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

Glaval Corporation - Plants 1 & 9
55135 CR 1, Elkhart, Indiana 46514 (Plant 1)
914 CR 1, Elkhart, Indiana 46514 (Plant 9)

(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.: T 039-6955-00126	
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). 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 stationary vehicle assembly source.

Responsible Official:	Thomas A. Stutsman
Source Address:	55135 CR 1, Elkhart, Indiana 46514 (Plant 1) 914 CR 1, Elkhart, Indiana 46514 (Plant 9)
Mailing Address:	P.O. Box 1647, Elkhart, Indiana 46515
SIC Code:	3711
County Location:	Elkhart
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD; 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:

Plant 1

(a) One (1) fiberglass and plastic paint operation, identified as EU-1, consisting of eleven (11) paint booths and one (1) body shop, equipped with high volume low pressure (HVLP) spray applicators, equipped with dry filters for overspray control, exhausting through Stacks S1 - S11 and S12 and S13, capacity: 32 miscellaneous parts per hour.

Plant 9

(b) One (1) car wash, identified as EU-2, exhausting through any or all of Stacks GV-1 through GV-9, capacity 25 vehicles per hour.

(c) One (1) general assembly and cleaning area, identified as EU-3, exhausting through any or all Stacks GV-1 through GV-9, capacity: 25 vehicles per hour.

(d) One (1) gluing operation, identified as EU-4, exhausting through any or all Stacks GV-1 through GV-9, capacity: 25 vehicles per hour.

(e) One (1) gluing operation, identified as EU-5, exhausting through any or all Stacks GV-1 through GV-9, capacity: 25 vehicles per hour.

Plant 1

(f) Three (3) spray paint lines, identified as EU-6a, EU-6b and EU-6c, all equipped with high volume low pressure (HVLP) spray applicators, all equipped with dry filters for overspray control, exhausting through Stacks S14, S15 and S16, respectively, capacity: 13 vehicles per day each for EU-6a and EU-6b and 5 vehicles per day for EU-6c.

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) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

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

(c) Welding and torch and plasma cutting emitting greater than 1 pounds per day, but less than 5 pounds per day or 1 ton per year of a single HAP

(d) MIG aluminum welding (PM: 0.004 pounds per hour)

(e) MIG steel welding (PM: 0.22 pounds per hour)

(f) Oxyacetylene cutting (PM: 0.34 pounds per hour)

(g) Plasma cutting (PM: 0.19 pounds per hour)

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:

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

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.

(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.

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

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, 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, 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, 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 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 April 15 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

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, 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]

(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

(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.

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, 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

(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

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, 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, 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, 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, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has 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

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, 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, 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, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, 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 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

(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, on or before the date it is due. [326 IAC 2-5-3]

(2) If IDEM, OAM, 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, 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, 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, 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

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 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

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, 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, 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, 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, nor an authorized representative, may disclose the information unless and until IDEM, OAM, 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, and IDEM, OAM, 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, 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, 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, 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.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

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

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

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

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 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

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.8 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

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.9 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.10 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

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.11 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.

C.12 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

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

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

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

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

The ERP does 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, 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, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

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

If a regulated substance, subject to 40 CFR 68, is present 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, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM, 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.15 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 upon request and shall be subject to review and approval by IDEM, OAM. 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.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate 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.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate 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 December 1 and ending November 30. 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

(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, on or before the date it is due.

C.18 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 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.19 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, 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.20 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

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

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

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Plant 1:

(a) One (1) fiberglass and plastic paint operation, identified as EU-1, consisting of eleven (11) paint booths and one (1) body shop, equipped with high volume low pressure (HVLP) spray applicators, equipped with dry filters for overspray control, exhausting through Stacks S1 - S11 and S12 and S13, capacity: 32 miscellaneous parts per hour.

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

D.1.1 Volatile Organic Compound [326 IAC 2-2] [326 IAC 8-1-6]

(a) Pursuant to CP-039-3822-00126, issued on December 10, 1995, this fiberglass and plastic paint operation shall use no more than 99.0 tons of VOC, including coatings, dilution solvents, and cleaning solvents per twelve (12) consecutive month period. This usage limit combined with a source-wide VOC emissions limit of 240 tons per twelve (12) consecutive month period makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

(b) Pursuant to CP 039-3822 and 326 IAC 8-1-6, issued on December 10, 1995, BACT for this fiberglass and plastic paint operation was determined to be the utilization of high volume low pressure (HVLP) spray applicators coupled with a water-based surface preparation material and lower VOC coatings with a maximum as-applied VOC content of 6.40 pounds of VOC per gallon of coating less water. In addition, high volume low pressure (HVLP) gun pressure shall not exceed 10 pounds per square inch.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the PM from this fiberglass and plastic paint operation 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:

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

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility 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 particulate matter limit specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitations contained in Conditions D.1.1 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, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.6 VOC Emissions

Compliance with Condition D.1.1 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.1.7 Particulate Matter (PM)

The fiberglass and plastic paint operation dry filters for PM control shall be in operation at all times when EU-1 is in operation.

D.1.8 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from this fiberglass and plastic paint operation Stacks S-1 through S-11 and body shop stacks S-12 and S-13. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from stacks S-1 through S-13 and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

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

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

D.1.9 Record Keeping Requirements

(a) To document compliance with Condition D.1.1 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.1.1.

(1) The amount as well as the 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.

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

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

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.1.1(b), the Permittee shall maintain a log of HVLP gun pressure observations and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) To document compliance with Conditions D.1.2 and D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

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

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Plant 1:

(f) Three (3) spray paint lines, identified as EU-6a, EU-6b and EU-6c, all equipped with high volume low pressure (HVLP) spray applicators, all equipped with dry filters for overspray control, exhausting through Stacks S14, S15 and S16, respectively, capacity: 13 vehicles per day each for EU-6a and EU-6b and 5 vehicles per day for EU-6c.

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, 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

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.

(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.

Operation Conditions

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

D.2.6 Volatile Organic Compound [326 IAC 2-2] [326 IAC 8-1-6]

Each of the three (3) spray paint lines shall use no more than 2.00 tons of VOC, including coatings, dilution solvents, and cleaning solvents per month. This usage limit combined with a source-wide VOC emissions limit of 240 tons per twelve (12) consecutive month period makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.2.7 Vehicle Limitation [326 IAC 8-2-9]

The number of vehicles coated shall be limited to 34 vehicles per line per day and any change or modification which increases the number of vehicles coated per line per day to 35 or greater shall obtain a New Construction Permit before any such change may occur. Therefore, 326 IAC 8-2-9 does not apply.

D.2.8 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the PM from each of the three (3) spray paint lines 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:

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

D.2.9 New source toxics control [326 IAC 2-1-3.4]

Pursuant to 326 IAC 2-1-3.4, any change or modification in EU 6a, EU-6b or EU-6c that results in an increase in a single HAP above ten (10) tons per year or an increase in the combination of HAPs above twenty-five (25) tons per year shall obtain prior approval from IDEM, OAM before such change may occur.

D.2.10 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

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

The Permittee is not required to test this facility 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 particulate matter limit specific in Condition D.2.8 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.12 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.2.6 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 reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.13 VOC Emissions

Compliance with Condition D.2.6 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.2.14 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when any of the three (3) spray paint lines are in operation.

D.2.15 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray paint Stacks S14, S15 and S16 when one or more of the three (3) spray paint lines are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from Stacks S14, S15 and S16 and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

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

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

D.2.16 Record Keeping Requirements

(a) To document compliance with Condition D.2.6 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.2.6.

(1) The amount 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.

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

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

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.2.7, the Permittee shall maintain a log of the number of vehicles coated per line per day.

(c) To document compliance with Conditions D.2.8 and D.2.13, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.17 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.6 and D.2.7 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Plant 9:

(b) One (1) car wash, identified as EU-2, exhausting through any or all of Stacks GV-1 through GV-9, capacity 25 vehicles per hour.

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

D.3.1 Volatile Organic Compound [326 IAC 2-2] [326 IAC 8-1-6]

The car wash shall use no more than 2.00 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per month. This usage limit combined with a source-wide VOC emissions limit of 240 tons per twelve (12) consecutive month period makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device if applicable.

Compliance Determination Requirements

D.3.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility 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 VOC limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.3.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.3.1 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 reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.3.5 VOC Emissions

Compliance with Condition D.3.1 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.

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

D.3.6 Record Keeping Requirements

(a) To document compliance with Condition D.3.1 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.3.1.

(1) The amount 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.

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

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

(5) The weight of VOCs emitted for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.7 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Plant 9:

(c) One (1) general assembly and cleaning area, identified as EU-3, exhausting through any or all Stacks GV-1 through GV-9, capacity: 25 vehicles per hour.

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

D.4.1 Volatile Organic Compound (VOC) [326 IAC 2-2] [326 IAC 8-1-6]

The general assembly and cleaning area shall use no more than 2.00 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per month. This usage limit combined with a source-wide VOC emissions limit of 240 tons per twelve (12) consecutive month period makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.4.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device if applicable.

Compliance Determination Requirements

D.4.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility 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 VOC limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.4.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.4.1 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 reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.4.5 VOC Emissions

Compliance with Condition D.4.1 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.

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

D.4.6 Record Keeping Requirements

(a) To document compliance with Condition D.4.1 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.4.1.

(1) The amount 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.

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

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

(5) The weight of VOCs emitted for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.7 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Plant 9:

(d) One (1) gluing operation, identified as EU-4, exhausting through any or all Stacks GV-1 through GV-9, capacity: 25 vehicles per hour.

(e) One (1) gluing operation, identified as EU-5, exhausting through any or all Stacks GV-1 through GV-9, capacity: 25 vehicles per hour.

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

D.5.1 Volatile Organic Compounds (VOC) [326 IAC 2-2]

The two (2) gluing operations, EU-4 and EU-5, shall use no more than a total of 1.76 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per month. This usage limit combined with a source-wide VOC emissions limit of 240 tons per twelve (12) consecutive month period makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.5.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Surface coating emission limitations: wood furniture and cabinet coating), the surface coating applied to wood furniture and cabinets only in EU-4 shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.5.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compounds (VOC) content of coating delivered to the applicators only in EU-5 shall be limited to 3.5 pounds of VOC per gallon of coating less water, for forced warm air or air 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.5.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these operations.

Compliance Determination Requirements

D.5.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility 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 VOC limit specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.5.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.5.1 and D.5.3 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 reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.5.7 VOC Emissions

Compliance with Condition D.5.1 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.

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

D.5.8 Record Keeping Requirements

(a) To document compliance with Conditions D.5.1 and D.5.3 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.5.1.

(1) The amount as well as the 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.

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

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

(5) The weight of VOCs emitted for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.5.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.6 FACILITY OPERATION CONDITIONS

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

Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches soldering equipment, welding equipment, Welding and torch and plasma cutting emitting greater than 1 pounds per day, but less than 5 pounds per day or 1 ton per year of a single HAP, MIG aluminum welding (PM: 0.004 pounds per hour), MIG steel welding (PM: 0.22 pounds per hour), Oxyacetylene cutting (PM: 0.34 pounds per hour), and Plasma cutting (PM: 0.19 pounds per hour).

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

D.6.1 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

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

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a matter that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.6.2 Volatile Organic Compounds (VOC)

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.6.3 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the brazing equipment, cutting torches, soldering equipment, welding equipment, plasma cutting, MIG aluminum and steel welding, as well as oxyacetylene and plasma cutting shall not exceed allowable PM emission rate based on the following equation:

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

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

or

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

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

Compliance Determination Requirement

D.6.4 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 facilities are in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.6.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Glaval Corporation - Plants 1 & 9
Source Address: 55135 CR 1, Elkhart, Indiana 46514 (Plant 1)
914 CR 1, Elkhart, Indiana 46514 (Plant 9)
Mailing Address: P.O. Box 1647, Elkhart, Indiana 46515
Part 70 Permit No.: T 039-6955-00126

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: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Glaval Corporation - Plants 1 & 9
Source Address: 55135 CR 1, Elkhart, Indiana 46514 (Plant 1)
914 CR 1, Elkhart, Indiana 46514 (Plant 9)
Mailing Address: P.O. Box 1647, Elkhart, Indiana 46515
Part 70 Permit No.: T 039-6955-00126

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

PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: Glaval Corporation - Plants 1 & 9
Source Address: 55135 CR 1, Elkhart, Indiana 46514 (Plant 1)
914 CR 1, Elkhart, Indiana 46514 (Plant 9)
Mailing Address: P.O. Box 1647, Elkhart, Indiana 46515
Part 70 Permit No.: T 039-6955-00126

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.1.3)	**Number of Deviations**	**Date of Each Deviation**

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

Part 70 Monthly Report

Source Name: Glaval Corporation - Plants 1 & 9
Source Address: 55135 CR 1, Elkhart, Indiana 46514 (Plant 1)
914 CR 1, Elkhart, Indiana 46514 (Plant 9)
Mailing Address: P.O. Box 1647, Elkhart, Indiana 46515
Part 70 Permit No.: T 039-6955-00126
Facilities: Three (3) spray paint lines (EU-6a, b and c)
Parameter: Number of vehicles coated
Limit: Thirty-four (34) vehicles per day, each line

Month: _____ **Year:** _____

Day	# of Vehicles Coated Per Line			Day	# of Vehicles Coated Per Line		
	6a	6b	6c		6a	6b	6c
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

Part 70 Quarterly Report

Source Name: Glaval Corporation - Plants 1 & 9
Source Address: 55135 CR 1, Elkhart, Indiana 46514 (Plant 1)
914 CR 1, Elkhart, Indiana 46514 (Plant 9)
Mailing Address: P.O. Box 1647, Elkhart, Indiana 46515
Part 70 Permit No.: T 039-6955-00126
Facilities: EU-1 through EU-6
Parameter: Volatile Organic Compounds
VOC Limit: Source-Wide = 240 tons per consecutive 12 month period
Insignificant Activities = 9.0 tons per consecutive 12-month period
EU-1 = 99.0 tons per twelve (12) consecutive month period
EU-2 and EU-3 = 2.00 tons per month, each
EU-4 and EU-5 = 1.13 tons per month, total
EU-6 = 2.0 tons per month per line, 6.0 tons per month total

YEAR: _____, Month _____

VOC Emissions (tons per month)									
EU-1 This Month	EU-1 Last 12 Months	EU-2	EU-3	EU-4 & EU-5	EU-6a	EU-6b	EU-6c	Total Source This Month	Last 12 Months Total Source

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

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

Source Background and Description

Source Name:	**Glaval Corporation - Plants 1 & 9**
Source Location:	**55135 CR 1, Elkhart, Indiana 46514 (Plant 1)**
	914 CR 1, Elkhart, Indiana 46514 (Plant 9)
County:	**Elkhart**
SIC Code:	**3711 and 2551**
Operation Permit No.:	**T 039-6955-00126**
Permit Reviewer:	**Mark L. Kramer**

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Glaval Corporation relating to the operation of vehicle assembly source.

Source Definition

This vehicle assembly source consists of two (2) plants:

(1) Plant 1 is located at 55135 CR 1, Elkhart, Indiana and

(2) Plant 9 is located at 914 CR 1, Elkhart, Indiana.

Since the two (2) plants are located on contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

In addition, the same owner currently operates two other plants with the same first two- (2-) digit SIC code (37). The Bennington Marine Corp. plant is located in Elkhart in Elkhart County approximately seven (7) miles from Glaval Plants 1 & 9. Bennington Marine Corp. and Glaval Corporation are completely separate companies with separate owners due to the recent merger. There is no product exchange between the two (2) companies. Therefore, the Bennington Marine Corp. plant is not considered as part of the Glaval Plants 1 and 9 source. The Charleston Corp. projects that the majority of its fiberglass and plastic parts are shipped and used by Glaval Plant 1, but this plant is located in Bremen in Marshall County. Therefore, due to its noncontiguous location with the Glaval Plants 1 and 9, this Plant will not be considered part of the Glaval Plants 1 and 9 source.

Although Dynamax Corporation and Glaval Plants 1 and 9 have the same major two (2) digit SIC Code of 37and the Dynamax Corporation is located approximately three tenths of mile (0.3) from Glaval Plants 1 and 9, they are no longer owned by the same person or entity due to a recent merger which included Glaval Corporation, but not Dynamax Corporation. Additionally, there is no third party ownership and the two (2) entities do not share common corporate offices who are responsible for the day to day operations of the entities. The majority of the output of Glaval Corporation's Plants 1 and 9 is not provided to Dynamax or vice versa. These plants do not support one another and they

operate as completely separate entities. Dynamax would exist absent Glaval Corporation's Plants 1 and 9 and vice versa. Therefore, these two (2) Corporation's facilities are no longer considered one (1) source.

The Lexington Corporation seating line is now known as part of Glaval's operations and is located in Plant 9. The Lexington Corporation is a separate location (adjacent to Dynamax Corporation, within 0.5 miles of Glaval Plants 1 and 9) with no air emissions and as such has not been incorporated into the proposed Part 70 permit. Lexington Corporation sews the fabric seats for Glaval and Glaval operates the seating line. This seating line with water-based adhesives has no VOCs and qualifies as an insignificant activity.

Permitted Emission Units and Pollution Control Equipment

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

Plant 1

(a) One (1) fiberglass and plastic paint operation, identified as EU-1, consisting of eleven (11) paint booths and one (1) body shop, equipped with high volume low pressure (HVLP) spray applicators, equipped with dry filters for overspray control, exhausting through Stacks S1 - S11 and S12 and S13, capacity: 32 miscellaneous parts per hour.

EU-1 is the painting emissions. Fiberglass and plastic miscellaneous parts are production painted. The running boards and high tops are not put on all vehicles or trucks. This emission unit also includes body shop repair painting.

Unpermitted Emission Units and Pollution Control Equipment

Plant 9

(b) One (1) car wash, identified as EU-2, exhausting through any or all of Stacks GV-1 through GV-9, capacity 25 vehicles per hour.

(c) One (1) general assembly and cleaning area, identified as EU-3, exhausting through any or all Stacks GV-1 through GV-9, capacity: 25 vehicles per hour.

(d) One (1) gluing operation, identified as EU-4, exhausting through any or all Stacks GV-1 through GV-9, capacity: 25 vehicles per hour.

(e) One (1) gluing operation, identified as EU-5, exhausting through any or all Stacks GV-1 through GV-9, capacity: 25 vehicles per hour.

EU-2 is emissions from car washing. All vehicles pass through this car washing process. EU-3 is the cleaning solvent emissions. Again, all vehicles pass through this cleaning operation. EU-4 is the emissions from adhesive application to wood and plastic, while EU-5 is adhesive application to metal.

Construction was completed on EU-2 by September 1993 and construction was completed on EU-3, EU-4 and EU-5 by May 1, 1990.

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

The application includes information relating to the construction and operation of three (3) spray paint lines:

Plant 1

(f) Three (3) spray paint lines, identified as EU-6a, EU-6b and EU-6c, all equipped with high volume low pressure (HVLP) spray applicators, all equipped with dry filters for overspray control, exhausting through Stacks S14, S15 and S16, respectively, capacity: 13 vehicles per day each for EU-6a and EU-6b and 5 vehicles per day for EU-6c.

EU-6a,b and c are the full-body van and truck metal and plastic spraying and baking emission units. Construction is proposed to commence upon issuance of the Part 70 permit for EU-6a, EU-6b and EU-6c.

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 British thermal units per hour.

(b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 British thermal units per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 British thermal units per hour.

(c) Combustion source flame safety purging on startup.

(d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.

(e) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

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

(g) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

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

(i) Closed loop heating and cooling systems.

(j) Infrared cure equipment.

(k) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1 percent by volume.

(l) Any operation using aqueous solutions containing less than one (1) percent by weight of VOCs excluding HAPs (undercoating).

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

(n) Paved and unpaved roads and parking lots with public access.

(o) Asbestos abatement projects regulated by 326 IAC 14-10.

(p) 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.

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

(r) On-site fire and emergency response training approved by the department.

(s) Filter or coalescer media changeout.

(t) Water-based adhesives that are less than or equal to five (5) percent by volume by VOCs, excluding HAPs.

(u) Other activities or categories not previously identified:

(1) Touch-up running board screws (VOC: 0.46 pounds per hour or 10.95 pounds per day).

(2) Interior van cleaning (VOC: 0.01 pounds per hour or 0.15 pounds per day).

(3) Welding and torch and plasma cutting emitting greater than 1 pounds per day, but less than 5 pounds per day or 1 ton per year of a single HAP.

(4) MIG aluminum welding (PM: 0.004 pounds per hour).

(5) MIG steel welding (PM: 0.22 pounds per hour).

(6) Oxyacetylene cutting (PM: 0.34 pounds per hour).

(7) Plasma cutting (PM: 0.19 pounds per hour).

Existing Approvals

The source has been operating under the following approval:

CP 039-3822, issued on December 10, 1995.

Enforcement Issue

(a) IDEM is aware that the following equipment has been constructed and operated prior to receipt of the proper permit:

Plant 9

(1) One (1) car wash, identified as EU-2, exhausting through Stack GV-1, capacity 25 vehicles per hour.

(2) One (1) general assembly and cleaning area, identified as EU-3, exhausting through stack GV-1, capacity: 25 vehicles per hour.

(3) One (1) gluing operation, identified as EU-4, exhausting through any or all Stacks GV-1 through GV-9, capacity: 25 vehicles per hour.

(4) One (1) gluing operation, identified as EU-5, exhausting through any or all Stacks GV-1 through GV-9, capacity: 25 vehicles per hour.

(b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

The source has the following enforcement actions (Agreed Orders) pending:

Agreed Order (Cause Nos. A-2963, A-2964 & A-3053) finalized in July 1997.

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 October 18, 1996. Additional information was received on August 18 and September 8, 1997 as well as on January 5 and 6, February 11, and September 2, 3 and 23, 1998.

A notice of completeness letter was mailed to the source on October 29, 1996.

Emission Calculations

See pages 1 through 6 of 6 in Appendix A of this document for detailed emissions calculations.

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	greater than 100, less than 250
PM_{10}	greater than 100, less than 250
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.

HAPs	Potential Emissions (tons/year)
Xylene	greater than 10
Toluene	greater than 10
Hexane	greater than 10
Glycol Ethers	greater than 10
Methanol	less than 10
Lead Compounds	greater than 10
Nickel Compounds	greater than 10
MEK	greater than 10
MIBK	greater than 10
Methyl Chloroform	less than 10
Methylene Chloride	less than 10
Perc.	less than 10
TOTAL	**greater than 25**

(a) The potential emissions (as defined in the Indiana Rule) of VOC and PM_{10} 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 1995 OAM emission data and the applicant supplied the 1996 HAPs emissions.

Pollutant	Actual Emissions (tons/year)
PM	6.30
PM_{10}	6.30
SO_2	0.00
VOC	62.0
CO	0.00
NO_x	0.00
Xylene	8.2
Toluene	16.3
Hexane	2.4
Methanol	0.01
Triethylamine	2.0
MEK	4.7
MIBK	1.8
Methylene Chloride	25.8
MDI	1.0
DEHP	0.004
Ethyl Benzene	0.5

Limited Potential to Emit

The table below summarizes the total limited potential to emit of the significant emission units. The VOC emission limit of 99 tons per year for EU-1 is a result of BACT listed in Construction Permit CP 039-3822-00126 issued on December 10, 1995. The application proposed that EU-2 and EU-3 will each opt for a 24.0 ton per year limit, and EU-6a, b and c will opt for a 24 tons per year VOC emission limit on each of the three (3) independent lines to avoid the applicability of 326 IAC 8-1-6. However, the source has accepted a source-wide emission limit for VOC of 249 tons per year and a presumptive BACT.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM_{10}	SO_2	VOC	CO	NO_X	HAPS
Fiberglass & Plastic Paint Operation (EU-1)	0.883	0.883	0.00	99.0	0.00	0.00	59.9
Car Wash (EU-2)	0.00	0.00	0.00	24.0	0.00	0.00	7.66
General Assembly & Cleaning Area (EU-3)	0.00	0.00	0.00	24.0	0.00	0.00	18.5
Two (2) Gluing Operations (EU-4 & 5)	1.37	1.37	0.00	13.6	0.00	0.00	11.6
Three (3) Spray Paint Lines (EU-6 a, b and c)	0.326	0.326	0.00	72	0.00	0.00	30.7
Insignificant Activities	18.0	18.0	1.00	16	1.00	5.00	2.00
Total Emissions	20.6	20.6	1.00	249	1.00	5.00	130

The VOC limits specified are the BACT emissions limit for EU-1 and 24 tons per year limits per emission unit to avoid the requirement of 326 IAC 8-1-6. The source has accepted a total VOC source-wide emissions limit of 249 tons per year (233 tons per twelve (12) consecutive month period for the significant emission units and 16 tons per year as a conservative estimate for the insignificant activities) and no emission units will exceed the stated individual limits. The applicant has agreed to accept the source-wide limit for VOC to remain a minor source under PSD rules. The limited PM overspray emissions reflect the control of the filters and have been reduced proportionately by the original requested VOC limits. HAPS have been similarly reduced.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM_{10}	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

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. Elkhart County has been designated as maintenance 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) applicable to this source. The wood furniture NESHAP Subpart JJ does not apply because there are no woodworking and/or furniture manufacturing activities at this source. The only operation that involves wood in any way is wood coating done in EU-4 which involves applying an adhesive to pieces of wood trim and the potential HAPS are less than ten (10) tons per year.

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 ten (10) tons per year for specific Elkhart County of volatile organic compounds. 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 April 15 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)

The proposed new construction of EU-6a, 6b and 6c fits the definition of "to construct a major source" which is defined in CFR Part 63.41 (Definitions) as, " to fabricate, erect, or install at any developed site a new process or production unit which in and of itself emits or has the potential to emit 10 tons per year of any HAP or 25 tons per year of any combination of HAPS. The new construction is not subject to the requirements of this rule since the VOC emissions from each of the three (3) parallel new lines are limited to less than 25 tons per year and results in HAPS that are limited to less than the major source levels of 10 tons per year for a single HAP and 25 tons per year for the combination of all HAPS. Any change or modification in EU 6a, 6b or 6c that results in an increase in single HAP above 10 tons per year or combination of HAPS above 25 tons per year will require approval of IDEM, OAM before such change may occur.

326 IAC 6-3-2 (Process Operations)

The spray operations and the insignificant welding activities shall comply with 326 IAC 6-3-2(c). The 326 IAC 6-3-2 equations are as follows: $E = 4.10\ P^{0.67}$, where P equals process weight in tons per hour for process weights up to and including sixty thousand (60,000) pounds per hour and E equals the allowable emission rate in pounds per hour. For process weights in excess of sixty thousand (60,000) pounds per hour, $E = 55.0\ ^{P0.11} - 40$. Compliance for the spray operation is shown by the use of dry filters for overspray control.

326 IAC 8-1-6 (New facilities; general reduction requirements)

Pursuant to CP 039-3822, issued on December 10, 1995, the fiberglass and plastic paint operation (EU-1) shall comply with 326 IAC 8-1-6, which requires use of Best Available Control Technology (BACT). BACT for this facility was determined to be the utilization of high volume low pressure (HVLP) spray applicators, two conveyor paint lines and curing ovens coupled with a water-based surface preparation material, and lower VOC coatings with a maximum as-applied VOC content of 6.40 pounds of VOC per gallon of coating less water. In addition, HVLP gun pressure shall not exceed 10 pounds per square inch. This permit also contained a 99 tons per year VOC emission limit for EU-01.

The two conveyor paint lines and curing ovens are no longer necessary in order to comply with the maximum as-applied VOC content limit of 6.40 pounds of VOC per gallon of coating less water and the 99 tons per year VOC emission limit for EU-1. The conveyor lines and curing ovens did not improve production as originally planned and have no bearing on the VOC emission rate or VOC content. Therefore, BACT for this facility will be the utilization of high volume low pressure (HVLP) spray applicators coupled with a water-based surface preparation material, with lower VOC coatings and a maximum as-applied VOC content of 6.40 pounds of VOC per gallon of coating less water. In addition, HVLP gun pressure shall not exceed 10 pounds per square inch. The VOC emission limit for EU-01 is 99 tons per year.

Since the proposed additions of EU-6a, b and c have the potential to emit VOCs that exceeds 25 tons per year, each are subject to 326 IAC 8-1-6. Since each of the three (3) lines of EU-6 paints separate parts and are considered parallel operations, the source has accepted a limit of 24.0 tons per year to avoid the applicability of 326 IAC 8-1-6. The source has accepted a presumptive BACT for EU-6a, b and c as well as for EU-2 through EU-5 that require a source-wide limit of 233 tons per twelve (12) consecutive month period of VOC emissions including the emissions from EU-1. In addition, the following workplace practices are required of EU-2 through EU-6a, b and c since a source-wide VOC emission limit is also included as part of the proposed permit:

(a) The cleanup solvent containers used to transport solvent from drums to work stations be closed containers having soft gasketed spring-loaded closures.

(b) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.

(c) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.

(d) The application equipment operators shall be instructed and trained on the methods and practices utilized to minimize the overspray emitted on the floor and into the air filters.

(e) All solvent sprayed during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

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

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coatings applied to the metal van and truck parts in EU-5 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance 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 page of 1 of 6 of Appendix A, the coatings on metal in EU-5 comply with this rule.

Each line of EU-6 is exempt from the requirements of 326 IAC 8-2-9, since each line will limit throughput to less than 35 vehicles per day and therefore could be subject to the requirements of 326 IAC 8-1-6. The VOC emissions from EU-6 will be limit to 24.0 tons per year per line.

This rule does not apply to EU-2 and EU-3 since the materials applied are cleaners and not coatings.

326 IAC 8-2-12 (Surface coating emission limitations: wood furniture and cabinet coating)

The airless (aerosol) wood coating application method in EU-4 used in coating wood comply with this rule.

326 IAC 8-3-2 (Cold Cleaner Operations) or 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control)

The insignificant degreasing activities shall comply with the appropriate rule that requires work place standards in the operation of degreasing facilities.

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:

The surface coating operation has applicable compliance monitoring conditions as specified below:

(a) The amount of VOC delivered to the applicators including cleanup solvents must be monitored and recorded on a monthly basis. This information must be reported to OAM on a quarterly basis for EU-1, EU-2, EU-3, EU-4, EU-5 and EU-6a, b and c. Material Data Safety Sheets (MSDS) must be kept on file for each coating and cleanup solvent used during each quarter.

(b) Records of the pressure from the line pressure monitoring devices on the HVLP guns shall be taken on a daily basis, and records of these measurements shall be maintained for at least the past 24-month period and made available upon request of the Office of Air Management for EU-1.

(c) The number of vehicles coated by day in each of the three (3) lines of EU-6 must be monitored and recorded on a monthly basis. This information must be reported to OAM on a quarterly basis.

These monitoring conditions are necessary to ensure compliance with 326 IAC 2-7 (Part 70).

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 on pages 3 - 6 of 6 of Appendix A for detailed air toxic calculations.

Conclusion

The operation of this vehicle assembly source shall be subject to the conditions of the attached proposed **Part 70 Permit No. T 039-6955-00126.**

Indiana Department of Environmental Management
Office of Air Management

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

Source Name:	**Glaval Corporation - Plants 1 & 9**
Source Location:	**55135 CR 1, Elkhart, Indiana 46514 (Plant 1)**
	914 CR 1, Elkhart, Indiana 46514 (Plant 9)
County:	**Elkhart**
SIC Code:	**3711 and 2551**
Operation Permit No.:	**T 039-6955-00126**
Permit Reviewer:	**Mark L. Kramer**

On October 16, 1998, the Office of Air Management (OAM) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Glaval Corporation - Plants 1 & 9, had applied for a Part 70 Operating Permit to operate a vehicle assembly source with control. The notice also stated that OAM proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit should be issued as proposed.

On November 11, 1998, Shelly R. Harshberger, Environmental & Safety Manager, Glaval Corporation, submitted comments on the proposed Part 70 Operating Permit. The comments are as follows and deleted language appears as ~~strikeouts~~, new language is **bolded**:

Comment 1:

Page 20 of 54, Section B.28 Credible Evidence
The credible evidence condition is too generic and needs to define what permit condition it is applicable to. The credible evidence rule removes all certainty for us to monitor our own compliance. We request the credible evidence condition be removed from the permit.

Response 1:

The IDEM now believes that Condition B.28 is not necessary and has removed it from the permit. The issues regarding credible evidence can be adequately addressed during a showing of compliance or noncompliance. Indiana's statutes, and the rules adopted under this authority, govern the admissibility of evidence in any proceeding. Indiana law contains no provisions that limit the use of any credible evidence and an explicit statement is not required in the permit.

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

~~Not withstanding 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.~~

Comment 2:

Page 28 of 54, Section C.19 General Record Keeping Requirements
We request C.19(c)(4) be removed from the permit. This item is not required by Indiana Administrative Code and would be overly burdensome.

Response 2:

Condition C.19(c)(4) states:

(c) Support information shall include, where applicable:

(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.

The first sentence of (4) does not duplicate B.12, the Preventive Maintenance Plan requirement. The first sentence of (4) sets out the records that must be kept to be in compliance with B.12. The second sentence of (4) is required by 326 IAC 2-7-5(3)(B). Specifically, (B)(ii) requires retention of records for all required monitoring data and support information, and support information includes calibration and maintenance records. Therefore, this condition has been retained in the permit.

Comment 3:

Page 29 of 54, Section C.20 General Reporting Requirements
An Annual Compliance Certification is required to certify that the source has complied with the terms and conditions contained in the permit. The Part 70 Operating Permit Certification is required when submitting monitoring, testing reports/results or other documents. The Quarterly Compliance Monitoring Report is just another report stating the same as the previous two reports, and therefore is redundant, unnecessary and overly burdensome. Please remove all references to the Quarterly Compliance Monitoring Report requirement. The Annual Compliance Certification is adequate to evaluate and assure continuous compliance.

Response 3:

Pursuant to 326 IAC 2-7-5(3)(C)(i), with respect to monitoring, a Part 70 permit shall incorporate all applicable reporting requirements or alternative requirements established in section 24 or 25 of 326 IAC 2-7-5 and require the submittal of reports of any required monitoring at least every six (6) months. The Annual Compliance Certification does not meet the frequency requirement of at least every six (6) months. Furthermore, quarterly reports are required to specify whether or not an emission limit in the permit has been exceeded during the last twelve (12) consecutive month period. Therefore this condition cannot be deleted.

Comment 4:

Page 32 of 54, Section D.1.8 Monitoring
We request the references to daily inspections of the placement of the filters and of the overspray and weekly inspections of the coating emission stacks be removed. These tasks would be overly burdensome.

This requirement is also found on Page 36 and 37 of 54, Section D.2.15.

Response 4:

Complying with the requirements of 326 IAC 6-3-2 can be especially variable for paint booths. The actual substrate being painted and the solids content of the paint being used can affect the process weight rate, the gallons or pounds of solids used, transfer efficiency, or other factors that directly affect actual, allowable, or potential emissions. While permit applications contain representative information regarding these factors, relying on this information as an ongoing demonstration of compliance is difficult if the factors are not themselves enforceable. The OAM does not believe that it would be generally advisable to include these factors as permit conditions, to make them enforceable or to presume that they are so fixed they define a source's potential emissions because either could severely limit a source's operational flexibility. Properly operating the air pollution controls that are already in place is generally adequate to demonstrate compliance with 326 IAC 6-3 in lieu of a stack test and also assures compliance with applicable rules limiting fugitive dust, opacity, and (when necessary) Potential to Emit. The OAM believes that checking the placement and integrity of the filters once a day is a very effective means of ensuring proper operation and ongoing compliance. The OAM has re-evaluated the other compliance monitoring provisions related to evidence of actual emissions from the paint booths and believes that less resource intensive provisions are appropriate. The frequency of visible emissions evaluations has been changed from daily to weekly. The frequency of inspections of rooftops or other surfaces for a noticeable change in solids deposition has been changed from weekly to monthly.

This response also applies to Conditions D.2.15 and D.2.16.

The revisions are as follows:

D.1.8 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, ~~daily~~ **weekly** observations shall be made of the overspray from this fiberglass and plastic paint operation Stacks S-1 through S-11 and body shop stacks S-12 and S-13. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) **Monthly** ~~Weekly~~ inspections shall be performed of the coating emissions from stacks S-1 through S-13 and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain trouble-shooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance

Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

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

D.1.9 Record Keeping Requirements

(a) To document compliance with Condition D.1.1 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.1.1.

(1) The amount as well as the 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.

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

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

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.1.1(b), the Permittee shall maintain a log of HVLP gun pressure observations and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) To document compliance with Conditions D.1.2 and D.1.8, the Permittee shall maintain a log of **weekly** ~~daily~~ overspray observations, daily and **monthly** ~~weekly~~ inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.15 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, **weekly** ~~daily~~ observations shall be made of the overspray from the spray paint Stacks S14, S15 and S16 when one or more of the three (3) spray paint lines are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) **Monthly** ~~Weekly~~ inspections shall be performed of the coating emissions from Stacks S14, S15 and S16 and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain trouble-shooting contingency and response steps for when a noticeable change in over-spray 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.

D.2.16 Record Keeping Requirements

(a) To document compliance with Condition D.2.6 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.2.6.

(1) The amount 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.

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

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

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.2.7, the Permittee shall maintain a log of the number of vehicles coated per line per day.

(c) To document compliance with Conditions D.2.8 and D.2.13, the Permittee shall maintain a log of **weekly** ~~daily~~ overspray observations, daily and ~~weekly~~ **monthly** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 5:

Page 32 and 33 of 54, Section D.1.9 Record Keeping Requirements
Section (a)(1) states that "Solvent usage records shall differentiate between those added to coatings and those used as clean-up solvents." In addition, there is no reason or rule which requires the solvents be tracked separately. We request that this requirement be removed from the permit.

Section (a)(3) requires "the volume weighted VOC content of the coatings used for each month" be recorded. This is not used for any calculations for VOC emissions and therefore should not be required. Tracking volume weighted VOC would be overly burdensome. We request that this requirement be removed from the permit.

Section (c) requires "a log of daily overspray observations, daily and weekly inspections, and those additional inspections ….". Please change this to reflect the changes in D.1.8 Monitoring.

Response 5:

Condition D.1.9(a) (1) and (a)(3) have been changed as follows since there are no requirements in Section D.1 to track the usage of solvents separately and to track volume weighted VOC content.

D.1.9 Record Keeping Requirements

(a) To document compliance with Condition D.1.1 the Permittee shall maintain records in accordance with (1) through (~~6~~**5**) below. Records maintained for (1) through (~~6~~**5**) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.1.1.

(1) The amount as well as the 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 for each month;~~

(~~4~~**3**) The cleanup solvent usage for each month;

(~~5~~**4**) The total VOC usage for each month; and

(~~6~~**5**) The weight of VOCs emitted for each compliance period.

The requirement to keep a log of weekly overspray observations, daily and monthly inspections, and those additional inspections cannot be removed since these requirements have not been removed from Condition D.1.8. Therefore Condition D.1.9(c) has not been deleted.

Comment 6

Page 37 of 54, Section D.2.16 Record Keeping Requirements
Section (a)(1) states that "Solvent usage records shall differentiate between those added to coatings and those used as clean-up solvents." In addition, there is no reason or rule which requires the solvents be tracked separately. We request that this requirement be removed from the permit.

Section (c) requires "a log of daily overspray observations, daily and weekly inspections, and those additional inspections ….". Please change this to reflect the changes in D.2.15 Monitoring.

Response 6:

Condition D.2.16(a) (1) and (a)(3) have been changed as follows since there are no requirements in Section D.2 to limit VOC content, to track the usage of solvents separately or to track volume weighted VOC content.

D.2.16 Record Keeping Requirements

(a) To document compliance with Condition D.2.6 the Permittee shall maintain records in accordance with (1) through (~~6~~**5**) below. Records maintained for (1) through (~~6~~**5**) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.2.6.

(1) The amount ~~as well as the 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 for each month;~~

(~~4~~**3**) The cleanup solvent usage for each month;

(~~5~~**4**) The total VOC usage for each month; and

(~~6~~**5**) The weight of VOCs emitted for each compliance period.

The requirement to keep a log of weekly overspray observations, daily and monthly inspections, and those additional inspections cannot be removed since these requirements have not been removed from Condition D.2.15. Therefore Condition D.2.16(c) has not been deleted.

Comment 7:

Page 40 of 54, Section D.3.6 Record Keeping Requirements
Section (a)(1) states that "Solvent usage records shall differentiate between those added to coatings and those used as clean-up solvents." In addition, there is no reason or rule which requires the solvents be tracked separately. We request that this requirement be removed from the permit.

These requirements are also found on Page 42 of 54, Section D.4.6, Page 44 and 45 of 54, Section D.5.8.

Response 7:

Condition D.3.6(a) (1) has been changed as follows since there are no requirements in Section D.3 to limit VOC content or to track the usage of solvents separately. Condition D.3.6(a) has been revised to correct the fact that there are only 5 subparts not 6.

D.3.6 Record Keeping Requirements

(a) To document compliance with Condition D.3.1 the Permittee shall maintain records in accordance with (1) through (~~6~~**5**) below. Records maintained for (1) through (~~6~~**5**) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.3.1.

(1) The amount ~~as well as the 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;~~

Condition D.4.6(a) (1) has been changed as follows since there are no requirements in Section D.4 to limit VOC content or to track the usage of solvents separately. Condition D.4.6(a) has been revised to correct the fact that there are only 5 subparts not 6.

D.4.6 Record Keeping Requirements

(a) To document compliance with Condition D.4.1 the Permittee shall maintain records in accordance with (1) through (~~6~~**5**) below. Records maintained for (1) through (~~6~~**5**) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.4.1.

(1) The amount ~~as well as the 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;~~

Condition D.5.8(a) (1) has been changed as follows since there is no requirements in Section D.5 to track the usage of solvents separately. Condition D.5.8(a) has been revised to correct the fact that there are only 5 subparts not 6.

D.5.6 Record Keeping Requirements

(a) To document compliance with Condition D.5.1 the Permittee shall maintain records in accordance with (1) through (~~6~~**5**) below. Records maintained for (1) through (~~6~~**5**) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.5.1.

(1) The amount as well as the 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;~~

Comment 8:

Page 35 of 54, Section D.2.6 VOC Presumptive BACT
These workplace practices are not specific / applicable to the certain the identified emission unit operations. In addition, because we have already taken a VOC limit to avoid BACT, we should not be required to apply the workplace practices and to document the practices. Please remove the workplace practices from the permit.

These requirements are also found on Page 39 of 54, Section D.3.1, Page 41 of 54, Section D.4.1, Page 43 of 54, Section D.5.1.

Response 8:

Since the proposed additions of EU-6a, b and c have the potential to emit VOCs that exceeds 25 tons per year, each are subject to 326 IAC 8-1-6. Since each of the three (3) lines of EU-6 paints separate parts and are considered parallel operations, the source has accepted a limit of 24.0 tons per year to avoid the applicability of 326 IAC 8-1-6. Likewise, the source has accepted a limit of 24.0 tons per year to avoid the applicability of 326 IAC 8-1-6 for EU-2 and EU-3. Changes in the application have eliminated the need for presumptive BACT due to the fact that all emission units with potential emission over 25 tons per year have accepted limits. Therefore, part (b) of Conditions D.2.6, D.3.1, D.4.1 and D.5.1 have been deleted.

~~(b) The following presumptive BACT workplace practices apply to the each of the three (3) spray paint lines (D.2.6), car wash (D.3.1), general assembly and cleaning area (D.4.1), two (2) gluing operations (D.5.1):~~

~~(1) The cleanup solvent containers used to transport solvent from drums to work stations be closed containers having soft gasketed spring loaded closures.~~

~~(2) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.~~

~~(3) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.~~

~~(4) The application equipment operators shall be instructed and trained on the methods and practices utilized to minimize the overspray emitted on the floor and into the air filters.~~

~~(5) All solvent sprayed during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized.~~

~~(6) Storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.~~

Comments 9, 10 and 11

Page 54 of 54, Quarterly Report Form
The VOC limit for the insignificant activities is not consistent with the TSD, page 8 of 13. Please change the total insignificant activities VOC limit to 9 tons per year.

Page 43 of 54, Page 54 of 54, TSD page 8 of 13, Emissions for EU-4 and EU-5
The VOC limit for EU-4 and EU-5 is incorrect. On the TSD spreadsheet for EU-5, the gallon per unit amounts are incorrect. Please refer to the latest spreadsheet dated 9/2/98 for the correct information. The total potential emissions from EU-4 is 5 tons per year and EU-5 is 16 tons per year.

TSD Spreadsheet, EU-2
There is an error in the weight % water and weight % organics for the Citrus Plus material. The two numbers have been reversed.

Responses 9, 10 and 11:

The spreadsheets have been updated and attached to this TSD addendum. The TSD table summarizing the potential emissions after applicable controls and limits has been updated as follows. The total insignificant activities VOC emissions are limited to 9 tons per year to avoid source-wide VOC emissions to less than 250 tons per year to avoid the applicability of 326 IAC 2-2. Also the Quarterly Report Form has been revised.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM_{10}	SO_2	VOC	CO	NO_X	HAPs
Fiberglass & Plastic Paint Operation (EU-1)	0.883	0.883	0.00	99.0	0.00	0.00	59.9
Car Wash (EU-2)	0.00	0.00	0.00	24.0	0.00	0.00	14.6
General Assembly & Cleaning Area (EU-3)	0.00	0.00	0.00	24.0	0.00	0.00	18.5

Two (2) Gluing Operations (EU-4 & 5)	2.12	2.12	0.00	21.1	0.00	0.00	15.6
Three (3) Spray Paint Lines (EU-6 a, b and c)	0.326	0.326	0.00	72	0.00	0.00	30.7
Insignificant Activities	18.0	18.0	1.00	9.0	1.00	5.00	2.00
Total Emissions	21.3	21.3	1.00	249	1.00	5.00	141.2

The VOC limits specified are the BACT emissions limit for EU-1 and 24 tons per year limits per emission unit to avoid the requirement of 326 IAC 8-1-6. The source has accepted a total VOC source-wide emissions limit of 249 tons per year (240 tons per twelve (12) consecutive month period for the significant emission units and 9 tons per year as a conservative estimate for the insignificant activities) and no emission units will exceed the stated individual limits. The applicant has agreed to accept the source-wide limit for VOC to remain a minor source under PSD rules. The limited PM overspray emissions reflect the control of the filters and have been reduced proportionately by the original requested VOC limits. HAPs have been similarly reduced.

Condition D.5.1 has been revised to show the monthly limit as well as the change in the source-wide limit change from 233 to 240 tons per year in this condition as well as in D.1.1, D.2.6, D.3.1 and D.4.1.

D.5.1 Volatile Organic Compounds (VOC) [326 IAC 2-2]

(a) The two (2) gluing operations, EU-4 and EU-5, shall use no more than a total of 1.76 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per month. This usage limit combined with a source-wide VOC emissions limit of 240 tons per twelve (12) consecutive month period makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

Comment 12:

Please add the use of foam sealant with a potential emission of 0.0000175 tons per year of VOC and HAP.

Response 12:

This additional insignificant activity, originally not included in the Technical Support Document, does not have to be listed in Section A.3 since there are no Federal or State rules that are directly applicable to just this activity. However, this activity will be subject to the source-wide VOC limit of 249 tons per year of which 9.0 tons are attributable to the VOC from all insignificant activities. No changes in the permit result due to this addition. The activity has been noted as addition to part (u) of the following list of insignificant activities that appeared in the TSD.

(u) Other activities or categories not previously identified:

(1) Touch-up running board screws (VOC: 0.46 pounds per hour or 10.95 pounds per day).

(2) Interior van cleaning (VOC: 0.01 pounds per hour or 0.15 pounds per day).

(3) Welding and torch and plasma cutting emitting greater than 1 pounds per day, but less than 5 pounds per day or 1 ton per year of a single HAP.

(4) MIG aluminum welding (PM: 0.004 pounds per hour).

(5) MIG steel welding (PM: 0.22 pounds per hour).

(6) Oxyacetylene cutting (PM: 0.34 pounds per hour).

(7) Plasma cutting (PM: 0.19 pounds per hour).

(8) Foam sealant with a potential emission of 0.0000175 tons per year of VOC and HAP.

Upon further review, the OAM has decided to make the following changes to the Part 70 Operating Permit:

Condition C.2 has been updated to reflect the revision in 326 IAC 5-1-2 dated November 1, 1998.

C.2 Opacity [326 IAC 5-1]

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

(a) ~~Visible emissions~~ **Opacity** shall not exceed an average of forty percent (40%) ~~opacity~~ in ~~twenty-four (24) consecutive readings~~, any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

Company Name: Glaval Corporation, Plants 1 & 9
Address City IN Zip: 55135 & 914 County Road 1, Elkhart, Indiana 46514
Part 70: 039-6955
Plt ID: 039-00126
Reviewer: Mark Kramer
Date: October 18, 1996

Material	Density (lb/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential tons per year	lb VOC /gal solids	Transfer Efficiency	Material Substrate f=fiberglass p=plastic m=metal w=wood
EU-1																		
HIGH TOP AND RUNNING BOARD PAINTING																		
BASECOLOR + BASEMAKER (worst case)																		
Balancer (150K)	7.26	90.36%	0.00%	90.4%	0.0%	7.40%	0.0700	32	1.0	6.56	6.56	14.69	352.67	64.36	1.72	88.65	75%	f or p
Tint (892J)	8.66	79.41%	0.00%	79.4%	0.0%	13.70%	0.1000	32	1.0	6.88	6.88	22.01	528.15	96.39	6.25	50.20	75%	f or p
7160S	6.61	99.83%	0.00%	99.8%	0.0%	0.13%	0.2500	32	1.0	6.60	6.60	52.79	1266.96	231.22	0.10	5075.97	75%	f or p
Binder (175K)	7.66	69.60%	0.00%	69.6%	0.0%	24.73%	0.0800	32	1.0	5.33	5.33	13.65	327.56	59.78	6.53	21.56	75%	f or p
CLEARCOAT + ACTIVATOR/REDUCER (Worst case VOC)																		
Clearcoat (7600S)	7.75	64.65%	0.00%	64.7%	0.0%	28.80%	0.5000	32	1.0	5.01	5.01	80.17	1923.98	351.13	48.00	17.40	75%	f or p
Activator (7675S)	8.32	62.48%	0.00%	62.5%	0.0%	32.05%	0.1300	32	1.0	5.20	5.20	21.63	519.00	94.72	14.22	16.22	75%	f or p
Gun Cleaning (Pure Lacquer Thinner)	7.01	100.00%	0.00%	100.0%	0.0%	0.00%	0.00507	3	1.0	7.01	7.01	0.11	2.56	0.47	0.00	N/A	75%	cleaner
Wipe Down (3949S)	8.25	99.80%	94.00%	5.8%	94.0%	0.10%	0.1000	32	1.0	7.98	0.48	1.53	36.75	6.71	0.06	478.50	75%	f or p
Cleaner (3440s)	8.12	46.40%	0.00%	46.4%	0.0%	47.01%	0.2900	32	1.0	3.77	3.77	34.96	839.14	153.14	44.23	8.01	75%	f or p
Cleaner (193s)	9.05	25.04%	0.00%	25.0%	0.0%	69.95%	0.1000	32	1.0	2.27	2.27	7.25	174.04	31.76	23.77	3.24	75%	f or p
VAN REPAIR																		
BASECOLOR + BASEMAKER (Worst case VOC)																		
Balancer (150K)	7.26	90.36%	0.00%	90.4%	0.0%	7.40%	0.0700	32	1.0	6.56	6.56	14.69	352.67	64.36	1.72	88.65	75%	f, p or m
Binder (175K)	7.66	69.60%	0.00%	69.6%	0.0%	24.73%	0.0800	32	1.0	5.33	5.33	13.65	327.56	59.78	6.53	21.56	75%	f, p or m
Tint (892J)	8.66	79.41%	0.00%	79.4%	0.0%	13.70%	0.1000	32	1.0	6.88	6.88	22.01	528.15	96.39	6.25	50.20	75%	f, p or m
7160S	6.61	99.83%	0.00%	99.8%	0.0%	0.13%	0.2500	32	1.0	6.60	6.60	52.79	1266.96	231.22	0.10	5075.97	75%	f, p or m
CLEARCOAT + ACTIVATOR/REDUCER (Worst case VOC)																		
Clearcoat (7600S)	7.75	64.65%	0.00%	64.7%	0.0%	28.80%	0.5000	32	1.0	5.01	5.01	80.17	1923.98	351.13	48.00	17.40	75%	f, p or m
Activator (7675S)	8.32	62.48%	0.00%	62.5%	0.0%	32.05%	0.1300	32	1.0	5.20	5.20	21.63	519.00	94.72	14.22	16.22	75%	f, p or m
											EU-1 subtotal:	**453.71**	**10889.14**	**1987.27**	**221.67**		
EU-2																		
CAR WASH																		
Citrus Plus Formula 524	8.29	86.0%	66.00%	20.0%	65.7%	13.60%	0.2300	25	1.0	4.83	1.66	9.53	228.80	41.76	0.00	12.19	100%	m
Formula 511 Foaming Whitewall Cleaner	8.95	85.0%	45.00%	40.0%	48.4%	25.53%	0.1100	25	1.0	6.93	3.58	9.85	236.28	43.12	0.00	14.02	100%	m
Drying Agent 520	7.62	82.3%	44.50%	37.8%	40.7%	16.10%	0.1100	25	1.0	4.86	2.88	7.92	190.10	34.69	0.00	17.89	100%	m
											EU-2 subtotal:	**27.30**	**655.19**	**119.57**	**0.00**		
EU-3																		
CLEANERS																		
Citra-Solve	6.57	80.00%	0.00%	80.0%	0.0%	15.00%	0.0100	25	1.0	5.2560	5.26	1.31	31.54	5.76	0.00	35.04	100%	m
De-Solv-Bulk	5.62	100.00%	0.00%	100.0%	0.0%	0.00%	0.0400	25	1.0	5.6200	5.62	5.62	134.88	24.62	0.00	N/A	100%	m
											EU-3 subtotal:	**6.93**	**166.42**	**30.37**	**0.00**		
EU-4																		
GLUE																		
Spray RIte HIgh Temperature Spray Adhesive	9.16	85.00%	50.00%	35.0%	55.0%	0.00%	0.0140	25	1.0	7.12	3.21	1.12	26.93	4.91	0.53	N/A	75%	w or p
											EU-4 subtotal:	**1.12**	**26.93**	**4.91**	**0.53**		
EU-5																		
GLUE																		
22 Fluid Ounce Spray Adhesive	5.00	80.00%	30.00%	50.0%	18.0%	0.00%	0.0004	25	1.0	3.05	2.50	0.03	0.60	0.11	0.01	N/A	75%	m
SprayRite Pressure Sensitive Aerosol Adhesive	5.00	76.00%	15.00%	61.0%	9.0%	0.00%	0.0480	25	1.0	3.35	3.05	3.66	87.84	16.03	1.58	N/A	75%	m
											EU-5 subtotal:	**3.69**	**88.44**	**16.14**	**1.59**		
EU-6a and EU-6b																		
TRUCK PAINTING PER LINE																		
BASECOLOR + BASEMAKER (Worst case VOC)																		
Balancer (150K)	7.26	90.36%	0.00%	90.36%	0.0%	7.4%	0.0800	1.08	1.0	6.56	6.56	0.57	13.60	2.48	0.07	88.65	75%	m & p
Tint (892J)	8.66	79.41%	0.00%	79.4%	0.0%	13.7%	0.1100	1.08	1.0	6.88	6.88	0.82	19.61	3.58	0.23	50.20	75%	m & p
7160S	6.61	99.83%	0.00%	99.8%	0.0%	0.1%	0.2800	1.08	1.0	6.60	6.60	2.00	47.89	8.74	0.00	5075.97	75%	m & p
Binder (175K)	7.66	69.60%	0.00%	69.6%	0.0%	24.73%	0.0900	1.08	1.0	5.33	5.33	0.52	12.44	2.27	0.25	21.56	75%	m & p
RTS	**7.27**	**88.59%**	**0.00%**	**88.6%**	**0.0%**	**7.79%**	**0.5600**	**1.08**	**1.0**	**6.44**	**6.44**	**3.90**	**93.54**	**17.07**	**0.55**	**82.74**	**75%**	**m & p**
CLEARCOAT + ACTIVATOR/REDUCER (Worst Case VOC)																		
Clearcoat (7600S)	7.75	64.65%	0.00%	64.7%	0.0%	28.80%	0.3500	1.08	1.0	5.01	5.01	1.89	45.45	8.30	1.13	17.40	75%	m & p
Activator (7675S)	8.32	62.48%	0.00%	62.5%	0.0%	32.05%	0.0900	1.08	1.0	5.20	5.20	0.51	12.13	2.21	0.33	16.22	75%	m & p
RTS	**7.87**	**64.18%**	**0.00%**	**64.2%**	**0.0%**	**29.50%**	**0.4400**	**1.08**	**1.0**	**5.05**	**5.05**	**2.40**	**57.61**	**10.51**	**1.47**	**17.12**	**75%**	**m & p**
Gun Cleaning (Pure Lacquer Thinner)	**7.01**	**100.00%**	**0.00%**	**100.0%**	**0.0%**	**0.00%**	**0.00507**	**3.00**	**1.0**	**7.01**	**7.01**	**0.11**	**2.56**	**0.47**	**0.00**	**N/A**	**100%**	**cleaner**
Wipe Down (3949S)	**8.25**	**99.80%**	**94.00%**	**5.8%**	**94.0%**	**0.10%**	**0.2500**	**1.08**	**1.0**	**7.98**	**0.48**	**0.13**	**3.10**	**0.57**	**0.00**	**478.50**	**100%**	**m & p**
Cleaner (3440s)	8.12	46.40%	0.00%	46.4%	0.0%	47.01%	0.7300	1.08	1.0	3.77	3.77	2.97	71.29	13.01	0.00	8.01	100%	m & p
Cleaner (193s)	9.05	25.04%	0.00%	25.0%	0.0%	69.95%	0.2500	1.08	1.0	2.27	2.27	0.61	14.68	2.68	0.00	3.24	100%	m & p
RTS	**8.36**	**40.92%**	**0.00%**	**40.9%**	**0.0%**	**52.89%**	**0.9800**	**1.08**	**1.0**	**3.42**	**3.42**	**3.62**	**86.90**	**15.86**	**0.00**	**6.47**	**100%**	**m & p**
										Each Line	**EU-6a & EU-6b**	**10.15**	**243.70**	**44.47**	**2.02**			
										Total	**EU-6a & EU-6b**	**20.3**	**487.4**	**88.9**	**4.03**			

Material	Density (lb/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential tons per year	lb VOC /gal solids	Transfer Efficiency	Material Substrate
EU-6c																		
TRUCK PAINTING PER LINE																		
BASECOLOR + BASEMAKER (Worst case VOC)																		
Balancer (150K)	7.26	90.36%	0.00%	90.36%	0.0%	7.4%	0.5600	0.63	1.0	6.56	6.56	2.31	55.55	10.14	0.27	88.65	75%	m & p
Tint (892J)	8.66	79.41%	0.00%	79.4%	0.0%	13.7%	0.8300	0.63	1.0	6.88	6.88	3.60	86.30	15.75	1.02	50.20	75%	m & p
7160S	6.61	99.83%	0.00%	99.8%	0.0%	0.1%	2.0800	0.63	1.0	6.60	6.60	8.65	207.53	37.87	0.02	5075.97	75%	m & p
Binder (175K)	7.66	69.60%	0.00%	69.6%	0.0%	24.73%	0.6900	0.63	1.0	5.33	5.33	2.32	55.62	10.15	1.11	21.56	75%	m & p
RTS	**7.28**	**88.44%**	**0.00%**	**88.4%**	**0.0%**	**7.90%**	**4.1600**	**0.63**	**1.0**	**6.44**	**6.44**	**16.87**	**404.97**	**73.91**	**2.42**	**81.50**	**75%**	**m & p**
CLEARCOAT + ACTIVATOR/REDUCER (Worst Case VOC)																		
Clearcoat (7600S)	7.75	64.65%	0.00%	64.7%	0.0%	28.80%	0.8300	0.63	1.0	5.01	5.01	2.62	62.88	11.48	1.57	17.40	75%	m & p
Activator (7675S)	8.32	62.48%	0.00%	62.5%	0.0%	32.05%	0.2100	0.63	1.0	5.20	5.20	0.69	16.51	3.01	0.45	16.22	75%	m & p
RTS	**7.87**	**64.19%**	**0.00%**	**64.2%**	**0.0%**	**29.50%**	**1.0400**	**0.63**	**1.0**	**5.05**	**5.05**	**3.31**	**79.44**	**14.50**	**2.02**	**17.12**	**75%**	**m & p**
Gun Cleaning (Pure Lacquer Thinner)	**7.01**	**100.00%**	**0.00%**	**100.0%**	**0.0%**	**0.00%**	**0.00507**	**3.00**	**1.0**	**7.01**	**7.01**	**0.11**	**2.56**	**0.47**	**0.00**	**N/A**	**100%**	**cleaner**
Wipe Down (3949S)	**8.25**	**99.80%**	**94.00%**	**5.8%**	**94.0%**	**0.10%**	**0.2500**	**0.63**	**1.0**	**7.98**	**0.48**	**0.08**	**1.81**	**0.33**	**0.00**	**478.50**	**100%**	**m & p**
Cleaner (3440s)	8.12	46.40%	0.00%	46.4%	0.0%	47.01%	0.7300	0.63	1.0	3.77	3.77	1.73	41.59	7.59	0.00	8.01	100%	m & p
Cleaner (193s)	9.05	25.04%	0.00%	25.0%	0.0%	69.95%	0.2500	0.63	1.0	2.27	2.27	0.36	8.57	1.56	0.00	3.24	100%	m & p
RTS	**8.36**	**40.92%**	**0.00%**	**40.9%**	**0.0%**	**52.89%**	**0.9800**	**0.63**	**1.0**	**3.42**	**3.42**	**2.11**	**50.69**	**9.25**	**0.00**	**6.47**	**100%**	**m & p**
											Subtotal EU-6c	**22.48**	**539.47**	**98.45**	**4.44**	**583.59**		

State Potential Emissions **Add worst case coating to all solvents** **Total EU-1 -- EU-6:** **536** **12853** **2346** **232**

Control Technology Emissions (Combustion)																	
						Emission Factors							Emissions				
Type	Number	Capacity	Gas usage	PM	PM10	SO2	NOx	VOC	CO		PM	PM10	SO2	NOx	VOC	CO	
		MMBtu/hr	MMCF/yr	lb/MMCF	lb/MMCF	lb/MMCF	lb/MMCF	lb/MMCF	lb/MMCF		tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	
Catalytic			0.00	3.0	3.0	0.6	100.0	5.3	35.0		0.0	0.0	0.0	0.0	0.0	0.0	
Thermal			0.00	3.0	3.0	0.6	140.0	2.8	20.0		0.0	0.0	0.0	0.0	0.0	0.0	
Total			0.00								0.0	0.0	0.0	0.0	0.0	0.0	
										Control Efficiency		Controlled	Controlled	Controlled	Controlled		
										VOC	PM	VOC pounds	VOC pounds	VOC	Particulate		
									EU-1:		**0.92**	per hour	per day	tons/yr	tons/yr		
									EU-6:		**0.90**						

Controlled Emissions due to Surface Coating Operations and Controls **Controlled Total:** **536** **12853** **2346** **20.7**

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) * Flash-off
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day) * Flash-off
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) * Flash-off
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) * Flash-off
Total = Worst Coating + Sum of all solvents used

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

Company Name: Glaval Corporation, Plants 1 & 9, Dynamax and Lexington
Address City IN Zip: 55135 & 914 County Road 1, Elkhart, Indiana 46514
Part 70: 039-6955
Plt ID: 039-00126
Reviewer: Mark Kramer
Date: October 18, 1996

AFTER BACT FOR EU-8

Material	Density (lb/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential tons per year	lb VOC /gal solids	Transfer Efficiency	Material Substrate f=fiberglass p=plastic m=metal w=wood
EU-1																		
HIGH TOP AND RUNNING BOARD PAINTING																		
BASECOLOR + BASEMAKER (worst case)																		
Balancer (150K)	7.26	90.36%	0.00%	90.4%	0.0%	7.40%	0.0700	32	1.0	6.56	6.56	14.69	352.67	64.36	1.72	88.65	75%	f or p
Tint (892J)	8.66	79.41%	0.00%	79.4%	0.0%	13.70%	0.1000	32	1.0	6.88	6.88	22.01	528.15	96.39	6.25	50.20	75%	f or p
7160S	6.61	99.83%	0.00%	99.8%	0.0%	0.13%	0.2500	32	1.0	6.60	6.60	52.79	1266.96	231.22	0.10	5075.97	75%	f or p
CLEARCOAT + ACTIVATOR/REDUCER (Worst case VOC)																		
Clearcoat (7601S)	7.17	96.35%	0.00%	96.4%	0.0%	2.76%	0.5000	32	1.0	6.91	6.91	110.53	2652.79	484.13	4.59	250.30	75%	f or p
Activator (7675S)	8.32	62.48%	0.00%	62.5%	0.0%	32.05%	0.1300	32	1.0	5.20	5.20	21.63	519.00	94.72	14.22	16.22	75%	f or p
Gun Cleaning (Pure Lacquer Thinner)	7.01	100.00%	0.00%	100.0%	0.0%	0.00%	0.00507	3	1.0	7.01	7.01	0.11	2.56	0.47	0.00	N/A	75%	cleaner
Wipe Down (3949S)	8.25	99.80%	94.00%	5.8%	94.0%	0.10%	0.1000	32	1.0	7.98	0.48	1.53	36.75	6.71	0.06	478.50	75%	f or p
Cleaner (3440s)	8.12	46.40%	0.00%	46.4%	0.0%	47.01%	0.2900	32	1.0	3.77	3.77	34.96	839.14	153.14	44.23	8.01	75%	f or p
Cleaner (193s)	9.05	25.04%	0.00%	25.0%	0.0%	69.95%	0.1000	32	1.0	2.27	2.27	7.25	174.04	31.76	23.77	3.24	75%	f or p
VAN REPAIR																		
BASECOLOR + BASEMAKER (Worst case VOC)																		
Balancer (150K)	7.26	90.36%	0.00%	90.4%	0.0%	7.40%	0.0700	32	1.0	6.56	6.56	14.69	352.67	64.36	1.72	88.65	75%	f, p or m
Binder (175K)	7.66	69.60%	0.00%	69.6%	0.0%	24.73%	0.0800	32	1.0	5.33	5.33	13.65	327.56	59.78	6.53	21.56	75%	f, p or m
Tint (892J)	8.66	79.41%	0.00%	79.4%	0.0%	13.70%	0.1000	32	1.0	6.88	6.88	22.01	528.15	96.39	6.25	50.20	75%	f, p or m
7160S	6.61	99.83%	0.00%	99.8%	0.0%	0.13%	0.2500	32	1.0	6.60	6.60	52.79	1266.96	231.22	0.10	5075.97	75%	f, p or m
CLEARCOAT + ACTIVATOR/REDUCER (Worst case VOC)																		
Clearcoat (7601S)	7.17	96.35%	0.00%	96.4%	0.0%	2.76%	0.5000	32	1.0	6.91	6.91	110.53	2652.79	484.13	4.59	250.30	75%	f, p or m
Activator (7675S)	8.32	62.48%	0.00%	62.5%	0.0%	32.05%	0.1300	32	1.0	5.20	5.20	21.63	519.00	94.72	14.22	16.22	75%	f, p or m
											EU-1 subtotal:	**500.80**	**12019.18**	**2193.50**	**128.32**		
EU-2																		
CAR WASH																		
Citrus Plus Formula 524	8.29	86.0%	20.00%	66.0%	65.7%	13.60%	0.2300	25	1.0	15.94	5.47	31.46	755.05	137.80	0.00	40.23	100%	m
Formula 511 Foaming Whitewall Cleaner	8.95	85.0%	40.00%	45.0%	48.4%	25.53%	0.1100	25	1.0	7.80	4.03	11.08	265.82	48.51	0.00	15.78	100%	m
Drying Agent 520	7.62	82.3%	37.80%	44.5%	40.7%	16.10%	0.1100	25	1.0	5.72	3.39	9.32	223.80	40.84	0.00	21.06	100%	m
											EU-2 subtotal:	**51.86**	**1244.67**	**227.15**	**0.00**		
EU-3																		
CLEANERS																		
Citra-Solve	6.57	80.00%	0.00%	80.0%	0.0%	15.00%	0.0100	25	1.0	5.2560	5.26	1.31	31.54	5.76	0.00	35.04	100%	m
De-Solv-Bulk	5.62	100.00%	0.00%	100.0%	0.0%	0.00%	0.0400	25	1.0	5.6200	5.62	5.62	134.88	24.62	0.00	N/A	100%	m
											EU-3 subtotal:	**6.93**	**166.42**	**30.37**	**0.00**		
EU-4																		
GLUE																		
Spray RIte HIgh Temperature Spray Adhesive	9.16	85.00%	50.00%	35.0%	50.0%	0.00%	0.0100	25	1.0	6.41	3.21	0.80	19.24	3.51	0.38	N/A	75%	w or p
											EU-4 subtotal:	**0.80**	**19.24**	**3.51**	**0.38**		
EU-5																		
GLUE																		
22 Fluid Ounce Spray Adhesive	5.00	80.00%	30.00%	50.0%	18.0%	0.00%	0.0003	25	1.0	3.05	2.50	0.02	0.45	0.08	0.01	N/A	75%	m
SprayRite Pressure Sensitive Aerosol Adhesive	5.00	76.00%	15.00%	61.0%	9.0%	0.00%	0.0300	25	1.0	3.35	3.05	2.29	54.90	10.02	0.99	N/A	75%	m
											EU-5 subtotal:	**2.31**	**55.35**	**10.10**	**0.99**		
EU-6																		
TRUCK PAINTING PER LINE (6 LINE TOTAL)																		
BASECOLOR + BASEMAKER (Worst case VOC)																		
Balancer (150K)	7.26	90.36%	0.00%	90.4%	0.0%	7.4%	0.0800	1.25	1.0	6.56	6.56	0.66	15.74	2.87	0.08	88.65	75%	m & p
Tint (892J)	8.66	79.41%	0.00%	79.4%	0.0%	13.7%	0.1100	1.25	1.0	6.88	6.88	0.95	22.69	4.14	0.27	50.20	75%	m & p
7160S	6.61	99.83%	0.00%	99.8%	0.0%	0.1%	0.2800	1.25	1.0	6.60	6.60	2.31	55.43	10.12	0.00	5075.97	75%	m & p
RTS	**7.16**	**92.85%**	**0.00%**	**92.9%**	**0.0%**	**4.53%**	0.4700	**1.25**	**1.0**	**6.65**	**6.65**	**3.91**	**93.74**	**17.11**	**0.33**	**146.76**	**75%**	**m & p**
CLEARCOAT + ACTIVATOR/REDUCER (Worst Case VOC)																		
Clearcoat (7601S)	7.17	96.35%	0.00%	96.4%	0.0%	2.76%	0.3500	1.25	1.0	6.91	6.91	3.02	72.54	13.24	0.13	250.30	75%	m & p
Activator (7675S)	8.32	62.48%	0.00%	62.5%	0.0%	32.05%	0.0900	1.25	1.0	5.20	5.20	0.58	14.04	2.56	0.38	16.22	75%	m & p
RTS	**7.41**	**89.36%**	**0.00%**	**89.4%**	**0.0%**	**8.80%**	0.4400	**1.25**	**1.0**	**6.62**	**6.62**	**3.64**	**87.40**	**15.95**	**0.47**	**75.25**	**75%**	**m & p**
Gun Cleaning (Pure Lacquer Thinner)	**7.01**	**100.00%**	**0.00%**	**100.0%**	**0.0%**	**0.00%**	**0.00507**	**3.00**	**1.0**	**7.01**	**7.01**	**0.11**	**2.56**	**0.47**	**0.00**	**N/A**	**100%**	**cleaner**
Wipe Down (3949S)	**8.25**	**99.80%**	**94.00%**	**5.8%**	**94.0%**	**0.10%**	**0.2500**	**1.25**	**1.0**	**7.98**	**0.48**	**0.15**	**3.59**	**0.65**	**0.00**	**478.50**	**100%**	**m & p**
Cleaner (3440s)	8.12	46.40%	0.00%	46.4%	0.0%	47.01%	0.7300	1.25	1.0	3.77	3.77	3.44	82.51	15.06	0.00	8.01	100%	m & p
Cleaner (193s)	9.05	25.04%	0.00%	25.0%	0.0%	69.95%	0.2500	1.25	1.0	2.27	2.27	0.71	17.00	3.10	0.00	3.24	100%	m & p
RTS	**8.36**	**40.92%**	**0.00%**	**40.9%**	**0.0%**	**52.89%**	**0.9800**	**1.25**	**1.0**	**3.42**	**3.42**	**4.19**	**100.57**	**18.35**	**0.00**	**6.47**	**100%**	**m & p**
										Per Line	**EU-6:**	**11.99**	**287.86**	**52.54**	**0.80**			
										6 Lines	**EU-6 Subtotal:**	**72.0**	**1727.2**	**315.2**	**4.8**			

Material	Density (lb/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential tons per year	lb VOC /gal solids	Transfer Efficiency	Material Substrate
EU-7																		
PRIME TO RUNNING BOARDS																		
Uro-primer 1140S	12.87	30.69%	0.00%	30.7%	0.0%	46.47%	0.0300	30	1.0	3.95	3.95	3.55	85.32	15.57	8.79	8.50	75%	f or p
Hardner 1125S	8.12	60.03%	0.00%	60.0%	0.0%	33.80%	0.0075	30	1.0	4.87	4.87	1.10	26.32	4.80	0.80	14.42	75%	f or p
Reducer 1135S	7.30	99.85%	0.00%	99.9%	0.0%	0.13%	0.0225	30	1.0	7.29	7.29	4.92	118.08	21.55	0.01	5606.96	75%	f or p
RTS	**10.19**	**60.29%**	**0.00%**	**60.3%**	**0.0%**	**27.51%**	**0.0600**	**30**	**1.0**	**6.14**	**6.14**	**11.06**	**265.40**	**48.44**	**7.98**	**22.33**	**75%**	**f or p**
											EU-7 subtotal:	**11.06**	**265.40**	**48.44**	**7.98**			
EU-8 (Dynamax Corporation)																		
GLUE																		
Benders Spray Adhesive #618 (AFTER BACT)	6.62	83.00%	0.00%	83.0%	0.0%	17.00%	0.5000	0.5	1.0	5.49	5.49	1.37	32.97	6.02	0.31	32.32	75%	w
Benders Aerosol Adhesive #601 (AFTER BACT)	10.41	88.00%	0.00%	88.0%	0.0%	12.00%	0.0000	0.5	1.0	9.16	9.16	0.00	0.00	0.00	0.00	76.34	75%	w, p or m
Sikoflex (Black and White)	9.66	9.77%	0.00%	9.8%	0.0%	90.33%	2.9531	0.5	1.0	0.94	0.94	1.39	33.44	6.10	14.09	1.04	75%	m & f
ABS Cement	7.16	73.00%	0.00%	73.0%	0.0%	23.00%	0.0833	0.5	1.0	5.23	5.23	0.22	5.22	0.95	0.09	22.73	75%	p
Benders 501 Cabinet Glue	9.16	56.00%	0.00%	56.0%	0.0%	44.00%	0.2500	0.5	1.0	5.13	5.13	0.64	15.39	2.81	0.55	11.66	75%	w
Benders 630 LD Contact Cement (AFTER BACT)	10.83	77.00%	0.00%	77.0%	0.0%	33.00%	0.0000	0.5	1.0	8.34	8.34	0.00	0.00	0.00	0.00	25.27	75%	w
Hot Melt Adhesive	7.75	0.00%	0.00%	0.0%	0.0%	100.00%	1.0900	0.5	1.0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%	w
PAINT/PREP																		
Centari - Black chassis paint	8.01	59.18%	0.00%	59.2%	0.0%	40.82%	1.3300	0.5	1.0	4.74	4.74	3.15	75.66	13.81	2.38	11.61	75%	m
Reducer	6.57	100.00%	11.00%	89.0%	0.0%	0.00%	0.6667	0.5	1.0	5.85	5.85	1.95	46.78	8.54	0.00	ERR	75%	m
RTS	**7.53**	**73.00%**	**4.00%**	**69.0%**	**0.0%**	**27.00%**	**2.0000**	**0.5**	**1.0**	**5.20**	**5.20**	**5.20**	**124.70**	**22.76**	**2.23**	**19.24**	**75%**	**m**
Flat Black Paint	9.00	58.90%	0.00%	58.9%	0.0%	41.10%	0.0900	0.5	1.0	5.30	5.30	0.24	5.73	1.04	0.18	12.90	75%	w
MISCELLANEOUS MATERIALS																		
Resin (hand layup)	9.21	36.15%	0.00%	36.2%	0.0%	63.85%	3.0000	0.5	0.13	3.33	3.33	0.65	15.58	2.84	9.66	0.68	75%	f or m
Gloss Black	6.89	85.00%	25.00%	60.0%	0.0%	15.00%	1.5000	0.5	1.0	4.13	4.13	3.10	74.41	13.58	0.85	27.56	75%	f or m
Rubberized Undercoating	8.33	65.70%	0.00%	65.7%	0.0%	34.30%	0.3984	0.5	1.0	5.47	5.47	1.09	26.16	4.78	0.62	15.96	75%	f
Featherrite	10.00	33.00%	0.00%	33.0%	0.0%	77.00%	0.5000	0.5	0.13	3.30	3.30	0.11	2.57	0.47	1.83	0.56	75%	f
ITW Plexus Adhesive (& activator)	7.75	85.00%	0.00%	85.0%	0.0%	15.00%	0.0396	0.5	1.0	6.59	6.59	0.13	3.13	0.57	0.03	43.92	75%	m & f
Crazy Clean	8.33	7.90%	0.00%	7.9%	0.0%	92.10%	0.2344	0.5	1.0	0.66	0.66	0.08	1.85	0.34	0.98	0.71	75%	cleaner
											EU-8 subtotal:	**14.22**	**341.16**	**62.26**	**31.42**			
State Potential Emissions			**Add worst case coating to all solvents**								**Total EU-1 -- EU-8:**	**660**	**15839**	**2891**	**174**			

Control Technology Emissions (Combustion)																
						Emission Factors							Emissions			
Type	Number	Capacity	Gas usage	PM	PM10	SO2	NOx	VOC	CO		PM	PM10	SO2	NOx	VOC	CO
		MMBtu/hr	MMCF/yr	lb/MMCF	lb/MMCF	lb/MMCF	lb/MMCF	lb/MMCF	lb/MMCF		tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr
Catalytic			0.00	3.0	3.0	0.6	100.0	5.3	35.0		0.0	0.0	0.0	0.0	0.0	0.0
Thermal			0.00	3.0	3.0	0.6	140.0	2.8	20.0		0.0	0.0	0.0	0.0	0.0	0.0
Total			0.00								0.0	0.0	0.0	0.0	0.0	0.0
										Control Efficiency		Controlled	Controlled	Controlled	Controlled	
										VOC	PM	VOC pounds	VOC pounds	VOC	Particulate	
									EU-1 & 8:		**0.92**	per hour	per day	tons/yr	tons/yr	
									EU-6 & 7:		**0.90**					
Controlled Emissions due to Surface Coating Operations and Controls											**Controlled Total:**	**660**	**15839**	**2891**	**15.4**	

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) * Flash-off
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day) * Flash-off
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) * Flash-off
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) * Flash-off
Total = Worst Coating + Sum of all solvents used

HAP Emission Calculations

Company Name: **Glaval Corporation, Plants 1 & 9**
Plant Location: **55135 & 914 County Road 1, Elkhart, Indiana 46514**
Part 70: **T 039-6955**
Plt ID: **T 039-00126**
County: **Elkhart**
Permit Reviewer: **Mark L. Kramer**
Date: **October 18, 1996**

Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Weight % Xylene	Weight % Toluene	Weight % Trichloroethylene	Weight % Styrene	Weight % Hexane	Weight % Glycol Ethers	Weight % Methanol	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	Trichloroethylene Emissions (tons/yr)	Styrene Emissions (tons/yr)	Hexane Emissions (tons/yr)	Glycol Ethers Emissions (tons/yr)	Methanol Emissions (tons/yr)
EU-1																		
HIGH TOP AND RUNNING BOARD PAINTING																		
BASECOLOR + BASEMAKER (worst case)																		
Balancer (150K)	7.26	0.0700	32.00	1.00	16.00%	30.00%	0.00%	0.00%	0.00%	0.00%	0.00%	11.40	21.37	0.00	0.00	0.00	0.00	0.00
814J (toluene)	8.95	0.1000	32.00	1.00	0.00%	3.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	3.76	0.00	0.00	0.00	0.00	0.00
844J (lead)	12.30	0.1000	32.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
845J (xylene)	7.90	0.1000	32.00	1.00	52.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	57.58	0.00	0.00	0.00	0.00	0.00	0.00
840J (nickel)	12.60	0.1000	32.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
7175S	7.09	0.2500	32.00	1.00	28.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00%	69.56	12.42	0.00	0.00	0.00	0.00	0.00
Binder (175K)	7.66	0.0800	32.00	1.00	6.00%	26.00%	0.00%	0.00%	0.00%	0.00%	0.00%	5.15	22.33	0.00	0.00	0.00	0.00	0.00
CLEARCOAT + ACTIVATOR/REDUCER (Worst case VOC)																		
Clearcoat (7600S)	7.75	0.5000	32.00	1.00	25.00%	18.00%	0.00%	0.00%	0.00%	0.00%	0.00%	135.78	97.76	0.00	0.00	0.00	0.00	0.00
Activator (7655S)	8.08	0.1300	32.00	1.00	0.00%	27.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	39.75	0.00	0.00	0.00	0.00	0.00
Gun Cleaning (Pure Lacquer Thinner)	7.01	0.00507	3.00	1.00	10.40%	62.00%	0.00%	0.00%	0.00%	0.00%	2.90%	0.05	0.29	0.00	0.00	0.00	0.00	0.01
Wipe Down (3949S)	8.25	0.1000	32.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Cleaner (3440s)	8.12	0.2900	32.00	1.00	0.00%	4.00%	0.00%	0.00%	0.00%	2.00%	0.00%	0.00	13.20	0.00	0.00	0.00	6.60	0.00
Cleaner (193s)	9.05	0.1000	32.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	4.00%	0.00%	0.00	0.00	0.00	0.00	0.00	5.07	0.00
VAN REPAIR																		
BASECOLOR + BASEMAKER (Worst case VOC)																		
Balancer (150K)	7.26	0.0700	32.00	1.00	16.00%	30.00%	0.00%	0.00%	0.00%	0.00%	0.00%	11.40	21.37	0.00	0.00	0.00	0.00	0.00
Binder (175K)	7.66	0.0800	32.00	1.00	6.00%	26.00%	0.00%	0.00%	0.00%	0.00%	0.00%	5.15	22.33	0.00	0.00	0.00	0.00	0.00
814J (toluene)	8.95	0.1000	32.00	1.00	0.00%	3.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	3.76	0.00	0.00	0.00	0.00	0.00
844J (lead)	12.30	0.1000	32.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
845J (xylene)	7.90	0.1000	32.00	1.00	52.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	57.58	0.00	0.00	0.00	0.00	0.00	0.00
840J (nickel)	12.60	0.1000	32.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
7175S	7.09	0.2500	32.00	1.00	28.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00%	69.56	12.42	0.00	0.00	0.00	0.00	0.00
CLEARCOAT + ACTIVATOR/REDUCER (Worst case VOC)																		
Clearcoat (7600S)	7.75	0.5000	32.00	1.00	25.00%	18.00%	0.00%	0.00%	0.00%	0.00%	0.00%	135.78	97.76	0.00	0.00	0.00	0.00	0.00
Activator (7655S)	8.08	0.1300	32.00	1.00	0.00%	27.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	39.75	0.00	0.00	0.00	0.00	0.00
										Subtotal EU-1		**558.99**	**408.29**	**0.00**	**0.00**	**0.00**	**11.67**	**0.01**
EU-2											**W/Bact**	**27.85**	**20.34**	**0.00**	**0.00**	**0.00**	**0.582**	**0.001**
CAR WASH																		
Citrus Plus Formula 524	8.29	0.2300	25.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	20.00%	0.00%	0.00	0.00	0.00	0.00	0.00	41.76	0.00
Formula 511 Foaming Whitewall Cleaner	8.95	0.1100	25.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	20.00%	0.00%	0.00	0.00	0.00	0.00	0.00	21.56	0.00
Drying Agent 520	7.62	0.1100	25.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	10.00%	0.00%	0.00	0.00	0.00	0.00	0.00	9.18	0.00
										Subtotal EU-2		**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**72.50**	**0.00**
EU-3											**W/Limit**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**14.55**	**0.00**
CLEANERS																		
Citra-Solve	6.57	0.0100	25.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
De-Solv-Bulk	5.62	0.0400	25.00	1.00	0.00%	0.00%	0.00%	0.00%	95.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	23.38	0.00	0.00
										Subtotal EU-3		**0.00**	**0.00**	**0.00**	**0.00**	**23.38**	**0.00**	**0.00**
EU-4											**W/Limit**	**0.00**	**0.00**	**0.00**	**0.00**	**18.46**	**0.00**	**0.00**
GLUE																		
Spray RIte HIgh Temperature Spray Adhesive	9.16	0.0140	25.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
										Subtotal EU-4		**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**
EU-5																		
GLUE																		
22 Fluid Ounce Spray Adhesive	5.00	0.0004	25.00	1.00	0.00%	5.00%	0.00%	0.00%	20.00%	0.00%	0.00%	0.00	0.01	0.00	0.00	0.04	0.00	0.00
SprayRite Pressure Sensitive Aerosol Adhesive	5.00	0.0480	25.00	1.00	0.00%	0.00%	0.00%	0.00%	40.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	10.51	0.00	0.00
										Subtotal EU-5		**0.00**	**0.011**	**0.00**	**0.00**	**10.56**	**0.00**	**0.00**

Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Weight % Xylene	Weight % Toluene	Weight % Trichloroethyln	Weight % Styrene	Weight % Hexane	Weight % Glycol Ethers	Weight % Methanol	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	Trichloroethylene Emissions (tons/yr)	Styrene Emissions (tons/yr)	Hexane Emissions (tons/yr)	Glycol Ethers Emissions (tons/yr)	Methanol Emissions (tons/yr)
EU-6a and EU-6b																		
TRUCK PAINTING PER LINE																		
BASECOLOR + BASEMAKER (Worst case VOC)																		
Balancer (150K)	7.26	0.0800	1.08	1.00	16.00%	30.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.44	0.82	0.00	0.00	0.00	0.00	0.00
814J (toluene)	8.95	0.1100	1.08	1.00	0.00%	3.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.14	0.00	0.00	0.00	0.00	0.00
844J (lead)	12.30	0.1100	1.08	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
845J (xylene)	7.90	0.1100	1.08	1.00	52.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	2.14	0.00	0.00	0.00	0.00	0.00	0.00
840J (nickel)	12.60	0.1100	1.08	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
7175S	7.09	0.2800	1.08	1.00	28.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00%	2.63	0.47	0.00	0.00	0.00	0.00	0.00
Binder (175K)	7.66	0.0900	1.08	1.00	6.00%	26.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.20	0.85	0.00	0.00	0.00	0.00	0.00
LEARCOAT + ACTIVATOR/REDUCER (Worst Case VOC)																		
Clearcoat (7600S)	7.75	0.3500	1.08	1.00	25.00%	18.00%	0.00%	0.00%	0.00%	0.00%	0.00%	3.21	2.31	0.00	0.00	0.00	0.00	0.00
Activator (7655S)	8.08	0.0900	1.08	1.00	0.00%	27.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.93	0.00	0.00	0.00	0.00	0.00
Gun Cleaning (Pure Lacquer Thinner)	7.01	0.00507	3.00	1.00	10.40%	62.00%	0.00%	0.00%	0.00%	0.00%	2.90%	0.05	0.29	0.00	0.00	0.00	0.00	0.01
Wipe Down (3949S)	8.25	0.2500	1.08	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Cleaner (3440s)	8.12	0.7300	1.08	1.00	0.00%	4.00%	0.00%	0.00%	0.00%	2.00%	0.00%	0.00	1.12	0.00	0.00	0.00	0.56	0.00
Cleaner (193s)	9.05	0.2500	1.08	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	4.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.43	0.00
										Subtotal EU-6a and EU6b		**16.93**	**12.17**	**0.00**	**0.00**	**0.00**	**1.98**	**0.03**
											W/Limit	**9.14**	**6.57**	**0.00**	**0.00**	**0.00**	**1.07**	**0.01**
EU-6c																		
TRUCK PAINTING																		
BASECOLOR + BASEMAKER (Worst case VOC)																		
Balancer (150K)	7.26	0.5600	0.63	1.00	16.00%	30.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.79	3.37	0.00	0.00	0.00	0.00	0.00
814J (toluene)	8.95	0.8300	0.63	1.00	0.00%	3.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.61	0.00	0.00	0.00	0.00	0.00
844J (lead)	12.30	0.8300	0.63	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
845J (xylene)	7.90	0.8300	0.63	1.00	52.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	9.41	0.00	0.00	0.00	0.00	0.00	0.00
840J (nickel)	12.60	0.8300	0.63	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
7175S	7.09	2.0800	0.63	1.00	28.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00%	11.39	2.03	0.00	0.00	0.00	0.00	0.00
Binder (175K)	7.66	0.6900	0.63	1.00	6.00%	26.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.88	3.79	0.00	0.00	0.00	0.00	0.00
LEARCOAT + ACTIVATOR/REDUCER (Worst Case VOC)																		
Clearcoat (7600S)	7.75	0.8300	0.63	1.00	25.00%	18.00%	0.00%	0.00%	0.00%	0.00%	0.00%	4.44	3.19	0.00	0.00	0.00	0.00	0.00
Activator (7655S)	8.08	0.2100	0.63	1.00	0.00%	27.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	1.26	0.00	0.00	0.00	0.00	0.00
Gun Cleaning (Pure Lacquer Thinner)	7.01	0.00507	3.00	1.00	10.40%	62.00%	0.00%	0.00%	0.00%	0.00%	2.90%	0.05	0.29	0.00	0.00	0.00	0.00	0.01
Wipe Down (3949S)	8.25	0.2500	0.63	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Cleaner (3440s)	8.12	0.7300	0.63	1.00	0.00%	4.00%	0.00%	0.00%	0.00%	2.00%	0.00%	0.00	0.65	0.00	0.00	0.00	0.33	0.00
Cleaner (193s)	9.05	0.2500	0.63	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	4.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.25	0.00
											Subtotal EU-6c	**27.08**	**11.42**	**0.00**	**0.00**	**0.00**	**0.58**	**0.01**
											W/Limit	**6.60**	**2.78**	**0.00**	**0.00**	**0.00**	**0.14**	**0.00**
									Totals EU-1 -- EU-6:		**(tons/yr)**	**603**	**432**	**0.000**	**0.000**	**33.9**	**86.7**	**0.054**
											(lbs/hr)	**138**	**99**	**0.00**	**0.00**	**7.75**	**19.8**	**0.012**
								W/Limits & BACT	**Totals EU-1 -- EU-6:**		**(tons/yr)**	**43.59**	**29.70**	**0.000**	**0.00**	**29.02**	**16.34**	**0.019**

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

Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Weight % Lead	Weight % Nickel	Weight % MEK	Weight % MIBK	Weight % Methyl Methacrylate	Weight % Methylene Chloride	Weight % Perc.	Lead Emissions (tons/yr)	Nickel Emissions (tons/yr)	MEK Emissions (tons/yr)	MIBK Emissions (tons/yr)	Methyl Methacrylate Emissions (tons/yr)	Methylene Chloride Emissions (tons/yr)	Perc. Emissions (tons/yr)
EU-1																		
HIGH TOP AND RUNNING BOARD PAINTING																		
BASECOLOR + BASEMAKER (worst case)																		
Balancer (150K)	7.26	0.0700	32.0	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
814J (toluene)	8.95	0.1000	32.0	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
844J (lead)	12.30	0.1000	32.0	1.00	46.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	79.30	0.00	0.00	0.00	0.00	0.00	0.00
845J (xylene)	7.90	0.1000	32.0	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
840J (nickel)	12.60	0.1000	32.0	1.00	0.00%	43.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	75.94	0.00	0.00	0.00	0.00	0.00
7175S	7.09	0.2500	32.0	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Binder (175K)	7.66	0.0800	32.0	1.00	0.00%	0.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	4.29	0.00	0.00	0.00	0.00
CLEARCOAT + ACTIVATOR/REDUCER (Worst case VOC)																		
Clearcoat (7600S)	7.75	0.5000	32.0	1.00	0.00%	0.00%	12.00%	6.00%	0.00%	0.00%	0.00%	0.00	0.00	65.17	32.59	0.00	0.00	0.00
Activator (7655S)	8.08	0.1300	32.0	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Gun Cleaning (Pure Lacquer Thinner)	7.01	0.00507	3.0	1.00	0.00%	0.00%	39.30%	29.50%	1.00%	1.00%	1.00%	0.00	0.00	0.18	0.14	0.00	0.00	0.00
Wipe Down (3949S)	8.25	0.1000	32.0	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Cleaner (3440s)	8.12	0.2900	32.0	1.00	0.00%	0.00%	2.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	6.60	0.00	0.00	0.00	0.00
Cleaner (193s)	9.05	0.1000	32.0	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
VAN REPAIR																		
BASECOLOR + BASEMAKER (Worst case VOC)																		
Balancer (150K)	7.26	0.0700	4.0	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Binder (175K)	7.66	0.0800	32.0	1.00	0.00%	0.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	4.29	0.00	0.00	0.00	0.00
Tint (892J)	8.66	0.1000	32.0	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
7160S	6.61	0.2500	32.0	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
CLEARCOAT + ACTIVATOR/REDUCER (Worst case VOC)																		
Clearcoat (7600S)	7.75	0.5000	32.0	1.00	0.00%	0.00%	12.00%	6.00%	0.00%	0.00%	0.00%	0.00	0.00	65.17	32.59	0.00	0.00	0.00
Activator (7655S)	8.08	0.1300	32.0	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
										Subtotal EU-1		**79.30**	**75.94**	**145.72**	**65.31**	**0.00**	**0.00**	**0.00**
EU-2										**W/Bact & Control**		**0.316**	**0.303**	**7.259**	**3.254**	**0.000**	**0.000**	**0.000**
CAR WASH																		
Citrus Plus Formula 524	8.29	0.2300	25.0	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Formula 511 Foaming Whitewall Cleaner	8.95	0.1100	25.0	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Drying Agent 520	7.62	0.1100	25.0	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
										Subtotal EU-2		**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**
EU-3											**W/Limit**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**
CLEANERS																		
Citra-Solve	6.57	0.0100	25.0	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
De-Solv-Bulk	5.62	0.0400	25.0	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
										Subtotal EU-3		**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**
EU-4											**W/Limit**	**0.000**	**0.000**	**0.000**	**0.000**	**0.000**	**0.000**	**0.000**
GLUE																		
Spray RIte HIgh Temperature Spray Adhesive	9.16	0.0100	25.0	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	50.00%	0.00%	0.00	0.00	0.00	0.00	0.00	5.02	0.00
										Subtotal EU-4		**0.000**	**0.000**	**0.000**	**0.000**	**0.000**	**5.015**	**0.000**
EU-5																		
GLUE																		
22 Fluid Ounce Spray Adhesive	5.00	0.0004	25.0	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
SprayRite Pressure Sensitive Aerosol Adhesive	5.00	0.0480	25.0	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
										Subtotal EU-5		**0.000**	**0.000**	**0.000**	**0.000**	**0.000**	**0.000**	**0.000**

Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Weight % Lead	Weight % Nickel	Weight % MEK	Weight % MIBK	Weight % Methyl Methacrylate	Weight % Methylene Chloride	Weight % Perc.	Lead Emissions (tons/yr)	Nickel Emissions (tons/yr)	MEK Emissions (tons/yr)	MIBK Emissions (tons/yr)	Methyl Methacrylate Emissions (tons/yr)	Methylene Chloride Emissions (tons/yr)	Perc. Emissions (tons/yr)
EU-6a and EU-6b																		
TRUCK PAINTING PER LINE																		
BASECOLOR + BASEMAKER (Worst case VOC)																		
Balancer (150K)	7.26	0.0800	1.08	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
814J (toluene)	8.95	0.1100	1.08	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
844J (lead)	12.30	0.1100	1.08	1.00	46.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	2.94	0.00	0.00	0.00	0.00	0.00	0.00
845J (xylene)	7.90	0.1100	1.08	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
840J (nickel)	12.60	0.1100	1.08	1.00	0.00%	43.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	2.82	0.00	0.00	0.00	0.00	0.00
7175S	7.09	0.2800	1.08	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Binder (175K)	7.66	0.0900	1.08	1.00	0.00%	0.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.16	0.00	0.00	0.00	0.00
CLEARCOAT + ACTIVATOR/REDUCER (Worst Case VOC)																		
Clearcoat (7600S)	7.75	0.3500	1.08	1.00	0.00%	0.00%	12.00%	6.00%	0.00%	0.00%	0.00%	0.00	0.00	1.54	0.77	0.00	0.00	0.00
Activator (7655S)	8.08	0.0900	1.08	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Gun Cleaning (Pure Lacquer Thinner)	7.01	0.00507	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Wipe Down (3949S)	8.25	0.2500	1.08	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Cleaner (3440s)	8.12	0.7300	1.08	1.00	0.00%	0.00%	2.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.56	0.00	0.00	0.00	0.00
Cleaner (193s)	9.05	0.2500	1.08	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
									Subtotal EU-6a and EU6-b, each			**2.944**	**2.819**	**2.101**	**0.770**	**0.000**	**0.000**	**0.000**
										Subtotal EU-6a and EU6-b		**5.89**	**5.64**	**4.20**	**1.54**	**0.000**	**0.000**	**0.000**
											W/Limit & Control	**0.318**	**0.304**	**2.268**	**0.831**	**0.000**	**0.000**	**0.000**
EU-6c																		
TRUCK PAINTING PER LINE																		
BASECOLOR + BASEMAKER (Worst case VOC)																		
Balancer (150K)	7.26	0.5600	0.63	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
814J (toluene)	8.95	0.8300	0.63	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
844J (lead)	12.30	0.8300	0.63	1.00	46.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	12.96	0.00	0.00	0.00	0.00	0.00	0.00
845J (xylene)	7.90	0.8300	0.63	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
840J (nickel)	12.60	0.8300	0.63	1.00	0.00%	43.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	12.41	0.00	0.00	0.00	0.00	0.00
7175S	7.09	2.0800	0.63	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Binder (175K)	7.66	0.6900	0.63	1.00	0.00%	0.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.73	0.00	0.00	0.00	0.00
CLEARCOAT + ACTIVATOR/REDUCER (Worst Case VOC)																		
Clearcoat (7600S)	7.75	0.8300	0.63	1.00	0.00%	0.00%	12.00%	6.00%	0.00%	0.00%	0.00%	0.00	0.00	2.13	1.06	0.00	0.00	0.00
Activator (7655S)	8.08	0.2100	0.63	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Gun Cleaning (Pure Lacquer Thinner)	7.01	0.00507	3.00	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Wipe Down (3949S)	8.25	0.2500	0.63	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Cleaner (3440s)	8.12	0.7300	0.63	1.00	0.00%	0.00%	2.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.33	0.00	0.00	0.00	0.00
Cleaner (193s)	9.05	0.2500	0.63	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
											Subtotal EU-6c	**12.959**	**12.409**	**2.457**	**1.065**	**0.000**	**0.000**	**0.000**
											W/Limit & Control	**0.316**	**0.303**	**0.060**	**0.026**	**0.000**	**0.000**	**0.000**
									Totals EU-1 -- EU-6:		**(tons/yr):**	**98.1**	**94.0**	**152.4**	**67.9**	**0.005**	**5.020**	**0.005**
PM overspray for EU-1 is 92% controlled, and 90% controlled for EU-6											**(lbs/hr):**	**22.4**	**21.5**	**34.8**	**15.5**	**0.001**	**1.15**	**0.001**
After Controls and BACT Limits									**Totals EU-1 -- EU-6:**		**(tons/yr):**	**0.950**	**0.910**	**9.588**	**4.111**	**0.00023**	**5.015**	**0.00023**

Grand Total All HAPs (tons/yr) **1573.1**

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

After Controls and BACT Limits **Grand Total All HAPs (tons/yr)** **139.2**