

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

**Bodor Corporation (dba Explorer Van Company)
U.S. 30 West and Fox Farm Road North
Warsaw, Indiana 46580**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T085-7436-00074	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary motor vehicles parts and accessories manufacturing operation.

Responsible Official: Stephen Kesler
Source Address: U.S. 30 West and Fox Farm Road North, Warsaw, IN 46580
Mailing Address: P.O. Box 4527, Warsaw, IN 46581-4527
SIC Code: 3714
County Location: Kosciusko
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

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

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

- (1) Woodworking activities, identified as B-34 and B-35, consisting of various woodworking equipment, with a maximum capacity of 1500 pounds per hour, using two baghouses with flow rates of 37150 cfm and 26450 cfm respectively, to control particulate emissions, and exhausting to stacks SB-34 and SB-35 respectively.
- (2) Two (2) air assisted airless wood coating spray booths, identified as B-26 and B-33, with a maximum capacity of 3 vans per hour, equipped with dry filters for overspray control and exhausting to stacks SB-26 and SB-33 respectively.
- (3) Four high volume low pressure wood coating spray booths, identified as B-24, B-27, B-30/31 and B-32, with a maximum capacity of 3 vans per hour, equipped with dry filters for overspray control and exhausting to stacks SB-24, SB-27, SB-30 and SB-32.
- (4) One (1) stain dip tank, identified as B-1, with a maximum capacity of 30 units per hour, with no controls, and exhausting to atmosphere.
- (5) Wood gluing operations, identified as BF-1 and BF-2, with a maximum capacity of 2 vans per hour and exhausting to atmosphere.
- (6) One (1) air-assisted airless wood/rubber fabric gluing operations, identified as PF-1, with a maximum capacity of 7.5 vans per hour, with no controls and venting to atmosphere.
- (7) Fiberglass operations, consisting of two (2) spray-up booths identified as I-19 and I-23, and one (1) gel coat booth, identified as I-15, with a maximum capacity of 3 vans per hour, equipped with dry filters for overspray control and exhausting to stacks SI-15, SI-19 and SI-23 respectively.

- (8) One (1) high volume low pressure fiberglass and plastic primer booth, identified as I-5, with a maximum capacity of 3 vans per hour, equipped with dry filters for overspray control and exhausting to stack SI-5.
- (9) Three (3) high volume low pressure topcoat booths, identified as Q-3, Q-6 and Q-7, with a maximum capacity of 3 vans per hour, equipped with dry filters for overspray control and exhausting to stacks SQ-3, SQ-6 and SQ-7.
- (10) Two (2) air atomization van body repair and touch-up booths, identified as C-6 and C-7, with a maximum capacity of 35 vans per day, equipped with dry filters for overspray control and exhausting to stacks SC-6 and SC-7.
- (11) One (1) Interior Glue application, identified as AF-1, with a maximum capacity of 1 van per hour, equipped with dry filters for overspray control and exhausting to atmosphere.
- (12) One (1) glue spray booth, identified as F-1, that applies adhesive to plastic parts, with a maximum capacity of 0.275 gallons per hour, equipped with dry filters for overspray control and exhausting to stack SF-1.
- (13) Woodworking activities, identified as PF-2, consisting of various woodworking equipment, with a maximum capacity of 300 pounds per hour, using a sock filter for particulate control, and exhausting to atmosphere.

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

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

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (2) Cold Cleaning Degreasing - Paint gun cleaners using organic solvents.
- (3) Infrared curing equipment.
- (4) Exposure chambers ("towers", columns"), for curing of ultra-violet coatings where heat is the intended discharge.
- (5) Any operation using aqueous solutions containing less than 1% by weight VOCs excluding HAPs.
- (6) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (7) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (8) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (9) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.

- (10) Blowdown for any of the following: sight glass; boiler; compressors; pumps and cooling towers.
- (11) Stationary fire pumps.
- (12) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying and woodworking operations.
- (13) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees (C)).
- (14) Safety-Kleen spray gun cleaner.
- (15) Building B sanding machine.
- (16) Prep station.
- (17) Three (3) fiberglass mold presses,

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

SECTION B

GENERAL CONDITIONS

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

(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.

(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

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

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

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

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

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

(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

(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's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

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

and

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)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

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

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

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

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

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

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

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

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

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

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

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

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]
 - (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.

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

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

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

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

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

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

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

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

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

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

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

(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

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

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

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

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

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

- (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

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

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

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM, shall reserve the right to issue a new permit.

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

The total source potential to emit volatile organic compounds is limited to less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

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

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

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (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.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]

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

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

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

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

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

C.8 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.9 Performance Testing [326 IAC 3-6]

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

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

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

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

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

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

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

C.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

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

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

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

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

in writing, prior to the end of the 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.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.

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

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

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 11, 1996.
- (b) 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.
- (c) 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.
- (d) 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.
- (e) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

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

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

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

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

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]
[326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.

- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

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

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

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

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

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by 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 purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

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

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

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

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative, 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 (or local agency) 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.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

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

Stratospheric Ozone Protection

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

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) air-assisted airless wood/rubber fabric gluing operations, identified as PF-1, with a maximum capacity of 7.5 vans per hour, with no controls and venting to atmosphere.
- (b) One (1) Interior Glue application, identified as AF-1, with a maximum capacity of 1 van per hour, equipped with dry filters for overspray control and exhausting to atmosphere.
- (c) One (1) glue spray booth, identified as F-1, that applies adhesive to plastic parts, with a maximum capacity of 0.275 gallons per hour, equipped with dry filters for overspray control and exhausting to stack SF-1.
- (d) Fiberglass operations, consisting of two (2) spray-up booths identified as I-19 and I-23, and one (1) gel coat booth, identified as I-15, with a maximum capacity of 3 vans per hour, equipped with dry filters for overspray control and exhausting to stacks SI-15, SI-19 and SI-23 respectively.
- (e) One (1) high volume low pressure fiberglass and plastic primer booth, identified as I-5, with a maximum capacity of 3 vans per hour, equipped with dry filters for overspray control and exhausting to stack SI-5.
- (f) Three (3) high volume low pressure topcoat booths, identified as Q-3, Q-6 and Q-7, with a maximum capacity of 3 vans per hour, equipped with dry filters for overspray control and exhausting to stacks SQ-3, SQ-6 and SQ-7.
- (g) Two (2) air assisted airless wood coating spray booths, identified as B-26 and B-33, with a maximum capacity of 3 vans per hour, equipped with dry filters for overspray control and exhausting to stacks SB-26 and SB-33 respectively.
- (h) Four high volume low pressure wood coating spray booths, identified as B-24, B-27, B-30/31 and B-32, with a maximum capacity of 3 vans per hour, equipped with dry filters for overspray control and exhausting to stacks SB-24, SB-27, SB-30 and SB-32.
- (i) One (1) stain dip tank, identified as B-1, with a maximum capacity of 30 units per hour, with no controls, and exhausting to atmosphere.
- (j) Wood gluing operations, identified as BF-1 and BF-2, with a maximum capacity of 2 vans per hour and exhausting to atmosphere.
- (k) Two (2) air atomization van body repair and touch-up booths, identified as C-6 and C-7, with a maximum capacity of 35 vans per day, equipped with dry filters for overspray control and exhausting to stacks SC-6 and SC-7.

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

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

- (a) The potential VOC emissions from the wood/rubber fabric gluing operations, identified as PF-1 are less than 25 tons/yr. Therefore, 326 IAC 8-1-6 does not apply. Prior to any change in the operation which would result in an increase in potential emissions from this facility, exceeding those specified in 326 IAC 8-1-6, this change must be approved by the Office of Air Management.

- (b) The potential VOC emissions from the Interior Glue application, identified as AF-1 are less than 25 tons/yr. Therefore, 326 IAC 8-1-6 does not apply. Prior to any change in the operation which would result in an increase in potential emissions from this facility, exceeding those specified in 326 IAC 8-1-6, this change must be approved by the Office of Air Management.
- (c) The potential VOC emissions from the glue spray booth, identified as F-1 are less than 25 tons/yr. Therefore, 326 IAC 8-1-6 does not apply. Prior to any change in the operation which would result in an increase in potential emissions from this facility, exceeding those specified in 326 IAC 8-1-6, this change must be approved by the Office of Air Management.
- (d) Pursuant to CP 085-2841-00037, issued on May 24, 1995, and 326 IAC 8-1-6, the fiberglass operations, consisting of two (2) spray-up booths identified as I-19 and I-23, and one (1) gel coat booth, identified as I-15 and the high volume low pressure fiberglass and plastic primer booth, identified as I-5 shall:
 - (1) use relatively high solids, low-VOC coatings. The maximum VOC content by weight of the coatings shall not exceed 76.3% with a minimum solids content by volume of 16.2%; and
 - (2) use high-volume, low pressure (HVLP) spray applicators.

These conditions are required as a result of the BACT requirement under 326 IAC 8-1-6.

- (e) Pursuant to CP 085-4601-00037, issued on October 11, 1995, and 326 IAC 8-1-6, the three (3) high volume low pressure topcoat booths, identified as Q-3, Q-6 and Q-7, shall:
 - (1) use relatively high solids, low-VOC coatings. The maximum VOC content by weight of the coatings shall not exceed 76.3% with a minimum solids content by volume of 16.2%;
 - (2) use high-volume, low pressure (HVLP) spray applicators. The HVLP gun pressure shall not exceed 10 psi; and
 - (3) record readings from the line pressure monitors on the HVLP guns on a daily basis.

These conditions are required as a result of the BACT requirement under 326 IAC 8-1-6.

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

The potential VOC emissions from the two van body repair and touch-up booths, identified as C-6 and C-7, are less than 25 tons/yr. Therefore, 326 IAC 8-2-9 does not apply. Prior to any change in the operation which would result in an increase in potential emissions from this facility, exceeding those specified in 326 IAC 8-2-9, this change must be approved by the Office of Air Management.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furnishings, identified as B-26, B-33, B-24, B-27, B-30/31, B-1, BF-1 and BF-2, shall utilize one of the following application methods:

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

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

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

Pursuant to 326 IAC 6-3-2(c), the PM from the operations identified as PF-1, AF-1, F-1, I-19, I-23, I-15, I-5, Q-3, Q-6, Q-7, B-26, B-33, B-24, B-27, B-30/31, BF-1 and BF-2 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.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the fiberglass operations (I-19, I-23, I-15 and I-5), fiberglass coating operations (Q-3, Q-6 and Q-7) and wood coating booth B-30/31 and any control devices.

Compliance Determination Requirements

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

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions C.1 and D.1.1(d) and D.1.1(e) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.8 VOC Emissions

Compliance with Condition C.1 and D.1.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent month.

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

D.1.9 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the operations identified as PF-1, AF-1, F-1, I-19, I-23, I-15, I-5, Q-3, Q-6, Q-7, B-26, B-33, B-24, B-27, B-30/31, BF-1 and BF-2 are in operation.

D.1.10 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters for the fiberglass operations and wood coating booth identified as B-30/31. To monitor the performance of the dry filters, weekly observations shall be made of the overspray 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 an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.11 Record Keeping Requirements

- (a) To document compliance with Conditions C.1, D.1.1(d) and D.1.1(e) the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (5) shall be taken monthly and (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1(d) and D.1.1(e).
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.

- (6) A log of daily pressure measurements from the line pressure monitors for the HVLP guns used in the three (3) high volume low pressure topcoat booths, identified as Q-3, Q-6 and Q-7.
- (b) To document compliance with Condition D.1.10, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions C.1, D.1.1(d) and D.1.1(e) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (a) Woodworking activities, identified as B-34 and B-35, consisting of various woodworking equipment, with a maximum capacity of 1500 pounds per hour, using two baghouses with flow rates of 37150 cfm and 26450 cfm respectively, to control particulate emissions, and exhausting to stacks SB-34 and SB-35 respectively.
- (b) Woodworking activities, identified as PF-2, consisting of various woodworking equipment, with a maximum capacity of 300 pounds per hour, using a sock filter for particulate control, and exhausting to atmosphere.

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

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking facilities, B-34 and B-35, shall not exceed 3.38 pounds per hour when operating at a process weight rate of 1500 pounds per hour.
- (b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking facilities, PF-2, shall not exceed 1.15 pounds per hour when operating at a process weight rate of 300 pounds per hour.

The pounds per hour limitation was calculated with 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:

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

Compliance Determination Requirements

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

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.3 Particulate Matter (PM)

The baghouses and sock filter for PM control shall be in operation at all times when the B-34, B-35 and PF-2 are in operation and exhausting to the outside atmosphere.

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

D.2.4 Visible Emissions Notations

- (a) Daily visible emission notations of the baghouse exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.5 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.6 Broken Bag Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.2.7 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the baghouse exhaust.
- (b) To document compliance with Condition D.2.5, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

Insignificant Activity - Cold Cleaning Degreasing - Paint gun cleaners using organic solvents.

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

D.3.1 Volatile Organic Compounds (VOC)

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (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.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Bodor Corporation (dba Explorer Van Company)
Source Address: U.S. 30 and Fox Farm Road North, Warsaw, IN 46580
Mailing Address: P.O. Box 4527, Warsaw, IN 46581-4527
Part 70 Permit No.: T085-7436-00074

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: Bodor Corporation (dba Explorer Van Company)
Source Address: U.S. 30 and Fox Farm Road North, Warsaw, IN 46580
Mailing Address: P.O. Box 4527, Warsaw, IN 46581-4527
Part 70 Permit No.: T085-7436-00074

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 Quarterly Report

Source Name: Bodor Corporation (dba Explorer Van Company)
 Source Address: U.S. 30 and Fox Farm Road North, Warsaw, IN 46580
 Mailing Address: P.O. Box 4527, Warsaw, IN 46581-4527
 Part 70 Permit No.: T085-7436-00074
 Facility: Source
 Parameter: VOC
 Limit: 249 tons per year, 12 month rolling average

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Emissions this Month	VOC Emissions Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

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

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

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

Source Name: Bodor Corporation (dba Explorer Van Company)
 Source Address: U.S. 30 and Fox Farm Road North, Warsaw, IN 46580
 Mailing Address: P.O. Box 4527, Warsaw, IN 46581-4527
 Part 70 Permit No.: T085-7436-00074

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 and Enhanced New Source Review (ENSR)

Source Background and Description

Source Name: Bodor Corporation (dba Explorer Van Company)
Source Location: U.S. 30 West and Fox Farm Road North, Warsaw, IN 46580
County: Kosciusko
SIC Code: 3714
Operation Permit No.: T085-7436-00074
Permit Reviewer: J. Patterson

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Bodor Corporation (dba Explorer Van Company) relating to the motor vehicles part and accessories operations.

Permitted Emission Units and Pollution Control Equipment

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

- (1) Woodworking activities, identified as B-34 and B-35, consisting of various woodworking equipment, with a maximum capacity of 1500 pounds per hour, using two baghouses with flow rates of 37150 cfm and 26450 cfm respectively, to control particulate emissions, and exhausting to stacks SB-34 and SB-35 respectively.
- (2) Two (2) air assisted airless wood coating spray booths, identified as B-26 and B-33, with a maximum capacity of 3 vans per hour, equipped with dry filters for overspray control and exhausting to stacks SB-26 and SB-33 respectively.
- (3) Four high volume low pressure wood coating spray booths, identified as B-24, B-27, B-30/31 and B-32, with a maximum capacity of 3 vans per hour, equipped with dry filters for overspray control and exhausting to stacks SB-24, SB-27, SB-30 and SB-32.
- (4) One (1) stain dip tank, identified as B-1, with a maximum capacity of 30 units per hour, with no controls, and exhausting to atmosphere.
- (5) Wood gluing operations, identified as BF-1 and BF-2, with a maximum capacity of 2 vans per hour and exhausting to atmosphere.
- (6) One (1) air-assisted airless wood/rubber fabric gluing operations, identified as PF-1, with a maximum capacity of 7.5 vans per hour, with no controls and venting to atmosphere.
- (7) Fiberglass operations, consisting of two (2) spray-up booths identified as I-19 and I-23, and one (1) gel coat booth, identified as I-15, with a maximum capacity of 3 vans per hour, equipped with dry filters for overspray control and exhausting to stacks SI-15, SI-19 and SI-23 respectively.

- (8) One (1) high volume low pressure fiberglass and plastic primer booth, identified as I-5, with a maximum capacity of 3 vans per hour, equipped with dry filters for overspray control and exhausting to stack SI-5.
- (9) Three (3) high volume low pressure topcoat booths, identified as Q-3, Q-6 and Q-7, with a maximum capacity of 3 vans per hour, equipped with dry filters for overspray control and exhausting to stacks SQ-3, SQ-6 and SQ-7.
- (10) Two (2) air atomization van body repair and touch-up booths, identified as C-6 and C-7, with a maximum capacity of 35 vans per day, equipped with dry filters for overspray control and exhausting to stacks SC-6 and SC-7.
- (11) One (1) Interior Glue application, identified as AF-1, with a maximum capacity of 1 van per hour, equipped with dry filters for overspray control and exhausting to atmosphere.

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

The source also consists of the following unpermitted facilities/units:

- (12) One (1) glue spray booth, identified as F-1, that applies adhesive to plastic parts, with a maximum capacity of 0.275 gallons per hour, equipped with dry filters for overspray control and exhausting to stack SF-1.
- (13) Woodworking activities, identified as PF-2, consisting of various woodworking equipment, with a maximum capacity of 300 pounds per hour, using a sock filter for particulate control, and exhausting to atmosphere.

New Emission Units and Pollution Control Equipment Requiring 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(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (2) Cold Cleaning Degreasing - Paint gun cleaners using organic solvents.
- (3) Infrared curing equipment.
- (4) Exposure chambers ("towers", columns"), for curing of ultra-violet coatings where heat is the intended discharge.
- (5) Any operation using aqueous solutions containing less than 1% by weight VOCs excluding HAPs.
- (6) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (7) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (8) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

- (9) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.
- (10) Blowdown for any of the following: sight glass; boiler; compressors; pumps and cooling towers.
- (11) Stationary fire pumps.
- (12) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying and woodworking operations.
- (13) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees (C)).
- (14) Safety-Kleen spray gun cleaner.
- (15) Building B sanding machine.
- (16) Prep station.
- (17) Three (3) fiberglass mold presses,

Existing Approvals

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

- (1) CP 085-2841-000, issued on May 24, 1995;
- (2) CP 085-4601-00037, issued on October 11, 1995; and
- (3) CP 085-8093-00074, issued on August 11, 1997.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

- (1) CP 085-2841-00037, issued on May 24, 1995.

Condition 8: This condition limits VOC emissions from the applications in buildings P, B, C and I to less than 250 tons per year.

Reason not incorporated: Explorer Van has requested that VOC emissions be limited to less than 250 tons per year for the entire source, not just the applications mentioned above. Therefore, the PSD requirements do not apply.

- (2) CP 085-2841-00037, issued May 24, 1995.

Condition 4: This condition limits VOC emissions from coatings used in miscellaneous metal parts applications in Building P, pursuant to 326 IAC 8-2-9.

Reason not incorporated: There are no longer miscellaneous metal parts applications in Building P that would be applicable to 326 IAC 8-2-9. Therefore, this condition will not be incorporated into the Title V permit.

- (3) CP 085-2841-00037, issued May 24, 1995.

Condition 6: This condition limits the number of vans that are coated to 35 vans per day in order to make 326 8-2-9 non-applicable.

Reason not incorporated: The two spray booths, C-6 and C-7, were constructed prior to July 1, 1990 and each has potential emission less than 25 tons per year. Therefore, these booths are not applicable to 326 IAC 8-2-9 and the 35 vans per day limit will be removed.

- (4) CP 085-8093-0074, issued August 11, 1997.

Condition 15: This condition requires the facilities at Explorer Van that perform wood furniture manufacturing operations to comply with 40 CFR 63.800, Subpart JJ, the National Emission Standard for Wood Furniture Manufacturing Operations.

Reason not incorporated: Upon further review of these woodworking activities, the OAM has concluded that these operations are not applicable to Subpart JJ because they do not meet the definition of wood furniture manufacturing.

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR*.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

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 December 11, 1996. Additional information was received on March 17, 1998.

A notice of completeness letter was mailed to the source on January 17, 1997.

Emission Calculations

See Appendix A of this document for detailed emissions calculations

Potential Emissions

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

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

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

HAP's	Potential Emissions (tons/year)
Xylene	greater than 10
Toluene	greater than 10
Glycol Ethers	less than 10
Dioctyl Phthalate	less than 10
Styrene	greater than 10
Methyl Ethyl Ketone	less than 10
Methyl Isobutyl Ketone	less than 10
TOTAL	greater than 25

- (a) The potential emissions (as defined in 326 IAC 1-2-55) of volatile organic compounds are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in 326 IAC 1-2-55) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in 326 IAC 1-2-55) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) **Fugitive Emissions**
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

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

Pollutant	Actual Emissions (tons/year)
PM	2.771
PM-10	138.973
SO ₂	0
VOC	428.441
CO	0
NO _x	0
HAP (specify)	not available

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Insignificant Activities				3			
Source*				246			
Total Emissions				249			

*This limit is established at the request of the source. The source's potential emissions for all other pollutants are well below the 249 ton/yr level.

County Attainment Status

The source is located in Kosciusko County.

Pollutant	Status
TSP	attainment
PM-10	unclassifiable
SO ₂	attainment
NO ₂	unclassifiable/attainment
Ozone	unclassifiable/attainment
CO	unclassifiable/attainment
Lead	not designated

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

Federal Rule Applicability

- (a) Explorer Van is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.390, Subpart MM), because the source is not considered an assembly plant.
- (b) Explorer Van is not subject to the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63.460 Subpart T because they do not use any solvent containing the following as a cleaning or drying agent in the Cold Cleaner Degreasing - paint gun cleaners using organic solvent:
 - (1) perchloroethylene
 - (2) trichloroethylene
 - (3) 1,1,1-trichloroethane
 - (4) carbon tetrachloride
 - (5) chloroform
 - (6) methylene chloride

- (c) Explorer Van is not subject to the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63.800 Subpart JJ because the wood products utilized in the van conversions are not manufactured as described by the following Standard Industrial Classification codes: 2434, 2511, 2512, 2517, 2519, 2521, 2531, 2541, 2599 or 5712.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on December 11, 1996. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 1-5-2 (Emergency Reduction Plans)

The source has submitted an Emergency Reduction Plan (ERP) on December 11, 1996. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

326 IAC 2-2 Prevention of Significant Deterioration

This source is not a major stationary source because emissions of volatile organic compounds are limited to less than 250 tons per year and it is not one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. The source has chosen to comply with this limit by accepting a monthly rolling average.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of volatile organic compounds. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

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

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

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

- (a) Pursuant to 326 IAC 6-3, the particulate matter (PM) from the woodworking activities, B-34, B-35 and PF-2, 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:

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

$$E = 4.10(0.75)^{0.67} \quad E = 3.38 \text{ lbs/hr for B-34 and B-35} \\ E = 4.10(0.15)^{0.67} \quad E = 1.15 \text{ lbs/hr for PF-2}$$

The baghouses and sock filter shall be in operation at all times the woodworking facilities, B-34, B-35 and PF-2 are in operation, in order to comply with this limit.

- (b) Pursuant to 326 IAC 6-3, the particulate matter (PM) from the spray booths AF-1, PF-1, F-1, B-26, B-27, B-33, B-24, B-30, B-31, B-32, BF-1, BF-2, C-7, C-6, Q-6, Q-7, and Q-3 shall be limited by the following:

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

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

The booths equipped with dry filters for particulate matter overspray control shall be in operation at all times when the spray booths are in operation.

326 IAC 8-1-6 (BACT)

- (a) The potential VOC emissions from the glue spray booth, F-1, are less than 25 tons/yr. Therefore, 326 IAC 8-1-6 does not apply.
- (b) The potential VOC emissions from the interior glue application, AF-1, are less than 25 tons per year. Therefore, 326 IAC 8-1-6 does not apply.
- (c) The potential VOC emissions from the glue spray booth, PF-1, are less than 25 tons per year. Therefore, 326 IAC 8-1-6 does not apply.
- (d) Pursuant to CP 085-2841-00037, issued on May 24, 1995, the fiberglass operations, I-5, I-15, I-19 and I-23, were subject to 326 IAC 8-1-6. A Best Available Control Technology (BACT) was presented by the source. The BACT options specified in the permit are:
- (1) the use of relatively high solids, low-VOC coatings. The maximum VOC content by weight of the coatings shall not exceed 76.3% with a minimum solids content by volume of 16.2%.
 - (2) the use of high-volume, low pressure (HVLP) spray applicator.
- (e) Pursuant to CP 085-4601-00037, issued on October 11, 1995, the fiberglass coating operations, Q-3, Q-6 and Q-7, were subject to 326 IAC 8-1-6. A Best Available Control Technology (BACT) was presented by the source. The BACT options specified in the permit are:
- (1) the use of relatively high solids, low-VOC coatings. The maximum VOC content by weight of the coatings shall not exceed 76.3% with a minimum solids content by volume of 16.2%.
 - (2) use of high-volume, low pressure (HVLP) spray applicator. The HVLP gun pressure shall not exceed 10 psi.
 - (3) readings from the line pressure monitors on the HVLP guns shall be taken on a daily basis

326 IAC 8-2-9 Miscellaneous Metal Coating Operations

The two spray booths that coat miscellaneous metal parts, C-6 and C-7, were both constructed prior to July 1, 1990 and each booth has potential VOC emission less than 25 tons per year. Therefore, pursuant to 326 IAC 8-2-9, the surface coating emission limitations for miscellaneous metal coating operations do not apply.

Any change or modification which may increase the potential VOC emissions to 25 tons per year or more from spray booths C-6 and C-7 must be approved by the Office of Air Management (OAM) before such change may occur.

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

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coatings applied to the wood components at spray booths, B-24, B-26, B-27, B-30/31, B-32 and B-33, at dip tank, B-1 and wood gluing operations, BF-1 and BF-2, shall utilize one or more of the following application methods:

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

High volume low pressure (HVLP) spray means technology used to apply coating to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system. High volume low pressure spray is an acceptable alternative application of air-assisted airless spray.

Based on information submitted, Explorer Van, Inc. uses air-assisted airless spray applications, HVLP equipment, brush or wipe applications and dip-and-drain applications for wood coating and, therefore, is in compliance with this requirement.

326 IAC 8-3-5 (Cold cleaner degreaser operation and control)

- (a) Pursuant to 326 IAC 8-3-5, 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 easily be operated with one (1) hand if:
 - (A) the solvent volatility is greater than two (2) kilopascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));
 - (B) the solvent is agitated; or
 - (C) the solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kilopascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kilopascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) 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 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 Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

1. The fiberglass operations I-5, I-15, I-19 and I-23 and the fiberglass coating operations Q-3, Q-6 and Q-7 have applicable compliance monitoring conditions as specified below:

- (a) The Permittee shall record the line pressure of the fiberglass coating operations Q-3, Q-6 and Q-7 from the HVLP guns at least once daily when the HVLP guns are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the line pressure shall not exceed 10 psi. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is above this limit for any one reading.
- (b) Record keeping sufficient to show that the coatings used contain a maximum of 76.3% VOC by weight and a minimum of 16.2% solids by volume.

These monitoring conditions are necessary to show compliance with 326 IAC 8-1-6.

2. The source has applicable monitoring conditions as specified below:

- (a) Record keeping of information to show that the source VOC emissions do not exceed 249 tons per years based on a monthly rolling average.

These monitoring conditions are necessary to show the non-applicability of 326 IAC 2-2.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) 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 1990 Clean Air Act Amendments.
- (b) Since this source has no new construction or reconstruction of a major source of HAPS, 326 IAC 2-1-3.4 New Source Toxics Control, does not apply. (Facilities PF-2 and F-1, which are being reviewed under ENSR, do not emit levels of air toxics that constitute a major source.)

Conclusion

The operation of this motor vehicle parts and accessories manufacturing source shall be subject to the conditions of the attached proposed **Part 70 Permit No. T085-7436-00074**.

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

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

Source Name: Bodor Corporation (dba Explorer Van Company)
Source Location: U.S. 30 West and Fox Farm Road North, Warsaw,
Indiana 46580
County: Kosciusko
SIC Code: 3714
Operation Permit No.: T085-7436-00074
Permit Reviewer: J. Patterson / Catherine Moore

On October 20, 1998, the Office of Air Management (OAM) had a notice published in the Times Union, Warsaw, Indiana, stating that Bodor Corporation (dba Explorer Van Company) had applied for a Part 70 Operating Permit to operate motor vehicles part and accessories manufacturing operation. 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 November 19, 1998, Paul W. Sailor of Bodor Corporation submitted comments on the proposed FESOP. The summary of the comments is as follows:

Comment 1:

Condition B.4(b)

The proposed changes are set forth as follows. These changes are necessary and appropriate to state accurately the recent laws and regulations, and/or to avoid confusion and ambiguity in the permit.

- (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.~~

Response to Comment 1:

The present term is taken from the rule language in 326 IAC 2-7-7(a), is required by federal law and cannot be changed as suggested by the comment.

Comment 2:

Condition B.8(c)

The proposed changes are set forth as follows. These changes are necessary and appropriate to state accurately the recent laws and regulations, and/or to avoid confusion and ambiguity in the permit.

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by **and otherwise provided herein** 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.

Response to Comment 2:

IDEM, OAM feels that adding this phrase would make this condition confusing and unclear. The Permittee is required to submit copies of records required to be kept by this permit. There will be no changes to this condition in the final permit due to this comment.

Comment 3:

Condition B.9(a)

The proposed changes are set forth as follows. These changes are necessary and appropriate to state accurately the recent laws and regulations, and/or to avoid confusion and ambiguity in the permit.

- (a) ~~The Permittee must comply with all conditions of this permit.~~ Noncompliance with ~~any provisions of this permit~~ **may** constitutes a violation of the Clean Air Act and ~~is~~ **may be** grounds for:

Response to Comment 3:

326 IAC 2-7-5(6)(A) requires that the permit contain a provision stating the permittee must comply with all conditions of the Part 70 Permit. Any Part 70 permit noncompliance constitutes a violation of the CAA and is grounds for enforcement or other actions. There will be no changes to this condition in the final permit due to this comment.

Comment 4:

Condition B.11(c)(1)

The proposed changes are set forth as follows. These changes are necessary and appropriate to state accurately the recent laws and regulations, and/or to avoid confusion and ambiguity in the permit.

- (1) The **appropriate** identification of each term or condition of this permit that is the basis of the certification;

Response to Comment 4:

The present language for items (1) and (3) matches the language in 326 IAC 2-7-6(5)(C). There will be no changes to this condition in the final permit due to this comment.

Comment 5:

Condition B.15

The proposed changes are set forth as follows. These changes are necessary and appropriate to state accurately the recent laws and regulations, and/or to avoid confusion and ambiguity in the permit.

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any **alleged** exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an **alleged** 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.

Response to Comment 5:

If IDEM, OAM believes there is an exceedance of a permit limitation or condition, this would be an alleged exceedance. Once the alleged exceedance had been proven to be an actual exceedance, then this condition would apply. Therefore, there will be no changes to this condition in the final permit due to this comment.

Comment 6:

Condition B.16

The proposed changes are set forth as follows. These changes are necessary and appropriate to state accurately the recent laws and regulations, and/or to avoid confusion and ambiguity in the permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit ~~requirements~~ **emission limitations** (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and ~~any~~ **appropriate** 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 **emission** 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)(3) 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.

Response to Comment 6:

An exceedance of an emission limitation is not the only possible deviation of a permit requirement. If a Permittee fails to draft and implement a Preventive Maintenance Plan or Compliance Response Plan, this would also be a deviation of a permit requirement. If a Permittee failed to keep records of monitoring required by the permit, this would be a deviation. Therefore, there will be no changes to this condition in the final permit due to this comment.

Comment 7:

Condition B.24

The proposed changes are set forth as follows. These changes are necessary and appropriate to state accurately the recent laws and regulations, and/or to avoid confusion and ambiguity in the permit.

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 **and subject to the Permittee's right to claim that the information collected by the agency is confidential and shall be treated as such**, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

Response to Comment 7:

Requirements regarding confidentiality is covered in subconditions (e)(1) and (2) of this condition. IDEM, OAM feels that these subconditions are sufficient to explain submittal procedures regarding confidentiality. There will be no changes to this condition in the final permit due to this comment.

Comment 8:

Condition B.10 - Certification

The condition as written does not appear to be consistent with revisions which we understood the agency would be making to this condition based on issues raised by the State Chamber of Commerce. We would recommend that the revised version of this condition be used to provide: "where specifically designated by this permit or required by an applicable requirement, application forms, reports,...."

Response to Comment 8:

Condition B.10(a) "Certification" has been changed to be as follows:

- (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.

Comment 9:

Condition B.12 - Preventive Maintenance Plan

We would request that the phrase “lack of proper maintenance” in the second line of paragraph (b) be changed to “failure to implement the plan”. We believe that this alternative language is less ambiguous and does not imply that failure to conduct maintenance activities beyond those identified in the Preventive Maintenance Plan could be the basis for an enforcement action.

Response to Comment 9:

Subsection (b) of Condition B.12 “Preventive Maintenance Plan” does not imply that failure to implement the Preventive Maintenance Plan (PMP) will cause or contribute to a violation of any limitation on emissions or potential to emit. This subsection states that the PMP shall contain proper maintenance procedures such that these procedures will not cause or contribute to a violation of any limitation on emissions or potential to emit. There will be no changes to this condition in the draft permit due to this comment.

Comment 10:

Condition B.14 - Permit Shield

Since the wording of paragraph (b) of this condition is somewhat ambiguous with respect to whether former Construction Permit conditions, which are not included in this permit, may still be applicable, we would request that the following specific conditions be listed as no longer in effect in the permit:

- Construction Condition 1 and Operating Conditions 4, 5, 8, 9 and 10 in Construction permit CP 085-2841, issued May 24, 1995.
- Construction Condition 1 and Operating Conditions 4, 5, 6, 7 and 8 in Construction Permit CP 085-4601, issued October 11, 1995.
- Construction Condition 1 and Operating Conditions 10, 11, 12, 13, and 14 in Construction Permit CP 085-8093, issued August 11, 1997.

Response to Comment 10:

This condition is almost exactly the wording required by 326 IAC 2-7-15. OAM agrees that some of the wording should be changed as requested. 40 CFR 70.6(f) states that the permitting authority may expressly include in a Part 70 permit a provision stating that compliance with the conditions of the permit shall be deemed compliance with any applicable requirements. OAM believes non-applicable requirement determinations should be dealt with in Section D. OAM is also adding language dealing with applicable requirements from prior permits. On July 28, 1998, the OAM was notified that the U.S. EPA would object to any Title V Operating Permit that superseded all previous construction permits. The U.S. EPA indicated that they believed that the authority for certain applicable requirements might expire if the construction permits that established them expired. The OAM believes that the regulatory process is best served if all affected parties are able to rely on the Title V Operating Permit to identify all applicable requirements and the means for demonstrating compliance with each requirement.

The OAM intends to continue discussions with the U.S. EPA regarding the issues related to past construction permits. However the OAM also believes that the Permit Shield condition B.14 (b) (1) & (2) establishes that the Title V permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of the permit shall be deemed in compliance with any applicable requirements as of the date of the permit issuance for all the previous permits identified by the source and the OAM during the course of this review. There will be no changes to this condition in the final permit due to this comment.

Comment 11:

Condition B.28 - Credible Evidence

This condition should be eliminated from the permit since it is beyond the State's authority. We object to and propose that this condition be deleted. First, credible evidence is not defined, and the condition itself is unduly vague, ambiguous, and confusing. Because credible evidence has no definitive boundaries, it should not be used as a compliance condition. IDEM has no authority to include such a condition in this permit. Second, the applicable law spells out how compliance is to be determined and violations established. Each individual source has specific methods and tests contained in its permit that ensure compliance with the applicable emission limitations. IDEM simply has no regulatory authority to add this all-encompassing condition. For these reasons, the credible evidence condition should be deleted.

Response to Comment 11:

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

~~B.28 Credible Evidence [326 IAC 2-7-5(3)] [62 Federal Register 8313] [326 IAC 2-7-6]
Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or noncompliance.~~

Comment 12:

Condition C.9

This condition should be deleted because it is irrelevant to the processes covered by this permit.

Response to Comment 12:

Condition C.9 "Performance Testing" will not be removed. Since this source does not have any testing requirements, this condition would not be applicable to the source at this time. However, the condition is required to stay in the permit because a new facility could be added to the source at some later date. If the new facility has testing requirements, the source will be aware of their responsibilities under the testing requirements. Also, this decreases the number of changes to the permit upon modification and lessens the likelihood of confusion.

Comment 13:

Condition C.11

The condition should be changed as follows to avoid confusion.

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

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

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

in writing, prior to the end of the 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).

Response to Comment 13:

This Part 70 permit is a tool to document compliance with all applicable rules and regulations. Therefore, documentation must be maintained as specified in this permit. There will be no changes to this condition in the final permit due to this comment.

Comment 14:

Condition C.15 - Compliance Monitoring Plan

We would request that this condition be eliminated entirely from the permit, since we do not believe that any compliance monitoring requirements should apply to the facility, since both state and federal compliance monitoring guidance would exclude smaller facilities such as are located at Explorer Van from the monitoring requirements (see comment below on specific D Sections). If there are no specific compliance monitoring requirements in Section D of the permit, inclusion of this condition would still obligate us to prepare a Compliance Monitoring Plan without any clear objective or criteria for the monitoring provisions. We do not believe that 40 CFR Part 70, or 326 IAC 2-7 provides any authority to require the preparation of a Compliance Response Plan (CRP) or to establish the basis for a violation of the permit for failure to conduct the identified response steps. Failure to take specific response steps should not be interpreted in any way as evidence of non-compliance with an underlying applicable requirement, which is implied by this permit condition. We would request that all references to a Compliance Response Plan be eliminated from this condition.

Response to Comment 14:

IDEM has worked with members of the Clean Air Act Advisory Council's Permit Committee, Indiana Manufacturing Association, Indiana Chamber of Commerce and individual applicants regarding the Preventive Maintenance Plan, the Compliance Monitoring Plan and the Compliance Response Plan. IDEM has clarified the preventive maintenance requirements by working with sources on draft language over the past two years. The plans are fully supported by rules promulgated by the Air Pollution Control Board. The plans are the mechanism each permittee will use to verify continuous compliance with its permit and the applicable rules and will form the basis for each permittee's Annual Compliance Certification. Each permittee's ability to verify continuous compliance with its air pollution control requirements is a central goal of the Part 70 permit program.

The regulatory authority for and the essential elements of a compliance monitoring plant were clarified in IDEM's Compliance Monitoring Guidance, in May 1996. IDEM originally placed all the preventive maintenance requirements in the permit section titled "Preventive Maintenance Plan." Under that section the permittee's Preventive Maintenance Plan (PMP) had to set out requirements for the inspection and maintenance of equipment both on a routine basis and in response to monitoring. Routine maintenance was a set schedule of inspections and maintenance of the equipment. The second was inspection and maintenance in response to monitoring that showed that the equipment was not operating in its normal range. This monitoring would indicate that maintenance was required to prevent the exceedance of an emission limit or other permit requirement. The maintenance plan was to set out the "corrective actions" that the permittee would take in the event an inspection indicated an "out of specification situation", and also set out the time frame for taking the corrective action. In addition, the PMP had to include a schedule for devising additional corrective actions for out of compliance situations that the source had not predicted in the PMP. All these plans, actions and schedules were part of the Preventive Maintenance Plan, with the purpose of maintaining the permittee's equipment so that an exceedance of an emission limit or violation of other permit requirements could be prevented.

After issuing the first draft Title V permits on public notice in July of 1997, IDEM received comments from members of the regulated community regarding many of the draft permit terms, including the PMP requirements. One suggestion was that the corrective action and related schedule requirements be removed from the PMP requirement and placed into some other requirement in the permit. This suggestion was based, in some part, on the desire that a permittee's maintenance staff handle the routine maintenance of the equipment, and a permittee's environmental compliance and engineering staff handle the compliance monitoring and steps taken in reaction to an indication that the facility required maintenance to prevent an environmental problem.

IDEM carefully considered this suggestion and agreed to separate the "corrective actions" and related schedule requirements from the PMP. These requirements were placed into a separate requirement, which IDEM named the Compliance Response Plan (CRP). In response to another comment, IDEM changed the name of the "corrective actions" to "response steps." That is how the present CRP requirements became separated from the PMP requirement, and acquired their distinctive nomenclature.

Other comment sought clarification on whether the failure to follow the PMP was violation of the permit. The concern was that a permittee's PMP might call for the permittee to have, for example, three "widget" replacement parts in inventory. If one widget was taken from inventory for use in maintenance, then the permittee might be in violation of the PMP, since there were no longer three widgets in inventory, as required by the PMP. Comments also expressed a view that if a maintenance employee was unexpectedly delayed in making the inspection under the PMP's schedule, for example by the employee's sudden illness, another permit violation could occur, even though the equipment was still functioning properly.

IDEM considered the comments and revised the PMP requirement so that if the permittee fails to follow its PMP, a permit violation will occur only if the lack of proper maintenance causes or contributes to a violation of any limitation on emissions or potential to emit. This was also the second basis for separating the compliance maintenance response steps from the PMP and placing them in the Compliance Response Plan (CRP). Unlike the PMP, the permittee must conduct the required monitoring and take any response steps as set out in the CRP (unless otherwise excused) or a permit violation will occur.

The Compliance Monitoring Plan is made up of the PMP, the CRP, the compliance monitoring and compliance determination requirements in section D of the permit, and the record keeping and reporting requirements in sections C and D. IDEM decided to list all these requirements under this new name, the Compliance Monitoring Plan (CMP), to distinguish them from the PMP requirements. The section D provisions set out which facilities must comply with the CMP requirement. The authority for the CMP provisions is found at 326 IAC 2-7-5(1), 2-7-5(3), 2-7-5(13), 2-7-6(1), 1-6-3 and 1-6-5.

Most permittees already have a plan for conducting preventive maintenance for the emission units and control devices. It is simply a good business practice to have identified the specific personnel whose job duties include inspecting, maintaining and repairing the emission control devices. The emission unit equipment and the emission control equipment may be covered by a written recommendation from the manufacturer set out schedules for the regular inspection and maintenance of the equipment. The permittee will usually have adopted an inspection and maintenance schedule that works for its particular equipment and process in order to keep equipment downtime to a minimum and achieve environmental compliance. The manufacturer may also have indicate, or the permittee may know from experience, what replacement parts should be kept on hand. The permittee may already keep sufficient spare parts on hand so that if a replacement is needed, it can be quickly installed, without a delay in the permittee's business activities and without an environmental violation. For the most part, the PMP can be created by combining present business practices and equipment manufacturer guidance into one document, the Preventive Maintenance Plan (PMP).

The permittee has 90 days to prepare, maintain and implement the PMP. IDEM is not going to draft the PMP. Permittees know their processes and equipment extremely well and are in the best position to draft the PMP. IDEM's air inspectors and permit staff will be available to assist the permittee with any questions about the PMP. IDEM may request a copy of the PMP to review and approve.

The Preventive Maintenance Plan requirement must be included in every applicable Part 70 permit pursuant to 326 IAC 2-7-5(13). This rule refers back to the Preventive Maintenance Plan requirement as described in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

- (1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),
- (2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and
- (3) The identification and quantification of the replacement parts for the facility which the permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(2)).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, not any other facility equipment. The commissioner may require changes in the maintenance plan to reduce excessive malfunctions in any control device or combustion or process equipment under 326 IAC 1-6-5.

The CRP requirement of response steps and schedule requirements are another example of documenting procedures most permittees already have developed in the course of good business practices and the prevention of environmental problems. Equipment will often arrive with the manufacturer's trouble shooting guide. It will specify the steps to take when the equipment is not functioning correctly. The steps may involve some initial checking of the system to locate the exact cause, and other steps to place the system back into proper working order. Using the trouble shooting guide and the permittee's own experience with the equipment, the steps are taken in order and as scheduled until the problem is fixed.

A permittee will likely already have a procedure to follow when an unforeseen problem situation occurs. The procedure may list the staff to contact in order to select a course of action, or other step, before the equipment problem creates an environmental violation or interrupts the permittee's business process.

The Compliance Monitoring Plan (CMP) is consistent with IDEM's Compliance Monitoring Guidance released in May of 1996. The guidance discusses corrective action plans setting out the steps to take when compliance monitoring shows an out of range reading. Some of the terminology has changed, as a result of the comments from regulated sources, but the requirements in the permit do not conflict with the guidance.

Comment 15:

Condition C.16 - Actions Related to Noncompliance Demonstrated by a Stack Test

We would also request that this condition be eliminated from the permit, since none of the requirements of Section D of the permit require source tests.

Response to Comment 15:

Condition C.16 "Actions Related to Noncompliance Demonstrated by a Stack Test" will not be removed. OAM has authority under 326 IAC 2-7-6(6) to require this condition. OAM also has authority under 326 IAC 2-7-5. Since this source does not have any testing requirements, this condition would not be applicable to the source at this time. However, the condition is required to stay in the permit because a new facility could be added to the source at some later date. If the new facility has testing requirements, the source will be aware of their responsibilities under the testing requirements. Also, this decreases the number of changes to the permit upon modification and lessens the likelihood of confusion.

Comment 16:

Condition C.18 - Monitoring Data Availability

We request that paragraphs (a), (b) and (c) be deleted for the same reasons set forth in objection to C.15.

Response to Comment 16:

This condition applies to all records required in Section D. The purpose of Section C is to state general conditions once, so that they do not have to be restated in every subsection of Section D. Unless a term in Section D states otherwise, the Section C general term applies. IDEM will consider an applicant's request to move conditions from Section C to Section D or to consolidate Section D requirements into a single Section C condition. These requests can often be accommodated, so long as compliance related interests are not compromised. There will be no changes to this condition in the final permit due to this comment.

Comment 17:

Condition C.19 - General Record Keeping Requirements

The requirement that the facility produce required records "upon request", depending on the circumstances, may be unreasonable. Therefore, we propose that the language be changed to reflect the availability of such records "within a reasonable time". This change is consistent with the terms IDEM agreed to with the IMA/Chamber work group.

Response to Comment 17:

The one hour was used to provide a specific time frame other than "upon request" in response to previous concerns expressed by applicants. However, the OAM now believes that citing "upon request" as stated in the rule is the preferable language. Generally, sources and the OAM can come to an agreement on the amount of time needed to produce records, especially if the request requires a substantial amount of information. There will be no changes to this condition in the final permit due to this comment.

Comment 18:

Condition C.19(c)(4) should be deleted. It imposes an all-encompassing additional requirement to maintain records of all preventive maintenance regardless of whether the substantive permit conditions even require that such records be maintained. To the extent the records of preventive maintenance are required, they are addressed elsewhere in the permit.

Paragraph (c)(4) should be deleted from the permit since the requirements for preventive maintenance plans are already adequately addressed in Condition B.12 and the requirements of this paragraph are overly broad and exceed existing regulatory authority.

Response to Comment 18:

Condition C.19(c) "General Recordkeeping Requirements" states:

- (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.

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

Comment 19:

Condition C.20 - General Reporting Requirements

Any inconsistencies between the provisions of this condition and specific requirements of Section D of the permit should be resolved.

Response to Comment 19:

The Office of Air Management (OAM) does not feel that there are any inconsistencies between the provisions of Condition C.20 "General Reporting Requirements" and the reporting requirements of Section D. There will be no changes to the draft permit due to this comment.

Comment 20:

Condition D.1 - Emission Units and Pollution Control Equipment Description

We request that the capacity descriptions included in this section be eliminated. These units are appropriately described with the necessary provision regarding "this information is descriptive in nature", in Section A. In D.1 it is confusing and redundant. If the capacity descriptions need to remain in this section of the permit, we would request that Section A Prologue be amended as follows:

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 **and D.1 through D.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.

Response to Comment 20:

The exact facility descriptions from the Technical Support Document (TSD) and Section A were carried over into Section D in order to lessen the likelihood of confusion of identification of equipment. If the facility descriptions in Section D were different from the Technical Support Document (TSD) and Section A of the Part 70 Permit, the Permittee may not know which requirements are applicable to each facility. The descriptions that are listed in the box that prefaces each D section is information that was obtained from the applicant and was used to establish the actual permit conditions that follow. These descriptions are treated the same as those in Section A and not considered to be directly enforceable. The descriptions of the equipment would only be considered enforceable if explicitly stated in a permit condition. The descriptions should be considered very carefully because, just like the Section A descriptions, changes can affect compliance with existing applicable requirements or trigger new applicable requirements. New Requirements may include the need to obtain a revision to this permit prior to affecting the change. There will be no changes to this Section in the draft permit due to this comment.

Comment 21:

Condition D.1.1 - VOC Limits

We would request that Condition (e)(3) be eliminated from Condition D.1.1. The HVLP spray equipment used in these spray booths has a maximum design pressure of 10 psi, and maintaining a daily record of line pressure is not a reasonable use of resources, since the pressure cannot physically exceed 10 psi. We would also point out that Condition D.1.11(a)(6) requiring that a record of the daily readings be maintained, and condition D.1.12 requiring quarterly reports of records of line pressure should be eliminated as well. We would like to point out that the requirement to record line pressure is not a condition of Construction Permit CP 085-2841-00037 issued May 24, 1995.

Response to Comment 21:

Condition D.1.1(e)(3) can not be removed because it is required by Construction Permit CP 085-4601-00037, issued October 11, 1995 for the three (3) high volume low pressure topcoat booths, identified as Q-3, Q-6 and Q-7. There will be no changes to this condition in the final permit due to this comment.

Comment 22:

Condition D.1.3 - VOC Limits

This condition requires the use of specific application methods for the surface coatings applied to wood components used in our van conversions. The rule cited is 326 IAC 8-2-12, which applies to "surface coated of wood furnishings, which include cabinets (kitchen, bath and vanity), tables, beds, chairs, sofas (non-upholstered), art objects, and any other coated furnishings made of solid wood, wood composition or simulated wood material". Upon careful review of this rule and the regulatory history for the rule we have concluded that this rule does not apply to the surface coating of the wood components used in our van conversions, since they cannot in any way be classified as "wood furnishings". We recognize that if this rule does not apply, the requirements of 326 IAC 8-1-6, State BACT, would apply, and we believe that it is appropriate to consider that the requirements of 326 IAC 8-2-12 would satisfy the requirements of this rule. In order to ensure that the basis for the requirements identified in this condition are correct, we would propose that the citation given in the heading of the condition be changed from [326 IAC 8-2-12] to [326 IAC 8-1-6].

Response to Comment 22:

The Office of Air Management believes that the wood components used in the van conversions at this source are considered wood furnishings. Therefore, these facilities would be subject to the requirements of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating). There will be no changes to the draft permit due to this comment.

Comment 23:

Condition D.1.6 and D.2.2 - Testing Requirements

The provision regarding possible future compliance testing should be deleted. This provision inaccurately states the relevant statutory/regulatory authority.

Response to Comment 23:

Pursuant to 326 IAC 2-7-6(6) "Compliance Requirements", the Commissioner may require other provisions as necessary to show compliance with the applicable requirements stated in the Part 70 permit. Therefore, IDEM may require compliance testing when necessary to determine if a facility is in compliance with the conditions of this permit. There will be no changes to this condition in the draft permit due to this comment.

Comment 24:

Condition D.1.10 - Monitoring

We would request that this condition be eliminated, since none of the listed emission units has allowable emissions greater than 10 lbs/hour, and therefore, according to guidance provided by IDEM should not be required to conduct compliance monitoring under the Part 70 regulations. Condition D.1.11(b), which requires the maintenance of a log of observations, should also be eliminated from the permit.

Response to Comment 24:

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.

1. Condition D.1.10 "Monitoring" has been changed to be as follows:

D.1.10 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters for the fiberglass operations and wood coating booth identified as B-30/31. To monitor the performance of the dry filters, ~~daily~~ **weekly** observations shall be made of the overspray 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 Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
 - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
2. Condition D.1.11(b) "Record Keeping Requirements" has been changed to be as follows:
 - (b) To document compliance with Condition D.1.10, the Permittee shall maintain a log of ~~daily~~ **weekly** overspray observations, daily and ~~weekly~~ **monthly** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

Comment 25:

Condition D.1.11(a)(2) - Record Keeping Requirements

We would request that D.1.11(a)(2) be eliminated, since a separate log of operational dates of use for the various operations does not appear to serve any specific purpose for determining compliance. For reasons stated above, D.1.11(a)(6) and D.1.11 (b) should be deleted.

Response to Comment 25:

A log of operational dates of use is required because the source has a limited potential to emit Volatile Organic Compound (VOC) of less than 250 tons per year such that the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply. There will be no change to this condition in the draft permit due to this comment.

Comment 26:

Condition D.1.12 - Reporting Requirements

We request that D.1.12 should be amended to eliminate references to D.1.1(d) and D.1.1(e). Quarterly reports are unnecessary; fixed records (like MSDS sheets) are maintained to show compliance.

Response to Comment 26:

Conditions D.1.1(d) and (e) are requirements of the Best Available Control Technology (BACT) analysis performed for the previous permits. The Permittee must show compliance with these requirements to document compliance with their BACT requirements. This information should be submitted quarterly to IDEM, OAM to ensure that compliance is satisfied. There will be no changes to this condition in the final permit due to this comment.

Comment 27:

Condition D.2.4 - Visible Emission Notation

We would request the following changes be made to make this provision reasonable and viable for implementation.

D.2.4 Visible Emissions Notations

- (a) Daily visible emission notations of the baghouse exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, ~~eighty percent (80%) of~~ **during** the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who ~~has worked at the plant at least one (1) month~~ **and** has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Response to Comment 27:

IDEM, OAM feels that conditions prevailing or expected to prevail 80% of the time would be an adequate assumption of normal operations or usual conditions. There will be no changes to this condition in the final permit due to this comment.

Comment 28:

Condition D.2.6 - Broken Bag or Failure Detection

We would request the following changes be made to make this provision reasonable and viable or implementation.

D.2.6 Broken Bag or Failure Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.
- (b) ~~Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. A record will be made of the repair or replacement of the bag(s).~~

Response to Comment 28:

This condition states what steps to take when the specific control device (the baghouse) fails. This condition is there to ensure compliance with Condition D.2.1 "Particulate Matter". IDEM, OAM feels that having specific requirements in Section D of the permit regarding control devices will lessen the likelihood of violations of permit requirements. Condition D.2.6 "Broken Bag or Failure Detection" has been changed to be as follows:

D.2.6 Broken ~~or Failed~~ Bag ~~or Failure~~ Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. ~~For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.~~ **Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

- (b) ~~Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.~~ **For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

Comment 29:

Section D.3 - Volatile Organic Compound Limit for Degreasers

This condition applies to degreasing activities, which are insignificant activities under the Part 70 regulations. Upon further review of the information in our application, we do not have any "degreasing activities" at our facility. We do have two small gun cleaners, which are not degreasers and this equipment is not consistent with the equipment descriptions in 326 IAC 8-3-5(a). We would request that this section of the permit be eliminated, and that the descriptions of insignificant activities be amended to identify the small paint gun cleaners.

Response to Comment 29:

The definition of "Cold Cleaner Degreaser", according to 326 IAC 1-2-18.5, is a tank containing organic solvent at a temperature below the boiling point of the solvent which is used to spray, brush, flush or immerse an article for the purpose of cleaning or degreasing the article. According to this definition, the paint gun cleaners are considered Cold Cleaner Degreasers and therefore would be subject to the requirements of 326 IAC 8-3-5. Therefore, these requirements will not be removed.

Comment 30:

TSD, Enforcement Issue (b)

This statement should be modified to state that all unpermitted emission units were addressed in the recent Agreed Order.

Response to Comment 30:

The Enforcement Issue has not been completely resolved with the Agreed Order. Therefore, there will be no changes to the final permit due to this comment.

Comment 31:

TSD, Actual Emissions

We are reviewing this emission information, and question the source and accuracy of this data.

Response to Comment 31:

This information was taken from the 1995 emission data submitted by the source for their 1995 emission statement. There will be no changes to the final permit due to this comment.

Upon further review, OAM has made the following changes to the final Part 70 permit:

1. The name in the signature block on the cover page has been changed from "Felicia R. George" to "**Janet G. McCabe**".
2. 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.