

**PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT
and Anderson Office of Air Management**

**ELSA, LLC.
1240 South SR 37
Elwood, IN 46036**

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

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

Operation Permit No.: T095-7668-00048	
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 Anderson Office of Air Management (AOAM), 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 automobile fuel tank and exhaust systems manufacturing operation.

Responsible Official: Erl Haapanen
Source Address: 1240 South SR 37, Elwood, IN 46036
Mailing Address: 1240 South SR 37, Elwood, IN 46036
SIC Code: 3714
County Location: Madison
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

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

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

- (1) One (1) open top vapor degreaser utilizing trichloroethylene, identified as facility ID AN-01, with a maximum capacity of 2.3 gal/hr, and exhausting to stack 3.
- (2) One (1) paint booth, identified as PVC paint, with a maximum capacity of 28 units/hr,
with dry filters for overspray control, and exhausting to stack 14.
- (3) One (1) paint booth, identified as top coat, with a maximum capacity of 40 fuel tanks/hr,
with dry filters for overspray control, and exhausting to stack 15.
- (4) One (1) paint booth, identified as touch-up, with a maximum capacity of 40 fuel tanks/hr,
with dry filters for overspray control, and exhausting to stack 16.
- (5) One (1) paint booth, identified as BU, with a maximum capacity of 31 units/hr, with dry
filters for overspray control, and exhausting to stack 17.
- (6) One (1) paint booth, identified as wax robot, with a maximum capacity of 36 fuel tanks/hr,
with dry filters for overspray control, and exhausting to stack 34.
- (7) One (1) paint booth, identified as wax touch up, with a maximum capacity of 36 fuel
tanks/hr, with dry filters for overspray control, and exhausting to stack 35.
- (8) One (1) paint booth, identified as BV, with a maximum capacity of 38 units/hr, with dry
filters for overspray control, and exhausting to stack 41.
- (9) One (1) paint booth, identified as Ford Final, with a maximum capacity of 75 fuel
tanks/hr, with dry filters for overspray control, and exhausting to stack 42.
- (10) One (1) paint booth, identified as Subaru, with a maximum capacity of 45 fuel tanks/hr,
with dry filters for overspray control, and exhausting to stack 43.

- (11) One (1) paint booth, identified as Mazda PVC, with a maximum capacity of 23 fuel tanks/hr, with dry filters for overspray control, and exhausting to stack 44.
- (12) One (1) paint booth, identified as Touch-up, with dry filters for overspray control, and exhausting to stack 46.
- (13) Welding operations consisting of the following:
 - (i) Eight (8) metal inert gas (MIG) welders identified as AB-2, AB-4, AB-5, AB-6, AB-7, AB-8, AB-10, and AB-16 exhausting to stack 1.
 - (ii) Twenty-two (22) metal inert gas (MIG) welders identified as AJ-2, AJ-3, AJ-4, AJ-5, AJ-6, AJ-7, AJ-8, AJ-12, AX-1, AX-2, AX-3, AX-4-1, AX-5, AX-6, AX-7-1, AX-8, AX-9, AX-10-1, AX-11, AX-13-2, AX-14-1, and AX-15-1, exhausting to stack 2.
 - (iii) One (1) oxyacetylene welder identified as AC-2 exhausting to stack 4.
 - (iv) Four (4) metal inert gas (MIG) welders identified as AE-8, AE-10, AE-11, and AE-12 exhausting to stack 5.
 - (v) Eight (8) metal inert gas (MIG) welders identified as AP-5, AP-8, AP-10, AP-18, AP-28, AP-30, AP-33, and AP-37, exhausting to stack 6.
 - (vi) Fifteen (15) metal inert gas (MIG) welders identified as AF-2, AF-3, AF-7, AF-8, AF-10, AF-11, AF-16-1, AF-16-2, AF-19-1, AA-03, AA-04, AA-05, AA-06, AA-08-1, and AA-10 exhausting to stack 7.
 - (vii) Three (3) metal inert gas (MIG) welders identified as AT-06, AT-08, AT-09 and one (1) tungsten inert gas (TIG) welder identified as AT-10 exhausting to stack 8.
 - (viii) Eight (8) metal inert gas (MIG) welders identified as AG-2, AG-10, AG-11, AG-01, AG-04, AH-02, AH-03, and AH-08 exhausting to stack 28.
 - (ix) Seventeen (17) metal inert gas (MIG) welders identified as AI-05, AI-06, AI-09, AI-11, AI-13, AI-15, AI-16, AI-17, AI-18, AI-20, AI-21, AI-21, AS-05, AS-06, AS-13, AS-15-1, and AS-16-2 exhausting to stack 29.
 - (x) Forty-two (42) metal inert gas (MIG) welders identified as BD-01, BD-02, BD-03, BD-04, BD-05, BD-06, BD-08, BD-12, BD-13, BD-14, BK-01, BK-02, BK-03, BK-05, BK-06, BK-07, BK-13, BL-04, BL-05, BL-06, BL-09, BL-10, BL-11, BL-13, BL-16, BL-18, BL-23, BL-24, BL-25, BL-26, BL-27, BL-28, BL-29, BL-31, BL-32, BL-33, BL-35, BV-9-2, BV-10, BV-11, BV-13, and BV-13-1 exhausting to stack 33.
 - (xi) Eleven (11) metal inert gas (MIG) welders identified as AK-01, AK-02, AK-03, AY-1-1, AY-02, AY-03, AY-05, AY-06, AY-7-1, AY-7-2, AY-9-1 exhausting to stack 37.
 - (xii) Twenty-seven (27) metal inert gas (MIG) welders identified as BJ-01, BJ-02, BJ-

04, BJ-06, BJ-09, BJ-10, BM-01, BM-02, BM-03, BM-04, BN-01, BN-2-2, BN-2-3, BN-04, BN-05, BN-8-2, BN-11, BO-01, BO-02, BO-03, BO-05, BU-31, BU-33, BU-32, BU-34-1, BU-35-1, and BU-35-2, exhausting to stack 38.

- (xiii) Twenty-one (21) metal inert gas (MIG) welders identified as BB-01, BB-02, BB-03, BG-01, BG-02, BG-03, BG-04, BG-06, BG-07, BG-09, BG-10, BG-12, BG-16, BP-01, BP-02, BP-03, BP-04, BP-05, BO-01, BO-02, and BO-03, exhausting to stack 39.

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

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

- (1) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour, identified as Sh-1(3.8 MMBtu/hr) and exhausting to stack 10.
- (2) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour identified as Sh-2 (3.8 MMBtu/hr) and exhausting to stack 11.
- (3) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour identified as Rec-3 (3.8 MMBtu/hr) and exhausting to stack 13.
- (4) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour identified as dry-off, bake oven (4.5 MMBtu/hr) and exhausting to stacks 18 and 19.
- (5) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour identified as washer B (1.75 MMBtu/hr) and exhausting to stack 20 and 21.
- (6) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour identified as washer C (1.75 MMBtu/hr) and exhausting to stack 22 and 23.
- (7) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour identified as J washer (1.0 MMBtu/hr) and exhausting to stack 30.
- (8) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour identified as Ford washer C (2.5 MMBtu/hr) and exhausting to stack 31 and 32.
- (9) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour identified as wax bake oven (2.75 MMBtu/hr) and exhausting to stack 36.
- (10) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour identified as drying oven (0.74 MMBtu/hr) and exhausting to stack 45.
- (11) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour identified as drying oven (1.00 MMBtu/hr) and exhausting to stack 47.

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

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

because:

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

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

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

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

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management

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

and

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

- (b) The Permittee shall furnish to IDEM, OAM, and AOAM, within a reasonable time, any information that IDEM, OAM, and AOAM may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, and AOAM, 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, and AOAM, 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

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance

of this permit, including the following information on each:

- (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, and AOAM, upon request and shall be subject to review and approval by IDEM, OAM, and AOAM.

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, and AOAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

Telephone Number: 317-646-9835 (AOAM)

Facsimile Number: 317-646-9657 (AOAM)

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted

notice, either in writing or facsimile, of the emergency to:

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

and

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

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

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

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, and AOAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, and AOAM, 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, and AOAM, 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, and AOAM, 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, and AOAM 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, and AOAM, 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

and

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

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, and AOAM, determines any of the following:

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

and

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it

is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and AOAM, on or before the date it is due. [326 IAC 2-5-3]

- (2) If IDEM, OAM, and AOAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, and AOAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, and AOAM, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, and AOAM, 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, and AOAM, 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, and AOAM, 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
Anderson Office of Air Management
P.O. Box 2100
120 East 8th Street
Anderson, IN 46011

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

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

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

Such records shall consist of all information required to be submitted to IDEM, OAM, and AOAM, 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, and AOAM, 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 and AOAM, 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, and AOAM 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, and AOAM, 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 Major Source

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), this source is a major source.

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 Stack Height [326 IAC 1-7]

- (a) The Permittee shall comply with the provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.
- (b) Any change in an applicable stack shall require prior approval from IDEM, OAM.

C.8 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.9 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

and

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

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

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If

due to circumstances beyond its control, this schedule cannot be met, the Permittee 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

and

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

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

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 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.14 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

and

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

- (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.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

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

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

and

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

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

(c) If the ERP is disapproved by IDEM, OAM, and AOAM, 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, and AOAM, 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, and AOAM, 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.16 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, and AOAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, and AOAM, that the Risk Management Plan is being properly implemented.

C.17 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 and AOAM upon request and shall be subject to review and approval by IDEM, OAM, and AOAM. 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.18 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.19 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

and

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

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

C.20 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM and AOAM 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.21 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, and AOAM 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.22 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 Quality 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

and

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM and AOAM 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.23 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.

- (1) One (1) open top vapor degreaser, using trichloroethylene, at a maximum rate of 2.3 gal/hr and exhausting to stack S3.

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-3]

Pursuant to 326 IAC 8-3-3 (Open top vapor degreaser operation), the owner or operator of an open top vapor degreaser shall:

- (1) equip the vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;
- (2) keep the cover closed at all times except when processing work loads through the degreaser;
- (3) minimize solvent carryout by:
 - (A) racking parts to allow complete drainage;
 - (B) moving parts in and out of the degreaser at less than 3.3 meters per minute (eleven (11) feet per minute);
 - (C) degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
 - (D) tipping out any pools of solvent on the cleaned parts before removal; and
 - (E) allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry;
- (4) not degrease porous or absorbent materials, such as cloth, leather, wood or rope;
- (5) not occupy more than half of the degreaser's open top area with the workload;
- (6) not load the degreaser such that the vapor level drops more than fifty percent (50%) of the vapor depth when the workload is removed;
- (7) never spray above the vapor level;
- (8) repair solvent leaks immediately, or shut down the degreaser;
- (9) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;
- (10) not use workplace fans near the degreaser opening;
- (11) not allow visually detectable water in the solvent exiting the water separator; and

- (12) provide a permanent, conspicuous label summarizing the operating requirements.

D.1.2 Halogenated Solvent Cleaning Machine NESHAP [40 CFR Part 63, Subpart T]

This facility is subject to 40 CFR Part 63, Subpart T, (Halogenated Solvent Cleaning Machine NESHAP) that was promulgated on December 2, 1994. The source shall come into compliance with this rule no later than December 2, 1997.

- (i) The following design requirements for the degreasing operation are applicable:
 - (a) Reduce the room draft as described in 63.463(e)(2)(ii).
 - (b) A freeboard ratio of 0.75 or greater shall be maintained.
 - (c) An automated parts handling system capable of moving parts or baskets at a speed of 3.4 meters per minute (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts shall be installed.
 - (d) The degreaser shall be equipped with a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils.
 - (e) The degreaser shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.
 - (f) The degreaser shall have a primary condenser.
 - (g) A combination of controls, including a freeboard refrigeration device, reduced room draft and a freeboard ratio of 1.0, shall be used.
 - (h) Monitoring shall be conducted on each control device used.
- (ii) The following operational practices for the degreasing operation are applicable:
 - (a) Parts baskets or the parts being cleaned in the degreaser shall not occupy more than fifty percent (50%) of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meters per minute (3 feet per minute) or less.
 - (b) Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air.
 - (c) Parts shall be oriented so that the solvent drains from them freely. Parts with holes may need to be tipped or rotated before being removed.
 - (d) Parts or baskets shall not be removed from any solvent cleaning machine before dripping has stopped.
 - (e) During startup, the primary condenser shall be turned on before the sump heater.

- (f) During shutdown, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.
- (g) When solvent is added or drained, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent pump shall be located beneath the liquid solvent surface.
- (h) The machine and associated controls shall be maintained as recommended by the manufacturers of the equipment or by EPA approved alternative methods.
- (i) Each operator shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in appendix B of Subpart T, if requested during an inspection.
- (j) Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers that may contain a pressure relief device.
- (k) Sponges, fabric, wood, and paper products shall not be cleaned.

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

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

Compliance Determination Requirements

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

The Permittee shall determine whether each control device used to comply with 40 CFR Part 63, Subpart T meets the following requirements:

- (a) Ensure that the chilled air blanket temperature measured at the center of the air blanket of the freeboard refrigeration device is no greater than thirty percent (30%) of the solvent's boiling point. A thermometer or thermocouple shall be used to measure the temperature at the center of the air blanket during the idling mode.
- (b) Ensure that flow or movement of air across the top of the freeboard area of the solvent cleaning machine, or within the solvent cleaning machine enclosure, does not exceed 15.2 meters per minute (50 feet per minute) at any time as measured using the procedures in 63.466(d).
 - (i) The Permittee shall conduct initial and quarterly monitoring of wind speed within six (6) inches above the top of the freeboard area of the solvent cleaning machine as follows:
 - (A) Determine the direction of the wind current by slowly rotating a velometer or similar device until the maximum speed is located.
 - (B) Orient a velometer in the direction of the wind current at each of the four corners of the machine.
 - (C) Record the reading for each corner.

- (D) Average the values obtained at each corner and record the average wind speed.
- (c) Establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in 63.466(d).
 - (i) Monitor initially and weekly, the room parameters established during the initial compliance test that are used to achieve the reduced room draft.
- (d) Monitor the hoist speed as follows:
 - (i) Determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute).
 - (ii) Monitoring shall be conducted monthly. If after the first year, no exceedances of the hoist speed are measured, the owner or operator may begin monitoring the hoist speed quarterly.
 - (iii) If an exceedance of the hoist speed occurs during quarterly monitoring, the monitoring frequency returns to monthly until another year of compliance without an exceedance is demonstrated.
 - (iv) If an owner or operator can demonstrate to EPA's satisfaction in the initial compliance report that the hoist cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including the first year of compliance.
- (e) If any of the requirements of the above (a, b or c) are not met, the Permittee shall determine whether an exceedance has occurred.
 - (i) An exceedance has occurred if (c) has not been met; or
 - (ii) An exceedance has occurred if (a) or (b) have not been met and are not corrected within fifteen (15) days of detection. Adjustments or repairs shall be made to the solvent cleaning system or control device to reestablish required levels. The parameter must be remeasured immediately upon adjustment or repair and demonstrated to be within required limits.

D.1.5 Record Keeping Requirements

The Permittee shall maintain records to document compliance with Conditions D.1.2 and D.1.4. These records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit. These records shall include a minimum of the following:

- (i) The following records shall be kept for the life of the degreaser:
 - (a) Owner's manuals or written maintenance and operating procedures, for the solvent cleaning machine and control equipment.
 - (b) The date of installation of the solvent cleaning machine and all of its control

devices.

- (c) Records of the halogenated HAP solvent content for each solvent used in the solvent cleaning machine.
- (ii) The following records will be kept for a minimum of five (5) years:
 - (d) Results of monitoring required in Condition D.1.4.
 - (e) Information of actions taken to comply with Condition D.1.2, including written or verbal orders for replacements parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
 - (f) Estimates of annual solvent consumption of the solvent cleaning machine.
- (iii) Records maintained for (c) and (f) of this condition shall be taken monthly and shall be complete and sufficient to establish compliance with the NESHAP Subpart T as established in Condition D.1.2.

D.1.6 Reporting Requirements

A summary of the information to document compliance with Conditions D.1.2 and D.1.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, and to the following address:

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

- (a) Submit an initial notification report immediately. The report shall include the following information:
 - (i) The name and address of the owner or operator;
 - (ii) The address of the solvent cleaning machine;
 - (iii) A brief description of each solvent cleaning machine including machine type, solvent/air interface area and existing controls;
 - (iv) The date of installation for the solvent cleaning machine;
 - (v) The anticipated compliance approach for the solvent cleaning machine;
 - (vi) An estimated annual halogenated HAP solvent consumption for the solvent cleaning machine.
- (b) Submit an initial statement of compliance for the solvent cleaning machine no later than 150 days after December 2, 1997. This statement shall include:
 - (i) The name and address of the owner or operator;

- (ii) The address of the solvent cleaning machine;
 - (iii) A list of the control equipment used to achieve compliance for the solvent cleaning machine.
 - (iv) A list of the parameters that are monitored and the value of these parameters measured on or during the first month after the compliance date.
 - (v) Conditions to maintain the wind speed as designated in Condition D.1.2.
- (c) Submit an annual report by February 1 of the year following the one for which the reporting is being made. This report shall include:
- (i) A signed statement from the facility owner or his designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required in 63.463(d)(10).
 - (ii) An estimate of the solvent consumption for each solvent cleaning machine during the reporting period.
- (d) Submit a semiannual exceedance report. Once an exceedance has occurred, the owner or operator shall follow a quarterly reporting format until a request to reduce reporting frequency has been approved as under 63.468(i). Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter as appropriate. The report shall include:
- (i) Information on the actions taken to comply with monitoring conditions in Condition D.1.4, including records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
 - (ii) The reason for any exceedance that has occurred and description of the actions taken.
 - (iii) If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.

SECTION D.2

FACILITY OPERATION CONDITIONS

- (2) One (1) paint booth, identified as PVC paint, with a maximum capacity of 28 units/hr, with dry filters for overspray control, and exhausting to stack 14.
- (3) One (1) paint booth, identified as top coat, with a maximum capacity of 40 fuel tanks/hr, with dry filters for overspray control, and exhausting to stack 15.
- (4) One (1) paint booth, identified as touch-up, with a maximum capacity of 40 fuel tanks/hr, with dry filters for overspray control, and exhausting to stack 16.
- (5) One (1) paint booth, identified as BU, with a maximum capacity of 31 units/hr, with dry filters for overspray control, and exhausting to stack 17.
- (6) One (1) paint booth, identified as wax robot, with a maximum capacity of 36 fuel tanks/hr, with dry filters for overspray control, and exhausting to stack 34.
- (7) One (1) paint booth, identified as wax touch up, with a maximum capacity of 36 fuel tanks/hr, with dry filters for overspray control, and exhausting to stack 35.
- (8) One (1) paint booth, identified as BV, with a maximum capacity of 38 units/hr, with dry filters for overspray control, and exhausting to stack 41.
- (9) One (1) paint booth, identified as Ford Final, with a maximum capacity of 75 fuel tanks/hr, with dry filters for overspray control, and exhausting to stack 42.
- (10) One (1) paint booth, identified as Subaru, with a maximum capacity of 45 fuel tanks/hr, with dry filters for overspray control, and exhausting to stack 43.
- (11) One (1) paint booth, identified as Mazda PVC, with a maximum capacity of 23 fuel tanks/hr, with dry filters for overspray control, and exhausting to stack 44.
- (12) One (1) paint booth, identified as Touch-up, with dry filters for overspray control, and exhausting to stack 46.

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

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating), the volatile organic compound (VOC) content of coating delivered to the applicator at the eleven (11) paint booths shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.
- (b) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.2.2 PSD Minor Modification [326 IAC 2-2] [40 CFR 52.21]

- (a) Any change or modification which may increase the volatile organic compound (VOC)

emissions from the BV and Ford Final paint booths to 40 tons per year or more must be approved by IDEM, OAM and AOAM before any such change may occur.

- (b) Any change or modification which may increase the volatile organic compound (VOC) emissions from the Subaru paint booth to 40 tons per year or more must be approved by IDEM, OAM and AOAM before any such change may occur.
- (c) Any change or modification which may increase the volatile organic compound (VOC) emissions from the Mazda PVC paint booth to 40 tons per year or more must be approved by IDEM, OAM and AOAM before any such change may occur.

D.2.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

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

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

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

D.2.4 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 this facility and any control devices.

Compliance Determination Requirements

D.2.5 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 PM and VOC limits specified in Conditions D.2.1 and D.2.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

D.2.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.2.1 and D.2.2 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, and AOAM 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.2.7 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to CP 095-7134-00048, issued on June 9, 1997, the dry filters for PM control shall be in operation at all times when the eleven (11) paint booths are in operation.

D.2.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily 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.
- (d) The overspray from the paint booths shall be considered in compliance provided that the overspray is not:
 - (a) visibly detectable at the exhaust;
 - (b) detectable on the rooftops; or
 - (c) causing any nuisance problems.

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

D.2.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.1.
 - (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 day that any coating with VOC content greater than 3.5 pounds per gallon, less water, is used, by:

$$\frac{\text{lb VOC}}{\text{gallon less water}} = \frac{3 \text{ coatings } [D_c * O * Q / [1-W * D_c / D_w]]}{3 C}$$

Dc = density of coating, lb/gal

Dw = density of water, lb/gal

O = weight percent organics, %
W = percent volume water, %

Q = quantity of coating, gal/unit
C = total of coatings used, gal/unit

- (4) The cleanup solvent usage for each day;
 - (5) The total VOC usage for each day; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.2.7 and D.2.8, 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.

SECTION D.3 FACILITY OPERATION CONDITIONS

- (13) Welding operations consisting of the following:
- (a) Eight (8) metal inert gas (MIG) welders identified as AB-2, AB-4, AB-5, AB-6, AB-7, AB-8, AB-10, and AB-16 exhausting to stack 1.
 - (b) Twenty-two (22) metal inert gas (MIG) welders identified as AJ-2, AJ-3, AJ-4, AJ-5, AJ-6, AJ-7, AJ-8, AJ-12, AX-1, AX-2, AX-3, AX-4-1, AX-5, AX-6, AX-7-1, AX-8, AX-9, AX-10-1, AX-11, AX-13-2, AX-14-1, and AX-15-1, exhausting to stack 2.
 - (c) One (1) oxyacetylene welder identified as AC-2 exhausting to stack 4.
 - (d) Four (4) metal inert gas (MIG) welders identified as AE-8, AE-10, AE-11, and AE-12 exhausting to stack 5.
 - (e) Eight (8) metal inert gas (MIG) welders identified as AP-5, AP-8, AP-10, AP-18, AP-28, AP-30, AP-33, and AP-37, exhausting to stack 6.
 - (f) Fifteen (15) metal inert gas (MIG) welders identified as AF-2, AF-3, AF-7, AF-8, AF-10, AF-11, AF-16-1, AF-16-2, AF-19-1, AA-03, AA-04, AA-05, AA-06, AA-08-1, and AA-10 exhausting to stack 7.
 - (g) Three (3) metal inert gas (MIG) welders identified as AT-06, AT-08, AT-09 and one (1) tungsten inert gas (TIG) welder identified as AT-10 exhausting to stack 8.
 - (h) Eight (8) metal inert gas (MIG) welders identified as AG-2, AG-10, AG-11, AG-01, AG-04, AH-02, AH-03, and AH-08 exhausting to stack 28.
 - (i) Seventeen (17) metal inert gas (MIG) welders identified as AI-05, AI-06, AI-09, AI-11, AI-13, AI-15, AI-16, AI-17, AI-18, AI-20, AI-21, AI-21, AS-05, AS-06, AS-13, AS-15-1, and AS-16-2 exhausting to stack 29.
 - (j) Forty-two (42) metal inert gas (MIG) welders identified as BD-01, BD-02, BD-03, BD-04, BD-05, BD-06, BD-08, BD-12, BD-13, BD-14, BK-01, BK-02, BK-03, BK-05, BK-06, BK-07, BK-13, BL-04, BL-05, BL-06, BL-09, BL-10, BL-11, BL-13, BL-16, BL-18, BL-23, BL-24, BL-25, BL-26, BL-27, BL-28, BL-29, BL-31, BL-32, BL-33, BL-35, BV-9-2, BV-10, BV-11, BV-13, and BV-13-1 exhausting to stack 33.
 - (k) Forty-two (42) metal inert gas (MIG) welders identified as BD-01, BD-02, BD-03, BD-04, BD-05, BD-06, BD-08, BD-12, BD-13, BD-14, BK-01, BK-02, BK-03, BK-05, BK-06, BK-07, BK-13, BL-04, BL-05, BL-06, BL-09, BL-10, BL-11, BL-13, BL-16, BL-18, BL-23, BL-24, BL-25, BL-26, BL-27, BL-28, BL-29, BL-31, BL-32, BL-33, BL-35, BV-9-2, BV-10, BV-11, BV-13, and BV-13-1 exhausting to stack 33.
 - (l) Twenty-seven (27) metal inert gas (MIG) welders identified as BJ-01, BJ-02, BJ-04, BJ-06, BJ-09, BJ-10, BM-01, BM-02, BM-03, BM-04, BN-01, BN-2-2, BN-2-3, BN-04, BN-05, BN-8-2, BN-11, BO-01, BO-02, BO-03, BO-05, BU-31, BU-33, BU-32, BU-34-1, BU-35-1, and BU-35-2, exhausting to stack 38.
 - (m) Twenty-one (21) metal inert gas (MIG) welders identified as BB-01, BB-02, BB-03, BG-01, BG-02, BG-03, BG-04, BG-06, BG-07, BG-09, BG-10, BG-12, BG-16, BP-01, BP-02, BP-03, BP-04, BP-05, BO-01, BO-02, and BO-03, exhausting to stack 39.

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the welding facilities shall not exceed 9.03 pounds per hour when operating at a process weight rate of 6,500 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

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

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

Compliance Determination Requirements

D.3.3 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 PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

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

D.3.4 Record Keeping Requirements

To document compliance with Condition D.3.1, the Permittee shall maintain records of the amount of steel processed and amount of welding wire consumed.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
Anderson Office of Air Management**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: ELSA, LLC.
Source Address: 1240 South SR 37, Elwood, IN 46036
Mailing Address: 1240 South SR 37, Elwood, IN 46036
Part 70 Permit No.: T095-7668-00048

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**

Anderson Office of Air Management

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

Source Name: ELSA, LLC.
Source Address: 1240 South SR 37, Elwood, IN 46036
Mailing Address: 1240 South SR 37, Elwood, IN 46036
Part 70 Permit No.: T095-7668-00048

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2	
9	1. This is an emergency as defined in 326 IAC 2-7-1(12) c The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and c The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9	2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) c The Permittee must submit notice in writing within ten (10) calendar days

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

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

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

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT
 COMPLIANCE DATA SECTION
 Anderson Office of Air Management**

**PART 70 OPERATING PERMIT
 QUARTERLY COMPLIANCE REPORT**

Source Name:ELSA, LLC.
 Source Address:1240 South SR 37, Elwood, IN 46036
 Mailing Address:1240 South SR 37, Elwood, IN 46036
 Part 70 Permit No.: T095-7668-00048

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 (eg. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations	No Deviations

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

Attach a signed certification to complete this report.

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

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

Source Background and Description

Source Name: ELSA, LLC.
Source Location: 1240 South SR 37, Elwood, IN 46036
County: Madison
SIC Code: 3714
Operation Permit No.: T095-7668-00048
Permit Reviewer: Jay Patterson

The Office of Air Management (OAM) has reviewed a Part 70 permit application from ELSA, LLC. relating to the fuel tanks and exhaust systems manufacturing operation.

Permitted Emission Units and Pollution Control Equipment

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

- with
- (1) One (1) open top vapor degreaser utilizing trichloroethylene, identified as facility ID AN-01, with a maximum capacity of 2.3 gal/hr, and exhausting to stack 3.
 - (2) One (1) paint booth, identified as PVC paint, with a maximum capacity of 28 units/hr, dry filters for overspray control, and exhausting to stack 14.
 - (3) One (1) paint booth, identified as top coat, with a maximum capacity of 40 fuel tanks/hr, with dry filters for overspray control, and exhausting to stack 15.
 - (4) One (1) paint booth, identified as touch-up, with a maximum capacity of 40 fuel tanks/hr, with dry filters for overspray control, and exhausting to stack 16.
 - (5) One (1) paint booth, identified as BU, with a maximum capacity of 31 units/hr, with dry filters for overspray control, and exhausting to stack 17.
 - (6) One (1) paint booth, identified as wax robot, with a maximum capacity of 36 fuel tanks/hr, with dry filters for overspray control, and exhausting to stack 34.
 - (7) One (1) paint booth, identified as wax touch up, with a maximum capacity of 36 fuel tanks/hr, with dry filters for overspray control, and exhausting to stack 35.
 - (8) One (1) paint booth, identified as BV, with a maximum capacity of 38 units/hr, with dry filters for overspray control, and exhausting to stack 41.

- (9) One (1) paint booth, identified as Ford Final, with a maximum capacity of 75 fuel tanks/hr, with dry filters for overspray control, and exhausting to stack 42.
- (10) One (1) paint booth, identified as Subaru, with a maximum capacity of 45 fuel tanks/hr, with dry filters for overspray control, and exhausting to stack 43.
- (11) One (1) paint booth, identified as Mazda PVC, with a maximum capacity of 23 fuel tanks/hr, with dry filters for overspray control, and exhausting to stack 44.
- (12) One (1) paint booth, identified as Touch-up, with dry filters for overspray control, and exhausting to stack 44.
- (13) Welding operations consisting of the following:
- (1) Eight (8) metal inert gas (MIG) welders identified as AB-2, AB-4, AB-5, AB-6, AB-7, AB-8, AB-10, and AB-16 exhausting to stack 1.
 - (2) Twenty-two (22) metal inert gas (MIG) welders identified as AJ-2, AJ-3, AJ-4, AJ-5, AJ-6, AJ-7, AJ-8, AJ-12, AX-1, AX-2, AX-3, AX-4-1, AX-5, AX-6, AX-7-1, AX-8, AX-9, AX-10-1, AX-11, AX-13-2, AX-14-1, and AX-15-1, exhausting to stack 2.
 - (3) One (1) oxyacetylene welder identified as AC-2 exhausting to stack 4.
 - (4) Four (4) metal inert gas (MIG) welders identified as AE-8, AE-10, AE-11, and AE-12 exhausting to stack 5.
 - (5) Eight (8) metal inert gas (MIG) welders identified as AP-5, AP-8, AP-10, AP-18, AP-28, AP-30, AP-33, and AP-37, exhausting to stack 6.
 - (6) Fifteen (15) metal inert gas (MIG) welders identified as AF-2, AF-3, AF-7, AF-8, AF-10, AF-11, AF-16-1, AF-16-2, AF-19-1, AA-03, AA-04, AA-05, AA-06, AA-08-1, and AA-10 exhausting to stack 7.
 - (7) Three (3) metal inert gas (MIG) welders identified as AT-06, AT-08, AT-09 and one (1) tungsten inert gas (TIG) welder identified as AT-10 exhausting to stack 8.
 - (8) Eight (8) metal inert gas (MIG) welders identified as AG-2, AG-10, AG-11, AG-01, AG-04, AH-02, AH-03, and AH-08 exhausting to stack 28.
 - (9) Seventeen (17) metal inert gas (MIG) welders identified as AI-05, AI-06, AI-09, AI-11, AI-13, AI-15, AI-16, AI-17, AI-18, AI-20, AI-21, AI-21, AS-05, AS-06, AS-13, AS-15-1, and AS-16-2 exhausting to stack 29.
 - (10) Forty-two (42) metal inert gas (MIG) welders identified as BD-01, BD-02, BD-03, BD-04, BD-05, BD-06, BD-08, BD-12, BD-13, BD-14, BK-01, BK-02, BK-03, BK-05, BK-06, BK-07, BK-13, BL-04, BL-05, BL-06, BL-09, BL-10, BL-11, BL-13, BL-16, BL-18, BL-23, BL-24, BL-25, BL-26, BL-27, BL-28, BL-29, BL-31, BL-32, BL-33, BL-35, BV-9-2, BV-10, BV-11, BV-13, and BV-13-1 exhausting to stack 29.

stack 33.

- (11) Eleven (11) metal inert gas (MIG) welders identified as AK-01, AK-02, AK-03, AY-1-1, AY-02, AY-03, AY-05, AY-06, AY-7-1, AY-7-2, AY-9-1 exhausting to stack 37.
- (12) Twenty-seven (27) metal inert gas (MIG) welders identified as BJ-01, BJ-02, BJ-04, BJ-06, BJ-09, BJ-10, BM-01, BM-02, BM-03, BM-04, BN-01, BN-2-2, BN-2-3, BN-04, BN-05, BN-8-2, BN-11, BO-01, BO-02, BO-03, BO-05, BU-31, BU-33, BU-32, BU-34-1, BU-35-1, and BU-35-2, exhausting to stack 38.
- (13) Twenty-one (21) metal inert gas (MIG) welders identified as BB-01, BB-02, BB-03, BG-01, BG-02, BG-03, BG-04, BG-06, BG-07, BG-09, BG-10, BG-12, BG-16, BP-01, BP-02, BP-03, BP-04, BP-05, BO-01, BO-02, and BO-03, exhausting to stack 39.

Note: The abovementioned welding activities are not considered insignificant because they have potential emissions of 11.7 tons/yr PM-10 and 7.2 tons/yr single HAP (Manganese).

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 source with heat input equal to or less than ten (10) million Btu per hour, identified as Sh-1(3.8 MMBtu/hr) and exhausting to stack 10.
- (2) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour identified as Sh-2 (3.8 MMBtu/hr) and exhausting to stack 11.
- (3) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour identified as Rec-3 (3.8 MMBtu/hr) and exhausting to stack 13.
- (4) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour identified as dry-off, bake oven (4.5 MMBtu/hr) and exhausting to stacks 18 and 19.
- (5) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour identified as washer B (1.75 MMBtu/hr) and exhausting to stack 20 and 21.
- (6) Natural gas-fired combustion source with heat input equal to or less than ten (10) million

- Btu per hour identified as washer C (1.75 MMBtu/hr) and exhausting to stack 22 and 23.
- (7) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour identified as J washer (1.0 MMBtu/hr) and exhausting to stack 30.
 - (8) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour identified as Ford washer C (2.5 MMBtu/hr) and exhausting to stack 31 and 32.
 - (9) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour identified as wax bake oven (2.75 MMBtu/hr) and exhausting to stack 36.
 - (10) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour identified as drying oven (0.74 MMBtu/hr) and exhausting to stack 45.
 - (11) Natural gas-fired combustion source with heat input equal to or less than ten (10) million Btu per hour identified as drying oven (1.00 MMBtu/hr) and exhausting to stack 47.

Existing Approvals

The source has been operating under the following approvals:

- (1) Registration #CP095-7134-00048, issued on June 9, 1997.
- (2) Registration #CP095-5277-00056, issued on February 26, 1996.
- (3) Operating Permit #CP095-3771-00056, issued on August 29, 1994.
- (4) Operating Permit #CP095-3082-00056, issued on February 18, 1994.
- (5) Operating Permit #095-00048, issued on June 24, 1991.
- (6) Operating Permit #48-03-93-0090, issued on April 21, 1989.

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 incomplete Part 70 permit application for the purposes of this review was received on December 13, 1996. Additional information received on March 11, 1997 makes the Part 70 permit application administratively complete. A notice of completeness letter was mailed to ELSA, LLC. On March 14, 1997.

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)
Trichloroethylene	greater than 10
Methyl Isobutyl Ketone	greater than 10
Triethylamine	greater than 10
Toluene	less than 10
TOTAL	greater than 25

- (a) The potential emissions, as defined in Indiana rule, of volatile organic compounds are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions, as defined in Indiana rule, of PM-10 are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) 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 of 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.
- (d) 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 1994 emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.8064
PM-10	0.8064
SO ₂	0.0086
VOC	80.2255
CO	0.295
HAP Naphthalene	2.79
Toluene	0.067
Xylene	0.093
NO _x	1.405

County Attainment Status

The source is located in Madison County.

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

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

Part 70 Permit Conditions

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

- (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 and 40 CFR Part 60) applicable to this source.
- (b) The degreasing facility is subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR 63, Subpart T). The source shall achieve compliance with the provisions of Subpart T no later than December 2, 1997.

The following design requirements for the degreasing operation are applicable:

- (a) Reduce the room draft as described in 63.463(e)(2)(ii).
- (b) A freeboard ratio of 0.75 or greater shall be maintained.
- (c) An automated parts handling system capable of moving parts or baskets at a speed of 3.4 meters per minute (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts shall be installed.
- (d) The degreaser shall be equipped with a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils.
- (e) The degreaser shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.
- (f) The degreaser shall have a primary condenser.
- (g) A combination of controls, including a freeboard refrigeration device, working-mode cover and super heated vapor, shall be used.
- (h) Monitoring shall be conducted on each control device used.

The following operational practices for the degreasing operation are applicable:

- (a) Parts baskets or the parts being cleaned in the degreaser shall not occupy more than fifty percent (50%) of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meters per minute (3 feet per minute) or less.
- (b) Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air.
- (c) Parts shall be oriented so that the solvent drains from them freely. Parts with holes may need to be tipped or rotated before being removed.
- (d) Parts or baskets shall not be removed from any solvent cleaning machine before dripping has stopped.
- (e) During startup, the primary condenser shall be turned on before the sump heater.
- (f) During shutdown, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.
- (g) When solvent is added or drained, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent pump shall be located beneath the liquid solvent surface.
- (h) The machine and associated controls shall be maintained as recommended by the manufacturers of the equipment or by EPA approved alternative methods.

- (i) Each operator shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in appendix B of Subpart T, if requested during an inspection.
- (j) Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers that may contain a pressure relief device.
- (k) Sponges, fabric, wood, and paper products shall not be cleaned.

State Rule Applicability - Entire Source

326 IAC 2-2-1 Prevention of Significant Deterioration

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), this source is a major source. This status includes those activities at the source that are considered insignificant activities. This source became a major source after changing degreaser solvents from 1,1,1 Trichloroethane to trichloroethylene. The BV and Ford Final, Subaru and Mazda paint booths were subsequently added as modifications subject to 326 IAC 2-2. These modifications to an existing major source are not major because the VOC emissions are less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2 and 40 CFR 52.21, the PSD requirements do not apply to these modifications.

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's. 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)

Pursuant to 326 IAC 6-3 (Particulate Emission Limitations), the PM from the eleven (11) paint booths shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

P = process weight rate in tons per hour

Pursuant to CP 095-7134-00048 issued on June 9, 1997, CP 095-5277-00056 issued on February 26, 1996 and CP 095-3771-00056 issued on August 29, 1994, the overspray from the paint booths shall be considered in compliance provided that the overspray is not::

- (a) visibly detectable at the exhaust;
- (b) detectable on the rooftops; or
- (c) causing any nuisance problems.

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at all spray booths shall 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.

Based on the MSDS submitted by the source and calculations made, the paint booth is in compliance with this requirement.

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

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

- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) The owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Compliance Monitoring

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

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

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

1. The twelve (12) spray booths have applicable compliance monitoring conditions as specified below:
 - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation.
 - (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed.
 - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary to show compliance with 326 IAC 6-3-2.

2. The coatings used in the twelve (12) spray booths have applicable monitoring conditions as specified below:
 - (a) Record keeping of information sufficient to show that VOC emissions may not be discharged in excess of 3.5 lb VOC per gallon of coating, less water.

These monitoring conditions are necessary to show compliance with 326 IAC 8-2-9.

3. The degreaser has applicable monitoring conditions as specified below:
 - (a) Ensure that the chilled air blanket temperature measured at the center of the air blanket of the freeboard refrigeration device is no greater than thirty percent (30%) of the solvent's boiling point. A thermometer or thermocouple shall be used to measure the temperature at the center of the air blanket during the idling mode.
 - (b) Ensure that flow or movement of air across the top of the freeboard area of the solvent cleaning machine, or within the solvent cleaning machine enclosure, does not exceed 15.2 meters per minute (50 feet per minute) at any time as measured using the procedures in 63.466(d).
 - (i) The Permittee shall conduct initial and quarterly monitoring of wind speed within six (6) inches above the top of the freeboard area of the solvent cleaning machine as follows:
 - (A) Determine the direction of the wind current by slowly rotating a velometer or similar device until the maximum speed is located.
 - (B) Orient a velometer in the direction of the wind current at each of the four corners of the machine.
 - (C) Record the reading for each corner.

- (D) Average the values obtained at each corner and record the average wind speed.
- (c) Establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in 63.466(d).
 - (i) Monitor initially and weekly, the room parameters established during the initial compliance test that are used to achieve the reduced room draft.
- (d) Monitor the hoist speed as follows:
 - (i) Determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute).
 - (ii) Monitoring shall be conducted monthly. If after the first year, no exceedances of the hoist speed are measured, the owner or operator may begin monitoring the hoist speed monthly.
 - (iii) If an exceedance of the hoist speed occurs during quarterly monitoring, the monitoring frequency returns to monthly until another year of compliance without an exceedance is demonstrated.
 - (iv) If an owner or operator can demonstrate to EPA's satisfaction in the initial compliance report that the hoist cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including the first year of compliance.
- (e) If any of the requirements of the above (a,b or c) are not met, the Permittee shall determine whether an exceedance has occurred.
 - (i) An exceedance has occurred if (c) has not been met; or
 - (ii) An exceedance has occurred if (a) or (b) have not been met and are not corrected within fifteen (15) of detection. Adjustments or repairs shall be made to the solvent cleaning system or control device to reestablish required levels. The parameter must be remeasured immediately upon adjustment or repair and demonstrated to be within required limits.

These monitoring conditions are necessary in order to show compliance with 40 CFR Part 63, Subpart T - National Emission Standards for Halogenated Solvent Cleaning.

Toxic Emissions

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

- (a) This source will emit levels of air toxics greater than those that constitute major source

applicability according to Section 112 of the Clean Air Act.

- (b) Since this source has no new construction or reconstruction, 326 IAC 2-1-3.4 New Source Toxics Control, does not apply.

Conclusion

The operation of this automotive fuel tank and exhaust system manufacturing shall be subject to the conditions of the attached proposed **Part 70 Permit No. T095-7668-00048**.

**Appendix A: Emissions Calculations
From Surface Coating Operations**

Company Name: ELSA, LLC.
Address City IN Zip: 1240 South SR 37, Elwood, IN 46036
Part 70 No.: T095-7668-00048
Reviewer: RJP
Date: July 9, 1997

VOC & PM

Material	Paint															
	Density (Lb/Gal)	Weight% Volatile (H2O& Organics)	Weight% Water	Weight% Organics	Volume % Water	Volume% Non-Vol (solids)	Max. Cons. Rate		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
							(lbs/hr)	(gals/hr)								
PVC Penguin Coat (S14)	12.50	5.00%	0.00%	5.00%	0.00%	8.95%	87.500	7.00	0.63	0.63	4.38	105.00	19.16	91.02	6.98	75%
PPG (W40640) (S15)	8.93	54.67%	30.98%	23.69%	33.40%	37.23%	24.290	2.72	3.18	2.12	5.75	138.10	25.20	12.06	5.68	75%
PPG (W40640) (S16)	8.93	54.67%	30.98%	23.69%	33.40%	37.23%	24.660	2.74	3.18	2.12	5.80	139.12	25.39	12.15	5.68	75%
Aluminum Enamel (S17)	9.57	36.60%	0.00%	36.60%	0.00%	48.80%	5.360	0.56	3.50	3.50	1.95	46.91	8.56	7.41	7.18	50%
Plaswax (S34)	7.16	46.00%	0.00%	46.00%	0.00%	50.00%	47.180	6.59	3.29	3.29	21.70	520.92	95.07	27.90	6.59	75%
Plaswax (S35)	7.16	46.00%	0.00%	46.00%	0.00%	50.00%	47.180	6.59	3.29	3.29	21.70	520.87	95.06	27.90	6.59	75%
Aluminum Enamel (S41)	9.57	36.60%	0.00%	36.60%	0.00%	48.80%	8.610	0.90	3.50	3.50	3.15	75.66	13.81	11.96	7.18	50%
PPG (W40640) (S42)	8.93	54.67%	30.98%	23.69%	33.40%	37.23%	25.020	2.780	3.18	2.12	5.88	141.15	25.76	12.32	5.68	75%
PPG (W40640) (S43)	8.93	54.67%	30.98%	23.69%	33.40%	37.23%	15.030	1.670	3.18	2.12	3.53	84.79	15.47	7.40	5.68	75%
Penguin Coat RD5131 (S44)	11.1	6.86%	0.00%	6.86%	0.00%	95.00%	79.55	7.14	0.76	0.76	5.44	130.48	23.81	80.83	0.80	75%
Trichloroethylene S(3)	12.16	99.90%	0.00%	99.90%	0.00%	0.00%	27.97	2.3	12.15	12.15	27.94	670.56	122.38	0.00	0.00	100%
TOTAL										107.23	2573.55	469.67	290.95			

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lbs/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per day/24
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) * Average Consumption (gal/day)
Potential VOC Tons per Year = Pounds of VOC per day *365 days/yr /2000 lbs/ton
Particulate Potential Tons per Year =Average Consumption (gal/day)* Density (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *365 days/yr *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Potential PM emissions, after control:

290.95 ton/yr x (1-0.95) = **14.55 ton/yr**

Appendix A: Emission Calculations

Company Name: ELSA, LLC.
 Address, City, IN Zip: 1240 South SR 37, Elwood, IN 46036
 Part 70 No.: T095-7668-00048
 Reviewer: Jay Patterson
 Date: 10/21/97

1. From Welding Process

Number of Welding Stations	Maximum Throughput of Weld Wire/Metal (lbs/hr)	Maximum Wire/Metal Consumed per Station (lbs/hr)	Electrode Type	PM-10 5.2 (tons/yr)	HAP		
					Cr 0.01 (tons/yr)	Mn 3.18 (tons/yr)	Ni 0.01 (tons/yr)
8	399456	5.7	E70S	1.03859	0.0019973	0.635135	0.0019973
16	798912	5.7	E70S	2.07717	0.0039946	1.2702701	0.0039946
1	7393.44	0.844	E70S	0.01922	3.697E-05	0.0117556	3.697E-05
4	15768	0.45	E70S	0.041	7.884E-05	0.0250711	7.884E-05
10	499320	5.7	E70S	1.29823	0.0024966	0.7939188	0.0024966
14	206035.2	1.68	E70S	0.53569	0.0010302	0.327596	0.0010302
4	176251.2	5.03	E70S	0.45825	0.0008813	0.2802394	0.0008813
9	447811.2	5.68	E70S	1.16431	0.0022391	0.7120198	0.0022391
17	845865.6	5.68	E70S	2.19925	0.0042293	1.3449263	0.0042293
23	120686.52	0.599	E70S	0.31378	0.0006034	0.1918916	0.0006034
11	547324.8	5.68	E70S	1.42304	0.0027366	0.8702464	0.0027366
31	336734.4	1.24	E70S	0.87551	0.0016837	0.5354077	0.0016837
18	100915.2	0.64	E70S	0.26238	0.0005046	0.1604552	0.0005046

Total 11.7064 0.0225124 7.158933 0.0225124

METHODOLOGY

Emission factors are from AP42 Table 12.19-1 and 12.19-2, the units are lbs/1000 lb of electrode consumed

Throughput (lbs/yr) = Maximum wire consumed per station (lbs/hr) * 8760 (hrs/yr)

Pollutant Emission (tons/yr) = Throughput (lbs/yr) * Emission Factor (lbs/1000 lbs)/1000/2000 (lbs/ton)

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for Part 70 Operating Permit

Source Name: ELSA,LLC.
Source Location: 1240 South SR 37 , Elwood, IN 46036
County: Madison
SIC Code: 3714
Operation Permit No.: T095-7668-00048
Permit Reviewer: J. Patterson

On November 11, 1997, the Office of Air Management (OAM) had a notice published in the Anderson Herald, Anderson, Indiana, stating that ELSA, LLC. had applied for a Part 70 Operating Permit to operate a fuel tank and exhaust system manufacturing plant. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On December 2, 1997, ELSA, LLC. submitted comments on the proposed Part 70 permit. The summary of the comments is as follows. Changes are bolded for emphasis.

Comment 1:

The stack identification for emission unit 12 should be 46, not 44.

Response to Comment 1:

The OAM agrees and this description will be revised to reflect the correct stack identification.

The following changes will be made to the final part 70 permit:

1. Because of changes to the description, Emission Unit 12, Section A.2 page 6 and Section D.2 page 40 of 49, of the proposed permit, has been changed from:

(12) One (1) paint booth, identified as Touch-up, with dry filters for overspray control, and exhausting to stack 44.

to be as follows on pages 6 and 39 of 48 of the final permit:

(12) One (1) paint booth, identified as Touch-up, with dry filters for overspray control, and exhausting to stack 44 **46**.

There are no changes to other conditions or calculations due to this change in emission unit description.

The following changes in the Technical Support Document (TSD) should be noted.

1. The Emission Units and Pollution Control Equipment section, number (12), page 2 of 13, was proposed as:

(12) One (1) paint booth, identified as Touch-up, with dry filters for overspray control,

and exhausting to stack 44.

Because of changes in the description, this emission unit should be as follows:

- (12) One (1) paint booth, identified as Touch-up, with dry filters for overspray control, and exhausting to stack 44 **46**.

Comment 2:

ELSA, LLC. has increased their freeboard ratio to 1.0. Please change Condition D.1.2(i)(b) to reflect this change.

Response to Comment 2:

Condition D.1.2(i)(b) is a design requirement of the federal rule 40 CFR 63.463 (Subpart T) and can not be changed. It states that you must maintain a freeboard ratio of 0.75 or higher. The fact that ELSA, LLC. maintains the degreaser freeboard ratio at 1.0 indicates compliance with this requirement. Therefore, this condition will remain unchanged.

Comment 3:

In order to comply with Subpart T, ELSA, LLC. has opted for the control combination listed as option 6 as written in Table 2, 40 CFR 63.463.

Response to Comment 3:

It is at the discretion of the source to which control combination they use in order to comply with 40 CFR 63.463 (Subpart T). The OAM agrees with Option 6 and will revise the control combination.

The following changes will be made to the final Part 70 permit:

1. Because of a change in control combinations, Condition D.1.2(i)(g), page 34 of 49 of the proposed permit, has changed from:
 - (g) A combination of controls, including a freeboard refrigeration device, working-mode cover and super heated vapor, shall be used.

to be as follows on page 34 of 48 of the final permit:

- (g) A combination of controls, including a freeboard refrigeration device, **reduced room draft and a freeboard ratio of 1.0**, shall be used.

The following changes in the TSD should be noted:

1. The Federal Rule Applicability section (b), page 7 of 13, requirement (g), was proposed as follows:
 - (g) A combination of controls, including a freeboard refrigeration device, working-mode cover and super heated vapor, shall be used.

Because of control combination changes, this requirement should be as follows:

- (g) A combination of controls, including a freeboard refrigeration device, **reduced room draft and a freeboard ratio of 1.0**, shall be used.

Comment 4:

Please change D.1.1(5)(A) to a freeboard ratio of 1.0. This is the ratio currently maintained at ELSA, LLC.

Response to Comment 4:

D.1.1(5)(A) is a control equipment requirement of 326 IAC 8-3-5 and can not be changed. However, upon further review, it was discovered that the incorrect State rule was cited for the open top vapor degreaser operation. Rule 326 IAC 8-3-5, Cold cleaner degreaser operation and control, is applicable to cold cleaners and the degreaser used by ELSA, LLC. is an open top vapor degreaser. Therefore, rule 326 IAC 8-3-3, Open top vapor degreaser operation, is applicable and will replace the proposed cold cleaner degreaser rule.

The following changes will be made to the final Part 70 permit:

1. Because of an incorrect rule applicability, Condition D.1.1, page 33 of 49 of the proposed permit, has changed from:

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-5(a)]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):

- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

to be as follows:

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-3]

Pursuant to 326 IAC **8-3-3 (Open top vapor degreaser operation)**, the owner or operator of **an open top** vapor degreaser shall:

- (1) **equip the vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;**
- (2) **keep the cover closed at all times except when processing work loads through the degreaser;**
- (3) **minimize solvent carryout by:**
 - (A) **racking parts to allow complete drainage;**
 - (B) **moving parts in and out of the degreaser at less than 3.3 meters per minute (eleven (11) feet per minute);**
 - (C) **degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;**
 - (D) **tipping out any pools of solvent on the cleaned parts before removal; and**
 - (E) **allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry;**
- (4) **not degrease porous or absorbent materials, such as cloth, leather, wood or rope;**
- (5) **not occupy more than half of the degreaser's open top area with the**

workload;

- (6) not load the degreaser such that the vapor level drops more than fifty percent (50%) of the vapor depth when the workload is removed;**
- (7) never spray above the vapor level;**
- (8) repair solvent leaks immediately, or shut down the degreaser;**
- (9) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;**
- (10) not use workplace fans near the degreaser opening;**
- (11) not allow visually detectable water in the solvent exiting the water separator; and**
- (12) provide a permanent, conspicuous label summarizing the operating requirements.**

The above mentioned rule change also occurs in the TSD on page 9 of 13.

Upon further review, OAM has made the following changes to the final Part 70 permit (changes are bolded for emphasis):

1. Condition D.1.4(d)(ii), page 36 of 49 of the proposed permit, incorrectly states monthly monitoring. The correct frequency should be quarterly. Therefore, this condition was changed from:

(ii) Monitoring shall be conducted monthly. If after the first year, no exceedances of the hoist speed are measured, the owner or operator may begin monitoring the hoist speed monthly.

to be as follows on page 36 of 48 of the final permit:

(ii) Monitoring shall be conducted monthly. If after the first year, no exceedances of the hoist speed are measured, the owner or operator may begin monitoring the hoist speed monthly **quarterly**.

2. The ~~units for the~~ duration of time needed to correct an exceedance was omitted from Condition D.1.4(e)(ii), page 37 of 49 of the proposed permit. Therefore, this condition was changed from:

(ii) An exceedance has occurred if (a) or (b) have not been met and are not corrected within fifteen (15) of detection. Adjustments or repairs shall be made to the solvent cleaning system or control device to reestablish required levels. The parameter must be remeasured immediately upon adjustment or repair and demonstrated to be within required limits.

to be as follows on page 36 of 48 of the final permit:

(ii) An exceedance has occurred if (a) or (b) have not been met and are not corrected within fifteen (15) **days** of detection. Adjustments or repairs shall be made to the solvent cleaning system or control device to reestablish required levels. The

parameter must be remeasured immediately upon adjustment or repair and demonstrated to be within required limits.

3. Condition 3.1, page 45 of 49 of proposed permit, inadvertently refers to particulate emissions from woodworking facilities. The particulate emissions are from welding facilities, therefore, this condition was changed from:

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking facilities shall not exceed 9.03 pounds per hour when operating at a process weight rate of 6,500 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

to be as follows on page 44 of 48 of the final permit:

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking **welding** facilities shall not exceed 9.03 pounds per hour when operating at a process weight rate of 6,500 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

4. The last two lines of Condition B.8 (Duty to Supplement and Provide Information), on page 10 of 49 of the proposed permit, have been deleted:

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

to be as follows, on page 10 of 48 of the final permit:

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

5. The first word in subsections (a)(1) and (a)(2) of Condition C.21 (Emission Statement) on page 28 of 49 of the proposed permit have been changed from "Contain" to "Indicate".
6. The Table of Contents has been updated to reflect the above mentioned changes.