

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**The Braun Corporation
623 West 11th Street
Winamac, Indiana 46996**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

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

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| Operation Permit No.: T131-7058-00017 | |
| Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management | Issuance Date: |

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 motor vehicle conversion plant.

Responsible Official: William R. Roth
Source Address: 623 West 11th Street, Winamac, IN 46996
Mailing Address: P. O. Box 310, Winamac, IN 46996
Phone Number: 219-946-6153
SIC Code: 3711
County Location: Pulaski
County Status: Attainment for all criteria pollutants
Source Status: Minor Source, under PSD Rules
Major Source, Part 70 Permit Program

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

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

- (a) One (1) general assembly area in Plant 3, described as follows:
 - (1) Plant 3 Seat Shop, identified as Seat Shop, with a maximum rating of 8 units per hour. This facility operates independently of all other surface coating facilities.
- (b) Seven (7) surface coating booths in Plant 4, described as follows:
 - (1) Chrysler EnterVan Refinishing surface coating booth, identified as Chrysler, with a maximum rating of 0.083 vans per hour. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Chrysler. This facility operates independently of all other surface coating facilities.
 - (2) Ford EnterVan Line Refinishing surface coating booth, identified as Ford, with a maximum rating of 0.083 vans per hour. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Ford. This facility operates independently of all other surface coating facilities.
 - (3) New Bus/ParaTransit Van Line Refinishing surface coating booth, identified as New Bus/Para, with a maximum rating of 0.83 vans per hour. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID #New Bus/Pa. This facility operates independently of all other surface coating facilities.
 - (4) ParaTransit Van Line 1 Refinishing surface coating booth, identified as Para 1, with a maximum rating of 0.083 vans per hour. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 1. This facility operates independently of all other surface coating facilities.

- (5) ParaTransit Van Line 2 Refinishing surface coating booth, identified as Para 2, with a maximum rating of 0.083 vans per hour. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 2. This facility operates independently of all other surface coating facilities.
- (6) ParaTransit Van Line 3 Refinishing surface coating booth, identified as Para 3, with a maximum rating of 0.083 vans per hour. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 3. This facility operates independently of all other surface coating facilities.
- (7) ParaTransit Van Line 4 Refinishing surface coating booth, identified as Para 4, with a maximum rating of 0.083 vans per hour. Emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 4. This facility operates independently of all other surface coating facilities.

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 insignificant activities, 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.

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

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

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

B GENERAL CONDITIONS

B.1 Permit No Defense [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 2-7-15, 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) Where specifically designated by this permit or required by an applicable requirement, 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' compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

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

and

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;
 - (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)(10) 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)(7)]

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.
- (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 Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application 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) 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.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.

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 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

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 continue to comply with such 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 the 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 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.12 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.13 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 ($\pm 2\%$) of full scale reading.

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

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

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

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

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

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

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

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a 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.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]
[326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) 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.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

- (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

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

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

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate 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 purpose of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. This 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.19 Monitoring Data Availability

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

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM representative, for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or local agency within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
- (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;

- (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air 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. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.

Stratospheric Ozone Protection

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

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

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

D.1 FACILITY OPERATION CONDITIONS - Surface Coating Booths

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

One (1) general assembly area in Plant 3, described as follows:

- (1) Plant 3 Seat Shop, identified as Seat Shop, with a maximum rating of 8 units per hour. This facility operates independently of all other surface coating facilities.

Seven (7) surface coating booths in Plant 4, described as follows:

- (1) Chrysler EnterVan Refinishing surface coating booth, identified as Chrysler, with a maximum rating of 0.083 vans per hour. Emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Chrysler. This facility operates independently of all other surface coating facilities.
- (2) Ford EnterVan Line Refinishing surface coating booth, identified as For, with a maximum rating of 0.083 vans per hour. Emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Ford. This facility operates independently of all other surface coating facilities.
- (3) New Bus/ParaTransit Van Line Refinishing surface coating booth, identified as New Bus/Para, with a maximum rating of 0.83 vans per hour. Emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID #New Bus/Pa. This facility operates independently of all other surface coating facilities.
- (4) ParaTransit Van Line 1 Refinishing surface coating booth, identified as Para 1, with a maximum rating of 0.083 vans per hour. Emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 1. This facility operates independently of all other surface coating facilities.
- (5) ParaTransit Van Line 2 Refinishing surface coating booth, identified as Para 2, with a maximum rating of 0.083 vans per hour. Emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 2. This facility operates independently of all other surface coating facilities.
- (6) ParaTransit Van Line 3 Refinishing surface coating booth, identified as Para 3, with a maximum rating of 0.083 vans per hour. Emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 3. This facility operates independently of all other surface coating facilities.
- (7) ParaTransit Van Line 4 Refinishing surface coating booth, identified as Para 4, with a maximum rating of 0.083 vans per hour. Emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 4. This facility operates independently of all other surface coating facilities.

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

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM emissions from the Ford, Chrysler, New Bus/Para, Para 1, Para 2, Para 3, and Para 4 surface coating booths shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8]

- (a) Any change or modification that would cause VOC emissions from the application of adhesives from the Seat Shop, Ford, Chrysler, New Bus/Para, Para 1, Para 2, Para 3, and Para 4 surface coating booths to be greater than or equal to fifteen (15) pounds per day will require prior approval by IDEM, OAM.
- (b) Pursuant to CP 131-6363, issued on May 14, 1997, any change or modification to any facility that may cause potential emissions of VOC to increase to 25 tons per year, shall require prior approval by OAM and use of Best Available Control Technology.

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 these facilities and any control devices.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limits specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.5 Particulate Matter (PM)

The dry filters for PM control shall be in place at all times when the Ford, Chrysler, New Bus/Para, Para 1, Para 2, Para 3, and Para 4 surface coating booths are in operation.

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

D.1.6 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (Chrysler, Ford, #New Bus/Pa, Para 1, Para 2, Para 3 and Para 4) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance 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 Compliance Response Plan.

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

D.1.7 Record Keeping Requirements

- (a) To document compliance with Condition D.1.6, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Compliance Response Plan.

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

SECTION D.2 FACILITY OPERATION CONDITIONS

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

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

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

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (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 (38°C) (one hundred degrees Fahrenheit (100°F));
 - (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 (38°C) (one hundred degrees Fahrenheit (100°F)), 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 (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (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 or 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.

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limits specified in Conditions D.2.1 and D.2.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

D.2.3 Monitoring

Monitoring of this facility is not specifically required by this permit. However, any change or modification to this facility, as specified in 326 IAC 2-1 may require this facility to have monitoring requirements.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

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

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

D.3.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the welding operations 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

Compliance Determination Requirement

D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

D.3.3 Record Keeping and Reporting Requirements

There are no record keeping or reporting requirements for this facility.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: **The Braun Corporation**
Source Address: **623 West 11th Street, Winamac, Indiana 46996**
Mailing Address: **P. O. Box 310, Winamac, Indiana 46996**
Part 70 Permit No.: **T131-7058-00017**

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 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: **The Braun Corporation**
Source Address: **623 West 11th Street, Winamac, Indiana 46996**
Mailing Address: **P. O. Box 310, Winamac, Indiana 46996**
Part 70 Permit No.: **T131-7058-00017**

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 REPORT**

Source Name: **The Braun Corporation**
 Source Address: **623 West 11th Street, Winamac, Indiana 46996**
 Mailing Address: **P. O. Box 310, Winamac, Indiana 46996**
 Part 70 Permit No.: **T131-7058-00017**

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

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

Source Background and Description

Source Name: The Braun Corporation
Source Location: 623 West 11th Street, Winamac, Indiana 46996
County: Pulaski County
SIC Code: 3711
Operation Permit No.: T131-7058-00017
Permit Reviewer: Dana L. Brown

The Office of Air Management (OAM) has reviewed a Part 70 permit application from The Braun Corporation relating to the operation of a stationary motor vehicle conversion plant.

Permitted Emission Units and Pollution Control Equipment

This source presently consists of the following emission units and pollution control devices, which have been granted various levels of approval under 326 IAC 2:

- (a) One (1) surface coating booth in Plant 3, described as follows:
 - (1) Plant 3 Seat Shop surface coating booth, identified as Seat Shop, with a maximum rating of 8 units per hour. Particulate emissions shall be controlled by dry filters, then exhausted to general ventilation.

- (b) Seven (7) surface coating booths in Plant 4, described as follows:
 - (1) Chrysler EnterVan Refinishing surface coating booth, identified as Chrysler, with a maximum rating of 0.083 vans per hour. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Chrysler.
 - (2) Ford EnterVan Line Refinishing surface coating booth, identified as Ford, with a maximum rating of 0.083 vans per hour. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Ford.
 - (3) New Bus/ParaTransit Van Line Refinishing surface coating booth, identified as New Bus/Para, with a maximum rating of 0.83 vans per hour. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID #New Bus/Para.
 - (4) ParaTransit Van Line 1 Refinishing surface coating booth, identified as Para 1, with a maximum rating of 0.083 vans per hour. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 1.
 - (5) ParaTransit Van Line 2 Refinishing surface coating booth, identified as Para 2, with a maximum rating of 0.083 vans per hour. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 2.
 - (6) ParaTransit Van Line 3 Refinishing surface coating booth, identified as Para 3, with a maximum rating of 0.083 vans per hour. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 3.

- (7) ParaTransit Van Line 4 Refinishing surface coating booth, identified as Para 4, with a maximum rating of 0.083 vans per hour. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 4.

Unpermitted Emission Units and Pollution Control Equipment

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

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

There are no new facilities to be reviewed under the ENSR process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (a) Activities or categories of activities with individual HAP emissions not previously identified. Any unit with potential, uncontrolled emissions greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP.
- (b) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (c) Combustion unit(s) flame safety purging on startup.
- (d) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (e) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (f) Natural gas-fired combustion unit(s) with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (g) Paved and unpaved roads and parking lots with public access.
- (h) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (i) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (j) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
- (k) VOC and HAP vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

Existing Approvals

The source has been operating under the following approvals:

- (1) CP 131-6363-00017, issued on May 14, 1997.

Enforcement Issue

- (a) IDEM is aware that the source was constructed and operated prior to receipt of Construction Permit 131-6363-00017, issued on May 14, 1997. This matter is still under review by IDEM and appropriate action will be taken.

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 31, 1996.

Emission Calculations

See Appendix A of this document for detailed emissions calculations. (16 pages)

Potential Emissions

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

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

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

| HAP's | Potential Emissions (tons/year) |
|---------------------|---------------------------------|
| Hexane | less than 10 |
| Toluene | greater than 10, less than 25 |
| Methyl Methacrylate | less than 10 |
| Hydroquinone | less than 10 |
| Xylene | less than 10 |
| Methanol | less than 10 |
| MEK | less than 10 |
| TOTAL | greater than 25 |

- (a) 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.

- (b) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

Based on OAM Data Emission Tracking System, the source has never submitted actual emission data to IDEM, OAM.

Limited Potential to Emit

The table below summarizes the total limited potential to emit of the significant emission units.

| | Limited Potential to Emit |
|---|---------------------------|
| Process/facility | VOC |
| Each surface coating booth applying adhesive, Seat Shop, Ford, Chrysler, Para 1, Para 2, Para 3, Para 4, and New Bus/Para | 15 pounds per day |
| Total Emissions | 21.9 tons per year |

Attached Table 1 summarizes the permit conditions and requirements.

County Attainment Status

The source is located in Pulaski County.

| Pollutant | Status (attainment or unclassifiable/severe, moderate, marginal, or maintenance nonattainment) |
|-----------------|--|
| TSP | attainment |
| PM-10 | attainment |
| SO ₂ | attainment |
| NO ₂ | attainment |
| Ozone | attainment |
| CO | attainment |
| Lead | attainment |

- (a) Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Pulaski County has been designated as attainment or unclassifiable for ozone.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (1) 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.
- (2) 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) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

Since this source is located in Pulaski County and the potential to emit VOC is less than 100 tons per year, 326 IAC 2-6 does not apply. Since this source is not one of the 28 listed sources and its potential to emit PM10 is less than one-hundred (100) tons per year when added to fugitive emissions, 326 IAC 2-6 does not apply. However, for the purposes of Part 70 fee assessment, the source will be required to submit emissions data for all criteria pollutants and other regulated air pollutants.

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 6-3-2 (Process Operations)

The particulate matter (PM) overspray from the Ford, Chrysler, Para 1, Para 2, Para 3, Para 4 and New Bus/Para surface coating booths shall be limited by the following:

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

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

Compliance with this rule is shown by use of dry filters for overspray control.

326 IAC 8-1-6 (BACT)

The surface coating facilities at this source all have potential emissions of VOC of less than 25 tons per year, therefore this rule does not apply.

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

- (a) The application of adhesives in the Seat Shop, Ford, Chrysler, Para 1, Para 2, Para 3, Para 4 and New Bus/Para surface coating booths are each limited to actual VOC emissions of less than 15 pounds per day, so that 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), does not apply.
- (b) Use of coatings for automobile refinishing in the Ford, Chrysler, Para 1, Para 2, Para 3, Para 4 and New Bus/Para surface coating booths are exempt from the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), by 326 IAC 8-2-9(b)(3).

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

- (1) The Ford, Chrysler, New Bus/Para, Para 1, Para 2, Para 3, and Para 4 surface coating booths have applicable compliance monitoring conditions as specified below:
 - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation.
 - (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed.
 - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for the surface coating operations must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations).

Air Toxic Emissions

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

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act.
- (b) See attached calculations for detailed air toxic calculations. (8 pages)

Conclusion

The operation of this emission source, a stationary motor vehicle conversion plant, will be subject to the conditions of the attached proposed **Part 70 Permit No. T131-7058-00017**.

Description of facility: Seat Shop, Ford, Chrysler, Para 1, Para 2, Para 3, Para 4 and New Bus/Para surface coating booths
Max Rating: Seat Shop - 8 units per hour, all others - 0.83 vans per hour
Construction Date: 1990
Control Device (if any): Seat Shop - none, all others - dry filters

| EMISSION LIMITATIONS | | | |
|--|---|--|--|
| Numerical Emission Limit: | 15 lb/day | | |
| Regulation/Citation: | 326 IAC 8-2-9 | | |
| Compliance Demonstration: | record keeping and reporting | | |
| PERFORMANCE TESTING | | | |
| Parameter/Pollutant to be Tested: | NA | | |
| Testing Method/Analysis: | NA | | |
| Testing Frequency/Schedule: | NA | | |
| Submittal of Test Results: | NA | | |
| COMPLIANCE MONITORING | | | |
| Monitoring Description: | inspections of dry filters to verify the placement, integrity and particle loading of the filters. Observations of overspray while one or more of the booths are in operation. Inspections of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. | | |
| Monitoring Method: | observation | | |
| Monitoring Regulation/Citation: | NA | | |
| Monitoring Frequency: | daily, daily, weekly of booths equipped with dry filters | | |
| RECORD KEEPING | | | |
| Parameter/Pollutant to be Recorded: | Amount and VOC content of each coating material and solvent used including purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. A log of dates of use; Cleanup solvent usage for each day; Daily volume weighted average of coatings; Total VOC usage for each day; and weight of VOCs emitted for each compliance period. For booths with dry filters, a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventative Maintenance Plan. | | |
| Recording Frequency: | daily | | |
| REPORTING REQUIREMENTS | | | |
| Information in Report: | daily volume weighted average of VOC in coatings, amount of coating used per day, equivalent VOC emissions in pounds per day. | | |
| Reporting Frequency/Submittal: | quarterly for VOC record keeping, upon request for dry filter requirements | | |
| Additional Comments: | | | |

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for Part 70 Operating Permit

| | |
|------------------------------|---|
| Source Name: | The Braun Corporation |
| Source Location: | 623 West 11th Street, Winamac, Indiana 46996 |
| County: | Pulaski County |
| SIC Code: | 3711 |
| Operation Permit No.: | T131-7058-00017 |
| Permit Reviewer: | Dana L. Brown / Cathie Moore |

On July 9, 1997, the Office of Air Management (OAM) had a notice published in the Pulaski County Journal and Independent, Winamac, Indiana, stating that The Braun Corporation had applied for a Part 70 Operating Permit to operate a motor vehicle conversion plant. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On August 7, 1997, DECA, consultant for The Braun Corporation, submitted comments on the proposed Part 70 permit. The summary of the comments is as follows (~~strikeout~~ added to show what was deleted and **bold** added to show what was added):

Comment 1:

The reference to dry filters in Section D.1 on page 27 of 41 of the draft permit, should be removed because the use of dry filters for overspray control are not required for each facility to be in compliance with 326 IAC 6-3 (Process Weight Rate). In addition Condition D.1.6 on page 28 of 41 of the draft permit, requiring the use of dry filters should be deleted and Condition D.1.7 on page 28 of 41 of the draft permit, requiring monitoring of the dry filters should be deleted because dry filters are not required.

Facility Description, Section D.1

On each of the surface coating booths in Plant 4, please remove the last sentence which reads "Emissions shall be controlled by dry filters, then exhausted at (Stack ID)."

As was rigorously shown in the application, these facilities comply with the applicable particulate rule without benefit of any particulate emission control equipment whatsoever, therefore no emission control equipment can be required.

Condition D.1.7(a), Monitoring

Please remove this condition in its entirety.

As was shown rigorously in the application, each of these processes comply with the applicable particulate rule - 326 IAC 6-3-2(c) - and Condition D.1.1 without the benefit of emission control equipment of any sort. Indeed most of the adhesives are applied (as shown in the application) by mechanical extrusion from tubes rather than spraying. To require daily monitoring of the filters which are definitely not required to meet the applicable requirement is unnecessarily burdensome and provides no environmental benefit whatsoever.

Condition D.1.7(b), Monitoring

Please remove this condition in its entirety.

This condition has no basis in any rule or any other condition in this draft permit. Condition D.1.1 allows a finite amount of overspray emissions from the listed coating operations. The application showed rigorously that these emissions were in compliance with the applicable rule without any benefit of emission controls. Further any accumulation on the roof or ground are not air pollution. The simple fact that the particles settled to the ground or rooftop indicates that they were large and massive enough to overcome the vertical velocity imparted by the exhaust fan and fell quickly to the horizontal surface. Such particle would be in excess of 100 microns in diameter and hence, they never did constitute air pollution. Further, overspray accumulations on the floor or wall surfaces (often interpreted by IDEM/OAM Compliance personnel as being the "ground") obviously are not air pollution and never were air pollution. Such accumulations may constitute problems in the realms of quality assurance and employee morale, but these are far beyond the purview of this permit. The applicant is aware that IDEM often receives complaints about overspray from surface coating operations (other than the applicant's) settling on their vehicles or property. These complaints, may be valid as complaints about a nuisance, but they do not prove any health effects. IDEM's statutory authority concerning air pollution is strictly based on health effects, not nuisance. If a person has a complaint about overspray damaging his/her property, that is the proper business of the civil courts, not the Office of Air Management. The proven health-based rule in this case is 326 IAC 6-3-2(c) as expressed correctly by Condition D.1.1. As shown numerous times in the application and in these and previous comments, these processes comply with that rule without the benefit of emission control equipment. To require more than that exceeds the statutory authority of the agency.

Response to Comment 1:

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.

While there are definitions of particulate matter that include diameter, the reference method for determining compliance with the limitations that apply to particulate matter emissions from these facilities is a "method 5 stack test". This method does not exclude any normal sized particle in the measurement of emission rate. In addition, evidence of deposition strongly implies increased particulate matter emissions into the air. The OAM does not believe that such a test is necessary to demonstrate compliance at this time, but discussions of particulate matter emission rates should be made in terms of these methods.

Comment 2:

Condition D.1.2, limiting VOC emissions from the Seat Shop, Ford, Chrysler, New Bus/Para, Para 1, Para 2, Para 3, and Para 4 surface coating booths should be deleted because the facilities are exempted from 326 IAC 8-2-9 under 326 IAC 8-2-9(b)(3) for automobile refinishing.

Condition D.1.8 on page 28 of 41 of the permit, and Condition D.1.9 on page 29 of 41 of the permit, requiring record keeping and reporting for compliance with Condition D.1.2 should be deleted because 326 IAC 8-2-9 does not apply.

Response to Comment 2:

The OAM agrees that the application of coatings in these facilities is not subject to 326 IAC 8-2-9, but the application of adhesives is subject to the rule. In addition, the coating facilities must prove on a continuous basis that 326 IAC 8-1-6 (BACT) does not apply to each facility, therefore Condition D.1.2 has been changed to be as follows:

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

- (a) ~~The Seat Shop, Ford, Chrysler, New Bus/Para, Para 1, Para 2, Para 3, and Para 4 surface coating booths shall each be limited to input VOC less than fifteen (15) pounds per day.~~ Any change or modification that would cause VOC emissions from **the application of adhesives from any booth the Seat Shop, Ford, Chrysler, New Bus/Para, Para 1, Para 2, Para 3, and Para 4 surface coating booths** to be **greater than or equal to** fifteen (15) pounds per day will require prior approval by IDEM, OAM.**
- (b) Pursuant to CP 131-6363, issued on May 14, 1997, any change or modification to any facility that may cause potential emissions of VOC to increase to 25 tons per year, shall require prior approval by OAM and use of Best Available Control Technology.**

Condition D.1.9 has been deleted from the final permit as follows:

~~D.1.9 Reporting Requirements~~

~~A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.~~

Reporting forms have been changed to reflect changes in Condition D.1.2 and the limit for adhesive use.

Comment 3:

Condition D.1.3 requiring a preventive maintenance plan for the spray coating booths should be deleted because dry filters are not required for the facilities.

Condition D.1.3, Preventive Maintenance Plan

Please remove this condition in its entirety.

As no emission control equipment is required to comply with any applicable requirements there is nothing to maintain, so a Preventive Maintenance Plan is not required. 326 IAC 1-6-3 requires a preventive maintenance plan of emission control devices. As no such devices are required to meet air pollution rules, no air pollution control devices exist at this source and are hence not subject to any requirement for preventive maintenance plans under this rule.

Response to Comment 3:

Pursuant to 326 IAC 2-7-4(c)(9) (Permit Application), confirmation that the source maintains on-site a preventive maintenance plan as described in 326 IAC 1-6-3, must be included in the permit application. Pursuant to 326 IAC 2-7-5(13) (Permit Content), a provision that requires the source to do all of the following must be included in each Part 70 permit:

- 1) Maintain on-site the preventive maintenance plan as required under 326 IAC 2-7-4(c)(9);
- 2) Implement the preventive maintenance plan; and,
- 3) Forward to the department upon request the preventive maintenance plan.

The requirements in 326 IAC 1-6-1 and 326 IAC 1-6-3 specify that the requirement to maintain a Preventive Maintenance Plan is applicable to any facility that is required to obtain a permit under 326 IAC 2-1-2 (Registration) and 326 IAC 2-1-4 (Operating Permits). IDEM's preventive maintenance plan guidance states that a preventive maintenance plan is required only for:

- (a) the unit emits particulate matter, sulfur dioxide, or volatile organic compounds; and
- (b) the unit has existing applicable requirements; and
- (c) the unit is subject to a NSPS or NESHAP (for these units current requirements will satisfy as a compliance monitoring plan); or
- (d) the unit has a control device and the allowable emissions exceed 10 pounds per hour; or
- (e) the unit does not have a control device and has actual emissions exceeding 25 tons per year.

The guidance does not state that if a facility does not meet the above requirements, preventive maintenance will never be necessary, it does state that a preventive maintenance plan is not required to be submitted with the application. In most cases, the requirement to maintain a preventive maintenance plan and perform preventive maintenance has followed the same guidelines as specified above. However, there are some types of operations (i.e. woodworking) that the OAM has determined that compliance monitoring and preventive maintenance plans are necessary to ensure continuous compliance.

Since it is difficult to determine the process weight rate for surface coating operations, compliance monitoring and preventive maintenance plans are required for these operations. There will be no changes to this condition in the final permit due to this comment.

On July 28, 1998, David L. Whitmer of DECA, consultant for The Braun Corporation, submitted additional comments on the proposed Part 70 permit. The summary of the comments is as follows (~~strikeout~~ added to show what was deleted and **bold** added to show what was added):

Comment 4:

Facility Description, Section D.1

Please clarify the fact that each of the eight (entries) are to be considered as separate facilities for all rule applicability purposes.

Each of these facilities operates independently from the other facilities. No material is cross-produced whatsoever. Once material starts down one line, it never moves to another line for any processing whatsoever. This description fails to make clear that each line is a separate facility.

Response to Comment 4:

1. Condition A.2 "Emission Units and Pollution Control Equipment Summary" has been changed to be as follows:

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

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

- (a) One (1) ~~surface coating booth~~ **general assembly area** in Plant 3, described as follows:
 - (1) Plant 3 Seat Shop ~~surface coating booth~~, identified as Seat Shop, with a maximum rating of 8 units per hour. ~~Particulate emissions shall be controlled by dry filters, then exhausted to general ventilation.~~ **This facility operates independently of all other surface coating facilities.**
- (b) Seven (7) surface coating booths in Plant 4, described as follows:
 - (1) Chrysler EnterVan Refinishing surface coating booth, identified as Chrysler, with a maximum rating of 0.083 vans per hour. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Chrysler. **This facility operates independently of all other surface coating facilities.**
 - (2) Ford EnterVan Line Refinishing surface coating booth, identified as Ford, with a maximum rating of 0.083 vans per hour. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Ford. **This facility operates independently of all other surface coating facilities.**
 - (3) New Bus/ParaTransit Van Line Refinishing surface coating booth, identified as New Bus/Para, with a maximum rating of 0.83 vans per hour. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID #New Bus/Pa. **This facility operates independently of all other surface coating facilities.**
 - (4) ParaTransit Van Line 1 Refinishing surface coating booth, identified as Para 1, with a maximum rating of 0.083 vans per hour. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 1. **This facility operates independently of all other surface coating facilities.**
 - (5) ParaTransit Van Line 2 Refinishing surface coating booth, identified as Para 2, with a maximum rating of 0.083 vans per hour. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 2. **This facility operates independently of all other surface coating facilities.**
 - (6) ParaTransit Van Line 3 Refinishing surface coating booth, identified as Para 3, with a maximum rating of 0.083 vans per hour. Particulate emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 3. **This facility operates independently of all other surface coating facilities.**
 - (7) ParaTransit Van Line 4 Refinishing surface coating booth, identified as Para 4, with a maximum rating of 0.083 vans per hour. Emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 4. **This facility operates independently of all other surface coating facilities.**

- 2. The equipment listed in Section D.1 "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

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

One (1) ~~surface coating booth~~ **general assembly area** in Plant 3, described as follows:

- (1) Plant 3 Seat Shop ~~surface coating booth~~, identified as Seat Shop, with a maximum rating of 8 units per hour. ~~Particulate emissions shall be controlled by dry filters, then exhausted to general ventilation.~~ **This facility operates independently of all other surface coating facilities.**

Seven (7) surface coating booths in Plant 4, described as follows:

- (1) Chrysler EnterVan Refinishing surface coating booth, identified as Chrysler, with a maximum rating of 0.083 vans per hour. Emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Chrysler. **This facility operates independently of all other surface coating facilities.**
- (2) Ford EnterVan Line Refinishing surface coating booth, identified as For, with a maximum rating of 0.083 vans per hour. Emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Ford. **This facility operates independently of all other surface coating facilities.**
- (3) New Bus/ParaTransit Van Line Refinishing surface coating booth, identified as New Bus/Para, with a maximum rating of 0.83 vans per hour. Emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID #New Bus/Pa. **This facility operates independently of all other surface coating facilities.**
- (4) ParaTransit Van Line 1 Refinishing surface coating booth, identified as Para 1, with a maximum rating of 0.083 vans per hour. Emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 1. **This facility operates independently of all other surface coating facilities.**
- (5) ParaTransit Van Line 2 Refinishing surface coating booth, identified as Para 2, with a maximum rating of 0.083 vans per hour. Emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 2. **This facility operates independently of all other surface coating facilities.**
- (6) ParaTransit Van Line 3 Refinishing surface coating booth, identified as Para 3, with a maximum rating of 0.083 vans per hour. Emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 3. **This facility operates independently of all other surface coating facilities.**
- (7) ParaTransit Van Line 4 Refinishing surface coating booth, identified as Para 4, with a maximum rating of 0.083 vans per hour. Emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 4. **This facility operates independently of all other surface coating facilities.**

Comment 5:

Facility Description, Section D.1

Please remove the last sentence that reads "Emissions shall be controlled by dry filters, then exhausted to general ventilation." Please remove the reference to the "Seat Shop surface coating booth." Also please remove the phrase: "Emissions shall be controlled by dry filters..."

This facility, as was pointed out in the application, is not a spray booth, but a general assembly area. It does not have any dry filters or any sort of particulate control equipment whatsoever. The application rigorously showed that the particulate emissions from this facility complied with the applicable particulate rule without the benefit of emission control equipment, so no such equipment can be required.

Response to Comment 5:

Condition A.2(a) "Emission Units and Pollution Control Equipment Summary" has been changed to be as follows:

(a) One (1) ~~surface coating booth~~ **general assembly area** in Plant 3, described as follows:

(1) Plant 3 Seat Shop ~~surface coating booth~~, identified as Seat Shop, with a maximum rating of 8 units per hour. ~~Particulate emissions shall be controlled by dry filters, then exhausted to general ventilation.~~ **This facility operates independently of all other surface coating facilities.**

The equipment listed in Section D.1(a) "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

One (1) ~~surface coating booth~~ **general assembly area** in Plant 3, described as follows:

(1) Plant 3 Seat Shop ~~surface coating booth~~, identified as Seat Shop, with a maximum rating of 8 units per hour. ~~Particulate emissions shall be controlled by dry filters, then exhausted to general ventilation.~~ **This facility operates independently of all other surface coating facilities.**

Comment 6:

Condition D.1.2(a), Volatile Organic Compounds

Please remove the first sentence that reads "The application of adhesives in the Seat Shop, Ford, Chrysler, New Bus/Para, Para 1, Para 2, Para 3, and Para 4 surface coating booths shall be limited to input VOC less than fifteen (15) pounds per day for each booth."

In the application, it was shown that the potential emissions from application of coatings possibly subject to 326 IAC 8-2-9 was less than 15 pounds per day. This calculation of potential emissions was performed according to the definition of "potential emissions" as stipulated by 326 IAC 1-2-55; that is using the maximum rated capacity, operating 24 hours per day, 365 days per year, using the coating requirements of the largest vehicles, and using the highest VOC content of all alternative materials that could possible be used. Unless one is willing to repudiate the definition of "potential emission," there is absolutely no reason to apply a limit. Further, no part of 326 IAC 8 authorizes IDEM to arbitrarily impose a VOC limitation of 15 pounds per day. Either the potential emission exceeds 15 pounds per day (in this case not) and 326 IAC 8-2-9 applies, or the potential emission is less than 15 pounds per day (as it has been shown) and 326 IAC 8-2-9 does not apply. Any limitation that applies is strictly a function of the inherent limitations of the process, not any limitation imposed by a governmental unit. As actual emission cannot exceed potential emissions, and as specified in 326 IAC 8-2-1, no part of 326 IAC 8-2 applies unless the actual emissions exceed 15 pounds per day, then 326 IAC 8-2-9 simply does not apply. As this limitation is used to apply onerous monitoring and record keeping requirements further along in this document, this sentence must be removed.

Response to Comment 6:

1. Condition D.1.2(a) "Volatile Organic Compounds" has been changed to be as follows:

- (a) ~~The Seat Shop, Ford, Chrysler, New Bus/Para, Para 1, Para 2, Para 3, and Para 4 surface coating booths shall each be limited to input VOC less than fifteen (15) pounds per day.~~ Any change or modification that would cause VOC emissions from **the application of adhesives from any booth the Seat Shop, Ford, Chrysler, New Bus/Para, Para 1, Para 2, Para 3, and Para 4 surface coating booths** to be **greater than or equal to** fifteen (15) pounds per day will require prior approval by IDEM, OAM.
2. Condition D.1.5 "Volatile Organic Compounds" has also been deleted from the final permit.
 3. The quarterly reports required by this condition have also been deleted from the final permit.

However, it is the source's responsibility to show the adhesive usage to be less than fifteen pounds per day if ever there is a question as to the compliance of these facilities.

Comment 7:

Condition D.1.2(a), Volatile Organic Compounds

Please remove the last sentence that reads "This VOC limit will make 326 IAC 8-2-9 not applicable."

As shown above, this limitation has nothing to do with the fact that 326 IAC 8-2-9 does not apply.

Response to Comment 7:

As shown in Response to Comment 6, the last sentence has been deleted from Condition D.1.2(a) "Volatile Organic Compounds" as requested.

Comment 8:

Condition D.1.6, VOC Emissions

Please remove this condition in its entirety.

This condition has no basis in any rule. No applicable rule is cited in the draft. Further, as shown above, these facilities avoid Article 8 rule applicability in that their potential emission is less than the applicability thresholds of those rules, so any such demonstration has already been accomplished in the application. Further demonstration would be burdensome and unnecessary.

Response to Comment 8:

Since the surface coating boots are not subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Requirements) or 326 IAC 8-1-6 (General Reduction Requirements) at this time, Condition D.1.6 "VOC Emissions" has been removed from the final permit. However, any change or modification that would trigger applicability to either of these requirements, may make this condition applicable. The remaining conditions of this section have been renumbered.

Comment 9:

Condition D.1.7(c), Monitoring

Please remove this condition in its entirety.

As shown previously, there is no emission control equipment required to comply with any applicable requirements, therefore no requirement for a preventive maintenance plant, pursuant to 326 IAC 1-6-3, therefore no additional inspections or preventive maintenance measures would be required.

Response to Comment 9:

Condition D.1.7(c) (now renumbered Condition D.1.6(c)) "Monitoring" has been changed to be as follows:

- (c) Additional inspections and preventive measures shall be performed as prescribed in the ~~Preventive Maintenance~~ **Compliance Response Plan**.

Comment 10:

Condition D.1.8, Record Keeping Requirements

Please remove this condition in its entirety, including parts (a), (b) and (c).

As shown above, the surface coating operations, were shown to be not subject to the VOC rules because of their potential emissions, and equally in continuous compliance with the particulate rule, without requiring any reductions from their potential hourly emissions. The requirement for a Preventive Maintenance Plan was shown to be unnecessary. The requirement for weekly inspections for overspray on the rooftop and ground were shown to exceed IDEM/OAM's statutory authority. Since the underlying requirements are not valid, there is no valid reason to require any record keeping.

Response to Comment 10:

Since the surface coating boots are not subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Requirements) or 326 IAC 8-1-6 (General Reduction Requirements) at this time, Condition D.1.8(a) "Record Keeping Requirements" has been removed from the final permit. However, any change or modification that would trigger applicability to either of these requirements, may make this condition applicable. The remaining subsections of this condition have been renumbered.

Comment 11:

Condition D.1.9, Reporting Requirements

Please remove this condition in it's entirety.

This type of condition would be valid if the applicant were using an artificial limit to avoid applicability of a rule - a "synthetic minor" limitation. In this case the permittee relies on the fact that the potential emissions of these facilities are naturally less than the applicability thresholds of the rule, therefore, a requirement for such reports is unnecessary to show that 326 IAC 8-2-9 is not applicable, and an onerous burden on the permittee.

Response to Comment 11:

Since the surface coating boots are not subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Requirements) or 326 IAC 8-1-6 (General Reduction Requirements) at this time, Condition D.1.9 "Reporting Requirements" has been removed from the final permit. However, any change or modification that would trigger applicability to either of these requirements, may make this condition applicable.

Comment 12:

Conditions D.2.3 and D.2.4, Record Keeping and Reporting Requirements

The requirement to keep extensive records and make report for a tiny shop maintenance parts washer is a betrayal of the promises made by the agency during the Indiana Title V rulemaking, specifically those for the insignificant activities.

Response to Comment 12:

Insignificant activities have been the subject of several rule making actions. The commentor did not provide information regarding any specific promise that he feels was made by the agency, and therefore the OAM cannot specifically address the commentor's feelings. The OAM continues to act in good faith regarding the implementation of the Title V Operating Permit program as authorized under state and federal rules. The application process was very much streamlined with respect to insignificant activities and the rules provide operational flexibility with regard to changes at the source that involve defined insignificant activities. The OAM has continued to address constructive suggestions regarding compliance-related requirements to better match them to the environmental significance of the emissions unit. However, the underlying applicable requirements must be contained in the permit. In this case the record keeping related to actual emissions has been deleted. The new condition accurately reflects the requirements of the applicable rule.

1. Condition D.2.1 "Volatile Organic Compounds" has been changed to be as follows:

D.2.1 Volatile Organic Compounds (VOCs) [326 IAC 8-3-5]

~~The degreasers at the source shall be limited to 15 pounds per day of VOC emissions and 145 gallons of solvent usage per twelve (12) month rolling total, so that 326 IAC 8-3 will not apply. This will cause the degreasers to be considered as insignificant activities.~~

- (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 (38°C) (one hundred degrees Fahrenheit (100°F));
 - (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 (38°C) (one hundred degrees Fahrenheit (100°F)), 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 (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (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 or 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.

2. Condition D.2.3 "Monitoring" has been added to the permit as follows:

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

D.2.3 Monitoring

Monitoring of this facility is not specifically required by this permit. However, any change or modification to this facility, as specified in 326 IAC 2-1 may require this facility to have monitoring requirements.

3. Conditions D.2.3 "Record Keeping Requirements" and D.2.4 "Reporting Requirements" have been deleted from the final permit.

Upon further review, OAM has decided to make the following changes to the Part 70 permit (~~strikeout~~ added to show what was deleted and **bold** added to show what was added):

1. The first paragraph on the title page of the permit was changed to be as follows:

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the ~~facilities listed~~ **source described** in Section A (Source Summary) of this permit.

2. The second paragraph on the cover page has been changed to be as follows:

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.

3. The name in the signature block on the cover page has been changed from "Felicia R. George" to "**Janet G. McCabe**".
4. A "Source Summary" has been changed to be as follows:

SECTION A SOURCE SUMMARY

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

5. Condition A.1 "General Information" has been changed to be as follows:

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

The Permittee owns and operates a stationary motor vehicle conversion plant.

Responsible Official: William R. Roth
Source Address: 623 West 11th Street, Winamac, IN 46996
Mailing Address: P. O. Box 310, Winamac, IN 46996
Phone Number: 219-946-6153
SIC Code: 3711
County Location: Pulaski
County Status: Attainment for all criteria pollutants
Source Status: Minor Source, under PSD Rules
Major Source, Part 70 Permit Program

6. The following rule cite was added to the title lines of Conditions A.1 "General Information", and A.2 "Emission Units and Pollution Control Equipment Summary":

[326 IAC 2-7-5(15)]

7. The title line and first paragraph of Condition A.3 "Specifically Regulated Insignificant Activities", has been changed to be as follows:

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(~~20~~)(21)] [326 IAC 2-7-4(c)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(~~20~~)(21):

8. Condition A.4 "Part 70 Applicability" has been changed to be as follows:

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

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

- (a) It is a major source, as defined in 326 IAC 2-7-1(21)(22).
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).**

9. Condition A.5 "Prior Permit Conditions Superseded" has been deleted from the final permit as follows:

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

~~This permit supersedes the operating conditions of all construction and operating permits issued to this stationary source under 326 IAC 2 prior to the effective date of this Part 70 permit.~~

10. Condition B.1 "General Requirements" has been changed to be as follows:

~~B.1 General Requirements [IC 13-15] [IC 13-17] Permit No Defense [IC 13]~~

~~The Permittee shall comply with the provisions of IC 13-15 (Permits Generally), IC 13-17 (Air Pollution Control) and the rules promulgated thereunder.~~

- (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 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield".**

11. Condition B.6 "Severability" has been changed to be as follows:

~~B.6 Severability [326 IAC 2-7-5(5)] [326 IAC 2-7-8(a)(4)]~~

~~(a) The provisions of this permit are severable, and if any provisions of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.~~

~~(b) Indiana 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.~~

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.

12. Condition B.8 (c) "Duty to Supplement and Provide Information" has been changed to be as follows:

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

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

13. Condition B.10 "Certification" has been changed to be as follows:

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

- (a) **Where specifically designated by this permit or required by an applicable requirement, any** 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) ~~This One (1)~~ **One (1)** certification shall be ~~submitted~~ **be included**, on the attached Certification Form **with each submittal**.
- (c) A responsible official is defined at 326 IAC 2-7-1~~(33)~~**(34)**.

14. Condition B.11 "Annual Compliance Certification" have been changed to be as follows:

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

- (a) The Permittee shall annually ~~certify that the source has complied~~ **submit a compliance certification report which addresses the status of the source' compliance** with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall **cover the time period from January 1 to December 31 of the previous year, and shall** be submitted in letter form no later than July 1 of each year to:

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

and

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) This annual compliance certification report required by this permit shall be **considered** timely if ~~delivered by any method and received and stamped~~ **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]~~
- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was **based on** continuous or intermittent **data**;

- (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); ~~and~~
- (5) Any insignificant activity that has been added without a permit revision; and**
- ~~(5)~~ **(6)** Such other facts, as specified in Sections D of this permit, as IDEM, OAM may require to determine the compliance status of the source.

~~(d) The Permittee shall also annually certify that the source is in compliance with additional requirements as may be specified under Sections 114(a)(3) and 504(b) of the Clean Air Act.~~

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

15. Condition B.12 “Preventive Maintenance Plan” has been changed to be as follows:

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 ~~and implement~~ Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:
 - (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) Corrective actions that will be implemented in the event an inspection indicates an out of specification situation;~~
 - ~~(4) A time schedule for taking such corrective actions including a schedule for devising additional corrective actions for situations that may not have been predicted; and~~
 - ~~(5)~~ **(3)** Identification and quantification of the replacement parts which 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.**
- ~~(b)~~ **(c)** PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

16. Condition B.13(e) "Emergency Provisions" has been changed to be as follows:

- (e) IDEM, OAM may require that the Preventive Maintenance Plans required under 326 IAC ~~2-7-4(e)(9)~~ **2-7-1(c)(10)** be revised in response to an emergency.

17. Condition B.14 "Permit Shield" has been changed to be as follows:

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

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

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

Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided ~~that either of the following:~~

(1) The applicable requirements are included and specifically identified in this permit; **or**

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

~~(b)(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in, or subsequent to, the permit application. If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.~~

~~(c) (d) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order. No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.~~

~~(d)~~ **(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:**

- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
- (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

- (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
 - ~~(e)~~ (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
 - ~~(f)~~ (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. **[326 IAC 2-7-12(c)(7)]**
 - ~~(g)~~ (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM has issued the modification. ~~[326 IAC 2-7-12(b)(8)]~~ **[326 IAC 2-7-12(b)(7)]**
18. Condition B.16 "Deviations from Permit Requirements and Conditions" has been changed to be as follows:

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 ~~corrective actions~~ **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.

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

19. The first paragraph of subsection (a), and subsection (b)(1) of Condition B.18 "Permit Renewal" have been changed to be as follows:

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include, ~~at minimum,~~ 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~~(20)(21)~~ and **326 IAC 2-7-1(40)**.
- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) ~~The Permittee has a duty to submit a timely and complete permit renewal application.~~ 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) **Delivered by any method and received and stamped 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]~~

20. Condition B.19 "Administrative Permit Amendment", Condition B.20 "Minor Permit Modification", and Condition B.21 "Significant Permit Modification" have all been combined into one condition numbered Condition B.19 "Permit Amendment or Modification" as follows. The remaining conditions of this section have been renumbered:

~~B.19 Administrative Permit Amendment [326 IAC 2-7-11]~~

- ~~(a) An administrative permit amendment is a Part 70 permit revision that makes changes of the type specified under 326 IAC 2-7-11(a).~~
- ~~(b) An administrative permit amendment may be made by IDEM, OAM consistent with the procedures specified under 326 IAC 2-7-11(c).~~
- ~~(c) The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]~~

~~B.20 Minor Permit Modification [326 IAC 2-7-12]~~

- ~~(a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendments under 326 IAC 2-7-11.~~
- ~~(b) Minor modification to this permit shall follow the procedures specified under 326 IAC 2-7-12(b).~~
- ~~(c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-7-12(b) and shall include the information required in 326 IAC 2-7-12(b)(3)(A) through (E).~~

- ~~(d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application unless the change is subject to the construction permit requirements of 326 IAC 2-1, 326 IAC 2-2, or 326 IAC 2-3. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM takes any of the actions specified in 326 IAC 2-7-12(b)(6)(A) through (C), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-7-12(b)(7)]~~

~~B.21 Significant Permit Modification [326 IAC 2-7-12(d)]~~

- ~~(a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.~~
- ~~(b) Every significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.~~
- ~~(c) Nothing in 326 IAC 2-7-12(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-7 that would render existing permit compliance terms and conditions irrelevant.~~
- ~~(d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-7, including those for application, public participation, review by the U.S. EPA, and availability of the permit shield, as they apply to permit issuance and renewal.~~

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

21. Condition B.22 (a) (now renumbered Condition B.20(a)) “Permit Revision Under Economic Incentives and Other Programs” has been changed to be as follows:

- ~~(a) A provision stating that~~ **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.**

22. The first sentence of Condition B.23 (now renumbered Condition B.21) "Changes Under Section 502(b)(10) of the Clean Air Act" has been changed to be as follows:

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:

23. The word "therein" in subsection (a)(3) of Condition B.24 (now renumbered Condition B.22) "Operational Flexibility" has been changed to "herein".
24. Condition B.24 (b) and (c) (now renumbered Condition B.22 (b) and (c)) "Operational Flexibility" have been changed to be as follows:
- (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(~~33~~)(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(~~a~~)(c).
25. Condition B.25 (now renumbered Condition B.23) "Construction Permit Requirement" has been changed to be as follows:

B.2523 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.

26. Condition B.26 (now renumbered Condition B.24) "Inspection and Entry" has been changed to be as follows:

B.2624 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of **IDEM proper** identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, 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]

27. Condition B.27 "Transfer of Ownership" has been deleted from the final permit and replaced with the following condition (now renumbered Condition B.25):

~~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~~

~~(c) IDEM, OAM shall reserve the right to issue a new permit.~~

B.25 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

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

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

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

The application 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) 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)]**

28. Condition B.28 (now renumbered Condition B.26) "Annual Fee Payment" has been changed to be as follows:

~~B.28~~ **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, consistent with the fee schedule established in 326 IAC 2-7-19. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.**
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit, ~~referral to the Office of the Attorney General for collection, or other appropriate measures.~~
- ~~(c) The Permittee shall pay the annual fee within thirty (30) calendar days of receipt of a billing by IDEM, OAM or in a time period that is consistent with the payment schedule issued by IDEM, OAM.~~
- ~~(d)~~ **(c) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, The Permittee shall may call the following telephone numbers: 1-800-451-6027 or ~~317-233-5674~~ 317-233-0425 (ask for OAM, Data Technical Support and Modeling Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.**

29. Condition C.1 "PSD Minor Source Status" has been deleted from the final permit as follows. The remaining conditions of this section have been renumbered:

~~C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]~~

~~The total source potential emissions of VOC are less than 250 tons per 365 consecutive day period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.~~

~~Any change or modification which may increase potential emissions to above 250 tons per 365 day period from the equipment covered by this permit, shall obtain prior approval pursuant to 326 IAC 2-2.~~

30. Condition C.1 "Particulate Matter Emission Limitations for Processes with Process Weight Rates Less Than One Hundred pounds per hour" has been added to the permit as follows. The remaining conditions of this section have been renumbered:

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.

31. Condition C.2 "Opacity" has been changed to be as follows:

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 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.

32. Condition C.3 "Open Burning" has been changed to be as follows:

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.**

33. Condition C.5 "Fugitive Dust Emissions" has been changed to be as follows:

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

~~The Permittee shall be in violation of 326 IAC 6-4 (Fugitive Dust Emissions) if any of the criteria specified in 326 IAC 6-4-2(1) through (4) are violated. Observations of visible emissions crossing the property line of the source at or near ground level must be made by a qualified representative of IDEM. [326 IAC 6-4-5(c)]~~

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.

34. Condition C.6 "Operation of Equipment" has been changed to be as follows:

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

~~(a) All equipment that may emit pollutants into the ambient air shall be properly operated to meet the requirements of this permit and maintained in accordance with Section B-- Preventive Maintenance Plan.~~

~~(b) Unless otherwise stated in this permit, All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.~~

~~(c) The Permittee shall perform all necessary maintenance according to the Preventive Maintenance Plan and make all necessary attempts to keep all air pollution control equipment in proper operating condition at all times such that the requirements of this permit are met.~~

35. Condition C.7 "Asbestos Abatement Projects- Accreditation" and Condition C.14 "Asbestos Abatement Projects" have been combined into one condition as follows:

~~G.7 Asbestos Abatement Projects Accreditation [326 IAC 14-10] [326 IAC 18-1]
[40 CFR 61, Subpart M]~~

~~Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector be Indiana accredited is not federally enforceable.~~

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.

36. Condition C.8 "Performance Testing" has been changed to be as follows:

C.8 Performance Testing ~~[326 IAC 3-2.4]~~ [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of ~~326 IAC 3-2.4~~ **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 ~~before~~ **prior to** the intended test date. **The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.**

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

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

37. Condition C.9 "Visible Emissions Observations" has been removed from the final permit, and subsequent conditions have been renumbered.

~~C.9 Visible Emissions Observations~~

~~Visible observations at the source stack exhausts shall be performed in accordance with 40 CFR Part 60, Appendix A, Method 9. The observations will be taken in sets of three (3) six minute readings.~~

38. Condition C.10 (a) (now renumbered Condition C.9(a)) "Compliance Schedule" has been changed to be as follows:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; **and**

39. Condition C.11 (now renumbered Condition C.10) "Compliance Monitoring" has been changed to be as follows:

~~C.4410~~ Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

~~Compliance with applicable requirements shall be documented in accordance with the provisions of 326 IAC 2-7-5(3) 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 the compliance schedule an additional ninety (90) days provided the Permittee shall** notifies:

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

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

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(~~33~~)(34).

40. Condition C.12 (now renumbered Condition C.11) "Maintenance of Monitoring Equipment" has been changed to be as follows:

~~C.4211~~ Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

~~(a) The Permittee shall perform all necessary maintenance and make all necessary and reasonable attempts to keep all required monitoring equipment in proper operating condition at all times.~~

~~(b)~~(a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

~~(c)~~(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. **In addition, prompt corrective action shall be initiated whenever indicated.**

~~(d) Preventive Maintenance Plans of the monitors shall be implemented. In addition, prompt corrective action shall be initiated whenever indicated.~~

41. Condition C.13 (now renumbered Condition C.12) "Monitoring Methods" has been changed to be as follows:

~~C.4312~~ Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the **applicable** requirements of this permit shall be performed, ~~whenever applicable~~ according to the provisions of 326 IAC 3, or 40 CFR 60, Appendix A, as appropriate, unless some other method is specified in this permit.

42. In the first sentence of Condition C.14 (now renumbered Condition C.13) "Pressure Gauge Specifications", the word "taking" has been replaced with the word "measurement".

43. The heading "Corrective Actions" has been changed to "Corrective Actions and Response Steps".
44. Condition C.16 (now renumbered Condition C.14) "Emergency Reduction Plans" has been changed to be as follows:

~~C.16~~ **C.14** Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

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

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. ~~If after this time, the Permittee does not submit an approvable ERP, then IDEM, OAM shall supply such plan.~~
 - (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
 - (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
 - (f) Upon direct notification by IDEM, OAM 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]
45. The first sentence of Condition C.17 (now renumbered Condition C.15) "Risk Management Plan" has been changed to be as follows:

If a regulated substance, **subject to 40 CFR 68**, is present **at a source** in more than ~~the a~~ threshold quantity ~~that is subject to 40 CFR 68~~, 40 CFR 68 is an applicable requirement and the Permittee shall:
 46. The following sentence has been added to the end of Condition C.17 (now renumbered Condition C.15) "Risk Management Plan":

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
 47. Condition C.18 (now renumbered Condition C.16) "Compliance Monitoring Plan - Failure to Take Corrective Action" has been changed to be as follows:

C.4816 Compliance Monitoring Plan - Failure to Take ~~Corrective Action~~ Response Steps [326 IAC 2-7-5(9)] [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) ~~The Preventive Maintenance Plan described in Section B, Preventive Maintenance Plan, of this permit.~~

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 ~~corrective actions, as described in the Preventive Maintenance Plan,~~ **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 ~~corrective actions~~ **response steps** within the prescribed time ~~contained within the Preventive Maintenance Plan~~ **in the Compliance Response Plan**, shall constitute a violation of the permit unless taking the corrective action set forth in the ~~Preventive Maintenance Plan~~ **Compliance Response Plan** would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee ~~may be~~ **is** excused from taking further ~~corrective action~~ **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 ~~corrective actions~~ **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 Permittee determines that~~ The process has already returned to operating within "normal" parameters and no ~~corrective action is~~ **response steps are** required.
- (d) Records shall be kept of all instances in which the ~~action values were~~ **compliance related information was** not met and of all ~~corrective actions~~ **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.
48. Condition C.19 (now renumbered Condition C.17) "Actions Related to Noncompliance Demonstrated by a Stack Test" has been changed to be as follows:

~~C.4917~~ **Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]**

- (a) When the results of the stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, ~~appropriate corrective actions the Permittee shall be taken~~ **take appropriate corrective actions.** ~~A description of these corrective actions shall be submitted to IDEM, OAM, within thirty (30) days of receipt of the test results. These corrective actions shall be implemented immediately unless notified by IDEM, OAM that they are not acceptable.~~ **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 ~~make every effort~~ **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 right to utilize enforcement activities to resolve the noncompliant stack test.
- (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).

49. Subsections (a)(3) and (a)(4) of Condition C.20 (now renumbered Condition C.18) "Emission Statement" have been removed.
50. The name "Data Support Section" in the address given in subsection (b) of Condition C.20 (now renumbered Condition C.18) "Emission Statement" has been changed to "Technical Support and Modeling Section".
51. Condition C.20(a) and (c) (now renumbered Condition C.18) "Emission Statement" have been changed to be as follows:
- (a) The Permittee shall submit an ~~certified,~~ annual emission statement **certified pursuant to the requirements of 326 IAC 2-6**, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. This annual emission statement shall meet the following requirements:

- (1) ~~Contain~~ **Indicate** actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) ~~Contain~~ **Indicate** actual emissions of other regulated pollutants from the source, for purpose of Part 70 fee assessment.
- (c) This annual emission statement required by this permit shall be **considered** timely if ~~delivered by any method and received and stamped 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]~~
52. Condition C.21(a) (now renumbered Condition C.19(a)) "Monitoring Data Availability" has been changed to be as follows:
- (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.
53. The title and subsections (a) and (c)(4) of Condition C.22 (now renumbered Condition C.20) "General Record Keeping Requirements" has been changed from:

C.2220 General Record Keeping Requirements [326 IAC 2-7-5(3)(B)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location **for a minimum of three (3) years** and available **upon the request** ~~within one (1) hour upon verbal request of an IDEM, OAM representative, for a minimum of three (3) years. They~~ **The records** may be stored elsewhere for the remaining two (2) years **as long as they are available upon request** ~~providing they are made available within thirty (30) days after written request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.~~
- (4) ~~Records of any required preventive maintenance and corrective actions that were implemented. Such records shall briefly describe what was done and indicate who did it. Such records may include, but are not limited to: work orders, quality assurance procedures, quality control procedures, operator's standard operating procedures, manufacturer's specifications or their equivalent, and equipment "troubleshooting" guidance.~~

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.

54. Condition C.23 (now renumbered Condition C.21) "General Reporting Requirements" has been changed to be as follows:

~~C.23~~**21** General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) **To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**
- ~~(a)~~(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
- ~~(b)~~(c) **Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if delivered by any method and received and stamped 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]**
- ~~(c)~~(d) **Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**
- ~~(d)~~(e) **All instances of deviations from any requirements of this permit as described in Section B - Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**
- ~~(e)~~(f) **Any corrective actions or response steps taken as a result of an exceedance of a limit, an excursion from the parametric values, or a malfunction that may have caused excess emissions each deviation must be clearly identified in such reports.**
- ~~(f)~~(g) **The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.**
55. The equipment listed in Section D.1 "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

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

One (1) ~~surface coating booth~~ **general assembly area** in Plant 3, described as follows:

- (1) Plant 3 Seat Shop ~~surface coating booth~~, identified as Seat Shop, with a maximum rating of 8 units per hour. ~~Particulate emissions shall be controlled by dry filters, then exhausted to general ventilation.~~ **This facility operates independently of all other surface coating facilities.**

Seven (7) surface coating booths in Plant 4, described as follows:

- (1) Chrysler EnterVan Refinishing surface coating booth, identified as Chrysler, with a maximum rating of 0.083 vans per hour. Emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Chrysler. **This facility operates independently of all other surface coating facilities.**
- (2) Ford EnterVan Line Refinishing surface coating booth, identified as For, with a maximum rating of 0.083 vans per hour. Emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Ford. **This facility operates independently of all other surface coating facilities.**
- (3) New Bus/ParaTransit Van Line Refinishing surface coating booth, identified as New Bus/Para, with a maximum rating of 0.83 vans per hour. Emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID #New Bus/Pa. **This facility operates independently of all other surface coating facilities.**
- (4) ParaTransit Van Line 1 Refinishing surface coating booth, identified as Para 1, with a maximum rating of 0.083 vans per hour. Emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 1. **This facility operates independently of all other surface coating facilities.**
- (5) ParaTransit Van Line 2 Refinishing surface coating booth, identified as Para 2, with a maximum rating of 0.083 vans per hour. Emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 2. **This facility operates independently of all other surface coating facilities.**
- (6) ParaTransit Van Line 3 Refinishing surface coating booth, identified as Para 3, with a maximum rating of 0.083 vans per hour. Emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 3. **This facility operates independently of all other surface coating facilities.**
- (7) ParaTransit Van Line 4 Refinishing surface coating booth, identified as Para 4, with a maximum rating of 0.083 vans per hour. Emissions shall be controlled by dry filters, then exhausted at Stack/Vent ID Para 4. **This facility operates independently of all other surface coating facilities.**

56. Conditions D.1.4, D.2.2, and D.3.2 "Testing Requirements" have been changed to be as follows:

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

~~Testing of these facilities~~ **The Permittee is not required to test this facility is not specifically required by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limits specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. this does not preclude testing requirements on this facility under 326 IAC 2-1-4 (f) and 326 IAC 2-7-6(1).**

D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

~~Testing of these facilities~~ **The Permittee is not required to test this facility is not specifically required** by this permit. However, **IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limits specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.** ~~this does not preclude testing requirements on this facility under 326 IAC 2-1-4 (f) and 326 IAC 2-7-6(1).~~

D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

~~Testing of these facilities~~ **The Permittee is not required to test this facility is not specifically required** by this permit. However, **IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.** ~~this does not preclude testing requirements on this facility under 326 IAC 2-1-4 (f) and 326 IAC 2-7-6(1).~~

57. Condition D.1.5 "Volatile Organic Compounds" has been deleted from the final permit as follows. The remaining conditions of this section have been renumbered:

~~**D.1.5 Volatile Organic Compounds (VOC)**~~

~~Compliance with the VOC content and usage limitations contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) 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.~~

58. Condition D.1.7 (now renumbered Condition D.1.6) "Monitoring" has been changed to be as follows:

~~**D.1.76 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 the surface coating booth stacks (Chrysler, Ford, #New Bus/Pa, Para 1, Para 2, Para 3 and Para 4)** while one or more of the booths are in operation. **The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.**
- (b) ~~Weekly~~ **Monthly** inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The ~~Preventive Maintenance Compliance Response~~ **Compliance Response** Plan for this unit shall contain troubleshooting contingency and ~~corrective actions~~ **response steps** for when ~~an overspray emission, evidence of overspray emission, or other abnormal emission~~ **a noticeable change in overspray emission, or evidence of overspray emission** is observed. **The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.**
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

59. Condition D.1.8(b) (now renumbered Condition D.1.7(a)) "Record Keeping Requirements" has been changed to be as follows:

~~(b)~~(a) To document compliance with Condition D.1.6, the Permittee shall maintain a log of ~~daily~~ **weekly** overspray observations, daily and ~~weekly~~ **monthly** inspections, and those additional inspections prescribed by the ~~Preventative Maintenance~~ **Compliance Response Plan**.

60. The equipment listed in Section D.2 "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

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

Insignificant Activities:

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

61. The equipment listed in Section D.3 "FACILITY OPERATION CONDITIONS" has been changed to be as follows:

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

Insignificant Activities:

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

62. The Certification Form has been replaced with a revised Certification Form (state form numbers have been removed).

63. The Deviation Occurrence Form has been replaced with the Emergency/Deviation Occurrence Form.

64. A Quarterly Compliance Monitoring Report Form has been added.

65. The Table of Contents has been updated to reflect the above mentioned changes.

HAP Emission Calculations - Ford EnterVan Line Refinishing

Company Name: The Braun Corporation
Plant Location: 623 West 11th Street, Winimac, Indiana 46996
County: Pulaski
Permit Reviewer: Dana L. Brown
Date: June 25, 1997

| Material | Density (Lb/Gal) | Gal of Mat (gal/unit) | Maximum (unit/hour) | Weight % Hexane | Weight % Toluene | Weight % Xylene | Weight % MEK | Weight % | Weight % Glycol Ethers | Weight % Methanol | Hexane Emission (ton/yr) | Toluene Emission (ton/yr) | Xylene Emission (ton/yr) | MEK Emission (ton/yr) | Hexane Emission (ton/yr) | Ethers Emission (ton/yr) | Methanol Emission (ton/yr) |
|----------------|------------------|-----------------------|---------------------|-----------------|------------------|-----------------|--------------|----------|------------------------|-------------------|--------------------------|---------------------------|--------------------------|-----------------------|--------------------------|--------------------------|----------------------------|
| DRR 1185 | 7.42 | 0.375000 | 0.08 | 0.00% | 9.31% | 2.55% | 9.95% | 0.00% | 0.00% | 0.00% | 0.00 | 0.09 | 0.03 | 0.10 | 0.00 | 0.00 | 0.00 |
| DC 1100 | 7.87 | 0.375000 | 0.08 | 0.00% | 0.00% | 0.67% | 9.76% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.01 | 0.10 | 0.00 | 0.00 | 0.00 |
| NCT Primer | 10.87 | 0.375000 | 0.08 | 0.00% | 14.23% | 17.53% | 0.00% | 0.00% | 0.00% | 0.09% | 0.00 | 0.21 | 0.26 | 0.00 | 0.00 | 0.00 | 0.00 |
| DBU 500 | 7.93 | 0.062500 | 0.08 | 0.00% | 6.50% | 6.86% | 7.40% | 0.00% | 0.00% | 0.00% | 0.00 | 0.01 | 0.01 | 0.01 | 0.00 | 0.00 | 0.00 |
| DAS 1980 | 7.85 | 0.966000 | 0.08 | 0.00% | 3.65% | 6.51% | 16.72% | 0.00% | 0.00% | 0.00% | 0.00 | 0.10 | 0.18 | 0.46 | 0.00 | 0.00 | 0.00 |
| 1031 HV | 7.23 | 1.000000 | 0.08 | 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 |
| RR-1 | 7.4 | 0.125000 | 0.08 | 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 |
| Thinner | 7 | 0.750000 | 0.08 | 0.00% | 60.00% | 0.00% | 0.00% | 0.00% | 0.00% | 40.00% | 0.00 | 1.15 | 0.00 | 0.00 | 0.00 | 0.00 | 0.76 |
| Plastic Primer | 7.24 | 0.008000 | 0.08 | 0.00% | 0.00% | 92.38% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.02 | 0.00 | 0.00 | 0.00 | 0.00 |
| Contact Adh | 6.59 | 2.000000 | 0.08 | 10.00% | 8.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.48 | 0.38 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

Total State Potential Emissions

0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00

METHODOLOGY

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

HAP Emission Calculations - Chrysler EnterVan Line Refinishing

Company Name: The Braun Corporation
Plant Location: 623 West 11th Street, Winimac, Indiana 46996
County: Pulaski
Permit Reviewer: Dana L. Brown
Date: June 25, 1997

| Material | Density (Lb/Gal) | Gal of Mat (gal/unit) | Maximum (unit/hour) | Weight % Hexane | Weight % Toluene | Weight % Xylene | Weight % MEK | Weight % | Weight % Glycol Ethers | Weight % Methanol | Hexane Emission (ton/yr) | Toluene Emission (ton/yr) | Xylene Emission (ton/yr) | MEK Emission (ton/yr) | Hexane Emission (ton/yr) | Ethers Emission (ton/yr) | Methanol Emission (ton/yr) |
|----------------|------------------|-----------------------|---------------------|-----------------|------------------|-----------------|--------------|----------|------------------------|-------------------|--------------------------|---------------------------|--------------------------|-----------------------|--------------------------|--------------------------|----------------------------|
| DRR 1185 | 7.42 | 0.375000 | 0.08 | 0.00% | 9.31% | 2.55% | 9.95% | 0.00% | 0.00% | 0.00% | 0.00 | 0.09 | 0.03 | 0.10 | 0.00 | 0.00 | 0.00 |
| DC 1100 | 7.87 | 0.375000 | 0.08 | 0.00% | 0.00% | 0.67% | 9.76% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.01 | 0.10 | 0.00 | 0.00 | 0.00 |
| NCT Primer | 10.87 | 0.375000 | 0.08 | 0.00% | 14.23% | 17.53% | 0.00% | 0.00% | 0.00% | 0.09% | 0.00 | 0.21 | 0.26 | 0.00 | 0.00 | 0.00 | 0.00 |
| DBU 500 | 7.93 | 0.062500 | 0.08 | 0.00% | 6.50% | 6.86% | 7.40% | 0.00% | 0.00% | 0.00% | 0.00 | 0.01 | 0.01 | 0.01 | 0.00 | 0.00 | 0.00 |
| DAS 1980 | 7.85 | 0.966000 | 0.08 | 0.00% | 3.65% | 6.51% | 16.72% | 0.00% | 0.00% | 0.00% | 0.00 | 0.10 | 0.18 | 0.46 | 0.00 | 0.00 | 0.00 |
| 1031 HV | 7.23 | 1.000000 | 0.08 | 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 |
| RR-1 | 7.4 | 0.125000 | 0.08 | 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 |
| Thinner | 7 | 0.750000 | 0.08 | 0.00% | 60.00% | 0.00% | 0.00% | 0.00% | 0.00% | 40.00% | 0.00 | 1.15 | 0.00 | 0.00 | 0.00 | 0.00 | 0.76 |
| Plastic Primer | 7.24 | 0.008000 | 0.08 | 0.00% | 0.00% | 92.38% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.02 | 0.00 | 0.00 | 0.00 | 0.00 |
| Contact Adh | 6.59 | 2.000000 | 0.08 | 10.00% | 8.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.48 | 0.38 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

Total State Potential Emissions

0.00 0.00 0.00 0.00 0.00 0.00 0.00

METHODOLOGY

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

HAP Emission Calculations - ParaTransit Van Line 1 Refinishing

Company Name: The Braun Corporation
Plant Location: 623 West 11th Street, Winimac, Indiana 46996
County: Pulaski
Permit Reviewer: Dana L. Brown
Date: June 25, 1997

| Material | Density (Lb/Gal) | Gal of Mat (gal/unit) | Maximum (unit/hour) | Weight % Hexane | Weight % Toluene | Weight % Xylene | Weight % MEK | Weight % | Weight % Glycol Ethers | Weight % Methanol | Hexane Emission (ton/yr) | Toluene Emission (ton/yr) | Xylene Emission (ton/yr) | MEK Emission (ton/yr) | Hexane Emission (ton/yr) | Ethers Emission (ton/yr) | Methanol Emission (ton/yr) |
|----------------|------------------|-----------------------|---------------------|-----------------|------------------|-----------------|--------------|----------|------------------------|-------------------|--------------------------|---------------------------|--------------------------|-----------------------|--------------------------|--------------------------|----------------------------|
| DRR 1185 | 7.42 | 0.375000 | 0.08 | 0.00% | 9.31% | 2.55% | 9.95% | 0.00% | 0.00% | 0.00% | 0.00 | 0.09 | 0.03 | 0.10 | 0.00 | 0.00 | 0.00 |
| DC 1100 | 7.87 | 0.375000 | 0.08 | 0.00% | 0.00% | 0.67% | 9.76% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.01 | 0.10 | 0.00 | 0.00 | 0.00 |
| NCT Primer | 10.87 | 0.250000 | 0.08 | 0.00% | 14.23% | 17.53% | 0.00% | 0.00% | 0.00% | 0.09% | 0.00 | 0.14 | 0.17 | 0.00 | 0.00 | 0.00 | 0.00 |
| DBU 500 | 7.93 | 0.062500 | 0.08 | 0.00% | 6.50% | 6.86% | 7.40% | 0.00% | 0.00% | 0.00% | 0.00 | 0.01 | 0.01 | 0.01 | 0.00 | 0.00 | 0.00 |
| DAS 1980 | 7.85 | 0.241000 | 0.08 | 0.00% | 3.65% | 6.51% | 16.72% | 0.00% | 0.00% | 0.00% | 0.00 | 0.03 | 0.04 | 0.11 | 0.00 | 0.00 | 0.00 |
| 1031 HV | 7.23 | 2.000000 | 0.08 | 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 |
| RR-1 | 7.4 | 0.250000 | 0.08 | 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 |
| Thinner | 7 | 1.250000 | 0.08 | 0.00% | 60.00% | 0.00% | 0.00% | 0.00% | 0.00% | 40.00% | 0.00 | 1.91 | 0.00 | 0.00 | 0.00 | 0.00 | 1.27 |
| Plastic Primer | 7.24 | 0.125000 | 0.08 | 0.00% | 0.00% | 92.38% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.30 | 0.00 | 0.00 | 0.00 | 0.00 |
| Contact Adh | 6.59 | 1.500000 | 0.08 | 10.00% | 8.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.36 | 0.29 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

Total State Potential Emissions

0.00 0.00 0.00 0.00 0.00 0.00 0.00

METHODOLOGY

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

HAP Emission Calculations - ParaTransit Van Line 2 Refinishing

Company Name: The Braun Corporation
Plant Location: 623 West 11th Street, Winimac, Indiana 46996
County: Pulaski
Permit Reviewer: Dana L. Brown
Date: June 25, 1997

| Material | Density (Lb/Gal) | Gal of Mat (gal/unit) | Maximum (unit/hour) | Weight % Hexane | Weight % Toluene | Weight % Xylene | Weight % MEK | Weight % | Weight % Glycol Ethers | Weight % Methanol | Hexane Emission (ton/yr) | Toluene Emission (ton/yr) | Xylene Emission (ton/yr) | MEK Emission (ton/yr) | Hexane Emission (ton/yr) | Ethers Emission (ton/yr) | Methanol Emission (ton/yr) |
|----------------|------------------|-----------------------|---------------------|-----------------|------------------|-----------------|--------------|----------|------------------------|-------------------|--------------------------|---------------------------|--------------------------|-----------------------|--------------------------|--------------------------|----------------------------|
| DRR 1185 | 7.42 | 0.375000 | 0.08 | 0.00% | 9.31% | 2.55% | 9.95% | 0.00% | 0.00% | 0.00% | 0.00 | 0.09 | 0.03 | 0.10 | 0.00 | 0.00 | 0.00 |
| DC 1100 | 7.87 | 0.375000 | 0.08 | 0.00% | 0.00% | 0.67% | 9.76% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.01 | 0.10 | 0.00 | 0.00 | 0.00 |
| NCT Primer | 10.87 | 0.250000 | 0.08 | 0.00% | 14.23% | 17.53% | 0.00% | 0.00% | 0.00% | 0.09% | 0.00 | 0.14 | 0.17 | 0.00 | 0.00 | 0.00 | 0.00 |
| DBU 500 | 7.93 | 0.062500 | 0.08 | 0.00% | 6.50% | 6.86% | 7.40% | 0.00% | 0.00% | 0.00% | 0.00 | 0.01 | 0.01 | 0.01 | 0.00 | 0.00 | 0.00 |
| DAS 1980 | 7.85 | 0.241000 | 0.08 | 0.00% | 3.65% | 6.51% | 16.72% | 0.00% | 0.00% | 0.00% | 0.00 | 0.03 | 0.04 | 0.11 | 0.00 | 0.00 | 0.00 |
| 1031 HV | 7.23 | 2.000000 | 0.08 | 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 |
| RR-1 | 7.4 | 0.250000 | 0.08 | 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 |
| Thinner | 7 | 1.250000 | 0.08 | 0.00% | 60.00% | 0.00% | 0.00% | 0.00% | 0.00% | 40.00% | 0.00 | 1.91 | 0.00 | 0.00 | 0.00 | 0.00 | 1.27 |
| Plastic Primer | 7.24 | 0.125000 | 0.08 | 0.00% | 0.00% | 92.38% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.30 | 0.00 | 0.00 | 0.00 | 0.00 |
| Contact Adh | 6.59 | 1.500000 | 0.08 | 10.00% | 8.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.36 | 0.29 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

Total State Potential Emissions

0.00 0.00 0.00 0.00 0.00 0.00 0.00

METHODOLOGY

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

HAP Emission Calculations - ParaTransit Van Line 3 Refinishing

Company Name: The Braun Corporation
Plant Location: 623 West 11th Street, Winimac, Indiana 46996
County: Pulaski
Permit Reviewer: Dana L. Brown
Date: June 25, 1997

| Material | Density (Lb/Gal) | Gal of Mat (gal/unit) | Maximum (unit/hour) | Weight % Hexane | Weight % Toluene | Weight % Xylene | Weight % MEK | Weight % | Weight % Glycol Ethers | Weight % Methanol | Hexane Emission (ton/yr) | Toluene Emission (ton/yr) | Xylene Emission (ton/yr) | MEK Emission (ton/yr) | Hexane Emission (ton/yr) | Ethers Emission (ton/yr) | Methanol Emission (ton/yr) |
|----------------|------------------|-----------------------|---------------------|-----------------|------------------|-----------------|--------------|----------|------------------------|-------------------|--------------------------|---------------------------|--------------------------|-----------------------|--------------------------|--------------------------|----------------------------|
| DRR 1185 | 7.42 | 0.375000 | 0.08 | 0.00% | 9.31% | 2.55% | 9.95% | 0.00% | 0.00% | 0.00% | 0.00 | 0.09 | 0.03 | 0.10 | 0.00 | 0.00 | 0.00 |
| DC 1100 | 7.87 | 0.375000 | 0.08 | 0.00% | 0.00% | 0.67% | 9.76% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.01 | 0.10 | 0.00 | 0.00 | 0.00 |
| NCT Primer | 10.87 | 0.250000 | 0.08 | 0.00% | 14.23% | 17.53% | 0.00% | 0.00% | 0.00% | 0.09% | 0.00 | 0.14 | 0.17 | 0.00 | 0.00 | 0.00 | 0.00 |
| DBU 500 | 7.93 | 0.062500 | 0.08 | 0.00% | 6.50% | 6.86% | 7.40% | 0.00% | 0.00% | 0.00% | 0.00 | 0.01 | 0.01 | 0.01 | 0.00 | 0.00 | 0.00 |
| DAS 1980 | 7.85 | 0.241000 | 0.08 | 0.00% | 3.65% | 6.51% | 16.72% | 0.00% | 0.00% | 0.00% | 0.00 | 0.03 | 0.04 | 0.11 | 0.00 | 0.00 | 0.00 |
| 1031 HV | 7.23 | 2.000000 | 0.08 | 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 |
| RR-1 | 7.4 | 0.250000 | 0.08 | 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 |
| Thinner | 7 | 1.250000 | 0.08 | 0.00% | 60.00% | 0.00% | 0.00% | 0.00% | 0.00% | 40.00% | 0.00 | 1.91 | 0.00 | 0.00 | 0.00 | 0.00 | 1.27 |
| Plastic Primer | 7.24 | 0.125000 | 0.08 | 0.00% | 0.00% | 92.38% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.30 | 0.00 | 0.00 | 0.00 | 0.00 |
| Contact Adh | 6.59 | 1.500000 | 0.08 | 10.00% | 8.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.36 | 0.29 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

Total State Potential Emissions

0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00

METHODOLOGY

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

HAP Emission Calculations - ParaTransit Van Line 4 Refinishing

Company Name: The Braun Corporation
Plant Location: 623 West 11th Street, Winimac, Indiana 46996
County: Pulaski
Permit Reviewer: Dana L. Brown
Date: June 25, 1997

| Material | Density (Lb/Gal) | Gal of Mat (gal/unit) | Maximum (unit/hour) | Weight % Hexane | Weight % Toluene | Weight % Xylene | Weight % MEK | Weight % | Weight % Glycol Ethers | Weight % Methanol | Hexane Emission (ton/yr) | Toluene Emission (ton/yr) | Xylene Emission (ton/yr) | MEK Emission (ton/yr) | Hexane Emission (ton/yr) | Ethers Emission (ton/yr) | Methanol Emission (ton/yr) |
|----------------|------------------|-----------------------|---------------------|-----------------|------------------|-----------------|--------------|----------|------------------------|-------------------|--------------------------|---------------------------|--------------------------|-----------------------|--------------------------|--------------------------|----------------------------|
| DRR 1185 | 7.42 | 0.375000 | 0.08 | 0.00% | 9.31% | 2.55% | 9.95% | 0.00% | 0.00% | 0.00% | 0.00 | 0.09 | 0.03 | 0.10 | 0.00 | 0.00 | 0.00 |
| DC 1100 | 7.87 | 0.375000 | 0.08 | 0.00% | 0.00% | 0.67% | 9.76% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.01 | 0.10 | 0.00 | 0.00 | 0.00 |
| NCT Primer | 10.87 | 0.250000 | 0.08 | 0.00% | 14.23% | 17.53% | 0.00% | 0.00% | 0.00% | 0.09% | 0.00 | 0.14 | 0.17 | 0.00 | 0.00 | 0.00 | 0.00 |
| DBU 500 | 7.93 | 0.062500 | 0.08 | 0.00% | 6.50% | 6.86% | 7.40% | 0.00% | 0.00% | 0.00% | 0.00 | 0.01 | 0.01 | 0.01 | 0.00 | 0.00 | 0.00 |
| DAS 1980 | 7.85 | 0.241000 | 0.08 | 0.00% | 3.65% | 6.51% | 16.72% | 0.00% | 0.00% | 0.00% | 0.00 | 0.03 | 0.04 | 0.11 | 0.00 | 0.00 | 0.00 |
| 1031 HV | 7.23 | 2.000000 | 0.08 | 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 |
| RR-1 | 7.4 | 0.250000 | 0.08 | 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 |
| Thinner | 7 | 1.250000 | 0.08 | 0.00% | 60.00% | 0.00% | 0.00% | 0.00% | 0.00% | 40.00% | 0.00 | 1.91 | 0.00 | 0.00 | 0.00 | 0.00 | 1.27 |
| Plastic Primer | 7.24 | 0.125000 | 0.08 | 0.00% | 0.00% | 92.38% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.30 | 0.00 | 0.00 | 0.00 | 0.00 |
| Contact Adh | 6.59 | 1.500000 | 0.08 | 10.00% | 8.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.36 | 0.29 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

Total State Potential Emissions

0.00 0.00 0.00 0.00 0.00 0.00 0.00

METHODOLOGY

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

HAP Emission Calculations - New Bus/ParaTransit Van Line Refinishing

Company Name: The Braun Corporation
Plant Location: 623 West 11th Street, Winimac, Indiana 46996
County: Pulaski
Permit Reviewer: Dana L. Brown
Date: June 25, 1997

| Material | Density (Lb/Gal) | Gal of Mat (gal/unit) | Maximum (unit/hour) | Weight % Hexane | Weight % Toluene | Weight % Xylene | Weight % MEK | Weight % | Weight % Glycol Ethers | Weight % Methanol | Hexane Emission (ton/yr) | Toluene Emission (ton/yr) | Xylene Emission (ton/yr) | MEK Emission (ton/yr) | Hexane Emission (ton/yr) | Ethers Emission (ton/yr) | Methanol Emission (ton/yr) |
|----------------|------------------|-----------------------|---------------------|-----------------|------------------|-----------------|--------------|----------|------------------------|-------------------|--------------------------|---------------------------|--------------------------|-----------------------|--------------------------|--------------------------|----------------------------|
| DRR 1185 | 7.42 | 0.375000 | 0.08 | 0.00% | 9.31% | 2.55% | 9.95% | 0.00% | 0.00% | 0.00% | 0.00 | 0.09 | 0.03 | 0.10 | 0.00 | 0.00 | 0.00 |
| DC 1100 | 7.87 | 0.375000 | 0.08 | 0.00% | 0.00% | 0.67% | 9.76% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.01 | 0.10 | 0.00 | 0.00 | 0.00 |
| NCT Primer | 10.87 | 0.250000 | 0.08 | 0.00% | 14.23% | 17.53% | 0.00% | 0.00% | 0.00% | 0.09% | 0.00 | 0.14 | 0.17 | 0.00 | 0.00 | 0.00 | 0.00 |
| DBU 500 | 7.93 | 0.062500 | 0.08 | 0.00% | 6.50% | 6.86% | 7.40% | 0.00% | 0.00% | 0.00% | 0.00 | 0.01 | 0.01 | 0.01 | 0.00 | 0.00 | 0.00 |
| DAS 1980 | 7.85 | 0.241000 | 0.08 | 0.00% | 3.65% | 6.51% | 16.72% | 0.00% | 0.00% | 0.00% | 0.00 | 0.03 | 0.04 | 0.11 | 0.00 | 0.00 | 0.00 |
| 1031 HV | 7.23 | 2.000000 | 0.08 | 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 |
| RR-1 | 7.4 | 0.250000 | 0.08 | 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 |
| Thinner | 7 | 1.250000 | 0.08 | 0.00% | 60.00% | 0.00% | 0.00% | 0.00% | 0.00% | 40.00% | 0.00 | 1.91 | 0.00 | 0.00 | 0.00 | 0.00 | 1.27 |
| Plastic Primer | 7.24 | 0.125000 | 0.08 | 0.00% | 0.00% | 92.38% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00 | 0.00 | 0.30 | 0.00 | 0.00 | 0.00 | 0.00 |
| Contact Adh | 6.59 | 1.500000 | 0.08 | 10.00% | 8.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.00% | 0.36 | 0.29 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

Total State Potential Emissions

0.00 0.00 0.00 0.00 0.00 0.00 0.00

METHODOLOGY

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