

# **PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT**

**Carpenter Industries, Inc.  
1100 Industries Road  
Richmond, Indiana 47375**

(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.: T177-7681-00027	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date:

## SECTION A SOURCE SUMMARY

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

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

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The Permittee owns and operates a school bus and multi-purpose passenger vehicle bodies manufacturing plant.

Responsible Official: Mr. Marcus Kennedy  
Source Address: 1100 Industries Road, Richmond, Indiana 47375  
Mailing Address: 1100 Industries Road, Richmond, Indiana 47375  
SIC Code: 3713  
County Location: Wayne  
County Status: Nonattainment for SO<sub>2</sub>  
Attainment for all other criteria pollutants  
Source Status: Part 70 Permit Program  
Major Source, Section 112 of the Clean Air Act  
Major Source, under PSD

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

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

- (1) One (1) Surface coating booth, identified as SBP 1-1, type of product being coated is metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company), application method used is air atomization or equivalent, and exhausting to stack 001A and 001B.
- (2) One (1) Surface coating booth, identified as SBP 2-1, type of product being coated is metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company), application method used is air atomization or equivalent, and exhausting to stack 002A and 002B.
- (3) One (1) Surface coating booth, identified as SBP 3-1, type of product being coated is metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company), application method used is air atomization or equivalent, with the same or better transfer method of application, and exhausting to stack 003A and 003B.
- (4) One (1) Surface coating booth, identified as SBP 4-1, type of product being coated is metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company), application method used is air atomization or equivalent, with the same or better transfer method of application, and exhausting to stack 004A and 004B.

- (5) One (1) Surface coating booth, identified as SBI 1-2, type of product being coated is metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company), application method used is air atomization or equivalent, with the same or better transfer method of application, and exhausting to stack 005A and 005B.
- (6) One (1) Surface coating booth, identified as SBI 2-2, type of product being coated is metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company), application method used is air atomization or equivalent, with the same or better transfer method of application, and exhausting to stack 006A and 006B.
- (7) One (1) Surface coating booth, identified as SBI 3-2, type of product being coated is metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company), application method used is air atomization or equivalent, with the same or better transfer method of application, and exhausting to stack 007A and 007B.
- (8) One (1) Surface coating booth, identified as SBE 1-3, type of product being coated is metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company), application method used is air atomization or equivalent, with the same or better transfer method of application, and exhausting to stack 008A and 008B.
- (9) One (1) Surface coating booth, identified as SBE 2-3, type of product being coated is metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company), application method used is air atomization or equivalent, with the same or better transfer method of application, and exhausting to stack 009A and 009B.
- (10) One (1) Surface coating booth, identified as SBE 3-3, type of product being coated is metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company), application method used is air atomization or equivalent, with the same or better transfer method of application, and exhausting to stack 010A and 010B.
- (11) One (1) Surface coating booth, identified as SBT4-2, type of product being coated is metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company), application method used is air atomization or equivalent, with the same or better transfer method of application, and exhausting to stack 011A and 011B.
- (12) One (1) Surface coating booth, identified as SPPB1, type of product being coated is metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company), application method used is air atomization or equivalent, with the same or better transfer method of application, and exhausting to stack 016A.
- (13) Four (4) Surface coating booths, identified as CPB1, CPB2, CPB3, and CPB 4, type of product being coated is metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company), application method used is air atomization or equivalent, with the same or better transfer method of application, and exhausting to stack 017A.

- (14) Three (3) Surface coating booths, identified as UCB 1, UCB 2, and UCB 3, type of product being coated is metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company), application method used is air atomization or equivalent, with the same or better transfer method of application, and exhausting to stack 018A.
- (15) Two (2) Surface coating booths, identified as BPB1 and BPB2, type of product being coated is metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company), application method used is air atomization or equivalent, with the same or better transfer method of application, and exhausting to stack 019A, 019B, 019C and 019D.
- (16) Two (2) closed mold polyurethane foam turnstile production operation identified as EU-5.1 and EU-5.2, with total of two (2) robotic high volume low pressure (HVLP) spray application, with maximum capacity of 37.0 lbs. release agent per hour, 808.30 pounds of Isocyanates and 1,550 pounds of polyols per hour, exhausting at vents identified as V-34 and V-35.

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

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

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

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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).

## SECTION B GENERAL CONDITIONS

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

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- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

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

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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)]

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

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

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

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

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

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

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

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

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

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

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

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

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.

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

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

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- (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)]**

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

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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was based on continuous or intermittent data;
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);

- (5) Any insignificant activity that has been added without a permit revision; and
- (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

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

**B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]**

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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 facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

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

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;

- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

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

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

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- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
  - (1) The applicable requirements are included and specifically identified in this permit; or
  - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

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

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

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

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

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

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

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

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

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

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

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination**

[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

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

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]
- (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015
- Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

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

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

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

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

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

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

and

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

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

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

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

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.

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

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

**B.23 Construction Permit Requirement [326 IAC 2]**

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

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

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]
  - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
  - (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

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

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

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

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

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

B.27 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]

Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non compliance.

## 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), and 40 CFR 52.21 this source is a major source.

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

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

#### C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
- (A) Asbestos removal or demolition start date;
- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

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

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

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

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

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

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

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

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

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

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

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The Permittee:

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

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

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

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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

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

**C.12 Monitoring Methods [326 IAC 3]**

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

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

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

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

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

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

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

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

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

(c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

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

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

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

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

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

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management

Plan (RMP); and

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

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

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

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- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
    - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

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

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

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

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

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

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

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- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
  - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

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

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

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

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

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

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

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

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

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

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

### **Stratospheric Ozone Protection**

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

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

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

**SECTION D.1**

**FACILITY OPERATION CONDITIONS**

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

- (1) One (1) Surface coating booth, identified as SBP 1-1, type of product being coated is metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company), application method used is air atomization or equivalent, with the same or better transfer method of application, and exhausting to stack 001A and 001B.
- (2) One (1) Surface coating booth, identified as SBP 2-1, type of product being coated is metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company), application method used is air atomization or equivalent, with the same or better transfer method of application, and exhausting to stack 002A and 002B.
- (3) One (1) Surface coating booth, identified as SBP 3-1, type of product being coated is metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company), application method used is air atomization or equivalent, with the same or better transfer method of application, and exhausting to stack 003A and 003B.
- (4) One (1) Surface coating booth, identified as SBP 4-1, type of product being coated is metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company), application method used is air atomization or equivalent, with the same or better transfer method of application, and exhausting to stack 004A and 004B.
- (5) One (1) Surface coating booth, identified as SBI 1-2, type of product being coated is metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company), application method used is air atomization or equivalent, with the same or better transfer method of application, and exhausting to stack 005A and 005B.
- (6) One (1) Surface coating booth, identified as SBI 2-2, type of product being coated is metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company), application method used is air atomization or equivalent, with the same or better transfer method of application, and exhausting to stack 006A and 006B.
- (7) One (1) Surface coating booth, identified as SBI 3-2, type of product being coated is metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company), application method used is air atomization or equivalent, with the same or better transfer method of application, and exhausting to stack 007A and 007B.
- (8) One (1) Surface coating booth, identified as SBE 1-3, type of product being coated is metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company), application method used is air atomization or equivalent, with the same or better transfer method of application, and exhausting to stack 008A and 008B.

- (9) One (1) Surface coating booth, identified as SBE 2-3, type of product being coated is metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company), application method used is air atomization or equivalent, with the same or better transfer method of application, and exhausting to stack 009A and 009B.
- (10) One (1) Surface coating booth, identified as SBE 3-3, type of product being coated is metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company), application method used is air atomization or equivalent, with the same or better transfer method of application, and exhausting to stack 010A and 010B.
- (11) One (1) Surface coating booth, identified as SBT4-2, type of product being coated is metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company), application method used is air atomization or equivalent, with the same or better transfer method of application, and exhausting to stack 011A and 011B.
- (12) One (1) Surface coating booth, identified as SPPB1, type of product being coated is metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company), application method used is air atomization or equivalent, with the same or better transfer method of application, and exhausting to stack 016A.
- (13) Four (4) Surface coating booths, identified as CPB1, CPB2, CPB3, and CPB 4, type of product being coated is metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company), application method used is air atomization or equivalent, with the same or better transfer method of application, and exhausting to stack 017A.
- (14) Three (3) Surface coating booths, identified as UCB 1, UCB 2, and UCB 3, type of product being coated is metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company), application method used is air atomization or equivalent, with the same or better transfer method of application, and exhausting to stack 018A.
- (15) Two (2) Surface coating booths, identified as BPB1 and BPB2, type of product being coated is metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company), application method used is air atomization or equivalent, with the same or better transfer method of application, and exhausting to stack 019A, 019B, 019C and 019D.

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

### **D.1.1 Emission Limitation**

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- (a) All surface coating equipment was installed prior to the effective dates of 326 IAC 2-2 and 326 IAC 8.
- (b) Any change or modification that would lead to an increase in allowable emissions greater than exempt levels, as specified in 326 IAC 2-1, shall be subject to New Source Review and must be approved by the Office of Air Management (OAM) before such change can occur.

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

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326 IAC 6-3-2 (Process Operations)

Pursuant to OP 89-08-88-0174, issued on September 14, 1984, the particulate matter (PM) overspray from the coating booths shall be limited by the following:

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

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

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

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

## **Compliance Determination Requirements**

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

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

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

### **D.1.5 Compliance Monitoring**

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When the surface coating booths are in operation the filters and baffles shall be operating at all times.

### **D.1.6 Monitoring**

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- (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 from the surface coating booth stacks (please refer to the facilities descriptions above) 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 a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

#### **D.1.7 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The volume weighted VOC content of the coatings used for each month;
  - (4) The cleanup solvent usage for each month;
  - (5) The total VOC usage for each month; and
  - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.5, and D.1.6 the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### **D.1.8 Reporting Requirements**

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A summary of information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements of this permit, upon request.

## SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (16) Two (2) closed mold polyurethane foam turnstile production operation identified as EU-5.1 and EU-5.2, with total of two (2) robotic high volume low pressure (HVLP) spray application, with maximum capacity of 37.0 lbs. release agent per hour, 808.30 pounds of Isocyanates and 1,550 pounds of polyols per hour, exhausting at vents identified as V-34 and V-35.

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

#### D.2.1 Emission Limitation [BACT 326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (New Facilities, General Reduction Requirements), and the construction permit CP # 039-9044-00086 issued on March 4, 1998.

- (a) The high volume low pressure (HVLP) spray application shall be used all the time when two (2) closed mold polyurethane turnstile production units identified as EU-5.1 and EU-5.2 are in operation.

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

- (a) The volatile organic compounds (VOC) delivered to the mold release compound shall not exceed 2.71 tons per month from each of the two (2) closed mold polyurethane turnstile production units identified as EU-5.1 and EU-5.2. This is equivalent to 7% solid content by weight in the mold release compound, based on the 0.003 gallon of the mold release use per unit.

Any change or modification in which may increase the potential VOC emissions from the two (2) closed mold polyurethane turnstile production operation identified as EU-5.1 and EU-5.2 in this BACT analysis shall be approved by the Office of Air Management (OAM).

#### D.2.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

326 IAC 6-3-2 (Process Operations)

Pursuant to CP -039-9044, issued on March 4, 1998, the particulate matter (PM) overspray from the two (2) closed mold polyurethane foam turnstile production operations, identified as EU-5.1 and EU-5.2, shall be limited by the following:

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

#### D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5 (13)]

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

## **Compliance Determination Requirements**

### **D.2.4 Testing Requirements [326 IAC 2-7-6(1)]**

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

## **Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

### **D.2.5 Reporting Requirements**

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A quarterly report will be necessary to document compliance with operation permit condition no. D.2.1 (b) shall be maintained. These records shall be kept for at least the past 36 month period and made available upon request to the Office of Air Management (OAM).

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

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Carpenter Industries, Inc.  
Source Address: 1100 Industries Road, Richmond, Indiana 47375  
Mailing Address: 1100 Industries Road, Richmond, Indiana 47375  
Part 70 Permit No.: 177-7681-00027

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

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Carpenter Industries, Inc.  
Source Address: 1100 Industries Road, Richmond, Indiana 47375  
Mailing Address: 1100 Industries Road, Richmond, Indiana 47375  
Part 70 Permit No.: 177-7681-00027

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

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

**9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD**

**9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

<b>Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)</b>	<b>Number of Deviations</b>	<b>Date of each Deviations</b>

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  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

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

Source Name: Carpenter Industries, Inc.  
Source Address: 1100 Industries Road, Richmond, Indiana 47375  
Mailing Address: 1100 Industries Road, Richmond, Indiana 47375  
Part 70 Permit No.: 177-7681-00027

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2	
<b>9</b>	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
<b>9</b>	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 <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

**Indiana Department of Environmental Management  
Office of Air Management  
Compliance Data Section**

**Quarterly Report**

Company Name: Carpenter Company  
Location: 195 County Road 15 South, Elkhart, Indiana 46515 -  
Permit No.: T 177-7681-00027  
Source: mold release compound  
Pollutant: Volatile organic compound (VOC)  
Limit: 2.71 tons/month from each production unit (EU-5.1 and EU-5.2)

**Year:** \_\_\_\_\_

Month	Usage/Emissions (tons/month)

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

## Indiana Department of Environmental Management Office of Air Management

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

#### Source Background and Description

**Source Name:** Carpenter Industries, Inc.  
**Source Location:** 1100 Industries Road, Richmond, IN 47375  
**County:** Wayne  
**SIC Code:** 3713  
**Operation Permit No.:** T177-7681- 00027  
**Permit Reviewer:** Peggy Zukas

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Carpenter Industries, Inc. relating to the operation for a school bus body manufacturing operation.

#### Permitted Emission Units and Pollution Control Equipment

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

- (1) One (1) Surface coating booth, identified as SBP 1-1, maximum number of units per hour is 1.0, type of product being coated is small bus metal, using water baffle and dry filters as control, application method used is air atomization and exhausting to stack 001A 001B.
- (2) One (1) Surface coating booth, identified as SBP 2-1, maximum number of units per hour is 2.75, type of product being coated is small bus metal, using water baffle and dry filters as control, application method used is air atomization and exhausting to stack 002A 002B.
- (3) One (1) Surface coating booth, identified as SBP 3-1, maximum number of units per hour is 2.75, type of product being coated is small bus metal, using water baffle and dry filters as control, application method used is air atomization and exhausting to stack 003A 003B.
- (4) One (1) Surface coating booth, identified as SBP 4-1, maximum number of units per hour is 5.0, type of product being coated is small bus metal, using water baffle and dry filters as control, application method used is air atomization and exhausting to stack 004A 004B.
- (5) One (1) Surface coating booth, identified as SBI 1-2, maximum number of units per hour is 1.0, type of product being coated is small bus metal, using dry filters as control, application method used is air atomization and exhausting to stack 005A 005B.
- (6) One (1) Surface coating booth, identified as SBI 2-2, maximum number of units per hour is 2.75, type of product being coated is small bus metal, using dry filters as control, application method used is air atomization and exhausting to stack 006A 006B.

- (7) One (1) Surface coating booth, identified as SBI 3-2, maximum number of units per hour is 2.75, type of product being coated is small bus metal, using dry filters as control, application method used is air atomization and exhausting to stack 007A 007B.
- (8) One (1) Surface coating booth, identified as SBE 1-3, maximum number of units per hour is 1.0, type of product being coated is small bus metal, using water baffle and dry filters as control, application method used is air atomization and exhausting to stack 008A 008B.
- (9) One (1) Surface coating booth, identified as SBE 2-3, maximum number of units per hour is 2.75, type of product being coated is small bus metal, using water baffle and dry filters as control, application method used is air atomization and exhausting to stack 009A 009B.
- (10) One (1) Surface coating booth, identified as SBE 3-3, maximum number of units per hour is 2.75, type of product being coated is small bus metal, using water baffle and dry filters as control, application method used is air atomization and exhausting to stack 010A 010B.
- (11) One (1) Surface coating booth, identified as SBT4-2, maximum number of units per hour is 0.21, type of product being coated is large and small special bus metal, using water baffle and dry filters as control, application method used is air atomization and exhausting to stack 011A 011B.
- (12) One (1) Surface coating booth, identified as SPPB1, maximum number of gallons per hour is 3.5, type of product being coated is small parts metal, using water baffle and dry filters as control, application method used is air atomization and exhausting to stack 016A.
- (13) Four (4) Surface coating booth, identified as CPB1, CPB2, CPB3, and CPB 4, maximum number of units per hour is 1.6, type of product being coated is touch-up metal, application method used is air atomization and exhausting to stack 017A.
- (14) Four (3) Surface coating booth, identified as UCB 1, UCB 2, and UCB 3, maximum number of units per hour is 2.2, type of product being coated is undercoat buses, application method used is air atomization and exhausting to stack 018A.
- (15) One (1) Surface coating booth, identified as BPB 1, maximum number of gallons per hour is 6.0, type of product being coated is prime metal parts, application method used is air atomization and exhausting to stack 019A and 019B.

### **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

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (2) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (3) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (4) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (5) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (6) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (7) Cleaners and solvents characterized as follows:
  - A) having a vapor pressure equal to or less than 2 kPa; 15mmHg; or 0.3 psi measured at 38 degrees C (100<sup>o</sup>F) or;
  - B) having a vapor pressure equal to or less than 0.7 kPa; 5 mmHg; or 0.1 psi measured at 20<sup>o</sup>C (68<sup>o</sup>F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (8) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (9) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent.
- (10) Using 80 tons or less of welding consumables.
- (11) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (12) Heat exchanger cleaning and repair.
- (13) Paved and unpaved roads and parking lots with public access.
- (14) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (15) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following; deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (16) Filter or coalescer media change out.

### Existing Approvals

The source has been operating under the following approvals:

- (1) OP 89-08-88-0174, issued on September 14, 1984,
- (2) OP 89-08-88-0175, issued on September 14, 1984,
- (3) OP 89-08-84-0144, issued on November 19, 1980,
- (4) OP 89-08-84-0145, issued on November 19, 1980,
- (5) OP 89-08-84-0146, issued on November 19, 1980, and
- (6) Exemption, CP number was not given, issued on January 13, 1986.

### Enforcement Issue

There are no Enforcement actions pending.

### Recommendation

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

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

An administratively complete Part 70 permit application for the purposes of this review was received on January 23, 1997.

A notice of completeness letter was mailed to the source on January 23, 1997.

### Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in the application.

### 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 <sub>2</sub>	less than 250
VOC	greater than 250
CO	less than 250
NO <sub>x</sub>	less than 250

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)
Butyl Cellosolve	less than 10
DGME	less than 10
Glycol ethers	greater than 25
MEK	greater than 25
Methyl isobutyl ketone	greater than 10 less than 25
Toulene	greater than 25
Xylene	greater 25
TOTAL	greater than 25

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

**Actual Emissions**

The following table shows the actual emissions submitted by the applicant.

Pollutant	Actual Emissions (tons/year)
PM	1.3
PM-10	1.3
SO <sub>2</sub>	insignificant
VOC	106.5
CO	insignificant
Butyl Cellosolve	1.2
DGME	0.06
Glycol ethers	9.2
MEK	6.7
Methyl isobutyl ketone	3.2
Toulene	4.1
Xylene	4.1
NOx	insignificant

**Limited Potential to Emit**

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

Process/ facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
All surface coating booths	as determined by 6-3	as determined by 6-3	--	249	--	--	--

## County Attainment Status

The source is located in Wayne County.

Pollutant	Status
TSP	attainment
PM-10	attainment
SO <sub>2</sub>	nonattainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Wayne 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) The office boiler is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40b and 40c, Subpart Db and Dc), because the boiler was constructed in 1965 which predates the applicable rule of 1984 and 1989, respectively.
- (b) The surface coating booths are not subject to 326 IAC 12, (40 CFR 60.390, Subpart MM), because the coating booths were constructed in 1965 which predates the applicability date of 1979.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) applicable to this source.

## State Rule Applicability - Entire Source

### 326 IAC 2-2 (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. The source shall be allowed to add insignificant activities not already in the permit.

### 326 IAC 2-6 (Emission reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of volatile organic compounds and particulate matter 10. Pursuant to this rule, the owner /operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1, of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

### 326 IAC 5-1 (Visible Emissions Limitations)

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

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

### State Rule Applicability - Individual Facilities

#### 326 IAC 8 (Volatile Organic Compound Rules)

The surface coating booths are exempt from all article 8 rules since the booths were constructed in 1965 which predates state rules.

#### 326 IAC 6-3-2 (Process Operations)

Pursuant to OP 89-08-88-0174, issued on September 14, 1984, the particulate matter (PM) overspray from the coating booths shall be limited by the following:

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

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

Compliance is shown by using both dry filters and water baffles or just dry filters as overspray control.

### Compliance Requirements

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

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

### Air Toxic Emissions

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

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act.
- (b) 326 IAC 2-1-3.4 (New source toxics control) rule is not applicable to this source since the facilities or process lines were constructed and reconstructed prior to the effective date (July 27, 1997) of this rule.

### **Conclusion**

The operation of this school bus body manufacturing operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T177-7681-00027**.

## Indiana Department of Environmental Management Office of Air Management

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

**Source Name:** Carpenter Industries, Inc.  
**Source Location:** 1100 Industries Road, Richmond, IN 47375  
**County:** Wayne  
**SIC Code:** 3713  
**Operation Permit No.:** T177-7681- 00027  
**Permit Reviewer:** Peggy Zukas

On October 29, 1997, the Office of Air Management (OAM) had a notice published in the Palladium Item, in Richmond, Indiana, stating that Carpenter Industries, Inc. had applied for a Part 70 Operating Permit to operate a school bus body manufacturing operation. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On November 21, 1997, Carpenter Industries, Inc. submitted comments on the proposed Part 70 permit. The summary of the comments is as follows:

**Comment 1:**

Carpenter Industries, Inc. would like to include a second Bonderite line paint booth identified as BPB2.

**Response to Comment 1:**

Changes will be made to the final Part 70 permit to include an additional paint booth identified as BPB2. There will be no additional requirements since this booth was constructed in 1966 which predates state rules. However, any change or modification that would lead to an increase in allowable emissions greater than exempt levels, as specified in 326 IAC 2-1, shall be subject to New Source Review and must be approved by the Office of Air Management (OAM) before such change can occur.

Please refer to pages 2 of 13 through 4 of 13 of the addendum regarding changes to facility description.

**Comment 2:**

Carpenter Industries, Inc. would like to remove all references to maximum number of "units per hour".

**Response to Comment 2:**

Since the maximum number of units per hour will vary OAM has agreed to remove "units per hour". Changes will be made to the final Part 70. Please refer to pages 2 of 13 through 4 of 13 of the addendum regarding changes to facility description.

**Comment 3:**

Carpenter Industries, Inc. has requested that the words "small bus metal," "large and small special bus metal," "small parts metal," "touch-up metal," "undercoat buses," and "prime metal parts" be changed to "metal and other materials related to bus or similar vehicle manufacturing."

**Response to Comment 3:**

Changes will be made to the final Part 70. Please refer to pages 2 of 13 through 4 of 13 of the addendum regarding changes to facility description.

**Comment 4:**

Carpenter Industries, Inc. has requested that the description of the control equipment be changed from "water baffle and dry filters as control" to "dry filters as control".

**Response to Comment 4:**

Changes will be made to the final Part 70. Please see below for changes in facility description.

**Comment 5 :**

Carpenter Industries, Inc. has requested that the reference to "air atomization" as the application method be changed to "air atomization or equivalent."

**Response to Comment 5:**

Changes will be made to the final Part 70 permit. Please see below for changes in facility description.

**Upon further review, OAM has determined that the following will be added to the permit:**

1. The phrase "with the same or better transfer method of application" will be added to facility description.
2. In section A.2 page 4 of 37 and section D.1 page 27 of 37 the facilities described in No. (14) will be changed from four (4) to three (3) coating booths.

Because of facility description changes mentioned above, each coating booth in sections A.2 and D.1 of the permit and 2 of 7 of the TSD have been revised as follows:

- (1) One (1) Surface coating booth, identified as SBP 1-1, ~~maximum number of units per hour is 1.0; type of product being coated is small bus metal, using water baffle and dry filters as control,~~ **metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company),** application method used is air atomization **or equivalent,** and exhausting to stack 001A **and** 001B.
- (2) One (1) Surface coating booth, identified as SBP 2-1, ~~maximum number of units per hour is 2.75, type of product being coated is small bus metal, using water baffle and dry filters as control,~~ **metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company),** application method used is air atomization **or equivalent,** and exhausting to stack 002A **and** 002B.
- (3) One (1) Surface coating booth, identified as SBP 3-1, ~~maximum number of units per hour is 2.75, type of product being coated is small bus metal, using water baffle and dry filters as control,~~ **metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company),** application method used is air atomization **or equivalent,** with the same or better transfer method of application, and exhausting to stack 003A **and** 003B.
- (4) One (1) Surface coating booth, identified as SBP 4-1, ~~maximum number of units per hour is 5.0; type of product being coated is small bus metal, using water baffle and dry filters as control,~~ **metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company),** application method used is air atomization **or equivalent,** with the same or better transfer method of application, and exhausting to stack 004A **and** 004B.

- (5) One (1) Surface coating booth, identified as SBI 1-2, ~~maximum number of units per hour is 1.0~~, type of product being coated is ~~small bus metal, using water baffle and dry filters as control~~, **metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company)**, application method used is air atomization **or equivalent**, with the same or better transfer method of application, and exhausting to stack 005A and 005B.
- (6) One (1) Surface coating booth, identified as SBI 2-2, ~~maximum number of units per hour is 2.75~~ type of product being coated is ~~small bus metal, using water baffle and dry filters as control~~, **metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company)**, application method used is air atomization **or equivalent**, with the same or better transfer method of application, and exhausting to stack 006A and 006B.
- (7) One (1) Surface coating booth, identified as SBI 3-2, ~~maximum number of units per hour is 2.75~~ , type of product being coated is ~~small bus metal, using water baffle and dry filters as control~~, **metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company)**, application method used is air atomization **or equivalent**, **with the same or better transfer method of application**, and exhausting to stack 007A and 007B.
- (8) One (1) Surface coating booth, identified as SBE 1-3, ~~maximum number of units per hour is 1.0~~ type of product being coated is ~~small bus metal, using water baffle and dry filters as control~~, **metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company)**, application method used is air atomization **or equivalent**, **with the same or better transfer method of application**, and exhausting to stack 008A and 008B.
- (9) One (1) Surface coating booth, identified as SBE 2-3, ~~maximum number of units per hour is 2.75~~, type of product being coated is ~~small bus metal, using water baffle and dry filters as control~~, **metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company)**, application method used is air atomization **or equivalent**, **with the same or better transfer method of application**, and exhausting to stack 009A and 009B.
- (10) One (1) Surface coating booth, identified as SBE 3-3, ~~maximum number of units per hour is 2.75~~, type of product being coated is ~~small bus metal, using water baffle and dry filters as control~~, **metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company)**, application method used is air atomization **or equivalent**, **with the same or better transfer method of application**, and exhausting to stack 010A and 010B.
- (11) One (1) Surface coating booth, identified as SBT4-2, ~~maximum number of units per hour is 0.24~~, type of product being coated is ~~small bus metal, using water baffle and dry filters as control~~, **metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company)**, application method used is air atomization **or equivalent**, **with the same or better transfer method of application**, and exhausting to stack 011A and 011B.

- (12) One (1) Surface coating booth, identified as SPPB1, ~~maximum number of gallons per hour is 3.5, type of product being coated is small bus metal, using water baffle and dry filters as control,~~ **metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company)**, application method used is air atomization **or equivalent, with the same or better transfer method of application**, and exhausting to stack 016A.
- (13) Four (4) Surface coating booths, identified as CPB1, CPB2, CPB3, and CPB 4, ~~maximum number of units per hour is 1.6, type of product being coated is small bus metal, using water baffle and dry filters as control,~~ **metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company)**, application method used is air atomization **or equivalent, with the same or better transfer method of application**, and exhausting to stack 017A.
- (14) ~~Four~~ Three (3) Surface coating booths, identified as UCB 1, UCB 2, and UCB 3, ~~maximum number of units per hour is 2.2, type of product being coated is small bus metal, using water baffle and dry filters as control,~~ **metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company)**, application method used is air atomization **or equivalent, with the same or better transfer method of application**, and exhausting to stack 018A.
- (15) ~~One (1)~~ Two (2) Surface coating booths, identified as BPB1 **and BPB2**, ~~maximum number of units per hour is 6.0, type of product being coated is small bus metal, using water baffle and dry filters as control,~~ **metal and other materials related to bus or similar vehicle manufacturing, using dry filters as control (water baffle may be used as voluntary control by the company)**, application method used is air atomization **or equivalent, with the same or better transfer method of application**, and exhausting to stack 019A, 019B, **019C and 019D**.

**Comment 6:**

Carpenter Industries, Inc. requested that Section C.13 be revised as follows:

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

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

within ninety (90) days after **such a request for a plan is requested by the IDEM, OAM**.

Carpenter Industries, Inc. justification is the following:

"The justification for such a change is twofold. First, although Carpenter is a major VOC source, and thus could potentially impact ozone levels, Wayne County is presently in attainment of the ozone standard. Second, there is no history of any past air pollution emergency in Wayne county. These plans should be required only if Wayne County becomes nonattainment for ozone."

**Response to Comment 6:**

Office of Air Management (OAM) has reviewed Carpenter Industries, Inc. request to include the wording "requested by the IDEM" to Emergency Reduction Plan section C.13 (a)(b) conditions. According to the state rule 326 IAC 1-5-2 (Emergency Reduction Plans), "All persons responsible for the operation of a source that has the potential to emit one hundred (100) tons per year, or more, of any pollutant shall prepare, and submit to the commissioner, for approval, written emergency reduction plans consistent with safe operating procedures". Companies are not exempt from the provisions of this rule because of their location in an attainment county. Furthermore, a company is not exempt from this rule due to the fact that the county has had no history of past air pollution emergencies. Thus, OAM has concluded that Carpenter Industries, Inc. shall prepare a written emergency reduction plan consistent with safe operating procedures, as required by the permit. No changes will be made on the final permit.

**Comment 7 :**

Carpenter Industries, Inc. has requested that the reference of "Compliance Monitoring Plan - Failure to Take Response Steps" be included in section C.15.

**Response to Comment 7:**

On page 22 of 37 in section C.15 the Compliance Monitoring Plan - Failure to Take Response Steps" will be added as follows:

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

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
    - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

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

Preceding conditions have been renumbered due to these deletions.

**Comment 8 :**

Carpenter Industries, Inc. has noted that Ms. Stephanie Hutchings is not the Responsible Official as referenced in the permit. The correct Responsible Official name is Mr. Marcus Kennedy, the Chief Operating Officer.

**Response to Comment 8:**

Ms. Stephanie Hutchings is not the Responsible Official as referenced in section A.1, page 4 of 37, of the permit. The correct Responsible Official name is Mr. Marcus Kennedy, the Chief Operating Officer. Section A.1 has been changed as follows:

The Permittee owns and operates a school bus body manufacturing operation.

Responsible Official: ~~Stephanie Hutchings~~ **Mr. Marcus Kennedy**  
Source Address: 1100 Industries Road, Richmond, Indiana 47375  
Mailing Address: 1100 Industries Road, Richmond, Indiana 47375  
SIC Code: 3713  
County Location: Wayne  
County Status: Nonattainment for SO2  
Source Status: Part 70 Permit Program  
Major Source, Section 112 of the Clean Air Act  
Major Source, under PSD

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

In section D.1, two (2) conditions, Monitoring in section D.1.6 on page 29 of 37 and Record Keeping Requirements on page 30 of 37, have been added to the permit to assure compliance of the operation by using dry filters. The addition will read as follows:

**D.1.6 Monitoring**

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, 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.

Preceding conditions have been renumbered due to these additions.

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

#### **D.1.7 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The volume weighted VOC content of the coatings used for each month;
  - (4) The cleanup solvent usage for each month;
  - (5) The total VOC usage for each month; and
  - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.5, and D.1.6, 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.

**Preceding conditions have been renumbered due to these additions.**

OAM has incorporated the permitted units and corresponding conditions and requirements under NSR construction permit, issued on March 4, 1998, CP # 039-9044-00086 into the Title V permit. The following revisions were made to the Title V permit and TSD:

1. On page 4 of 37, section A.2, of the permit and 2 of 7 of the TSD the following equipment have been added:

**(16) Two (2) closed mold polyurethane foam turnstile production operation identified as EU-5.1 and EU-5.2, with total of two (2) robotic high volume low pressure (HVLP) spray application, with maximum capacity of 37.0 lbs. release agent per hour, 808.30 pounds of Isocyanates and 1,550 pounds of polyols per hour, exhausting at vents identified as V-34 and V-35.**

The following equipment are insignificant and will not be specified in the permit on page 4 of 37.

- (17) One(1) fixed roof above ground storage tank identified as MLD-1, for storage of Isocyanates, has the diameter, height and annual throughput as: 10 feet, 14 feet and 131,549 gallons per year respectively.**
- (18) One (1) fixed roof above ground storage tank identified as MLD-2, for storage of Polyols-soft, has the diameter, height and annual throughput as: 10 feet, 14 feet, and 323,546 gallons per year respectively.**
- (19) One (1) fixed roof above ground storage tank identified as MLD-3, for storage of Polyols-hard, has the diameter, height and annual throughput as: 10 feet, 14 feet, and 310,408 gallons per year respectively.**

2. The following is an additional section D.2 on page 31 of 37 of the permit:

<p>(16) Two (2) closed mold polyurethane foam turnstile production operation identified as EU-5.1 and EU-5.2, with total of two (2) robotic high volume low pressure (HVLP) spray application, with maximum capacity of 37.0 lbs. release agent per hour, 808.30 pounds of Isocyanates and 1,550 pounds of polyols per hour, exhausting at vents identified as V-34 and V-35.</p>
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### **Emission Limitations and Standards [326 IAC 2-7-5(1)]**

#### D.2.1 Emission Limitation [BACT 326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (New Facilities, General Reduction Requirements), and the construction permit CP # 039-9044-00086 issued on March 4, 1998.

- (a) The high volume low pressure (HVLP) spray application shall be used all the time when two (2) closed mold polyurethane turnstile production units identified as EU-5.1 and EU - 5.2 are in operation.

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

- (a) The volatile organic compounds (VOC) delivered to the mold release compound shall not exceed 2.71 tons per month from each of the two (2) closed mold polyurethane turnstile production units identified as EU-5.1 and EU-5.2 . This is equivalent to 7% solid content by weight in the mold release compound, based on the 0.003 gallon of the mold release use per unit.

Any change or modification in which may increase the potential VOC emissions from the two (2) closed mold polyurethane turnstile production operation identified as EU-5.1 and EU-5.2 in this BACT analysis shall be approved by the Office of Air Management (OAM).

**D.2.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]**

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**326 IAC 6-3-2 (Process Operations)**

Pursuant to CP -039-9044, issued on March 4, 1998, the particulate matter (PM) overspray from the two (2) closed mold polyurethane foam turnstile production operations, identified as EU-5.1 and EU-5.2, shall be limited by the following:

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

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

**D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5 (13)]**

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

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Testing of this facility is not specifically required by this permit. If testing is required, compliance with the volatile organic compounds limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. However, this does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

**Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**D.2.5 Reporting Requirements**

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A log of information necessary to document compliance with operation permit condition no. D.2.1 (b) shall be maintained. These records shall be kept for at least the past 37 month period and made available upon request to the Office of Air Management (OAM).

3. On page 4 of 7 of the TSD has been revised as follows:

**Emission Calculations**

**The calculation for the closed mold polyurethane process: (EU-5.1 and EU-5.2) are found below. All other calculations submitted by the applicant have been verified and found to be accurate and correct.**

**This process emits small amounts of toluene diisocyanate (TDI), 4-4, Methylenediphenyl Diisocyanate (MDI) and Diethanolamine (DEOA), which are hazardous air pollutants (HAPs). Similar rates for MDI, TDI and DEOA are calculated using the "MDI / Polymeric MDI Reporting Guidelines For the Polyurethane Industry: for Section 313 of EPCRA and State Reporting (Completing EPA's From R)."**

**Toluene Diisocyanate (TDI):**

**Polyurethane foam industry TDI emission factor at 50 lb. TDI / 1,000,000 lbs.**

**Potential Emissions = wt. % HAP x gal /unit x unit/ hr x e.f. x 8760 hrs./year x ton/2000**

**in tons per year**

$$= 0.81 \times 10.16 \times 0.121 \times 480 \times 5.0 \times 10^{-5} \times 8760 \times 1/2000 \\ = 0.010 \text{ ton / year}$$

**4-4 Methylenediphenyl Diisocyanate (MDI):**

**MDI emissions are calculated as follows:**

$$\begin{aligned} \text{Saturated Vapor Pressure (SVC)}_{\text{ppm}} &= \frac{(\text{MDI VP (MM Hg.)}) \times 10^6}{\text{Barometric Pressure (mm Hg.)}} \\ &= \frac{1.4 \times 10^{-3} \times 10^6 \text{ mm Hg.}}{760 \text{ mm Hg.}} \\ &= 1.84 \text{ ppm} \end{aligned}$$

$$\begin{aligned} \text{Saturated Vapor Pressure (SVC)}_{\text{lbs/ft}^3} &= 1.84 \text{ ppm} \times (10.2 \text{ mg/M}^3 \text{ MDI/1 ppm}) \times \\ &= (2.2 \text{ lb./1} \times 10^6 \text{ mg}) \times (1 \text{ M}^3 / 35.31 \text{ ft}^3) \\ &= 1.2 \times 10^{-6} \text{ lbs/ft}^3 \end{aligned}$$

$$\begin{aligned} \text{Total Volume of mold in ft}^3 &= \text{no.of mold} \times \text{mold volume} \\ &= 2 \times (2 \text{ ft}^3) \\ &= 4 \text{ ft}^3 / \text{mold} \end{aligned}$$

$$\begin{aligned} \text{Total MDI released per mold frequency} &= (1.2 \times 10^{-6} \text{ lbs/ft}^3) \times (4 \text{ ft}^3) \\ &= 4.80 \times 10^{-6} \text{ lbs. / mold} \end{aligned}$$

$$\begin{aligned} \text{Total MDI released per year} &= 4.80 \times 10^{-6} \text{ lbs. / mold} \times \text{mold} / 8.13 \\ &= \text{min} \times 60 \text{ min/hr} \times 24 \text{ hr/ day} \times 365 \\ &= \text{days/year} \times 1 \text{ ton/2000 lbs.} \\ &= 1 \times 10^{-3} \text{ Tons per year} \end{aligned}$$

**Diethanolamine (DEOA):**

$$\begin{aligned} \text{DEOA potential emissions} &= 0.87 \times 9.0 \times 0.006 \times 480 \times 1.0 \text{ E}^{-5} \times 4.38 \\ &= 9.9 \text{ E}^{-4} \text{ ton/year} \end{aligned}$$

**(b) Storage Tank Emissions:**

Storage tanks emissions were calculated using the TANKS 3.0 programs. This calculation was based on the worst case assumption. The emissions are summarized as follows:

Tank Identification	Total Loses in lb.
MLD-1	13.40
MLD-2	157.00
MLD-3	157.00
<b>Total Emissions in tons per year</b>	<b>0.160</b>

4. On page 5 of 7 the following actual emissions will be changed because of the additional emissions from the new equipment installed:

Pollutant	Actual Emissions (tons/year)
PM	<del>4.3</del> 1.5
PM-10	<del>4.3</del> 1.5
SO <sub>2</sub>	insignificant
VOC	<del>406.5</del> 124.9
CO	<del>insignificant</del> 2.15
Butyl Cellosolve	1.2
DGME	0.06
Glycol ethers	9.2
MEK	6.7
Methyl isobutyl ketone	3.2
Toluene	4.1
Xylene	4.1
NOx	<del>insignificant</del> 9.20

5. On page 5 of 7 of the TSD will be amended because of new equipment being installed:

**Limited Potential to Emit**

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

Process/ facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
All surface coating booths	as determined by 6-3	as determined by 6-3	--	249	--	--	--
Two closed mold polyurethane foam turnstile EU-5.1 and EU-5.2	as determined by 6-3	as determined by 6-3	--	2.71 tons/month	--	--	--

6. On page 6 of 7 and 7 of 7 of the TSD the following condition will be added since new equipment has been installed:

**Federal Rule Applicability**

**(d) 40 CFR Part 60, Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels**

The volatile organic liquid storage tanks identified as MLD-1, MLD-2 and MLD-3 are not applicable to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110, Subpart Kb), because each tank has the volume of 31.20 cubic meters which is less than the applicability level of 40 cubic meters.

**State Rule Applicability - Entire Source**

**326 IAC 2-1-3.4 (New Source Toxics Control)**

This rule does not apply to two(2) closed mold polyurethane foam production facilities, because it does not have potential to emit ten (10) tons per year or more of any hazardous air pollutant or twenty-five (25) tons of any combination of hazardous air pollutants which are listed in Section 112(b) of the Clean Air Act.

**State Rule Applicability - Individual Facilities**

**326 IAC 8-4-3 Petroleum Sources: petroleum liquid storage facilities**

The storage tanks identified as MLD-1, MLD-2 and MLD-3 are not subject to this rule, because the storage tanks does not store any petroleum liquid and have capacities less than 39,000 gallons and true vapor pressure less than 10.5 kPa.

**326 IAC 8-6-1 Organic Solvent Emission Limitations**

This rule does not apply to this source, because this source commenced operation after the applicability of this rule.

**326 IAC 8-1-6 General Reduction Requirements for New Facilities**

The closed mold polyurethane processes identified as EU-5.1 and EU-5.2 are subject to this rule, because new facilities (as of January 1, 1980), which have potential emissions of 25 tons or more per year, located anywhere in the state, which are not otherwise regulated by other provisions of 326 IAC 8, shall reduce VOC emissions using the best available control technology (BACT).

The following revisions were made to the model Part 70 permit.

B.11 (Annual Compliance Certification) has been modified as follows:

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

- (a) ~~The Permittee shall annually certify that the source has complied~~ **submit a compliance certification report which addresses the status of the source'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:

**SECTION C**

- 1) C.2 (Opacity) remove the statement: "This condition is not federally enforceable."

- 2) C.3 (Open Burning) has been modified as follows:

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

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

- 3) C.4 (Incineration) remove the statement: "This condition is not federally enforceable."

- 4) C.5 (Fugitive Dust Emissions) has been modified as follows:

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). Rule 326 IAC 6-4-2(4) regarding visible dust is not federally enforceable.~~ **Only 326 IAC 6-4-2(4) is not federally enforceable.**

- 5) C.20 (General Reporting Requirements) part (a) and (b) has been revised and the rest of the condition has been re-lettered as follows:

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) ~~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 local agency when applicable)**~~

- (a) **To affirm that the source has met all the requirements stated in this permit the source shall submit a Quarterly Compliance Report. Any deviation from the requirements and the date(s) of each deviation must be reported.**

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

- (b) (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (e) (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) (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.
- (e) (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (f) (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The following are model revision for June 5, 1998:

#### Section A

- 1) A (Source Summary) has been changed as follows:

#### SECTION A

#### SOURCE SUMMARY

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

- 2) A.1 (General Information) the way to describe a nonattainment area within an attainment county has been changed as follows.

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

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County Status: **Attainment for all other criteria pollutants**

- 3) A.5 (Prior Permit Conditions Superseded) Language has been added to B.14 (Permit Shield) to address the effect of prior permit conditions.

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

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~~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

- 1) B.1 (Permit No Defense) part (b) of the condition has been changed as follows:

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

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

- 2) B.8 (Duty to Supplement and Provide Information) part (c) of the condition has been changed as follows:

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

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- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. **If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, For information claimed to be confidential, the Permittee must shall furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.**
- 3) B.11 (Annual Compliance Certification) part (c) of the condition has been changed to the following. This change includes the revision from the Guidance for Current Permit and Compliance Issues (3-19-1998).

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

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- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was **based on** continuous or intermittent **data**;
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); **and**
  - (5) **Any insignificant activity that has been added without a permit revision; and**

- ~~(5)~~ (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

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

- 4) B.12 (Preventive Maintenance Plan) has been changed as follows:

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

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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~~ **ninety (90) days (this time frame is determined on a case by case basis but no more than ninety (90) days)** after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing ~~emission 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.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.
- 5) B.14 (Permit Shield) has been changed as follows and part b of the condition has been replaced with a sentence from EPA.

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

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- (a) **This condition provides a permit shield as addressed in 326 IAC 2-7-15.**
- (b) ~~The provisions of this permit take precedence over previous conditions related to an applicable requirement established by a previously issued permit.~~ **This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.** Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
- (1) The applicable requirements are included and specifically identified in this permit; **or**

- (2) ~~IDEM, OAM, in acting on the Part 70 permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 permit includes the determination or a concise summary thereof. The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.~~
- ~~(b) (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.~~
- ~~(c) (d) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order. No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.~~
- ~~(e) (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:~~
- ~~(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;~~
  - ~~(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;~~
  - ~~(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and~~
  - ~~(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.~~
- ~~(f) (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).~~
- ~~(g) (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]~~
- ~~(h) (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]~~
- 6) B.16 (Deviations from Permit Requirements and Conditions) has been changed as follows:
- B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

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

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

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

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

- 7) B.18 (Permit Renewal) part (a) of the condition has been changed as follows:

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

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

- 8) B.19 (Administrative Permit Amendment), B.20 (Minor Permit Modification), and B.21 (Significant Permit Modification) have all been combined into one condition numbered B.19 (Permit Amendment or Modification) shown below. The new B.19 condition will read as follows:

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

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

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

- 9) B.26 (now B.24) (Inspection and Entry) remove "IDEM", since Local Agencies do not have IDEM identification cards.

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

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]
  - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
  - (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

- 10) B.27 (now B.25) (Transfer of Ownership or Operation) part (b) of the condition has been changed as follows:

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

- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. **The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

11) B.28 (now B.26) (Annual Fee Payment) has been changed as follows:

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

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. ~~or in a time period consistent with the fee schedule established in 326 IAC 2-7-19.~~ **If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.**
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (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.~~
- 2) B.27 Credible Evidence the condition has been replaced with language from EPA. This condition should only be in Part 70 permits.

B.27 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]

~~Notwithstanding the conditions of this permit specifying practices for applicable requirements, other credible evidence may also be used to establish compliance or noncompliance with applicable requirements.~~ **Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non compliance.**

**Section C**

- 1) C.1 has been changed to match the conditions in the Guidance for Current Permit and Compliance Issues (3-19-1998).

C.1 Major Source

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) **and 40 CFR 52.21**, this source is a major source.

- 2) C.2 (Particulate Matter Emission Limitations for Processes with Process Weight Rates Less Than One Hundred pounds per hour): this is a new condition from the Guidance for Current Permit and Compliance Issues (3-19-1998).

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

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

3) C.7 (Operation of Equipment) has been changed as follows:

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

All air pollution control equipments listed in this permit **and used to comply with an applicable requirement** shall be operated at all times that the emission units vented to the control equipment are in operation. ~~as described in Section D of this permit. (Be sure to specify in Section A, any equipment that does not need to be operated at all times, but only at the source's discretion.)~~

4) C.8 (Asbestos Abatement Projects- Accreditation) and C.16 (Asbestos Abatement Projects) have been combined into one condition which will read as follows:

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
  - (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
  - (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
  
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

5) C.9 (Performance Testing) changed the rule cite to 326 IAC 3-6 and added the following language:

C.9 Performance Testing ~~[326 IAC 3-2-1]~~ [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC ~~3-2-1~~ 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

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

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

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

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

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

6) C.10 (Compliance Schedule) has been changed as follows:

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

The Permittee:

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

7) C.11(Compliance Monitoring) has been changed as follows:

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

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

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

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

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

8) C.12 (Monitoring Methods) has been changed as follows:

C.12 Monitoring Methods [326 IAC 3]

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

9) C.16 (Asbestos Abatement Projects) delete this condition. It is now C.8 (Asbestos Abatement Projects) and has been revised there.

~~C.16 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]~~

~~(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.~~

~~(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:~~

~~(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or~~

~~(2) If there is a change in the following:~~

~~(A) Asbestos removal or demolition start date;~~

~~(B) Removal or demolition contractor; or~~

~~(3) Waste disposal site.~~

~~(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).~~

~~(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).~~

~~All required notifications shall be submitted to:~~

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

~~(e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.~~

~~(f) Indiana Accredited Asbestos Inspector  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.~~

10) C.13 (Emergency Reduction Plans) has been changed as follows:

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

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

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

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

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

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

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

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

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

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

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

11) C.14 (Risk Management Plan) has been changed as follows:

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

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

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

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

12) C.15 (Compliance Monitoring Plan - Failure to Take Response Steps) add the following rule cites:

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 1-6]

13) C.16 (Actions Related to Noncompliance Demonstrated by a Stack Test), add the following rule cites to the title, and add language as follows:

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

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

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

14) C.17 (Emission Statement ) part (a) of the condition has been changed as follows:

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

(a) The Permittee shall submit ~~an certified~~, annual emission statement **certified pursuant to the requirements of 326 IAC 2-6**, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

15) C.19 (General Record Keeping Requirements) has been changed as follows:

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

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location **for a minimum of three (3) years** and available **upon the request** ~~within one (1) hour upon verbal request~~ of an IDEM, OAM, representative, ~~for a minimum of three (3) years. They~~ **The records** may be stored elsewhere for the remaining two (2) years **as long as they are available upon request** ~~providing they are made available within thirty (30) days after written request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.~~

16) C.20 (General Reporting Requirements) change "Quality" to "Quarterly", and change the language as follows:

C.20 General Reporting Requirements ~~[326 IAC 2-7-5(3)(C)]~~

(a) To affirm that the source has met all the **compliance monitoring** requirements stated in this permit the source shall submit a ~~Quality~~ **Quarterly Compliance Monitoring** Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

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

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.

(e) All instances of deviations **as described in Section B- Deviations from Permit Requirements Conditions** must be clearly identified in such reports. ~~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.

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

## Section D

- 1) D (Facility Operation Conditions) the following rule cite was added to the facility description box in all D sections.

### SECTION D.? FACILITY OPERATION CONDITIONS

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

- 2) The (Testing Requirements) have been changed as follows.

~~D.1.6 and D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)]~~

~~Testing of The Permittee is not required to test this facility is not specifically required by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the (pollutant) limit specified in Condition D.x.x 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.~~

- 3) D.1.6 (Monitoring) has been changed as follows.

~~D.1.6 Monitoring~~

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray from the surface coating booth stack(s) (S1, S2, S3) 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~~ **a noticeable change in overspray emission, or evidence of overspray emission** is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
  
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Carpenter Industries, Inc.  
Source Address: 1100 Industries Road, Richmond, Indiana 47375  
Mailing Address: 1100 Industries Road, Richmond, Indiana 47375  
Part 70 Permit No.: 177-7681-00027

**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:

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 <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

~~Attach a signed certification to complete this report.~~

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

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

Source Name: Carpenter Industries, Inc.  
 Source Address: 1100 Industries Road, Richmond, Indiana 47375  
 Mailing Address: 1100 Industries Road, Richmond, Indiana 47375  
 Part 70 Permit No.: 177-7681-00027

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

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

**9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD**

**9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD. LIST EACH COMPLIANCE MONITORING REQUIREMENT EXISTING FOR THIS SOURCE:**

<b>Compliance Monitoring Requirement</b> (e.g. Permit Condition D.1.3)	<b>Number of Deviations</b>	<b>Date of each Deviations</b>	<del>— No —</del> <del>— Deviations —</del>

Form Completed By: \_\_\_\_\_  
 Title/Position: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

Attach a signed certification to complete this report.