

**PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT
and ANDERSON OFFICE OF AIR MANAGEMENT**

**Paint and Assembly Corporation
SR 37 and Brickyard Road
Elwood, Indiana 46036**

(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 and 326 IAC 2-1-3.2 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.: T095-6536-00044	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

SECTION A

SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a motor vehicle plastic and metal parts coating source.

Responsible Official: James Maus
Source Address: SR 37 and Brickyard Road, Elwood, Indiana 46036
Mailing Address: P.O. Box 496, Elwood, Indiana 46036
SIC Code: 3714
County Location: Madison
County 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) Spray Coating Line:

- (1) One (1) coating booth, identified as Paint Booth #1, coating a maximum of 240 plastic parts per hour, equipped with an electrostatic air atomization spray application system and a waterwash particulate matter overspray control system, exhausting at three (3) stacks identified as E1A, E1B, and E1C;
- (2) One (1) coating booth, identified as Paint Booth #2, coating a maximum of 240 plastic parts per hour, equipped with an electrostatic air atomization spray application system and a waterwash particulate matter overspray control system, exhausting at three (3) stacks identified as E2A, E2B, and E2C;
- (3) One (1) coating booth, identified as Paint Booth #3, coating a maximum of 240 plastic parts per hour or using a maximum of 8 gallons of clear coat per hour when coating plastic automotive bumper covers, equipped with both an air assisted airless spray application system used when coating plastic automotive bumper covers and an electrostatic air atomization spray application system used when coating all other plastic parts, and a waterwash particulate matter overspray control system, exhausting at two (2) stacks identified as E3A and E3B;
- (4) One (1) coating booth, identified as Paint Booth #4, coating a maximum of 240 plastic parts per hour or using a maximum of 8 gallons of clear coat per hour when coating plastic automotive bumper covers, equipped with both an air assisted airless spray application system used when coating plastic automotive bumper covers and an electrostatic air atomization spray application system used when coating all other plastic parts, and a waterwash particulate matter overspray control system, exhausting at two (2) stacks identified as E4A and E4B;

- (5) One (1) coating booth, identified as the Adhesion Promoter Booth, coating a maximum of 240 plastic parts per hour, equipped with an electrostatic air atomization spray application system and a waterwash particulate matter overspray control system, exhausting at two (2) stacks identified as ADB1A and ADB1B; and
 - (6) One (1) coating booth, identified as the Primer Booth, coating a maximum of 240 plastic parts per hour, equipped with an electrostatic air atomization spray application system and a waterwash particulate matter overspray control system, exhausting at three (3) stacks identified as PB1A, PB1B, and PB1C; and
- (b) Dip Coating Line:
- (1) Three (3) dip tanks identified as Dip Tank #1, Dip Tank #2 and Dip Tank #3 coating a total of 1,560 metal parts per hour, each equipped with a drain back and cover, all exhausting at one (1) stack identified as PDRE.

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) Coating materials test booth.
- (b) One (1) natural gas direct fired bake oven consisting of five (5) separate combustion zones identified as OPS-new (1.0 MMBtu/hr, rated), O1-new (3.5 MMBtu/hr, rated), O2-new (3.5 MMBtu/hr, rated), O3-new (3.5 MMBtu/hr, rated), and QZS-new (1.0 MMBtu/hr, rated), with a total heat input rate of 12.5 MMBtu/hr, all exhausting through four (4) stacks identified as ADOE1, ADOE2, ADEP1 and ADEP2.

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 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

B.2 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, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and Anderson Office of Air Management.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.
- (c) All terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by Anderson Office of Air Management.

B.5 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.6 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.7 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.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (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 Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

- (b) The Permittee shall furnish to IDEM, OAM, and Anderson Office of Air Management within a reasonable time, any information that IDEM, OAM, and Anderson Office of Air Management 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.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, and Anderson Office of Air Management, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, and Anderson Office of Air Management along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 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 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.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, 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, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 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 certification 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 Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

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, OAM, and Anderson Office of Air Management on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
 - (5) Any insignificant activity that has been added without a permit revision; and
 - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, 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.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) 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;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP 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 Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, and Anderson Office of Air Management upon request and shall be subject to review and approval by IDEM, OAM, and Anderson Office of Air Management.

B.13 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, OAM, and Anderson Office of Air Management 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 Management,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

Telephone Number: 317-646-9835 or -9836 (Anderson Office of Air
Management)
Facsimile Number: 317-646-9657

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

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

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

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) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) IDEM, OAM, and Anderson Office of Air Management may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.

- (f) Failure to notify IDEM, OAM, and Anderson Office of Air Management by telephone or facsimile of an emergency lasting more than one (1) hour in compliance 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.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. 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:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (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, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, and Anderson Office of Air Management, 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.

- (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, OAM, and Anderson Office of Air Management have 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, OAM, and Anderson Office of Air Management have issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 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.16 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 Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

within ten (10) calendar days from the date of the discovery of the deviation.

- (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) An emergency as defined in 326 IAC 2-7-1(12); or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

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

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 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)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, and Anderson Office of Air Management 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, OAM, and Anderson Office of Air Management 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, OAM, and Anderson Office of Air Management at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, and Anderson Office of Air Management may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and Anderson Office of Air Management 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).

Request for renewal shall be submitted to:

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

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

- (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, OAM, and Anderson Office of Air Management on or before the date it is due. [326 IAC 2-5-3]
- (2) If IDEM, OAM, and Anderson Office of Air Management, 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, OAM, and Anderson Office of Air Management, 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, OAM, and Anderson Office of Air Management, 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, OAM, and Anderson Office of Air Management 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.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with 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 Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

- (c) The Permittee may implement the 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.20 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.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(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) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

- (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 approval required by 326 IAC 2-1 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 Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

and

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

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

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

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

- (b) 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 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, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, Anderson Office of Air Management, 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, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, 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.
[326 IAC 2-7-6(6)]

- (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, Anderson Office of Air Management, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, Anderson Office of Air Management, nor an authorized representative, may disclose the information unless and until IDEM, OAM, or Anderson Office of Air Management makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
- (2) The Permittee, IDEM, OAM, *and* Anderson Office of Air Management acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, and Anderson Office of Air Management, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. 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).
- (c) IDEM, OAM, and Anderson Office of Air Management shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, and Anderson Office of Air Management, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.27 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

B.28 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]

Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non compliance.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Major Source

Pursuant to A095-5819-00044, issued May 23, 1996, the total source emissions of volatile organic compounds (VOC) shall be limited to less than 250 tons per 365 consecutive day period. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

C.2 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.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a) (2)(A) and (B) are not federally enforceable.

C.5 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.

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

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

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

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 unit vented to the control equipment is in operation.

C.8 Stack Height [326 IAC 1-7]

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

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(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 Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

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 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 mandatory 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 is federally enforceable.

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

C.10 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 methods approved by IDEM, OAM.

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 Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.11 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

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

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

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).

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 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.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

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

The ERP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAM, and Anderson Office of Air Management, 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, OAM, and Anderson Office of Air Management, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

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

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the 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); and
 - (3) A verification to IDEM, OAM, and Anderson Office of Air Management that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, and Anderson Office of Air Management that the Risk Management Plan is being properly implemented.

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.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]
[326 IAC 1-6]

- (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. This compliance monitoring plan is comprised of:
- (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 (Monitoring Data Availability, 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, OAM and Anderson Office of Air Management upon request and shall be subject to review and approval by IDEM, OAM, and Anderson Office of Air Management. 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) Response steps that will 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 such 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, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. 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 or;
 - (3) An automatic measurement was taken when the process was not operating; or

- (4) The process has already returned 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.

**C.17 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 corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (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, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

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

- (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) Contain actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Contain actual emissions of other regulated pollutants 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 Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

- (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, OAM, and Anderson Office of Air Management on or before the date it is due.

C.19 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM and Anderson Office of Air Management may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data 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 and available upon the request of an IDEM, OAM, and Anderson Office of Air Management representative.

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 written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.

- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

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

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

- (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 Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

- (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, OAM, and Anderson Office of Air Management on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B - Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) 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.

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).

Stratospheric Ozone Protection

C.22 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 Descriptions [326 IAC 2-7-5(15)]:

(a) Spray Coating Line:

- (1) One (1) coating booth identified as Paint Booth #1 coating a maximum of 240 plastic parts per hour, equipped with an electrostatic air atomization spray application system and a waterwash particulate matter overspray control system, exhausting at three (3) stacks identified as E1A, E1B, and E1C;
- (2) One (1) coating booth identified as Paint Booth #2 coating a maximum of 240 plastic parts per hour, equipped with an electrostatic air atomization spray application system and a waterwash particulate matter overspray control system, exhausting at three (3) stacks identified as E2A, E2B, and E2C;
- (3) One (1) coating booth identified as Paint Booth #3 coating a maximum of 240 plastic parts per hour or using a maximum of 8 gallons of clear coat per hour when coating plastic automotive bumper covers, equipped with both an air assisted airless spray application system used when coating plastic automotive bumper covers and an electrostatic air atomization spray application system used when coating all other plastic parts, and a waterwash particulate matter overspray control system, exhausting at two (2) stacks identified as E3A and E3B;
- (4) One (1) coating booth identified as Paint Booth #4 coating a maximum of 240 plastic parts per hour or using a maximum of 8 gallons of clear coat per hour when coating plastic automotive bumper covers, equipped with both an air assisted airless spray application system used when coating plastic automotive bumper covers and an electrostatic air atomization spray application system used when coating all other plastic parts, and a waterwash particulate matter overspray control system, exhausting at two (2) stacks identified as E4A and E4B;
- (5) One (1) coating booth, identified as the Adhesion Promoter Booth, coating a maximum of 240 plastic parts per hour, equipped with an electrostatic air atomization spray application system and a waterwash particulate matter overspray control system, exhausting at two (2) stacks identified as ADB1A and ADB1B; and
- (6) One (1) coating booth, identified as the Primer Booth, coating a maximum of 240 plastic parts per hour, equipped with an electrostatic air atomization spray application system and a waterwash particulate matter overspray control system, exhausting at three (3) stacks identified as PB1A, PB1B, and PB1C.

(b) Dip Coating Line:

Three (3) dip tanks identified as Dip Tank #1, Dip Tank #2 and Dip Tank #3 coating a total of 1,560 metal parts per hour, each equipped with a drain back and cover, all exhausting at one (1) stack identified as PDRE.

and the following specifically regulated insignificant activity, as defined in 326 IAC 2-7-1(21):

(a) Coating materials test booth.

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

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

Pursuant to 326 IAC 8-1-6 (New Facilities: General Reduction Requirements), the best available control technology (BACT) for the Spray Coating Line shall be as follows:

- (a) The surface coating applied to plastic automotive bumper covers in Paint Booth Nos. 3 and 4 shall utilize an air assisted airless spray application system.

- (b) The surface coating applied to all other plastic parts in any Spray Coating Line booth shall utilize an electrostatic spray application system.
- (c) The total clear coat paint usage shall not exceed eight (8) gallons per day when coating plastic automotive bumper covers in Paint Booth Nos. 3 and 4.
- (d) The total volatile organic compound (VOC) input usage to the Spray Coating Line (i.e., Paint Booth Nos.1 - 4, the Adhesion Promoter Booth and the Primer Booth), including solvent usage, minus the VOC solvent shipped out, shall be limited to 241.0 tons per twelve (12) consecutive month period.
- (e) The VOC content of any coating applied shall be limited to 6.5 pounds per gallon, less water.

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

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating applied at the Dip Coating Line shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air (less than 90EC or 194EF) dried coatings.
- (b) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.3 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The total volatile organic compound (VOC) input usage to source-wide surface coating (i.e, the Spray Coating Line inclusive of Paint Booth Nos. 1 - 4, the Adhesion Promoter Booth and the Primer Booth; the Dip Coating Line inclusive of Dip Tank Nos. 1 - 3; and the coating materials test booth), including solvent usage, minus the VOC solvent shipped out, shall be limited to 247.7 tons per twelve (12) consecutive month period. This input limitation is equivalent to source-wide VOC emissions of less than 250 tons per twelve (12) consecutive month period and compliance with this limit makes 326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration) not applicable.

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the PM from the Spray Coating Line shall not exceed the pound per hour emission rate established as E in the following formula:

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:

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

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

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

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the volatile organic compound limits specified in Conditions D.1.1 and D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1, D.1.2, and D.1.3 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. IDEM, OAM, and Anderson Office of Air Management reserve the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.8 VOC Emissions

Compliance with Conditions D.1.1(d) and D.1.3 shall be demonstrated at 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.1.9 Particulate Matter (PM)

The waterwash for PM control shall be in operation at all times when Spray Coating Line booths are in operation.

D.1.10 Monitoring

- (a) Daily inspections shall be performed to verify the integrity of the particle collection waterwash systems. To monitor the performance of the waterwash systems, daily observations shall be made of the overspray from the surface coating booth stacks (E1A, E1B and E1C; E2A, E2B and E2C; E3A and E3B; E4A and E4B; ADB1A and ADB1B; and PB1A, PB1B and PB1C) 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) Weekly 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 the units 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.1.11 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.2, and D.1.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly, except for item (5) which shall be daily, and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1, D.1.2, and D.1.3.
- (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 volume weighted VOC content of the coatings used each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total clear coat used for each day; and
 - (6) The total VOC input usage for each month.
- (b) To document compliance with Conditions D.1.9 and D.1.10, the Permittee shall maintain a log of daily overspray observations, daily and weekly 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.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.3 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY CONDITIONS

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

The modification of the Spray Coating Line by the construction of the following:

- (a) One (1) coating booth identified as the Adhesion Promoter Booth coating a maximum of 240 plastic parts per hour, equipped with an electrostatic air atomization spray application system and a waterwash particulate matter overspray control system, exhausting at two (2) stacks identified as PBA1 and PBA2;
- (b) One (1) coating booth identified as the Primer Booth coating a maximum of 240 plastic parts per hour, equipped with an electrostatic air atomization spray application system and a waterwash particulate matter overspray control system, exhausting at three (3) stacks identified as PB1A, PB1B, and PB1C; and
- (c) One (1) natural gas direct fired bake oven consisting of five (5) separate combustion zones identified as OPS-new (1.0 MMBtu/hr, rated), O1-new (3.5 MMBtu/hr, rated), O2-new (3.5 MMBtu/hr, rated), O3-new (3.5 MMBtu/hr, rated), and QZS-new (1.0 MMBtu/hr, rated), with a total heat input rate of 12.5 MMBtu/hr, exhausting through four (4) stacks identified as ADOE1, ADOE2, ADEP1 and ADEP2.

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

Construction Conditions [326 IAC 2-1-3.2]

General Construction Conditions

D.2.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

D.2.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.2.3 Pursuant to 326 IAC 2-1-9(b) (Revocation of Permits), IDEM, OAM, and Anderson Office of Air Management may revoke this section of the approved permit if construction is not commenced within eighteen (18) months after receipt of this permit or if construction is suspended for a continuous period of one (1) year or more.

D.2.4 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

First Time Operation Permit

D.2.5 This document shall also become the first-time operation permit for the facilities under this section of this permit, pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:

- (a) The attached affidavit of construction shall be submitted to:

Indiana Department of Environmental Management
Permit Administration & Development Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

verifying that the facilities were constructed as proposed in the application. The facilities covered in this section of this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM and Anderson Office of Air Management.

- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) The permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
AND ANDERSON OFFICE OF AIR MANAGEMENT**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Paint and Assembly Corporation
Source Address: SR 37 and Brickyard Road, Elwood, Indiana 46036
Mailing Address: P.O. Box 496, Elwood, Indiana 46036
Part 70 Permit No.: T095-6536-00044

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 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 MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-6865**

and ANDERSON OFFICE OF AIR MANAGEMENT

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Paint and Assembly Corporation
Source Address: SR 37 and Brickyard Road, Elwood, Indiana 46036
Mailing Address: P.O. Box 496, Elwood, Indiana 46036
Part 70 Permit No.: T095-6536-00044

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2

- 9** 1. This is an emergency as defined in 326 IAC 2-7-1(12)
C The Permittee must notify the Office of Air Management (OAM), 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
- 9** 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
C The Permittee must submit notice in writing within ten (10) calendar days

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/Deviation:

Describe the cause of the Emergency/Deviation:

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

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? 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/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT
 COMPLIANCE DATA SECTION
 AND ANDERSON OFFICE OF AIR MANAGEMENT**

Part 70 Monthly Report

Source Name: Paint and Assembly Corporation
 Source Address: SR 37 and Brickyard Road, Elwood, Indiana 46036
 Mailing Address: P.O. Box 496, Elwood, Indiana 46036
 Part 70 Permit No.: T095-6536-00044
 Facility: Spray Coating Line Booth Nos. 3 & 4
 Parameter: Clear Coat Paint
 Limit: 8 gallons per day

Month: _____ Year: _____

Day	Usage This Day (gal/day)	Day	Usage This Day (gal/day)
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16		no. of deviations	

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: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
AND ANDERSON OFFICE OF AIR MANAGEMENT**

Part 70 Quarterly Report

Source Name: Paint and Assembly Corporation
Source Address: SR 37 and Brickyard Road, Elwood, Indiana 46036
Mailing Address: P.O. Box 496, Elwood, Indiana 46036
Part 70 Permit No.: T095-6536-00044
Facilities: (a) Spray Coating Line (Booth Nos. 1 - 4, Primer Booth & Adhesion Promoter Booth)
(b) Source-wide Coating Operations (Spray Coating Line Booth Nos. 1 - 4, Primer Booth & Adhesion Promoter Booth; Dip Coating Line Dip Tank Nos. 1 - 3; and coating materials test booth)
Parameter: Total VOC input usage
Limit: (a) 241.0 tons per twelve (12) consecutive months for Spray Coating Line
(b) 247.7 tons per twelve (12) consecutive months for Source-wide Coating Operations

YEAR: _____

Facility	Month	VOC Input Usage (tons/month)
Spray Coating Line		
Source-wide Coating Operations		

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT
 COMPLIANCE DATA SECTION
 AND ANDERSON OFFICE OF AIR MANAGEMENT**

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

Source Name: Paint and Assembly Corporation
 Source Address: SR 37 and Brickyard Road, Elwood, Indiana 46036
 Mailing Address: P.O. Box 496, Elwood, Indiana 46036
 Part 70 Permit No.: T095-6536-00044

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

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. 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:

Compliance Monitoring Requirement (e.g. Permit Condition D.1.9)	Number of Deviations	Date of each Deviations

Form Completed By: _____
 Title/Position: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Management
and Anderson Office of Air Management**

Technical Support Document (TSD) for a Part 70 Operating Permit and
Enhanced New Source Review (ENSR)

Source Background and Description

Source Name:	Paint and Assembly Corporation
Source Location:	SR 37 and Brickyard Road, Elwood, Indiana 46036
County:	Madison
SIC Code:	3714
Operation Permit No.:	T095-6536-00044
Permit Reviewer:	Michael Hirtler/EVP

The Office of Air Management (OAM) has reviewed a Part 70 permit and Enhanced New Source Review (ENSR) application from Paint and Assembly Corporation relating to the operation of a motor vehicle plastic and metal parts coating source.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Spray Coating Line:
- (1) One (1) coating booth, identified as Paint Booth #1, coating a maximum of 240 plastic parts per hour, equipped with an electrostatic air atomization spray application system and a waterwash particulate matter overspray control system, exhausting at three (3) stacks identified as E1A, E1B, and E1C;
 - (2) One (1) coating booth, identified as Paint Booth #2, coating a maximum of 240 plastic parts per hour, equipped with an electrostatic air atomization spray application system and a waterwash particulate matter overspray control system, exhausting at three (3) stacks identified as E2A, E2B, and E2C;
 - (3) One (1) coating booth, identified as Paint Booth #3, coating a maximum of 240 plastic parts per hour or using a maximum of 8 gallons of clear coat per hour when coating plastic automotive bumper covers, equipped with both an air assisted airless spray application system used when coating plastic automotive bumper covers and an electrostatic air atomization spray application system used when coating all other plastic parts, and a waterwash particulate matter overspray control system, exhausting at two (2) stacks identified as E3A and E3B;

- (4) One (1) coating booth, identified as Paint Booth #4, coating a maximum of 240 plastic parts per hour or using a maximum of 8 gallons of clear coat per hour when coating plastic automotive bumper covers, equipped with both an air assisted airless spray application system used when coating plastic automotive bumper covers and an electrostatic air atomization spray application system used when coating all other plastic parts, and a waterwash particulate matter overspray control system, exhausting at two (2) stacks identified as E4A and E4B;
- (5) One (1) natural gas direct fired bake oven identified as AMU-6 rated at 12.5 MMBtu/hr (Note: the previous AMU-6 identification has been changed to reflect five (5) separate combustion zones as OPS (1.0 MMBtu/hr), O1 (3.5 MMBtu/hr), O2 (3.5 MMBtu/hr), O3 (3.5 MMBtu/hr), and QZS (1.0 MMBtu/hr), all exhausting at four (4) stacks identified as EP1, EP2, OE1 and OE2. This bake oven is also considered to be an insignificant activity.);
- (6) Miscellaneous natural gas direct fired heat combustion units, also considered as insignificant activities, as follows:
 - (i) Air make-up unit no. 1 (AMU-1), rated at 4.0 million (MM) British thermal units per hour (MMBtu/hr);
 - (ii) AMU-2, rated at 4.0 MMBtu/hr;
 - (iii) AMU-3, rated at 4.0 MMBtu/hr;
 - (iv) AMU-4, rated at 3.25 MMBtu/hr (Note: this unit has been taken out of service);
 - (v) AMU-5, rated at 1.0 MMBtu/hr (Note: the previous AMU-5 identification has been changed to PMR2);
 - (vi) AMU-7, rated at 3.75 MMBtu/hr (Note: the previous AMU-7 identification has been changed to HBO);
 - (vii) Dry-off oven AMU-8, rated at 7.0 MMBtu/hr (Note: the previous AMU-8 identification has been changed to reflect two (2) separate combustion zones as S1CB (5.0 MMBtu/hr) and DOOS (2.0 MMBtu/hr));
 - (viii) AMU-9, rated at 2.5 MMBtu/hr (Note: the previous AMU-9 identification has been changed to HCTS); and
 - (ix) Heater flash tunnel AMU-10 rated at 1.0 MMBtu/hr (Note: the previous AMU-10 identification has been changed to HFTR).
- (7) One (1) boiler identified as AMU-11 rated at 9.0 MMBtu/hr (Note: this boiler has been taken out of service).

- (b) Dip Coating Line:
 - (1) Three (3) dip tanks identified as Dip Tank #1, Dip Tank #2 and Dip Tank #3 coating a total of 1,560 metal parts per hour, each equipped with a drain back and cover, all exhausting at one (1) stack identified as PDRE; and
 - (2) One (1) natural gas direct fired oven rated at 1.0 MMBtu/hr (Note: this unit is also considered as an insignificant activity).

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)

The application includes information relating to the modification on the existing Spray Coating Line, consisting of the addition of the following equipment:

- (a) One (1) coating booth, identified as the Adhesion Promoter Booth, coating a maximum of 240 plastic parts per hour, equipped with an electrostatic air atomization spray application system and a waterwash particulate matter overspray control system, exhausting at two (2) stacks identified as ADB1A and ADB1B;
- (b) One (1) coating booth, identified as the Primer Booth, coating a maximum of 240 plastic parts per hour, equipped with an electrostatic air atomization spray application system and a waterwash particulate matter overspray control system, exhausting at three (3) stacks identified as PB1A, PB1B, and PB1C;
- (c) One (1) natural gas direct fired bake oven consisting of five (5) separate combustion zones identified as OPS-new (1.0 MMBtu/hr, rated), O1-new (3.5 MMBtu/hr, rated), O2-new (3.5 MMBtu/hr, rated), O3-new (3.5 MMBtu/hr, rated), and QZS-new (1.0 MMBtu/hr, rated), with a total heat input rate of 12.5 MMBtu/hr, exhausting through four (4) stacks identified as ADOE1, ADOE2, ADEP1 and ADEP2; and
- (d) One (1) non-heated flash tunnel.

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 (10) million (MM) British thermal units per hour (MMBtu/hr), including: air make-up unit no. 1 (AMU-1), 4.0 MMBtu/hr; AMU-2, 4.0 MMBtu/hr; AMU-3, 4.0 MMBtu/hr; PMR2, 1.0 MMBtu/hr; HBO, 3.75 MMBtu/hr; S1CB, 5.0 MMBtu/hr; DOOS, 2.0 MMBtu/hr; HCTS, 2.5 MMBtu/hr; and HFTR, 1.0 MMBtu/hr.

- (b) One (1) natural gas direct fired bake oven identified as AMU-6 rated at 12.5 MMBtu/hr (Note: the previous AMU-6 identification has been changed to reflect five (5) separate combustion zones as OPS (1.0 MMBtu/hr), O1 (3.5 MMBtu/hr), O2 (3.5 MMBtu/hr), O3 (3.5 MMBtu/hr), and QZS (1.0 MMBtu/hr), all exhausting at four (4) stack identified as EP1, EP2, OE1 and OE2;
- (c) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (d) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (e) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (f) Paved and unpaved roads and parking lots with public access.
- (g) 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.
- (h) Mix room tanks (14 tank system).
- (i) Coating materials test booth.
- (j) Coating booths' water wall collection basin.
- (k) Plastic parts washing process using inorganic washing solution.
- (l) Four (4) non-heated flash tunnels.

Existing Approvals

The source has been operating under the following approvals:

- (a) Operation Permit OP 48-01-94-0095, issued on February 13, 1990.
- (b) Operation Permit OP 48-01-94-0096, issued on February 13, 1990.
- (c) Construction Permit CP 095-3763-00044, issued on December 14, 1994.
- (d) Amendment to Operation Permit 48-01-94-0096, A095-5819-00044, issued on May 23, 1996.

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 September 9, 1996. Additional information was received on October 28, 1997.

A notice of completeness letter was mailed to Paint and Assembly Corporation on November 7, 1996.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (four (4) pages).

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	less than 100
PM-10	less than 100
SO ₂	less than 100
VOC	greater than 250
CO	less than 100
NO _x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
methyl ethyl ketone (MEK)	greater than 10
toluene	greater than 10
xylene	greater than 10
methyl isobutyl ketone (MIBK)	greater than 10
glycol ethers	greater than 10
ethyl benzene	greater than 10
TOTAL	greater than 25

- (a) The potential emissions (as defined in the Indiana Rule) of volatile organic compounds (VOC) are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in Indiana Rule) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) 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.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the OAM 1995 emissions data.

Pollutant	Actual Emissions (tons/year)
PM	0.71
PM-10	0.71
SO ₂	0.00
VOC	88.93
CO	0.60
total HAPs*	24.45
NO _x	2.38

* Estimated as a fraction of actual 1995 VOC emissions.

Total Potential and Allowable Emissions For Units Covered Under Enhanced New Source Review

Indiana Permit Allowable Emissions Definition for the new Primer Booth, Adhesion Promoter Booth and Bake Oven, to be added to the existing Spray Coating Line (after compliance with applicable rules, based on 8,760 hours of operation per year at rated capacity):

Pollutant	Allowable Emissions (tons/year)	Potential Emissions (tons/year)
Particulate Matter (PM)	---	89.0
Particulate Matter (PM10)	---	89.0
Sulfur Dioxide (SO ₂)	---	0
Volatile Organic Compounds (VOC)	---	507.9
Carbon Monoxide (CO)	---	0
Nitrogen Oxides (NO _x)	---	0
Single Hazardous Air Pollutant (HAP)	---	66.0
Combination of HAPs	---	218.3

- (a) The potential emissions of VOC, PM and PM10 before control are the same as the allowable emissions, therefore, the potential emissions before control are used for the permitting determination for VOC, PM and PM10. See attached spreadsheets for detailed calculations (four (4) pages).
- (b) Allowable emissions (as defined in the Indiana Rule) of VOC, PM and PM10 are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, Sections 1 and 3, a construction permit is required.

Source Status

Existing Source PSD Definition (emissions after controls, based on the limits in Amendment to Operation Permit 48-01-94-0096, A095-5819-00044, issued on May 23, 1996):

Pollutant	Emissions (ton/yr)
PM	3.4
PM10	3.4
SO ₂	0.1
VOC	249.0
CO	3.9
NO _x	18.5

- (a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.
- (b) These emissions were based on the Part 70 application submitted by the company.

Proposed Modification Considered Under Enhanced New Source Review (ENSR)

PTE from the proposed modification considered under ENSR (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limits):

Pollutant	PM (ton/yr)	PM10 (ton/yr)	SO ₂ (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO _x (ton/yr)
Proposed Modification						
Adhesion & Primer Booths and Bake Oven added to existing Spray Coating Line	4.0	4.0	0.0	241.0*	1.2	5.5
PSD Threshold Level	250	250	250	250	250	250

* The Spray Coating Line is an existing facility. The proposed modification to this facility will not change the existing 241.0 ton/yr limit established in permit No. A095-5819-00044, issued May 23, 1996. The total source VOC limit of 249.0 tons/yr, also established in permit No. A095-5819-00044, will likewise not change with the modification to the Spray Coating Line.

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2 and 40 CFR 52.21, the PSD requirements do not apply.

Limited Potential to Emit

The table below summarizes the total limited potential to emit at the source (based on enforceable production limits):

Process/facility	Limited Potential to Emit (PTE) (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	Single HAP	Total HAPs
Spray Coating Line Surface Coating	3.4	3.4	0.0	241.0*	0.0	0.0	31.3	103.6
Natural Gas Fired Combustion Units (insignificant activities)	2.9	2.9	0.1	1.3	5.0	24.0	0.0	0.0
Source-Wide Surface Coating	3.4	3.4	0.0	247.7***	0.0	0.0	31.3	103.6
Total Source	6.3	6.3	0.1	249.0**	5.0	24.0	31.3	103.6

* Spray Coating Line surface coating limit established in permit No. A095-5819-00044, issued May 23, 1996.

** Total source limit established in permit No. A095-5819-00044, issued May 23, 1996. This limit is independent from, but inclusive of, the 241.0 ton/year limit (as 20.1 tons per month) for the Spray Coating Line.

***To ensure compliance with the total source VOC PTE limit of 249.0 tons/yr, source-wide surface coating will be limited to 247.7 tons/yr (as 20.6 tons per month). This is the total source limit of 249.0 tons/yr, less 1.3 tons/yr from insignificant activities.

County Attainment Status

The source is located in Madison County.

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

- (a) Volatile organic compounds (VOC) and oxides of nitrogen 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. Madison County has been designated as attainment or unclassifiable for ozone.

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) There are no New Source Performance Standards (326 IAC 12), 40 CFR Part 60, applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63, applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of volatile organic compounds (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 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-1-3.4 (New Source Toxics Control)

Pursuant to 326 IAC 2-1-3.4 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of the combination of HAPs, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). Although the proposed Primer and Adhesion Promoter spray booths have a PTE more than 10 tons per year of a single HAP and 25 tons per year of total HAPs, these booths will be installed onto the existing Spray Coating Line and they will not produce a product in and of themselves. Therefore, these spray booths are not subject to the requirements of 326 IAC 2-1-3.4.

326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration, PSD)

This source is not subject to the requirements of 326 IAC 2-2 and 40 CFR 52.21 (PSD) because the total volatile organic compound (VOC) input to all coating operations will be limited to 247.7 tons per year, such that source-wide VOC emissions are limited to 249 tons per year. Therefore, the requirements of 326 IAC 2-2 and 40 CFR 52.21 do not apply to the source.

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations) the particulate matter (PM) overspray from Spray Coating Line Booth Nos. 1, 2, 3 & 4, the Primer Booth and the Adhesion Promoter Booth 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:

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

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The particulate matter emissions from the six (6) spray booths shall comply with 326 IAC 6-3-2 by using waterwash for overspray control at all times when the spray booths are in operation.

326 IAC 8-1-6 (General Reduction Requirements)

Pursuant to A095-5819-00044, issued on May 23, 1996, best available control technology (BACT) for the Spray Coating Line has been determined to be the following:

- (a) When coating plastic automotive bumper covers in Booth Nos. 3 and 4:
 - (1) The total clear coat paint usage shall not exceed eight (8) gallons per day and the clear coating volatile organic compound (VOC) content as applied shall not exceed 6.5 pounds per gallon coating, less water; and
 - (2) The clear coating shall be applied utilizing the air atomization spray method.
- (b) When coating other plastic parts at the Spray Coating Line (Booth Nos. 1 - 4):
 - (1) The total VOC input shall be limited to 20.1 tons per month on a fixed monthly basis. This input limitation is equivalent to VOC emissions of 241.0 tons per 12-month period;
 - (2) The volume weighted average VOC content of any coating applied shall not exceed 6.5 pounds per gallon coating, less water; and
 - (3) The coatings shall be applied utilizing the electrostatic air atomization spray method.

The proposed Primer and Adhesion Promoter Booths will be installed onto the existing facility (i.e., Spray Coating Line). The BACT requirements of item (b) above will be maintained for the modified line, including maintenance of the allowable VOC emission limit at 20.1 tons per month and 241.0 tons per 12-month period, the usage of coatings with VOCs limited to 6.5 pounds per gallon coating, less water, and the utilization of an electrostatic air atomization spray application method in the Primer and Adhesion Promoter Booths. Therefore, additional new requirements pursuant to 326 IAC 8-1-6 do not apply to the Spray Coating Line.

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

Pursuant to CP095-3763-00044 issued December 14, 1994 and 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coating applied from the Dip Coating Line shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any calendar day, for forced warm air (less than 90EC or 194EF) dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the Dip Coating Line is in compliance with this rule.

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, OAM, 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 permit Section D 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 in permit Section D. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The Spray Coating Line (Paint Booth Nos. 1 - 4, the Adhesion Promoter Booth and the Primer Booth) has applicable compliance monitoring conditions as specified below:
 - (a) The surface coating applied to plastic automotive bumper covers in Paint Booth Nos. 3 and 4 shall utilize an air assisted airless spray application system.
 - (b) The surface coating applied to all other plastic parts in any Spray Coating Line booth shall utilize an electrostatic spray application system.
 - (c) The total clear coat paint usage shall not exceed eight (8) gallons per day when coating plastic automotive bumper covers in Paint Booth Nos. 3 and 4.
 - (d) The total volatile organic compound (VOC) input usage to the Spray Coating Line (i.e., Paint Booth Nos. 1 - 4, the Adhesion Promoter Booth and the Primer Booth) including solvent usage, minus the VOC solvent shipped out, shall be limited to 20.1 tons per month on a fixed monthly basis. This input limitation is equivalent to VOC emissions of 241.0 tons per twelve (12) consecutive month period.
 - (e) The VOC content of any coating applied shall be limited to 6.5 pounds per gallon, less water.
 - (f) Quarterly reports shall be submitted to OAM Compliance Section. These reports shall include the total daily clear coat paint usage in Paint Booth Nos. 3 and 4, and the total VOC input to the Spray Coating Line for each month during the calendar quarter reported.

These monitoring conditions are necessary because VOC emissions from the Spray Coating Line must be limited such that the facility complies with the best available control technology (BACT) requirements of 326 IAC 8-1-6.

2. Source-wide coating operations (the Spray Coating Line inclusive of Paint Booth Nos. 1 - 4, the Adhesion Promoter Booth and the Primer Booth; the Dip Coating Line inclusive of Dip Tank Nos. 1 - 3; and the coating materials test booth as an insignificant activity), have applicable compliance monitoring conditions as specified below:

- (a) The total volatile organic compounds (VOC) input usage to source-wide surface coating, (i.e, the Spray Coating Line inclusive of Paint Booth Nos. 1 - 4, the Adhesion Promoter Booth and the Primer Booth; the Dip Coating Line inclusive of Dip Tank Nos. 1 - 3; and the coating materials test booth), including solvent usage, minus the VOC solvent shipped out, shall be limited to 20.6 tons per month on a fixed monthly basis. This input limitation is equivalent to VOC emissions of 247.7 tons per twelve (12) consecutive month period.
- (b) Quarterly reports shall be submitted to OAM Compliance Section. These reports shall include the total VOC input usage to the Spray Coating Line, the Dip Coating Line and the coating materials test booth for each month during the calendar quarter reported.

These monitoring conditions are necessary because VOC emissions from the source-wide coating operations must be limited such that the Prevention of Significant Deterioration (PSD) requirements pursuant to 326 IAC 2-2 and 40 CFR 52.21 do not apply to this source.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act.
- (b) See attached calculations for detailed air toxic calculations (see Appendix A, four (4) pages).

The concentrations of these air toxics were modeled and found to be (in the worst case possible) as follows: The concentrations of these air toxics were compared to the Permissible Exposure Limits (PEL) developed by the Occupational Safety and Health Administration (OSHA). The Office of Air Management (OAM) does not have at this time any specific statutory or regulatory authority over these substances.

Air Toxics Analysis

Pollutant	Rate (lb/hr)	Rate (ton/yr)	Modeled Conc. (Fg/m ³)	OSHA PEL (Fg/m ³)	% OSHA PEL
Xylene	7.15	31.32	537.7	435,000	0.12%
Toluene	4.92	21.55	372.2	752,000	0.05%
MEK	5.66	24.78	425.6	590,000	0.07%
MIBK	2.23	9.77	167.7	410,000	0.04%
Propylene Glycol Monomethyl Ether (Glycol Ethers)	2.46	10.77	185.0	125,000*	0.15%
Ethyl Benzene	1.23	5.39	92.5	435,000	0.02%

* PEL for ethylene glycol used as default for this glycol ether.

Conclusion

The operation of this motor vehicle plastic and metal parts coating source shall be subject to the conditions of the attached proposed **Part 70 Permit No. T095-6536-00044**.

**Indiana Department of Environmental Management
Office of Air Management
and Anderson Office of Air Management**

**Addendum to the
Technical Support Document for a Part 70 Operating Permit and
Enhanced New Source Review (ENSR)**

Source Name: Paint and Assembly Corporation
Source Location: SR 37 and Brickyard Road, Elwood, Indiana 46036
County: Madison
SIC Code: 3714
Operation Permit No.: T095-6536-00044
Permit Reviewer: Michael Hirtler/EVP

On December 20, 1997, the Office of Air Management (OAM) had a notice published in the Anderson Herald, Anderson, Indiana, stating that Paint and Assembly Corporation (PAC) had applied for a Part 70 permit and Enhanced New Source Review (ENSR) relating to the operation of a motor vehicle plastic and metal parts coating source. The notice also stated that OAM proposed to issue a permit for this source and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAM has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

SECTION A:

1. Section A (Source Summary) has been revised to clarify that the description of the source in Conditions A.1 through A.3 is informational only and does not constitute separately enforceable conditions. The descriptive information in other permit conditions is enforceable.

SECTION A SOURCE SUMMARY

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

2. Condition A.5 (Prior Permit Conditions Superseded) has been deleted. Language has been added to B.14 (Permit Shield) to address the effect of prior permit conditions. U.S. EPA stated that it would object to any permit that contained such supersession language.

~~A.5 Prior Permit Conditions Superseded [326 IAC 2]~~

~~The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.~~

SECTION B

3. Condition B.1(b) (Permit No Defense) has been revised to reference the permit shield condition that is found later in Section B.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, **as set out in this permit in the Section B condition entitled "Permit Shield."**

4. Condition B.8 (c) (Duty to Supplement Information) has been revised to clarify how the Permittee may assert a claim that records are confidential information:

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM copies of records required to be kept by this permit. **If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, For information claimed to be confidential, the Permittee must shall furnish such records to IDEM, OAM along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.**

~~Such confidentiality claim shall meet the requirements of 40 CFR 2, Subpart B (when submitting to U.S. EPA) and 326 IAC 17 (when submitting to IDEM, OAM, and Anderson Office of Air Management).~~

5. Section B.11 (Annual Compliance Certification) has been revised to clarify the reporting requirement, with additional changes made to match changes to the federal Part 70 rules. The language in (c)(3) has been revised since it appears to be a clarification rather than a change in the requirement. The language in (c)(5) has been added to clarify the treatment of insignificant activities. OAM is revising the nonrule policy document Air-007 NPD to provide more guidance regarding the annual compliance certification requirements for sources with Title V permits:

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually ~~certify that the source has complied~~ **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 certification 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 Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

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, OAM, and Anderson Office of Air Management on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was **based on** continuous or intermittent **data**;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); ~~and~~
 - (5) Any insignificant activity that has been added without a permit revision; and**
 - ~~(5)~~ **(6)** Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

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

6. Condition B.12 (a) (Preventive Maintenance Plan) has been revised to more closely match the language in 326 IAC 1-6-3. A provision allowing a one time extension of the time within which the Permittee must prepare and maintain the PMP has also been added to (a).

B.12 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 (PMP) 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 units and associated~~ emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

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

If due to circumstances beyond its control, the PMP 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 Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015**

and

**Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011**

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
 - (c) PMP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM.
7. Condition B.14 (Permit Shield) condition has been revised to clarify how the permit shield affects applicable requirements from previous permits and how the permit shield affects determinations that a specific requirement is not applicable to the source.

B.14 Permit Shield [326 IAC 2-7-15]

(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

(a) (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.

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 of the following:~~

- (1) The applicable requirements are included and specifically identified in this permit; **or**
- (2) ~~IDEM, OAM, and Anderson Office of Air Management in acting on the Part 70 permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 permit includes the determination or a concise summary thereof.~~ **The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.**

- ~~(b)~~ **(c)** ~~No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. 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, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, and Anderson Office of Air Management, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.~~
- ~~(c)~~ **(d)** ~~If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement, IDEM, OAM, and Anderson Office of Air Management 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. **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.**~~
- ~~(d)~~ **(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.
- ~~(e)~~ **(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).
- ~~(f)~~ **(g)** This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, and Anderson Office of Air Management have issued the modifications. [326 IAC 2-7-12(c)(7)]
- ~~(g)~~ **(h)** This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, and Anderson Office of Air Management have issued the modification. [326 IAC 2-7-12(b)(8)]
8. Condition B.16 (Deviations from Permit Requirements and Conditions) has been revised to add the deviation terminology that had been contained in Section C, in the General Reporting Requirements condition:

B.16 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 Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

within ten (10) calendar days from the date of the discovery of the deviation.

- (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) An emergency as defined in 326 IAC 2-7-1(12); or**
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.**
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.**

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

- ~~(b)~~ **(c)** Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. **The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).**

- ~~(c)~~ **(d)** Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

9. Condition B.18 (a) (Permit Renewal) has been changed as follows to clarify the treatment of certain trivial activities :

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, 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).**

10. Conditions B.19 (Administrative Permit Amendment), B.20 (Minor Permit Modification), and B.21 (Significant Permit Modification) have all been combined into one condition numbered B.19 (Permit Amendment or Modification). Conditions B.20 and B.21 have been deleted. The new Condition B.19 (Permit Amendment or Modification) will read as follows:

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) **The Permittee must comply with 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 Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015**

and

**Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011**

Any such application should be certified by the “responsible official” as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

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

11. Condition B.26 (now B.24) (Inspection and Entry) has been revised to remove the requirement for an IDEM identification card, which other agencies do not have.

B.264 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of ~~IDEM~~ **proper** identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, Anderson Office of Air Management, 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, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- (d) Sample or monitor, at reasonable times, 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. [326 IAC 2-7-6(6)]
- (1) **The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, Anderson Office of Air Management, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, Anderson Office of Air Management, nor an authorized representative, may disclose the information unless and until IDEM, OAM, or Anderson Office of Air Management makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]**
 - (2) **The Permittee, IDEM, OAM, and Anderson Office of Air Management acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]**
12. Condition B.27(b) (now B.25) (Transfer of Ownership or Operation) has been revised to clarify that this notification does not require a certification by a responsible official.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. **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).**
13. Condition B.28 (now B.26) (Annual Fee Payment) has been revised to clarify the Permittee's responsibility for the timely payment of annual fees.

B.286 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, and Anderson Office of Air Management, within thirty (30) calendar days of receipt of a billing. ~~or in a time period consistent with the fee schedule established in 326 IAC 2-7-19.~~ **If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.**
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) ~~If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date,~~ The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. ~~The applicable fee is due April 1 of each year.~~

14. Condition B.28 (Credible Evidence) is a new condition. U.S. EPA stated that it would object to any permit that did not address the use of credible evidence. It reads as follows:

B.28 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]

Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non compliance.

SECTION C

1. Condition C.1 is revised to change the overall source to an amount "less than" the applicable limit as follows:

C.1 Major Source

Pursuant to A095-5819-00044, issued May 23, 1996, the total source emissions of volatile organic compounds (VOC) shall be limited to **less than 249 250** tons per 365 consecutive day period. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

2. Condition C.2 (Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour) is a new condition that reads as follows to address the PM emission limitation for facilities below 100 pounds per hour.

C.2 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.

3. Conditions C.2 (now C.3) (Opacity), C.3 (now C.4) (Open Burning), C.4 (now C.5) (Incineration), and C.5 (now C.6) (Fugitive Dust Emissions) have each been revised to clarify which condition or portion thereof is not federally enforceable:

C.23 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

~~This condition is not federally enforceable.~~

C.34 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. ~~This condition is not federally enforceable.~~ **326 IAC 4-1-3 (a) (2)(A) and (B) are not federally enforceable.**

C.45 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. ~~This condition is not federally enforceable.~~

C.56 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). ~~Rule 326 IAC 6-4-2(4) regarding visible dust is not federally enforceable.~~ **326 IAC 6-4-2(4) is not federally enforceable.**

4. Condition C.6 (now C.7) (Operation of Equipment) has been revised to clarify the requirement.

C.67 Operation of Equipment [326 IAC 2-7-6(6)]

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 unit vented to the control equipment is in operation. ~~as described in Section D of this permit.~~

5. Condition C.7 (now C.8) (Stack Height) has been revised to clarify the requirement.

C.78 Stack Height [326 IAC 1-7]

(a) 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.

~~(b) Any change in an applicable stack shall require prior approval from IDEM, OAM.~~

6. Conditions C.8 (Asbestos Abatement Projects-Accreditation) and C.13 (Asbestos Abatement Projects) have been combined into one new condition C.9 (Asbestos Abatement Projects).

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(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 Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015**

and

**Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011**

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 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 mandatory 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 is federally enforceable.

7. Condition C.9 (now C.10) (Performance Testing) is revised to correct a rule citation, add a notification requirement, and clarify that any submittal under this condition does not require a certification by a responsible official:

C.910 Performance Testing ~~[326 IAC 3-2-1]~~ **[326 IAC 3-6]**

- (a) All testing shall be performed according to the provisions of 326 IAC ~~3-2-1~~ **3-6** (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

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 Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

no later than thirty-five (35) days ~~before~~ **prior to** the intended test date. **The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.**

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

8. Condition C.10 (now C.11) (Compliance Schedule) has been revised to more closely match the rule language.

C.101 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) **Has certified that all facilities at this source are in compliance with all applicable requirements; and** ~~Will continue to comply with such requirements that become effective during the term of this permit; and~~
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) **Will comply with such applicable requirements that become effective during the term of this permit.** ~~Has certified that all facilities at this source are in compliance with all applicable requirements.~~

9. Condition C.11 (now C.12) (Compliance Monitoring) has been revised to allow a one time extension of the time to install and initiate any required monitoring.

C.142 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee **may extend compliance schedule an additional ninety (90) days provided the Permittee shall** notifies:

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

and

Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011

in writing, **prior to the end of the initial ninety (90) day compliance schedule** ~~no more than ninety (90) days after receipt of this permit, with full justification of the reasons for the inability to meet this date. and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.~~

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).

10. Condition C.12 (now as C.13) (Monitoring Methods) has been revised to clarify the requirement.

C.123 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the **applicable** requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

11. Condition C.14 (Emergency Reduction Plans) has been revised to clarify that the plan does not require a certification by a responsible official.

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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

and

Anderson Office of Air Management

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

The ERP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAM, and Anderson Office of Air Management, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. ~~If after this time, the Permittee does not submit an approvable ERP, then IDEM, OAM, shall supply such plan.~~
 - (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, OAM, and Anderson Office of Air Management, 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]
12. Condition C.15 (Risk Management Plan) has been revised to more closely match the rule language of 40 CFR 68 and clarify that any submittal under this condition requires a certification by a responsible official.

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

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

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the 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); and
 - (3) A verification to IDEM, OAM, and Anderson Office of Air Management that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

- (b) Provide annual certification to IDEM, OAM, and Anderson Office of Air Management that the Risk Management Plan is being properly implemented.

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

- 13. Condition C.16 (Compliance Monitoring Plan-Failure to Take Response Steps) the following rule cites were changed and added to the title, as follows:

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5(9)]
[326 IAC 2-7-6] [326 IAC 1-6]

- 14. Condition C.17 is revised to add the following rule cites to the title, and clarify that any submittal under this condition does not require a certification by a responsible official.

C.17 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 corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (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, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

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).

- 15. Condition C.18 (a) has been revised to clarify the certification requirement for the emission statement.

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an ~~certified~~, 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:

- 16. Condition C.20 (General Record Keeping) is revised to add the following rule citation and to change the requirements for keeping records, making records available, and furnishing records, to more closely match the rule language as follows:

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)(B)]~~[326 IAC 2-7-6]~~

- (a) Records of all required monitoring data 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** and available **upon the request** ~~within one (1) hour upon verbal request~~ of an IDEM, OAM, and Anderson Office of Air Management representative, ~~for a minimum of three (3) years. They~~ **The records** may be stored elsewhere for the remaining two (2) years **as long as they are available upon request** ~~providing they are made available within thirty (30) days after written request.~~ **If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.**

17. Condition C.21 (General Reporting Requirements) is revised to clarify what is included in the compliance monitoring reports and clarify that any submittal under this condition does not require a certification by a responsible official. The deviation terminology was moved to a Section B condition titled Deviations from Permit Requirements and Conditions.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) ~~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 Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015~~

To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

- (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 Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015**

and

**Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, Indiana 46011**

- ~~(b)(c)~~ (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, OAM, and Anderson Office of Air Management on or before the date it is due.

~~(e)~~(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.

~~(d)~~(e) All instances of deviations **as described in Section B - Deviations from Permit Requirements Conditions** must be clearly identified in such reports. ~~A reportable 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) An emergency as defined in 326 IAC 2-7-1(12); or~~

~~(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.~~

~~(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~

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

~~(e)~~(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

~~(f)~~(g) 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.

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).

SECTION D

1. Section D (Facility Operation Conditions) has been changed to add the following language to the facility description box in all D sections. A portion of Section D.1 is presented as an example.

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

- (a) Spray Coating Line:
- (1) One (1) coating booth identified as Paint Booth #1 coating a maximum of 240 plastic parts per hour, equipped with an electrostatic air atomization spray application system and a waterwash particulate matter overspray control system, exhausting at three (3) stacks identified as E1A, E1B, and E1C;

2. Condition D.1.1 (d) (Volatile Organic Compounds) has been revised to require compliance with the stated VOC usage limit on a twelve (12) consecutive month basis, rather than on a fixed monthly basis. This method of compliance is consistent with current OAM requirements.

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

- (d) The total volatile organic compound (VOC) input usage to the Spray Coating Line (i.e., Paint Booth Nos.1 - 4, the Adhesion Promoter Booth and the Primer Booth), including solvent usage, minus the VOC solvent shipped out, shall be limited to ~~20.1 tons per month on a fixed monthly basis. This input limitation is equivalent to VOC emissions of 241.0 tons per twelve (12) consecutive month period.~~
3. Condition D.1.3 (PSD Minor Limit) has been revised to require compliance with the stated VOC usage limit on a twelve (12) consecutive month basis, rather than on a fixed monthly basis. This method of compliance is consistent with current OAM requirements. Additionally, Condition D.1.3 is revised to change the overall source to an amount "less than" the applicable regulatory limit.

D.1.3 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- The total volatile organic compound (VOC) input usage to source-wide surface coating (i.e., the Spray Coating Line inclusive of Paint Booth Nos. 1 - 4, the Adhesion Promoter Booth and the Primer Booth; the Dip Coating Line inclusive of Dip Tank Nos. 1 - 3; and the coating materials test booth), including solvent usage, minus the VOC solvent shipped out, shall be limited to ~~20.6 tons per month on a fixed monthly basis. This input limitation is equivalent to VOC emissions of 247.7 tons per twelve (12) consecutive month period.~~ **This input limitation is equivalent to source-wide VOC emissions of less than 250 tons per twelve (12) consecutive month period and** compliance with this limit makes 326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration) not applicable.
4. Condition D.1.6 (Testing Requirements) has been changed to revise the rule citation and update the language as follows:

D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)]

- ~~Testing of The Permittee is not required to test these facilities is not specifically required by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance.~~ If testing is required by IDEM, compliance with the volatile organic compound limits specified in Conditions D.1.1 and D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. ~~This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~
5. Condition D.1.7 (Volatile Organic Compounds) has changed the rule citations.

D.1.7 Volatile Organic Compounds (VOC)

- Compliance with the VOC content and usage limitations contained in Conditions D.1.1, D.1.2 and D.1.3 shall be determined pursuant to ~~326 IAC 8-1-4(a)(3)(A)~~ **326 IAC 8-1-4(a)(3)** and ~~326 IAC 8-1-2(a)(7)~~ **326 IAC 8-1-2(a)** using formulation data supplied by the coating manufacturer. IDEM, OAM, and Anderson Office of Air Management reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

6. D.1.8 (VOC Emissions) this is a new condition added to the permit which reads as follows:

D.1.8 VOC Emissions

Compliance with Conditions D.1.1(d) and D.1.3 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

7. D.1.9 (now D.1.10) (Monitoring) has been changed as follows.

D.1.910 **Monitoring**

- (a) Daily inspections shall be performed to verify the integrity of the particle collection waterwash systems. To monitor the performance of the waterwash systems, daily observations shall be made of the overspray **from the surface coating booth stacks (E1A, E1B and E1C; E2A, E2B and E2C; E3A and E3B; E4A and E4B; ADB1A and ADB1B; and PB1A, PB1B and PB1C)** 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) Weekly 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 the units shall contain troubleshooting contingency and response steps for when ~~an overspray emission, evidence of overspray emission, or other abnormal emission~~ **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.

FORMS

- 1. The Certification Form is revised to clarify which forms require a certification.

- 2. The Emergency/Deviation Occurrence Reporting Form is revised to eliminate the certification requirement.

- 3. The Quarterly Compliance Report is renamed the Quarterly Compliance Monitoring Report and is revised to make it easier to understand and use.

- 4. The Part 70 Quarterly Report for volatile organic compound usage is revised such that the compliance averaging time is consistent with Conditions D.1.1(d) and D.1.3.

On February 12, 1998, August Mack Environmental, Inc., as the environmental consultant to PAC, submitted comments on behalf of PAC on the proposed Part 70 permit and ENSR. These comments were amended by August Mack on February 26, 1998. A summary of the comment and corresponding response is as follows:

Comment #1:

In Condition A.1, replace Mr. Steve Moyer as the Responsible Official with Mr. James Maus.

Response to Comment #1:

Condition A.1 of the permit is revised to reflect the newly designated Responsible Official for the source as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a motor vehicle plastic and metal parts coating source.

Paint and Assembly Corporation
Elwood, Indiana
Permit Reviewer: MH/EVP

Page 20 of 25
OP No. T095-6536-00044

Responsible Official: ~~Steve Moyer~~ **James Maus**
Source Address: SR 37 and Brickyard Road, Elwood, Indiana 46036
Mailing Address: P.O. Box 496, Elwood, Indiana 46036
SIC Code: 3714
County Location: Madison
County 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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
AND ANDERSON OFFICE OF AIR MANAGEMENT**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Paint and Assembly Corporation
Source Address: SR 37 and Brickyard Road, Elwood, Indiana 46036
Mailing Address: P.O. Box 496, Elwood, Indiana 46036
Part 70 Permit No.: T095-6536-00044

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 Emergency/Deviation Occurrence Reporting Form~~

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (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 MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

and ANDERSON OFFICE OF AIR MANAGEMENT

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Paint and Assembly Corporation
Source Address: SR 37 and Brickyard Road, Elwood, Indiana 46036
Mailing Address: P.O. Box 496, Elwood, Indiana 46036
Part 70 Permit No.: T095-6536-00044

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2	
9 1.	This is an emergency as defined in 326 IAC 2-7-1(12)
C	The Permittee must notify the Office of Air Management (OAM), 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
9 2.	This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
C	The Permittee must submit notice in writing within ten (10) calendar days

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/Deviation:
Describe the cause of the Emergency/Deviation:

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

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? 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/deviation:
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: _____

~~Attach a signed certification to complete this report.~~

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
AND ANDERSON OFFICE OF AIR MANAGEMENT**

Part 70 Quarterly Report

Source Name: Paint and Assembly Corporation
Source Address: SR 37 and Brickyard Road, Elwood, Indiana 46036
Mailing Address: P.O. Box 496, Elwood, Indiana 46036
Part 70 Permit No.: T095-6536-00044
Facilities: (a) Spray Coating Line (Booth Nos. 1 - 4, Primer Booth & Adhesion Promoter Booth)
(b) Source-wide Coating Operations (Spray Coating Line Booth Nos. 1 - 4, Primer Booth & Adhesion Promoter Booth; Dip Coating Line Dip Tank Nos. 1 - 3; and coating materials test booth)
Parameter: Total VOC input usage
Limit: (a) ~~20.1 tons per month on a fixed monthly basis~~ **241.0 tons per twelve (12) consecutive months** for Spray Coating Line
(b) ~~20.6 tons per month on a fixed monthly basis~~ **247.7 tons per twelve (12) consecutive months** for Source-wide Coating Operations

YEAR: _____

Facility	Month	VOC Input Usage (tons/month)
Spray Coating Line		
Source-wide Coating Operations		

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT
 COMPLIANCE DATA SECTION
 AND ANDERSON OFFICE OF AIR MANAGEMENT**

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

Source Name: Paint and Assembly Corporation
 Source Address: SR 37 and Brickyard Road, Elwood, Indiana 46036
 Mailing Address: P.O. Box 496, Elwood, Indiana 46036
 Part 70 Permit No.: T095-6536-00044

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

This report is an affirmation that the source has met all the **compliance monitoring** requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the **compliance monitoring** requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify ~~zero in the column marked "No Deviations"~~ 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: LIST EACH COMPLIANCE REQUIREMENT EXISTING FOR THIS SOURCE:

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations	No Deviations

Form Completed By: _____
 Title/Position: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

Appendix A: Emissions Summary

Company Name: Paint and Assembly Corporation
Address City IN Zip: SR 37 and Brickyard Road, Elwood, Indiana 46036
Part 70 No.: 095-6536
Plant ID: 095-00044
Reviewer: Michael Hirtler
Date: October 28, 1997

Amendment to Operation Permit No. 48-01-94-0096, A095-5819-00044 issued on May 23, 1996, limits VOC input to Spray Coating Line Booths 1, 2, 3 & 4 to 241 tons per year. Compliance with this limit, and other conditions of A095-5819-00044, did not affect the existing BACT for the facility, nor did it require new BACT pursuant to 326 IAC 8-1-6. Additionally, A095-5819-00044 limits VOC input to the source to 249 tons per year. The applicant wishes to add a Primer Booth, Adhesion Promoter Booth and a Bake Oven to the facility (i.e., the Spray Coating Line), while maintaining the 241 ton per year VOC input limit on the coating facility. Additionally, the applicant wishes to maintain the source-wide VOC limit of 249 tons per year. Therefore, continued compliance with these limits and other conditions of A095-5819-00044 shall make new requirements pursuant to 326 IAC 8-1-6 (BACT) and 326 IAC 2-2 (PSD) not applicable to the Spray Coating Line and the source, respectively.

For the facility (Spray Coating Line):

Process/facility	Limited PTE (tons/year)							
	PM	PM10	SO2	VOC	CO	NOx	Single HAP	Total HAPs
Spray Coating Line (Booths 1-4) - ** Existing VOC Limited Emissions	3.4	3.4	0.0	241.0	0.0	0.0	20.0	70.8
Proposed Primer & Adhesion Booths - Controlled/Limited	0.8	0.8	0.0	241.0	0.0	0.0	31.3	103.6
Total Emissions for Spray Coating Line - (Booths 1-4, Primer & Adhesion Booths)	3.4	3.4	0.0	241.0	0.0	0.0	31.3	103.6

** VOC emission limitation based on Permit No. A095-5819-00044. Remaining pollutant emission rates taken from Title V permit application.

For the source:

Process/facility	Limited PTE (tons/year)							
	PM	PM10	SO2	VOC	CO	NOx	Single HAP	Total HAPs
Existing Natural Gas Fired Combustion Units & Proposed Bake Oven	2.9	2.9	0.1	1.3	5.0	24.0	0.0	0.0
Source-wide Coating Operations (Spray & Dip Coating Lines and Test Booth)	3.4	3.4	0.0	247.7	0.0	0.0	31.3	103.6
Total Emissions for Source	6.3	6.3	0.1	249.0	5.0	24.0	31.3	103.6

**Appendix A: Emission Calculations
Natural Gas Combustion**

Company Name: Paint and Assembly Corporation
Address City IN Zip: SR 37 and Brickyard Road, Elwood, Indiana 46036
Part 70 No.: 095-6536
Plant ID: 095-00044
Reviewer: Michael Hirtler
Date: October 28, 1997

Combustion Unit Type	Capacity MMBtu/hr	Potential Thruput MMCF/yr	Emission Factor in lb/MMCF						Potential Emission Rate in tons/year					
			PM	PM10	SO2	NOx	VOC	CO	PM	PM10	SO2	NOx	VOC	CO
Existing Combustion Units														
AMU-1 (heat bldg. makeup air)	4.0	35.04	12.0	12.0	0.6	100.0	5.3	21.0	0.21	0.21	0.01	1.75	0.09	0.37
AMU-2 (heat bldg. makeup air)	4.0	35.04	12.0	12.0	0.6	100.0	5.3	21.0	0.21	0.21	0.01	1.75	0.09	0.37
AMU-3 (heat bldg. makeup air)	4.0	35.04	12.0	12.0	0.6	100.0	5.3	21.0	0.21	0.21	0.01	1.75	0.09	0.37
HBO (heated parts blow off)	3.75	32.85	12.0	12.0	0.6	100.0	5.3	21.0	0.20	0.20	0.01	1.64	0.09	0.34
S1CB (stage 1 combustion blower)	5.0	43.80	12.0	12.0	0.6	100.0	5.3	21.0	0.26	0.26	0.01	2.19	0.12	0.46
DOOS (supply air to dry-off oven)	2.0	17.52	12.0	12.0	0.6	100.0	5.3	21.0	0.11	0.11	0.01	0.88	0.05	0.18
HCTS (heated cooling tunnel supply)	2.5	21.90	12.0	12.0	0.6	100.0	5.3	21.0	0.13	0.13	0.01	1.10	0.06	0.23
HFTR (heated flash tunnel supply)	1.0	8.76	12.0	12.0	0.6	100.0	5.3	21.0	0.13	0.13	0.01	1.10	0.06	0.23
OPS (oven preheat)	1.0	8.76	12.0	12.0	0.6	100.0	5.3	21.0	0.05	0.05	0.00	0.44	0.02	0.09
O1 (oven heat)	3.5	30.66	12.0	12.0	0.6	100.0	5.3	21.0	0.18	0.18	0.01	1.53	0.08	0.32
O2 (oven heat)	3.5	30.66	12.0	12.0	0.6	100.0	5.3	21.0	0.18	0.18	0.01	1.53	0.08	0.32
O3 (oven heat)	3.5	30.66	12.0	12.0	0.6	100.0	5.3	21.0	0.18	0.18	0.01	1.53	0.08	0.32
QZS (pre-oven heat)	1.0	8.76	12.0	12.0	0.6	100.0	5.3	21.0	0.05	0.05	0.00	0.44	0.02	0.09
PMR2 (paint mix room-heat air supply)	1.0	8.76	12.0	12.0	0.6	100.0	5.3	21.0	0.05	0.05	0.00	0.44	0.02	0.09
Dip Coat Oven	1.0	8.76	12.0	12.0	0.6	100.0	5.3	21.0	0.05	0.05	0.00	0.44	0.02	0.09
Total Potential Emissions Existing Combustion Units									2.22	2.22	0.11	18.51	0.98	3.89
Proposed Bake Oven														
OPS-new (oven preheat)	1.0	8.76	12.0	12.0	0.6	100.0	5.3	21.0	0.05	0.05	0.00	0.44	0.02	0.09
O1-new (oven heat)	3.5	30.66	12.0	12.0	0.6	100.0	5.3	21.0	0.18	0.18	0.01	1.53	0.08	0.32
O2-new (oven heat)	3.5	30.66	12.0	12.0	0.6	100.0	5.3	21.0	0.18	0.18	0.01	1.53	0.08	0.32
O3-new (oven heat)	3.5	30.66	12.0	12.0	0.6	100.0	5.3	21.0	0.18	0.18	0.01	1.53	0.08	0.32
QZS-new (pre-oven heat)	1.0	8.76	12.0	12.0	0.6	100.0	5.3	21.0	0.05	0.05	0.00	0.44	0.02	0.09
Total Potential Emissions Proposed Combustion Units									0.66	0.66	0.03	5.48	0.29	1.15
Potential Emission in tons/yr	53.25	466.47							2.88	2.88	0.14	23.98	1.27	5.04

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

Emission factors from AP 42, Supplement B of 5th Edition, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, for residential (< 0.3 MMBtu/hr) and commercial (>= 0.3 & < 10.0 MMBtu/hr) combustion units.

**Appendix A: Emission Calculations
VOC and Particulate
From Proposed Primer and Adhesion Promoter Booth Surface Coating Operations**

Company Name: Paint and Assembly Corporation
Address City IN Zip: SR 37 and Brickyard Road, Elwood, Indiana 46036
Part 70 No.: 095-6536
Plant ID: 095-00044
Reviewer: Michael Hirtler
Date: October 28, 1997

Potential Uncontrolled Emissions:																		
Coating Material (as applied)	Product Being Coated	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency	
Primer Booth																		
High Solids Primer	Plastic Auto Fascia	8.17	57.00%	0.00%	57.00%	0.00%	33.86%											
Isobutyl Acetate		7.25	100.00%	0.00%	100.00%	0.00%	0.00%											
Mixture as Applied (400:21.25 ratio)		8.12	58.94%	0.00%	58.94%	0.00%	32.34%	0.0505	240.00	4.79	4.79	58.03	1392.65	254.16	79.69	14.81	55%	
Methyl Ethyl Ketone (systems clean-up)		6.80	100.00%	0.00%	100.00%	0.00%	0.00%	0.1142	(gal/hour)	6.80	6.80	0.78	18.64	3.40	0.00	ERR	55%	
Isopropyl Alcohol (gun clean-up)		6.50	100.00%	0.00%	100.00%	0.00%	0.00%	0.1142	(gal/hour)	6.50	6.50	0.74	17.82	3.25	0.00	ERR	55%	
N-Methyl Pyrillidone (difficult clean-ups)		8.58	100.00%	0.00%	100.00%	0.00%	0.00%	0.0076	(gal/hour)	8.58	8.58	0.07	1.56	0.29	0.00	ERR	55%	
Isobutyl Acetate (misc. usage)		7.25	100.00%	0.00%	100.00%	0.00%	0.00%	1.0551	(gal/hour)	7.25	7.25	7.65	183.59	33.50	0.00	ERR	55%	
Adhesion Promoter Booth																		
Adhesion Promoter	Plastic Auto Fascia	7.20	90.88%	0.00%	90.88%	0.00%	6.16%	0.03	240.00	6.54	6.54	47.11	1130.69	206.35	9.32	106.22	55%	
Methyl Ethyl Ketone (systems clean-up)		6.80	100.00%	0.00%	100.00%	0.00%	0.00%	0.1142	(gal/hour)	6.80	6.80	0.78	18.64	3.40	0.00	ERR	55%	
Isopropyl Alcohol (gun clean-up)		6.50	100.00%	0.00%	100.00%	0.00%	0.00%	0.1142	(gal/hour)	6.50	6.50	0.74	17.82	3.25	0.00	ERR	55%	
N-Methyl Pyrillidone (difficult clean-ups)		8.58	100.00%	0.00%	100.00%	0.00%	0.00%	0.0076	(gal/hour)	8.58	8.58	0.07	1.56	0.29	0.00	ERR	55%	
Total Uncontrolled Potential Emissions:												115.96	2782.96	507.89	89.01			
Controlled and Limited Emissions																		
Total Controlled and Limited Emissions:										Material Input Limitation as % of Potential	Control Efficiency PM	Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr			
										47.45%	98.00%	55.02	1320.52	240.99	0.84			

Methodology:

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight% Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1-Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Transfer Efficiency
Uncontrolled VOC Total = Worst Coating + Sum of all solvents
Controlled and Limited VOC emission rate = Uncontrolled Emission Rate * Coating Material Input Limitation
Controlled and Limited PM emission rate = (Uncontrolled Emission Rate * Coating Material Input Limitation) * (1 - Control Efficiency)

Pursuant to Amendment to Operation Permit 48-01-94-0096, A095-5819-00044 issued on May 23, 1996, VOC input usage to the existing Spray Coating Line booths 1, 2, 3, & 4 is limited to 241.0 tons per year and 20.0 tons per month. Compliance with these limits did not impose new requirements pursuant to 326 IAC 8-1-6 (BACT) on the spray coating line. Amendment A095-5819-00044 also limited source-wide VOC input usage to 249.0 tons per year and 20.75 tons month on a fixed monthly basis, making the requirements of 326 IAC 2-2 and 40 CFR 52.21, Prevention of Significant Deterioration (PSD), not applicable to the source. The proposed Primer and Adhesion Promoter booths will be installed on the existing Spray Coating Line and the VOC emission limits of 241.0 tons per year and 20.0 tons per month for the facility, and 249.0 tons per year and 20.75 tons per month for the source, pursuant to the conditions of Amendment A095-5819-00044 will remain unchanged. Therefore, the existing requirements pursuant to 326 IAC 8-1-6 for the Spray Coating Line, inclusive of the two proposed booths, will continue to apply to the facility (i.e., the coating line), and the PSD requirements will not apply to the source.

**Appendix A: HAP Emission Calculations
Proposed Primer and Adhesion Promoter Booths**

Company Name: Paint and Assembly Corporation
 Address City IN Zip: SR 37 and Brickyard Road, Elwood, Indiana 46036
 Part 70 No.: 095-6536
 Plant ID: 095-00044
 Reviewer: Michael Hirtler
 Date: October 28, 1997

Material (as applied)	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Methyl Ethyl Ketone (MEK)	Weight % Methyl Isobutyl Ketone	Weight % Glycol Ethers	Weight % Ethyl Benzene	Weight %	HAP EMISSION RATES (TONS PER YEAR)														
											Xylene	Toluene	Methyl Ethyl Ketone (MEK)	Methyl Isobutyl Ketone	Glycol Ethers	Ethyl Benzene		Total All HAPs							
Primer Booth																									
High Solids Primer	8.17	11.5091	(gal/hour)	5.00%	0.00%	0.00%	5.00%	0.00%	0.00%	0.00%	20.59	0.00	0.00	20.59	0.00	0.00	0.00	41.18							
Methyl Ethyl Ketone (systems clean-up)	6.80	0.1142	(gal/hour)	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	3.40	0.00	0.00	0.00	0.00	3.40							
Adhesion Promoter Booth																									
Adhesion Promoter	7.20	7.200	(gal/hour)	20.00%	20.00%	20.00%	0.00%	10.00%	5.00%	0.00%	45.41	45.41	45.41	0.00	22.71	11.35	0.00	170.29							
Methyl Ethyl Ketone (systems clean-up)	6.80	0.1142	(gal/hour)	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	3.40	0.00	0.00	0.00	0.00	3.40							

Total Uncontrolled Potential Emissions											66.00	45.41	52.21	20.59	22.71	11.35	0.00	218.28
Total Limited Emissions (controlled)											31.32	21.55	24.78	9.77	10.77	5.39	0.00	103.57

METHODOLOGY

Uncontrolled Potential HAP Emission Rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
 Controlled VOC emission rate = Uncontrolled Emission Rate * Coating Material Input Limitation
 Total VOC input to the Spray Coating Line, inclusive of proposed Primer and Adhesion Promoter Booths, shall be limited to 47.45% of total potential input based on 8,760 hours per year operation in order to limit VOC emissions to 241.0 tons per year for the facility (i.e., Spray Coating Line) and the source VOC emissions to 249.0 tons per year. Therefore, the requirements pursuant to 326 IAC 8-1-6 (BACT) and 326 IAC 2-2 (PSD) will not apply to this source.