PART 70 OPERATING PERMIT

OFFICE OF AIR MANAGEMENT

United Technologies - Otis Elevator
1331 South Curry Pike
Bloomington, Indiana 47403

(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.: T105-7565-00006	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), and 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 elevator and escalator manufacturing plant.

Responsible Official:	Mr. Carl W. Krull
Source Address:	1331 South Curry Pike, Bloomington, IN 47403
Mailing Address:	1331 South Curry Pike, Bloomington, IN 47403
SIC Code:	3534
County Location:	Monroe
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD; Major Source, Section 112 of the Clean Air Act

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

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

(1) One (1) airless spray coating booth, identified as PB001, with a maximum capacity of spraying 2.81 gallons of paint per hour, using dry filters for particulate control, and exhausting to one (1) stack (S/V ID 001);

(2) three (3) air-assisted airless spray coating booths, identified as PB017, PB018, and PB019, each with a maximum capacity of spraying 9.38 gallons of paint per hour, using dry filters in PB019 and a waterwall in PB017 and PB018 for particulate control, and each exhausting to one (1) stack (S/V ID: 017, 018, 019 ,respectively);

(3) one (1) high volume-low pressure (HVLP) spray coating booth, identified as PB022, with a maximum capacity of spraying 9.38 gallons of paint per hour, using dry filters for particulate control, and exhausting to one (1) stack (S/V ID 022);

(4) one (1) high volume-low pressure (HVLP) spray coating booth, identified as PB024, with a maximum capacity of spraying 2.81 gallons of paint per hour, using dry filters for particulate control, and exhausting to one (1) stack (S/V ID 024);

(5) one (1) HVLP paint mix room spray booth, identified as PMR043, with a maximum capacity of spraying 3.28 gallons of paint per hour, using dry filters for particulate control, and exhausting to one (1) stack (S/V ID 043);

(6) one (1) HVLP spray coating booth, identified as PB044, with a maximum capacity of spraying 3.28 gallons of paint per hour, using dry filters for particulate control, and exhausting to one (1) stack (S/V ID 044);

(7) two (2) spray coating booths, identified as PB101and PB102, utilizing HVLP application for PB101, and airless application for PB102, each with a maximum capacity's of spraying 9.38 gallons and 0.60 gallons of paint per hour, respectively, each using dry filters for particulate control, and each exhausting to one (1) stack (S/V ID 101 and 102 respectively);

(8) two (2) HVLP adhesive coating booths, identified as GB001 and GB002. GB001 has a maximum capacity of applying 9.38 gallons of adhesive per hour and is equipped with a dry filter for particulate control. GB002 has a maximum capacity of applying 7.03 gallons of adhesive per hour and is uncontrolled. The booths each exhaust to one (1) stack (S/V ID G01 and G02, respectively); and

(9) three (3) varnish dip tanks, identified as VD001, VD002, and VD003, all exhausting to one (1) stack (S/V ID: V01).

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 does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

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

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

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

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

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

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

SECTION B 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.

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. For information claimed to be confidential, the Permittee shall furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, the Permittee shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

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

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

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

(a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

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

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

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

and

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 continuous or intermittent;

(4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The notification which shall be submitted 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:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and associated emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

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

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM, .

B.13 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

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

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

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

(f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

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

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

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

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

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

(b) 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.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

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

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) 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) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent.

(c) 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).

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 Administrative Permit Amendment [326 IAC 2-7-11]

(a) An administrative permit amendment is a Part 70 permit revision that makes changes of the type specified under 326 IAC 2-7-11(a).

(b) An administrative permit amendment may be made by IDEM, OAM, , consistent with the procedures specified under 326 IAC 2-7-11(c).

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

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

(a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-7-11.

(b) Minor modification to this permit shall follow the procedures specified under 326 IAC 2-7-12(b), except as provided by 326 IAC 2-7-12(c).

(c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-7-12(b) and shall include the information required in 326 IAC 2-7-12(b)(3)(A) through (E).

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

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

(a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.

(b) Every significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.

(c) Nothing in 326 IAC 2-7-12(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-7 that would render existing permit compliance terms and conditions irrelevant.

(d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-7, including those for application, public participation, review by affected states, review by the U.S. EPA, and availability of the permit shield, as they apply to permit issuance and renewal.

B.22 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.23 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.24 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.25 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.26 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of IDEM 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)]

B.27 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.

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

B.28 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, or in a time period consistent with the fee schedule established in 326 IAC 2-7-19.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

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]

(a) The total source potential to emit VOC is limited to 249 tons tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

(b) Any change or modification which may increase potential emissions to 250 tons per twelve (12) consecutive month period, from the equipment covered in this permit, shall require a PSD permit pursuant to 326 IAC 2-2, before such change may occur.

C.2 Opacity [326 IAC 5-1]

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

(a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.

(b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

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

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

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

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

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

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

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

All air pollution control equipment listed in this permit shall be operated at all times that the emission units vented to the control equipment are in operation, as described in Section D of this permit.

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

Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector be accredited is federally enforceable.

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

C.8 Performance Testing [326 IAC 3-2.1]

(a) All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

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

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

no later than thirty-five (35) days before the intended 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.

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

C.9 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

(a) Will continue to comply with such requirements that become effective during the term of this permit; and

(b) Has submitted a statement that the Permittee will continue to comply with such requirements; and

(c) Has certified that all facilities at this source are in compliance with all applicable requirements.

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

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

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

C.11 Monitoring Methods [326 IAC 3]

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

C.12 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

(3) 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

(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.

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

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

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

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

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

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

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

(c) If the ERP is disapproved by IDEM, OAM, , the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. If after this time, the Permittee does not submit an approvable ERP, then IDEM, OAM, , shall supply such a plan.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAM, , that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

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 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.

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5(3)]

(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

(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.

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 a certified, annual emission statement 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)(B)]

(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 and available within one (1) hour upon verbal request of an IDEM, OAM, representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.

(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 requirements stated in this permit, the source shall submit a Quarterly Compliance 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 must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

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

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

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

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

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

Stratospheric Ozone Protection

C.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

(1) One (1) airless spray coating booth, identified as PB001, with a maximum capacity of spraying 2.81 gallons of paint per hour, using dry filters for particulate control, and exhausting to one (1) stack (S/V ID 001);

(2) three (3) air-assisted airless spray coating booths, identified as PB017, PB018, and PB019, each with a maximum capacity of spraying 9.38 gallons of paint per hour, using dry filters in PB019 and a waterwall in PB017 and PB018 for particulate control, and each exhausting to one (1) stack (S/V ID: 017, 018, 019 ,respectively);

(3) one (1) high volume-low pressure (HVLP) spray coating booth, identified as PB022, with a maximum capacity of spraying 9.38 gallons of paint per hour, using dry filters for particulate control, and exhausting to one (1) stack (S/V ID 022);

(4) one (1) high volume-low pressure (HVLP) spray coating booth, identified as PB024, with a maximum capacity of spraying 2.81 gallons of paint per hour, using dry filters for particulate control, and exhausting to one (1) stack (S/V ID 024);

(5) one (1) HVLP paint mix room spray booth, identified as PMR043, with a maximum capacity of spraying 3.28 gallons of paint per hour, using dry filters for particulate control, and exhausting to one (1) stack (S/V ID 043);

(6) one (1) HVLP spray coating booth, identified as PB044, with a maximum capacity of spraying 3.28 gallons of paint per hour, using dry filters for particulate control, and exhausting to one (1) stack (S/V ID 044);

(7) two (2) spray coating booths, identified as PB101and PB102, utilizing HVLP application for PB101, and airless application for PB102, each with a maximum capacity's of spraying 9.38 gallons and 0.60 gallons of paint per hour, respectively, each using dry filters for particulate control, and each exhausting to one (1) stack (S/V ID 101 and 102 respectively);

(8) two (2) HVLP adhesive coating booths, identified as GB001 and GB002. GB001 has a maximum capacity of applying 9.38 gallons of adhesive per hour and is equipped with a dry filter for particulate control. GB002 has a maximum capacity of applying 7.03 gallons of adhesive per hour and is uncontrolled. The booths each exhaust to one (1) stack (S/V ID G01 and G02, respectively); and

(9) three (3) varnish dip tanks, identified as VD001, VD002, and VD003, all exhausting to one (1) stack (S/V ID: V01).

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coaitngs), no owner or operator engaged in the surface coating of miscellaneous metal parts shall discharge into the atmosphere any volatile organic compound (VOC) in excess of the following:

(a) The volatile organic compound (VOC) content of coating delivered to the applicator at the booths identified as PB044 and PB101 shall each be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.

Solvent sprayed from application equipment at PB044 and PB101 during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

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

This source shall use no more than 248.52 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period. This usage limit is required to limit the potential to emit of VOC to 249 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

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

Pursuant to 326 IAC 6-3-2(c) (Process Operations), the PM from the surface coating booths (PB001, PB017, PB018, PB019, PB022, PB024, PMR043, PB044, PB101, PB102, GB001 and GB002) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1)]

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the VOC limit specified in Condition D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

D.1.6 Volatile Organic Compounds (VOC)

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

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

D.1.7 Particulate Matter (PM)

The dry filters on booths PB001, PB019, PB022, PB024, PMR043, PB044, PB101, PB102, GB001 and GB002, and the waterwall on booths PB017 and PB018 for PM control shall be in operation at all times when the surface coating booths are in operation.

D.1.8 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters and waterwalls, daily 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 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.1.9 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1 and D.1.2.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each month;

(4) The cleanup solvent usage for each month;

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

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

(b) To document compliance with Conditions D.1.7 and D.1.8, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

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

D.1.10 Reporting Requirements

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

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

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: United Technologies - Otis Elevator
Source Address: 1331 South Curry Pike, Bloomington, Indiana 47403
Mailing Address: 1331 South Curry Pike, Bloomington, Indiana 47403
Part 70 Permit No.: T105-7565-00006

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

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Emergency/Deviation Occurrence Reporting Form

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

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

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: United Technologies - Otis Elevator
Source Address: 1331 South Curry Pike, Bloomington, Indiana 47403
Mailing Address: 1331 South Curry Pike, Bloomington, Indiana 47403
Part 70 Permit No.: T105-7565-00006

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

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

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

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: United Technologies - Otis Elevator
Source Address: 1331 South Curry Pike, Bloomington, Indiana 47403
Mailing Address: 1331 South Curry Pike, Bloomington, Indiana 47403
Part 70 Permit No.: T105-7565-00006
Facility: Source-wide surface coating booths and dip tanks
Parameter: VOC usage
Limit: 248.52 tons per twelve (12) consecutive month period

YEAR: _____

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons/yr)
	This Month	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 REPORT

Source Name: United Technologies - Otis Elevator
Source Address: 1331 South Curry Pike, Bloomington, Indiana 47403
Mailing Address: 1331 South Curry Pike, Bloomington, Indiana 47403
Part 70 Permit No.: T105-7565-00006

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

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

LIST EACH COMPLIANCE REQUIREMENT EXISTING FOR THIS SOURCE:

Requirement	Number of Deviations	Date of each Deviations	No Deviations

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

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Management

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

Source Background and Description

Source Name:	United Technologies - Otis Elevator
Source Location:	1331 South Curry Pike, Bloomington, IN 47403
County:	Monroe
SIC Code:	3534
Operation Permit No.:	T105-7565-00006
Permit Reviewer:	Jeremy Magliaro / EVP

The Office of Air Management (OAM) has reviewed a Part 70 permit application from United Technologies - Otis Elevator relating to the operation of their elevator and escalator manufacturing plant.

Permitted Emission Units and Pollution Control Equipment

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

(1) One (1) airless spray coating booth, identified as PB001, with a maximum capacity of spraying 2.81 gallons of paint per hour, using dry filters for particulate control, and exhausting to one (1) stack (S/V ID 001);

(2) three (3) air-assisted airless spray coating booths, identified as PB017, PB018, and PB019, each with a maximum capacity of spraying 9.38 gallons of paint per hour, using dry filters in PB019 and a waterwall in PB017 and PB018 for particulate control, and each exhausting to one (1) stack (S/V ID: 017, 018, 019 ,respectively);

(3) one (1) high volume-low pressure (HVLP) spray coating booth, identified as PB022, with a maximum capacity of spraying 9.38 gallons of paint per hour, using dry filters for particulate control, and exhausting to one (1) stack (S/V ID 022);

(4) one (1) high volume-low pressure (HVLP) spray coating booth, identified as PB024, with a maximum capacity of spraying 2.81 gallons of paint per hour, using dry filters for particulate control, and exhausting to one (1) stack (S/V ID 024);

(5) one (1) HVLP paint mix room spray booth, identified as PMR043, with a maximum capacity of spraying 3.28 gallons of paint per hour, using dry filters for particulate control, and exhausting to one (1) stack (S/V ID 043);

(6) one (1) HVLP spray coating booth, identified as PB044, with a maximum capacity of spraying 3.28 gallons of paint per hour, using dry filters for particulate control, and exhausting to one (1) stack (S/V ID 044);

(7) two (2) spray coating booths, identified as PB101and PB102, utilizing HVLP application for PB101, and airless application for PB102, each with a maximum capacity's of spraying 9.38 gallons and 0.60 gallons of paint per hour, respectively, each using dry filters for particulate control, and each exhausting to one (1) stack (S/V ID 101 and 102 respectively);

(8) two (2) HVLP adhesive coating booths, identified as GB001 and GB002. GB001 has a maximum capacity of applying 9.38 gallons of adhesive per hour and is equipped with a dry filter for particulate control. GB002 has a maximum capacity of applying 7.03 gallons of adhesive per hour and is uncontrolled. The booths each exhaust to one (1) stack (S/V ID G01 and G02, respectively); and

(9) three (3) varnish dip tanks, identified as VD001, VD002, and VD003, all exhausting to one (1) stack (S/V ID: V01).

The spray booth identified in the applicants Part 70 application as PB030, and originally permitted in Construction Permit 53-05-94-0085, issued May 1, 1994, has been decommissioned.

Unpermitted Emission Units and Pollution Control Equipment

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

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

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

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.
- (10) one (1) washer heater rated at 4.712 mmBtu per hour;
- (11) one (1) washer heater rated at 2.36 mmBtu per hour;
- (12) one (1) dry-off oven rated at 1.337 mmBtu per hour;
- (13) one (1) bake oven rated at 2.98 mmBtu per hour with propane backup fuel;
- (14) one (1) curing oven rated at 2.63 mmBtu per hour;
- (15) two (2) boilers, each rated at 2.5 mmBtu per hour;

(2) The following VOC and HAP storage containers:
- (a) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

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

(4)

(5) Machining where an aqueous cutting coolant continuously floods the machining interface.

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

(7) Infrared cure equipment.

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

(9) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.

(10) Noncontact natural draft cooling towers not regulated under a NESHAP.

(11) 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.

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

(13) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

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

(15) Gasoline emergency generators not exceeding 110 horsepower.

(16) Stationary fire pumps.

(17) 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 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

(18) The following units emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP:
- (a) one (1) laser cutter for precision cutting of steel, stainless steel, and brass plate material;
- (b) portable glue gun spray rigs;
- (c) touch-up spray painting operations using aerosol cans;

(19) Other categories with VOC emissions below 5 pounds per hour or 15 pounds per day:
- (a) one (1) water-wash iron phosphalizing 5-stage washing system;
- (b) three (3) solder dip tanks;

(17) Other categories with PM10 emissions below 5 pounds per hour or 25 pounds per day:
  (a) Woodworking operations including the use of table saw's, belt sanders, tool grinders, wire strippers, and routers;
  (b) three (3) automatic powder paint booths, identified as PB018A, PB019A, and PB022A, each equipped with an automatic, enclosed recycling unit that collects the overspray powder and returns it to the system. These units were issued a registration (CP-105-9342-00006) on February 3, 1998.

Existing Approvals

The source has been operating under the following approvals:
(1) PC-53-05-90-0066, issued February 10, 1987;
(2) Exemption for spray booth (PB102), issued October 17, 1989;
(3) PC-53-05-94-0085, issued March 27, 1990;
(4) CP-105-1783-00006, registration issued April 22, 1992;
(5) CP-105-3078-00006, registration issued July 19, 1993;
(6) CP-105-6311-00006, registration amended March 31, 1997; and
(7) CP-105-9342-00006, registration issued February 3, 1998.

Enforcement Issue

There are no Enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on December 12, 1996.

A notice of completeness letter was mailed to United Technologies - Otis Elevator on January 8, 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 250
PM-10	greater 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
Methyl isobutyl ketone (MIBK)	greater than 10
Bis(2-ethylhexyl) pthalate	less than 10
Methyl ethyl ketone (MEK)	greater than 10
Ethylbenzene	greater than 10
n-Hexane	greater than 10
Triethylamine (TEA)	less than 10
Formaldehyde	less than 10
Glycol ethers	less than 10
Methanol	less than 10
TOTAL	greater than 25

* The potential HAP emissions listed above were estimates supplied by the applicant in their Title V application.

(a) The potential emissions (as defined in the Indiana Rule) of VOC and PM10 are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential emissions (as defined in Indiana Rule) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive 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 OAM 1996 emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.93
PM-10	0.93
SO_2	0.00
VOC	92.70
CO	0.00
HAP (Total)	71.07
NO_x	0.00

Limited Potential to Emit

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

	Limited Potential to Emit (tons/year)						
Process/ facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Source-wide Surface Coating	33.20	33.20	0	248.52	0	0	Greater than 25
Natural Gas Combustion	0.99	0.99	0.05	0.48	1.75	8.33	0
Total Emissions	34.19	34.19	0.05	249	1.75	8.33	Greater than 25

County Attainment Status

The source is located in Monroe County.

Pollutant	Status
TSP	attainment
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

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

Part 70 Permit Conditions

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

(1) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(2) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) There are no New Source Performance Standards (326 IAC 12), 40 CFR Part 60, applicable to this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63 applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

The source shall limit total source-wide VOC emissions to 249 tons per twelve (12) consecutive month period. This limit is comprised of the following:

(a) VOC usage at all surface coating booths source-wide (PB001, PB017, PB018, PB019, PB022, PB024, PMR043, PB044, PB101, PB102, GB001 and GB002) shall be limited to 248.52 tons per twelve (12) consecutive month period;

This usage limitation combined with VOC emissions from combustion at the source, (see Appendix A, page 2 of 2 for detailed emissions calculations) shall limit source-wide VOC emissions to no more than 249 tons per twelve (12) consecutive month period:

248.52 tons VOC/year + 0.48 tons VOC/year from combustion = 249.00 tons VOC per year;.

Therefore, the requirements under 326 IAC 2-2 (Prevention of Significant Deterioration) are not applicable, and pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), this source is a minor source.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC and PM 10. 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 6-3-2 (Process Operations), the particulate matter (PM) overspray from the surface coating booths (PB001, PB017, PB018, PB019, PB022, PB024, PMR043, PB044, PB101, PB102, GB001 and GB002) shall each 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:

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

Unit GB002 is not equipped with any particulate control device. The surface coating booths identified as PB018 and PB019 utilize a waterwall for particulate control, while all other coating booths utilize dry filters for particulate control.

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the following operations engaged in the surface coating of miscellaneous metal parts shall not discharge into the atmosphere any volatile organic compound (VOC) in excess of the following:

(a) The volatile organic compound (VOC) content of coating delivered to the applicator at the booths identified as PB044 and PB101 shall each be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.

Based on the MSDS submitted by the source and calculations made, the paint booths PB044 and PB101 are in compliance with this requirement.

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

(b) The surface coating facilities identified PB102 and GB001 were constructed in 1989 in Monroe County and have total potential VOC emissions less than twenty-five (25) tons per year. Therefore, pursuant to 326 IAC 8-2-1 (Surface Coating Emissions Limitations: Applicability), the requirements under 326 IAC 8-2-9 (Miscellaneous Metal Coatings) are not applicable.

(c) The surface coating facilities identified as PB001, PB017, PB018, PB019, PB022, PB024, PMR043, and GB002 were all constructed prior to 1980 in Monroe County. Therefore, pursuant to 326 IAC 8-2-1 (Surface Coating Emissions Limitations: Applicability), the requirements under 326 IAC 8-2-9 (Miscellaneous Metal Coatings) are not applicable.

(d) Pursuant to the amendment to CP#105-6311-00006, amended March 31, 1997, the varnish dip tanks identified as VD001, VD002, and VD003, were constructed in 1987 in Monroe County and have total potential VOC emissions less than twenty-five (25) tons per year. Therefore, pursuant to 326 IAC 8-2-1 (Surface Coating Emissions Limitations: Applicability), the requirements under 326 IAC 8-2-9 (Miscellaneous Metal Coatings) are not applicable.

Compliance Requirements

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

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

The following surface coating booths have applicable compliance monitoring conditions as specified below:

(a) The volatile organic compound (VOC) content of coating delivered to the applicator at the booths identified as PB044 and PB101 shall each be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.

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

The source shall maintain records of material safety data sheets (MSDS) to show compliance with this rule. If the VOC content of any one (1) coating used exceeds 3.5 pounds per gallon of coating less water, than the VOC emissions shall be recorded daily using Compliance Method 326 IAC 8-1-2 (Daily Volume - Weighted Average).

These monitoring conditions are necessary to comply with 326 IAC 8-2-9 (Miscellaneous Metal Coatings), and 326 IAC 2-7 (Part 70).

(b) VOC usage at all surface coating booths source-wide (PB001, PB017, PB018, PB019, PB022, PB024, PMR043, PB044, PB101, PB102, GB001 and GB002) shall be limited to 248.52 tons per twelve (12) consecutive month period;

A log of information necessary to document compliance with this condition shall be maintained. Records shall include the number of gallons of surface coating and organic solvent used per month, the VOC content of each coating or solvent, and the amount of VOC emitted per month. Records shall be kept for at least the past 24 month period and made available upon request to the Office of Air Management. A quarterly summary shall be submitted to OAM Compliance Section. These reports shall include total monthly VOC usage in tons per month.

These compliance monitoring requirements are necessary to avoid the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration), and 326 IAC 2-7 (Part 70).

Air Toxic Emissions

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

(a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act.

Conclusion

The operation of this elevator and escalator manufacturing plant shall be subject to the conditions of the attached proposed Part 70 Permit No. T105-7565-00006.

Appendix A: Emission Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: United Technologies-Otis Elevator
Address City IN Zip: 1331 South Curry Pike, Bloomington, IN 47403
Title V: T105-7565-00006
Reviewer: JM/EVP
Date: March 31, 1998

Potential Emissions (uncontrolled):

Material (as applied)	Process	Density (Lb/Gal)	Weight % Volatile (H20& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Maximum Usage (gal/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
Capri Blue Air Dry	PB001	7.96	63.00%	0.00%	63.00%	0.00%	37.00%	2.81	5.0	5.01	14.09	338.20	61.72	18.12	27.11	0.5
Capri Blue Air Dry	PB017	7.96	63.00%	0.00%	63.00%	0.00%	37.00%	9.38	5.0	5.01	47.04	1128.93	206.03	60.50	27.11	0.5
Capri Blue Air Dry	PB018	7.96	63.00%	0.00%	63.00%	0.00%	37.00%	9.38	5.0	5.01	47.04	1128.93	206.03	60.50	27.11	0.5
Capri Blue Air Dry	PB019	7.96	63.00%	0.00%	63.00%	0.00%	37.00%	9.38	5.0	5.01	47.04	1128.93	206.03	60.50	27.11	0.5
Capri Blue Air Dry	PB022	7.96	63.00%	0.00%	63.00%	0.00%	37.00%	9.38	5.0	5.01	47.04	1128.93	206.03	60.50	27.11	0.5
Capri Blue Air Dry	PB024	7.96	63.00%	0.00%	63.00%	0.00%	37.00%	2.81	5.0	5.01	14.09	338.20	61.72	18.12	27.11	0.5
Capri Blue Air Dry	PMR-043	7.96	63.00%	0.00%	63.00%	0.00%	37.00%	3.28	5.0	5.01	16.45	394.77	72.04	21.16	27.11	0.5
Egyptian Black	PB044	9.40	58.20%	47.20%	11.00%	52.00%	32.41%	3.28	2.2	1.03	3.39	81.43	14.86	28.24	6.38	0.5
Black Water Based	PB044	8.80	69.50%	56.70%	12.80%	60.20%	30.50%	3.28	2.8	1.13	3.70	88.70	16.19	19.29	7.39	0.5
Egyptian Black	PB101	9.40	58.20%	47.20%	11.00%	52.00%	32.41%	9.38	2.2	1.03	9.69	232.65	42.46	80.67	6.38	0.5
Black Water Based	PB101	8.80	69.50%	56.70%	12.80%	60.20%	30.50%	9.38	2.8	1.13	10.56	253.44	46.25	55.11	7.39	0.5
White Booth Coater	PB102	8.04	76.50%	0.00%	76.50%	0.00%	23.50%	0.60	6.2	6.15	3.69	88.57	16.16	2.48	52.35	0.5
Capri Blue Water Based	PB102	8.57	64.50%	50.90%	13.60%	52.40%	35.50%	0.60	2.4	1.17	0.70	16.78	3.06	4.00	6.57	0.5
Capri Blue Air Dry	PB102	7.96	63.00%	0.00%	63.00%	0.00%	37.00%	0.60	5.0	5.01	3.01	72.21	13.18	3.87	27.11	0.5
HC-102 Glue	GB001	9.00	53.00%	50.83%	2.17%	0.00%	47.00%	9.38	0.2	0.20	1.83	43.94	8.02	86.85	0.83	0.5
SC-1913 Glue	GB002	6.60	82.50%	0.00%	82.50%	0.00%	17.50%	7.03	5.4	5.45	38.28	918.68	167.66	17.78	62.23	0.5
70 VT Polyester	VD001,002,003	9.30	32.50%	0.00%	32.50%	0.00%	60.80%	0.65	3.0	3.02	1.96	47.15	8.61	0.00	4.97	1
70 VT Thixo	VD001,002,003	9.34	35.50%	0.00%	35.50%	0.00%	56.10%	0.02	3.3	3.32	0.06	1.51	0.28	0.00	5.91	1
U287 air dry Varniish	VD001,002,003	7.02	52.50%	0.00%	52.50%	0.00%	40.90%	0.00	3.7	3.69	0.00	0.00	0.00	0.00	9.01	1
U282 red epoxy	VD001,002,003	9.01	52.10%	0.00%	52.10%	0.00%	36.30%	0.00	4.7	4.69	0.02	0.38	0.07	0.00	12.93	1
Total Potential Uncontrolled Emissions:											**292.89**	**7029.27**	**1282.84**	**516.94**		

Potential Emissions (limited/controlled):

	Control Efficiency: VOC	PM GB002	PM All booths *	Limited VOC lbs per Hour	Limited VOC lbs per Day	Limited VOC tons per Year	Controlled PM tons/yr
Total Potential Limited/Controlled Emissions:	0.00%	0.00%	96.91%	**56.74**	**1361.53**	**248.52**	**33.20**

The source shall limit source-wide VOC usage from the above surface coating booths to 248.52 tons per year, including cleanup solvents, to avoid 326 IAC 2-2 (Prevention of Significant Deterioration).
Total potential PM and VOC emissions were calculated using the worst-case emissions from each booth, as indicated by the grey shading.
PB001, PB017, PB018, PB019, PB022, PB024, PMR-043 and GB002 were constructed in 1965. Potential Emissions were calculated using the Capri Blue Air Dry coating, which is a commonly used, high VOC content coating used by the source.
PB044 and PB101 are subject to 326 IAC 8-2-9 (Miscellaneous Metal Coatings). The VOC content of coatings delivered to the applicator cannot exceed 3.5 pounds per gallon of coating less water for air dried coatings.
PB102, GB001, and VD001-003 are not subject to 326 IAC 8-2-9 (Miscellaneous Metal Coatings) because they were constructed between 1980-1989 and emit less than 25 tons of VOC per year in Monroe County.
* The control efficiency of 97% is the weighted average of the control efficiency of all booths other than GB002. Booth GB002 has no PM control.

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

Appendix A: Emission Calculations
Natural Gas Combustion
MM Btu/hr 0.3 - < 10

Company Name: United Technologies-Otis Elevator
Address City IN Zip: 1331 South Curry Pike, Bloomington, IN 47403
Title V: T105-7565-00006
Reviewer: JM/EVP
Date: March 31, 1998

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
19.0	166.6

Heat Input Capacity includes:
one (1) washer heater rated at 4.712 mmbtu per hour;
one (1) washer heater rated at 2.36 mmBru per hour;
one (1) dry-off oven rated at 1.337 mmBtu per hour;
one (1) bake oven rated at 2.98 mmBtu per hour with propane backup fuel;
one (1) curing oven rated at 2.63 mmBtu per hour;
two (2) boilers, each rated at 2.5 mmBtu per hour;

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	11.9	11.9	0.6	100.0	5.8	21.0
Potential Emission in tons/yr	0.99	0.99	0.05	8.33	0.48	1.75

Methodology:
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36
Emission Factors for CO: uncontrolled = 21, Low NOx burner = 15, Flue Gas Recirculation = ND.
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton