash plastic parts prior to painting.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) OP 17-03-87-0097, issued on April 8, 1983;
- (b) Amendment to OP 17-03-87-0097, issued on April 28, 1983;
- (c) Exemption, issued on September 21, 1987; and
- (d) OP 17-01-92-0107, issued on June 24, 1988.

All conditions from previous approvals were incorporated into 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 29, 1996. Additional information was received on September 29 and November 6, 2000, January 15, February 17 and 23, March 12, April 18, April 30, and May 7, 2001.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A (pages 1 through 15 of 15) of this document for detailed emissions calculations. Note: emissions calculated for the closed molding operations were calculated using a 3% flash-off factor multiplied by the VOC content, as per AP-42 Table 4.4-2.

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	353
PM ₁₀	353
SO ₂	17.9
VOC	439
CO	14.9
NO _x	23.0

Note: For the purpose of determining Title V applicability for particulates, PM₁₀, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Arsenic	0.0002
Beryllium	0.0002
Cadmium	0.0002
Chromium	0.0001
Lead	0.0005
Mercury	0.0002
Manganese	0.0004
Nickel	0.0001
Selenium	0.0008
Benzene	0.0001
Dichlorobenzene	0.00005
Formaldehyde	0.004
Hexane	0.116
Toluene	34.7
Xylene	21.7
MEK	34.3
Ethyl benzene	5.45
Glycol Ethers	16.7
Hexamethylene Diisocyanate	0.001
MIBK	23.8
Styrene	177
Toluene 2,4-Diisocyanate	0.57
Additional HAPs From Insignificant Activities	5.00
TOTAL	319

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC and PM₁₀ are equal to or greater than one hundred (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 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 1998 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	not reported
PM ₁₀	not reported
SO ₂	not reported
VOC	106
CO	not reported
NO _x	not reported
HAPS	not reported

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 Operating Permit.

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Prime Booth (SB-1), Topcoat Booth (SB-2), Topcoat Booth (SB-3),	0.327	0.327	0.00	99.9	0.00	0.00	53.8
Seventeen (17) Molding Presses	0.00	0.00	0.00	139	0.00	0.00	139
One (1) Boiler, Identified As BLRA	0.526	0.526	11.2	0.202	3.09	5.26	0.069
One (1) Boiler, Identified As BLRB	0.263	0.263	5.60	0.101	1.55	2.63	0.035

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
One (1) Natural Gas-Fired Pyrolysis Cleaning Furnace	0.153	0.153	0.055	0.066	0.219	0.066	0.00
Insignificant Activities	25.0	25.0	1.00	10.0	10.0	15.0	5.00
Total Emissions	26.3	26.1	17.9	< 250	14.9	23.0	198

County Attainment Status

The source is located in Dekalb County.

Pollutant	Status
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Dekalb County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Dekalb County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (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 Emission Offset 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 two (2) boilers identified as BLRA and BLRB are not subject to NSPS Subpart Dc (40 CFR Part 60.40) and 326 IAC 12, because their capacities are less than 10 million British thermal units per hour.
- (b) The pyrolysis cleaning furnace, identified as AFT-1, is not subject to NSPS Subpart E (40 CFR Part 60.50) and 326 IAC 12, because the paint residues being combusted do not meet the definition of solid waste as defined by 40 CFR Part 60.51(b).
- (c) The pyrolysis cleaning furnace, identified as AFT-1, is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart EEE because the cleaning furnace is an industrial furnace process which is exempt from this rule.
- (d) The one (1) five (5) stage parts washer, identified as WASHER, which is used to wash plastic parts prior to painting, is not subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR 63.460), Subpart T, because it does not use any halogenated solvents. This unit uses non-VOC containing detergents.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

In order to remain a minor source pursuant to 326 IAC 2-2 (PSD), Meridian Automotive Systems has agreed to a source-wide VOC emissions limit of less than 250 tons per twelve (12) consecutive months, including insignificant activities.

326 IAC 2-4.1-1 (New Source Air Toxics Control)

This source was constructed prior to July 27, 1997. Therefore, the requirements of 326 IAC 2-4.1-1 do not apply.

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 PM and VOC. 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 Emissions 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%) 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 Part 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.

State Rule Applicability - Individual Facilities

326 IAC 6-2-3 (Particulate Emissions Limitations for Facilities Constructed prior to September 21, 1983)

- (a) The one (1) boiler, identified as BLRB, installed in 1975, using natural gas as a primary fuel and No. 2 fuel oil as a backup fuel, with a total heat input capacity of 4.2 million British thermal units per hour, must comply with the PM emission limitation of 326 IAC 6-2-3. This limitation is based on the following equation is given in 326 IAC 6-2-3:

$$Pt = C \times a \times h / 76.5 \times Q^{0.75} \times N^{0.25}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBTU) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter for a period not to exceed a sixty (60) minute time period.

N = Number of stacks in fuel burning operation.

a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 MMBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 MMBtu/hr heat input.

h = Stack height in feet.

For the one (1) boiler, identified as BLRB:

$$Pt = 50 \times 0.67 \times 25.0 / 76.5 \times (4.2)^{0.75} \times 1^{0.25} = 3.73 \text{ lb/MMBTU}$$

Pursuant to 326 IAC 6-2-3 (e), PM emissions shall in no case exceed 0.6 pound per million British thermal units heat input.

Based on Appendix A, the potential to emit PM emissions from the one (1) boiler limited to 0.6 pound PM per million British thermal units is 0.263 tons per year.

$$0.263 \text{ tons/yr} \times (2000 \text{ lbs/ton} / 8760 \text{ hrs/yr}) = 0.06 \text{ lb/hr}$$
$$(0.06 \text{ lb/hr} / 4.2 \text{ MMBtu/hr}) = 0.014 \text{ lb PM} / \text{MMBtu}$$

Therefore, the one (1) boiler identified as BLRB will comply with this rule.

- (b) The one (1) boiler, identified as BLRA, installed in 1979, using natural gas as a primary fuel and No. 2 fuel oil as a backup fuel, with a total heat input capacity of 8.4 million British thermal units per hour, must comply with the PM emission limitation of 326 IAC 6-2-3. This limitation is based on the following equation given in 326 IAC 6-2-3:

$$Pt = C \times a \times h / 76.5 \times Q^{0.75} \times N^{0.25}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter for a period not to exceed a sixty (60) minute time period.

N = Number of stacks in fuel burning operation.

a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 MMBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 MMBtu/hr heat input.

h = Stack height in feet.

For the one (1) boiler, identified as BLRA:

$$Pt = 50 \times 0.67 \times 25.0 / 76.5 \times (12.6)^{0.75} \times 2^{0.25} = 1.21 \text{ lbs/MMBtu}$$

Pursuant to 326 IAC 6-2-3 (e), PM emissions shall in no case exceed 0.6 pound per million British thermal units heat input.

Based on Appendix A, the potential to emit PM emissions from the one (1) boiler limited to 1.21 pounds PM per million British thermal units is 0.526 tons per year.

$$0.526 \text{ tons/yr} \times (2000 \text{ lbs/ton} / 8760 \text{ hrs/yr}) = 0.12 \text{ lb/hr}$$
$$(0.12 \text{ lb/hr} / 8.4 \text{ MMBtu/hr}) = 0.014 \text{ lb PM} / \text{MMBtu}$$

Therefore, the one (1) boiler identified as BLRA will comply with this rule.

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the one (1) surface coating line, consisting of:

- (1) One (1) prime booth and one (1) flashoff tunnel, identified as SB-1;
- (2) One (1) first topcoat booth and one (1) flashoff tunnel, identified as SB-2; and
- (3) One (1) second topcoat booth and one (1) flashoff tunnel, identified as SB-3;

shall be limited by the following:

Interpolation and extrapolation 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:

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

The dry filters shall be in operation at all times the three (3) paint booths are in operation, in order to comply with this limit.

326 IAC 7-1 (Sulfur Dioxide Emissions Limitations)

The potential to emit Sulfur Dioxide from each of the two (2) boilers, identified as BLRA and BLRB, is less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 7-1 are not applicable.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

- (a) The seventeen (17) SMC closed molding presses are not subject to the requirements of 326 IAC 8-1-6 because none of the presses were built after 1980 and have the potential to emit VOC greater than twenty-five (25) tons per year. There are three (3) presses built after 1980, they are PR-1056, built in 1986, PR-1252, built in 1987 and PR-2560, built in 1984. None of these presses have the potential to emit VOC greater than twenty-five (25) tons per year. Press PR-3038, which does have the potential to emit VOC greater than twenty-five (25) tons per year was constructed prior to 1980.
- (b) The three (3) surface coating booths, identified as SB-1 through SB-3, have the potential to emit volatile organic compounds (VOC) greater than twenty-five (25) tons per year. Therefore, these facilities are subject to Best Available Control Technology (BACT) requirements pursuant to this rule.

A top-down BACT analysis from Meridian Automotive Systems was received on January 15, 2001, with additional information received April 18, 2001, and evaluated three (3) options: coating material substitutions, coating applicators and add-on controls consisting of: solvent recovery, zeolite and carbon rotors, carbon adsorbers, recirculation, recuperative incineration, regenerative incineration, and catalytic incineration.

The capital costs and annual operating costs required for the incinerators are not economically feasible for Meridian Automotive Systems. The range of cost in 1988 dollars per tons removed using a baseline of 99.9 tons per year for the entire surface coating line was \$5,290 per ton associated with recuperative incineration on the oven exhaust only closely followed by \$5,484 per ton associated with recuperative incineration for the two (2)

top coat booths combined, to \$79,860 per ton associated with regenerative incineration on the prime booth. Recirculation is a technique applied to paint spray booth exhaust to concentrate the solvent laden exhaust and reduce the total gas volume treated. Due to the high concentration build-up in the booth, recirculation is not commonly used for manual spraying operations because of worker exposure.

In practice, about 80% of the exhaust is recirculated, with 20% bled off to the control system. Concentrations may approach 25% of the lower explosive limit (LEL), but may be kept as low as 10% of the LEL. These levels are much greater than acceptable Threshold Limit Levels established by OSHA for worker health (8 hour time weighted average). For example, data for two (2) of the most prevalent paint solvents used – toluene and methyl ethyl ketone – are shown below. The LELs are typically expressed as a percentage of gas exhaust (1% = 10,000 ppm), whereas TLVs are expressed in parts per million (ppm). For some compounds, Short Term Exposure Limits (STELs), have been established which describe a maximum concentration that workers should avoid (15 minute exposure), even when the TLV is met.

Solvent Compound	TLV (ppm)¹	STE (ppm)¹	LEL (% by volume)²	10% LEL (ppm)
Toluene	50	(NA)	1.17 (11,700 ppm)	1, 170
Methyl Ethyl Ketone (MEK)	200	300	2.05 (20,500 ppm)	2,050

(1) Threshold Limit Values for Chemical Substances and Physical Agents, 2nd Printing, 1996, American Conference of American Industrial Hygienists

(2) Industrial Hygiene & Toxicology; Patty, Frank, A.; 1958, Interscience Publishers, Inc.; New York; pp. 515-516, Table 10.

As shown, the recirculated booth air concentration (10% of LEL or greater) is several orders of magnitude greater than the OSHA prescribed safe levels. If Meridian Automotive Systems attempted this control approach, it would either have to re-equip its booths with robotic spray apparatus, or the workers would have to be protected with full body pressurized suits and individual air supplies. While the latter has been done in some special situations, it is unpopular with workers and not a method of choice. For all these reasons, recirculation is not a viable technical option. The use of zeolite and carbon rotors was also not economically feasible.

(c) BACT for the three (3) surface coating booths, identified as SB-1 through SB-3, has been determined to be:

- (1) The potential VOC delivered to the applicators shall be limited to a total of 99.9 tons per twelve (12) consecutive month period for the three (3) surface coating booths, identified as SB-1 through SB-3.
- (2) The method of application at the three (3) surface coating booths, identified as SB-1 through SB-3, shall be performed with high volume-low pressure (HVLP) spray applicators or electrostatic applicators;
- (3) The use of medium (41-50%) and high (no less than 51%) solids content coatings, except the use of coatings with a volume percent solids of no less than 38% can

be used if required by military specifications; and

- (4) The following management and work practices shall apply:
- (A) Operator training course.
 - (B) Spray gun cleaning.
 - (C) The cleanup solvent containers used to transport solvent from drums to work stations be closed containers having soft gasketed closures.
 - (D) The application equipment operators shall be instructed and trained on the methods and practices utilized to minimize spillage on the floor and over application.
 - (E) Storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.
 - (F) Cleanup solvents will be reused in the process as much as possible to reduce hazardous waste and the related impact on the environment.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

The requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating) are not applicable to the one (1) surface coating line because fiberglass reinforced plastic parts are being coated. There are no metal parts being coated at this source.

326 IAC 8-6 (Organic Solvent Emission Limitations)

Pursuant to 326 IAC 8-6-2 (Organic Solvent Emission Limitations: limits; exemptions), the molding presses (PR-204, 234, 346, 347, 365, 437, 440, 651, 654, 845, 1039, 2053 and 3038), all constructed prior to January 1, 1980, having a potential VOC emission greater than one -hundred (100) tons per year are exempt from this rule because these facilities do not include diluents which are used as solvents, viscosity reducers, carrying agents, and cleaning agents.

State Rule Applicability - Insignificant Activities

326 IAC 8-3 (Organic Solvent Degreasing Operations)

The five (5) stage parts washer is not subject to the requirements of 326 IAC 8-3 because this washer uses non-VOC containing detergents to wash plastic parts prior to painting.

Testing Requirements

There is no testing required at this source. Emission calculations are based on AP-42 emission factors, usage, and information from Material Safety Data Sheets.

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 and federal 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:

- (a) The three (3) paint booths, identified as SB-1 through SB-3 have applicable compliance monitoring conditions as specified below:
 - (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters for paint booths SB-1 through SB-3. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while the spray 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 Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
 - (2) Monthly inspections shall be performed of the coating emissions from the paint booth stack exhausts, known as Stacks 2A, 2B, and 2C for 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 an overspray emission, evidence of overspray emission, or other abnormal 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 Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
 - (3) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for the three (3) paint booths must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations). and 326 IAC 2-7 (Part 70).

Conclusion

The operation of this high-pressure fiberglass-reinforced plastics manufacturing and painting source shall be subject to the conditions of the attached proposed **Part 70 Permit No. T 033-5941-00017**.

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Meridian Automotive Systems
Address City IN Zip: 320 South Wabash Avenue, Ashley, IN 46705
Part 70: T 033-5941
Plt ID: 033-00017
Reviewer: Craig J. Friederich
Date: May 29, 1996

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
Prime Booth (SB-1), Topcoat Booth (SB-2), Topcoat Booth (SB-3)																
E67AC17 Primer	9.49	37.00%	0.0%	37.0%	0.0%	25.00%	10.25	1.000	3.52	3.52	36.08	865.92	158.03	201.31	14.05	25%
E75AC601 Primer	9.42	32.00%	0.0%	32.0%	0.0%	56.00%	10.25	1.000	3.05	3.05	31.26	750.30	136.93	215.68	5.38	25%
E75D2301 Primer	9.43	32.00%	0.0%	32.0%	0.0%	55.00%	10.25	1.000	3.05	3.05	31.26	750.30	136.93	215.91	5.49	25%
E61AB1801 Primer	10.13	54.00%	0.0%	54.0%	0.0%	26.00%	10.25	1.000	5.48	5.48	56.17	1348.08	246.02	156.90	21.04	25%
BC-17 Primer	9.16	47.00%	0.0%	47.0%	0.0%	25.00%	10.25	1.000	4.27	4.27	43.77	1050.42	191.70	163.47	17.22	25%
F63GC32 (JD Green)	8.22	43.00%	0.0%	43.0%	0.0%	49.00%	10.25	1.000	3.56	3.56	36.49	875.76	159.83	157.76	7.21	25%
F63B70 (Buck Brown)	11.47	30.00%	0.0%	30.0%	0.0%	53.00%	10.25	1.000	3.41	3.41	34.95	838.86	153.09	270.35	6.49	25%
PPE0003 (Toyota Orange)	9.12	43.00%	0.0%	43.0%	0.0%	45.00%	10.25	1.000	3.96	3.96	40.59	974.16	177.78	175.04	8.71	25%
KAA0045 (Toyota Grey)	9.97	37.00%	0.0%	37.0%	0.0%	48.00%	10.25	1.000	3.67	3.67	37.62	902.82	164.76	211.49	7.69	25%
F63LC45 (NH Blue)	8.23	44.00%	0.0%	44.0%	0.0%	49.00%	10.25	1.000	3.62	3.62	37.12	890.82	162.57	155.18	7.39	25%
F63BC67 (NH Black)	10.39	33.00%	0.0%	33.0%	0.0%	51.00%	10.25	1.000	3.42	3.42	35.06	841.32	153.54	234.40	6.72	25%
F63R64 (Terra Cotta)	8.41	43.00%	0.0%	43.0%	0.0%	49.00%	10.25	1.000	3.59	3.59	36.80	883.14	161.17	161.41	7.38	25%
F63LC53 (New Blue)	8.20	44.00%	0.0%	44.0%	0.0%	49.00%	10.25	1.000	3.61	3.61	36.98	887.57	161.98	154.62	7.36	25%
SP74 (Purge Solvent)	6.81	10.00%	0.0%	10.0%	0.0%	0.00%	2.10	1.000	0.68	0.68	1.43	34.32	6.26	56.37	n/a	n/a

State Potential Emissions	Add worst case coating to all solvents	PM	Control Efficiency	99.90%			
		Uncontrolled	Controlled	57.6	1382	252	327
				57.6	1382	252	0.327

METHODOLOGY

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

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Meridian Automotive Systems, Inc.
Address City IN Zip: 320 South Wabash Avenue, Ashley, IN 46705
Part 70: T 033-5941
Plt ID: 033-00017
Reviewer: Craig J. Friederich
Date: May 29, 1996

Material (As Applied)	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MEK	Weight % MIBK	Weight % Ethyl Benzene	Weight % Glycol Ethers	Weight % Hexamethylene Diisocyanate	Weight % Toluene-2,4-d iisocyanate	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	MEK Emissions (tons/yr)	MIBK Emissions (tons/yr)	Ethyl Benzene Emissions (tons/yr)	Glycol Ethers Emissions (tons/yr)	Hexamethylene Diisocyanate Emissions (tons/yr)	Toluene-2,4-diisocyanate Emissions (tons/yr)
Prime Booth (SB-1), Topcoat Booth (SB-2), Topcoat Booth (SB-3)																			
E67AC17 Primer	9.49	10.25000	1.000	1.40%	1.40%	4.19%	5.59%	0.00%	2.10%	0.00%	0.03%	5.96	5.96	17.85	23.82	0.00	8.95	0.0000	0.13
F63GC32 (JD Green)	8.22	10.25000	1.000	5.89%	5.07%	0.00%	5.85%	1.33%	0.00%	0.04%	0.00%	21.74	18.71	0.00	21.59	4.91	0.00	0.0011	0.00
F63B70 (Buck Brown)	11.47	10.25000	1.000	1.52%	3.63%	0.00%	0.00%	0.00%	0.00%	0.11%	0.00%	7.83	18.69	0.00	0.00	0.00	0.00	0.0000	0.57
E75AC601 Primer	9.42	10.25000	1.000	0.00%	0.89%	4.32%	1.84%	0.00%	2.38%	0.00%	0.00%	0.00	3.76	18.27	7.78	0.00	10.07	0.0000	0.00
PE0003 (Toyota Orange)	9.12	10.25000	1.000	2.88%	0.00%	0.86%	0.00%	0.58%	3.75%	0.00%	0.00%	11.79	0.00	3.52	0.00	2.37	15.35	0.0000	0.00
AA0045 (Toyota Grey)	9.97	10.25000	1.000	0.00%	0.00%	0.79%	0.00%	0.00%	3.73%	0.00%	0.00%	0.00	0.00	3.54	0.00	0.00	16.70	0.0000	0.00
E75D2301 Primer	9.43	10.25000	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.0000	0.00
E61AB1801 Primer	10.13	10.25000	1.000	1.90%	7.62%	0.00%	3.80%	0.00%	0.00%	0.00%	0.02%	8.64	34.65	0.00	17.28	0.00	0.00	0.0000	0.09
BC-17 Primer	9.16	10.25000	1.000	2.31%	0.00%	8.33%	2.80%	0.00%	3.63%	0.00%	0.04%	9.50	0.00	34.26	11.51	0.00	14.93	0.0000	0.16
F63LC45 (NH Blue)	8.23	10.25000	1.000	5.24%	5.36%	0.00%	3.93%	1.47%	0.00%	0.04%	0.00%	19.36	19.80	0.00	14.52	5.43	0.00	0.0009	0.00
F63BC67 (NH Black)	10.39	10.25000	1.000	2.17%	2.07%	0.00%	4.59%	0.61%	0.00%	0.02%	0.00%	10.12	9.66	0.00	21.41	2.85	0.00	0.0002	0.00
F63R64 (Terra Cotta)	8.41	10.25000	1.000	5.13%	5.33%	0.00%	3.85%	1.44%	0.00%	0.04%	0.00%	19.37	20.12	0.00	14.54	5.44	0.00	0.0009	0.00
F63LC53 (New Blue)	8.20	10.25000	1.000	5.26%	5.37%	0.00%	3.95%	1.48%	0.00%	0.04%	0.00%	19.36	19.77	0.00	14.54	5.45	0.00	0.0009	0.00
SP74 (Purge Solvent)	6.81	2.10000	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.0000	0.00
Individual Total												21.7	34.7	34.3	23.8	5.45	16.7	0.001	0.566
Overall Total												137							

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Small Industrial Boiler

Company Name: Meridian Automotive Systems
Address City IN Zip: 320 South Wabash Avenue, Ashley, IN 46705
Part 70: T 033-5941
Plt ID: 033-00017
Reviewer: Craig J. Friederich
Date: May 29, 1996

One (1) Boiler Identified as BLRA

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
8.40	73.58

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.070	0.280	0.022	3.68	0.202	3.09

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

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

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 5 for HAPs emissions calculations.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Small Industrial Boiler

HAPs Emissions

Company Name: Meridian Automotive Systems

Address City IN Zip: 320 South Wabash Avenue, Ashley, IN 46705

Part 70: T 033-5941

Plt ID: 033-00017

Reviewer: Craig J. Friederich

Date: May 29, 1996

One (1) Boiler Identified as BLRA

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	7.73E-05	4.42E-05	2.76E-03	6.62E-02	1.25E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total HAPs
Potential Emission in tons/yr	1.84E-05	4.05E-05	5.15E-05	1.40E-05	7.73E-05	0.069

Methodology is the same as page 4.

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

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

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Small Industrial Boiler

Company Name: Meridian Automotive Systems
Address City IN Zip: 320 South Wabash Avenue, Ashley, IN 46705
Part 70: T 033-5941
Plt ID: 033-00017
Reviewer: Craig J. Friederich
Date: May 29, 1996

One (1) Boiler Identified as BLRB

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
4.20	36.79

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.035	0.140	0.011	1.84	0.101	1.55

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

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

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 7 for HAPs emissions calculations.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Small Industrial Boiler

HAPs Emissions

Company Name: Meridian Automotive Systems

Address City IN Zip: 320 South Wabash Avenue, Ashley, IN 46705

Part 70: T 033-5941

Plt ID: 033-00017

Reviewer: Craig J. Friederich

Date: May 29, 1996

One (1) Boiler Identified as BLRB

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.86E-05	2.21E-05	1.38E-03	3.31E-02	6.25E-05

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total HAPs
Potential Emission in tons/yr	9.20E-06	2.02E-05	2.58E-05	6.99E-06	3.86E-05	0.035

Methodology is the same as page 6.

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

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

**Appendix A: Emission Calculations
Pyrolysis Cleaning Furnace**

Company Name: Meridian Automotive Systems
Address City IN Zip: 320 South Wabash Avenue, Ashley, IN 46705
Part 70: T 033-5941
Plt ID: 033-00017
Reviewer: Craig J. Friederich
Date: May 29, 1996

Pyrolysis Cleaning Furnace

<p align="center">THROUGHPUT lbs/hr 10.00</p>

THROUGHPUT
tons/yr
43.8

Emission Factor in lb/ton	POLLUTANT				
	PM	SO2	CO	VOC	NOX
Potential Emissions in ton/yr	7.0	2.5	10.0	3.0	3.0
	0.153	0.055	0.219	0.066	0.066

Methodology

Emission factors are from AP 42 (5th Edition 1/95) Table 2.1-12, Uncontrolled emission factors for industrial/commercial refuse combustors, multiple chambers
Throughput (lb/hr) * 8760 hr/yr * ton/2000 lb = throughput (ton/yr)

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Combustion Emissions From Insignificant Activities

Company Name: Meridian Automotive Systems

Address City IN Zip: 320 South Wabash Avenue, Ashley, IN 46705

Part 70: T 033-5941

Plt ID: 033-00017

Reviewer: Craig J. Friederich

Date: May 29, 1996

Insignificant Activities

		Unit	Rating
Heat Input Capacity	Potential Throughput	Air Make-Up 60K	3.75
MMBtu/hr	MMCF/yr	Air Make-Up 60K	9.72
		Air Make-Up 60K	2.64
		Two Water Heaters	3.8 each
		Topcoat Bake Oven	2.5
		Dry-Off Oven	2.2

28.41

248.87

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.236	0.946	0.075	12.4	0.684	10.5

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

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

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 10 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Combustion Emissions From Insignificant Activities
MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions

Company Name: Meridian Automotive Systems
Address City IN Zip: 320 South Wabash Avenue, Ashley, IN 46705
Part 70: T 033-5941
Plt ID: 033-00017
Reviewer: Craig J. Friederich
Date: May 29, 1996

Unit	Rating
Air Make-Up 60K	3.75
Air Make-Up 60K	9.72
Air Make-Up 60K	2.64
Two Water Heaters	3.8 each
Topcoat Bake Oven	2.5
Dry-Off Oven	2.2

Insignificant Activities

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.61E-04	1.49E-04	9.33E-03	2.24E-01	4.23E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total HAPS
Potential Emission in tons/yr	6.22E-05	1.37E-04	1.74E-04	4.73E-05	2.61E-04	0.235

Methodology is the same as page 9.

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

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil

Company Name: Meridian Automotive Systems
Address, City IN Zip: 320 South Wabash Avenue, Ashley, IN 46705
Part 70: T 033-5941
Plt ID: 033-00017

***Fuel Oil As Back-Up** **Reviewer:** Craig J. Friederich
One (1) Boiler Identified as BLRA **Date:** May 29, 1996

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	S = Weight % Sulfur <table border="1"><tr><td>0.3</td></tr></table>	0.3
0.3			
<table border="1"><tr><td>8.40</td></tr></table>	8.40	525.6	
8.40			

Emission Factor in lb/kgal	Pollutant				
	PM*	SO2	NOx	VOC	CO
	2.0	42.6 (142.0S)	20.0	0.34	5.0
Potential Emission in tons/yr	0.526	11.2	5.26	0.089	1.31

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)

*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

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

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 12 for HAPs emission calculations.

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil
HAPs Emissions

Company Name: Meridian Automotive Systems
Address, City IN Zip: 320 South Wabash Avenue, Ashley, IN 46705
Part 70: T 033-5941
Plt ID: 033-00017
Reviewer: Craig J. Friederich
Date: May 29, 1996

***Fuel Oil As Back-Up**

One (1) Boiler Identified as BLRA

HAPs - Metals

Emission Factor in lb/mmBtu	Arsenic 4.0E-06	Beryllium 3.0E-06	Cadmium 3.0E-06	Chromium 3.0E-06	Lead 9.0E-06
Potential Emission in tons/yr	1.47E-04	1.10E-04	1.10E-04	1.10E-04	3.31E-04

HAPs - Metals (continued)

Emission Factor in lb/mmBtu	Mercury 3.0E-06	Manganese 6.0E-06	Nickel 3.0E-06	Selenium 1.5E-05	Total HAPS
Potential Emission in tons/yr	1.10E-04	2.21E-04	1.10E-04	5.52E-04	0.002

Methodology

No data was available in AP-42 for organic HAPs.

Potential Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil

Company Name: Meridian Automotive Systems
Address, City IN Zip: 320 South Wabash Avenue, Ashley, IN 46705
Part 70: T 033-5941
Plt ID: 033-00017
***Fuel Oil As Back-Up**
One (1) Boiler Identified as BLRB **Reviewer:** Craig J. Friederich
Date: May 29, 1996

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	S = Weight % Sulfur <table border="1"><tr><td>0.3</td></tr></table>	0.3
0.3			
<table border="1"><tr><td>4.20</td></tr></table>	4.20	262.8	
4.20			

Emission Factor in lb/kgal	Pollutant				
	PM*	SO2	NOx	VOC	CO
	2.0	42.6 (142.0S)	20.0	0.34	5.0
Potential Emission in tons/yr	0.263	5.60	2.63	0.045	0.657

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)

*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

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

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 14 for HAPs emission calculations.

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil
HAPs Emissions

Company Name: Meridian Automotive Systems
Address, City IN Zip: 320 South Wabash Avenue, Ashley, IN 46705
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***Fuel Oil As Back-Up Plt ID: 033-00017**
One (1) Boiler Identified as BLRB Reviewer: Craig J. Friederich
Date: May 29, 1996

HAPs - Metals

Emission Factor in lb/mmBtu	Arsenic 4.0E-06	Beryllium 3.0E-06	Cadmium 3.0E-06	Chromium 3.0E-06	Lead 9.0E-06
Potential Emission in tons/yr	7.36E-05	5.52E-05	5.52E-05	5.52E-05	1.66E-04

HAPs - Metals (continued)

Emission Factor in lb/mmBtu	Mercury 3.0E-06	Manganese 6.0E-06	Nickel 3.0E-06	Selenium 1.5E-05	Total HAPS
Potential Emission in tons/yr	5.52E-05	1.10E-04	5.52E-05	2.76E-04	0.001

Methodology

No data was available in AP-42 for organic HAPs.

Potential Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton

Company Name: Meridian Automotive Systems
Address City IN Zip: 320 South Wabash Avenue, Ashley, IN 46705
Part 70: T 033-5941
Plt ID: 033-00017
Reviewer: Craig J. Friederich
Date: May 29, 1996

Summary of Emissions

Uncontrolled Potential Emissions

Emission Unit	PM (tons/yr)	PM-10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	HAPS (tons/yr)
Three (3) Spray Booths	327	327	0	0	252	0	137
Fifteen (15) Molding Machines	0	0	0	0	176	0	176
One (1) Boiler (BLRA)	0.526	0.526	11.2	5.26	0.202	3.09	0.069
One (1) Boiler (BLRB)	0.263	0.263	5.6	2.63	0.101	1.55	0.035
Pyrolosis Cleaning Furnace	0.153	0.153	0.055	0.066	0.066	0.219	0
Insignificant Activities	25	25	1	15	10	10	5
Total	353	353	17.9	23.0	438	14.9	318

Controlled Emissions (Including All Limits)

Emission Unit	PM (tons/yr)	PM-10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	HAPS (tons/yr)
Three (3) Spray Booths	0.327	0.327	0.000	0.000	99.9	0.000	53.8
Fifteen (15) Molding Machines	0.000	0.000	0.000	0.000	139	0.000	139
One (1) Boiler (BLRA)	0.526	0.526	11.2	5.26	0.202	3.09	0.069
One (1) Boiler (BLRB)	0.263	0.263	5.60	2.63	0.101	1.55	0.035
Pyrolosis Cleaning Furnace	0.153	0.153	0.055	0.066	0.066	0.219	0.000
Insignificant Activities	25.0	25.0	1.00	15.0	10.0	10.0	5.00
Total	26.3	26.3	17.9	23.0	249	14.9	198