

**CONSTRUCTION PERMIT
OFFICE OF AIR MANAGEMENT**

**Certified Metal Finishers
1210 E. Seymour Street
Muncie, Indiana 47307**

This permit is issued to the above mentioned company (herein known as the Permittee) under the provisions of 326 IAC 2-1 and 40 CFR 52.780, with conditions listed on the attached pages.

Construction Permit No.: CP-035-9338-00042	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), and presented in the permit application.

A.1 General Information

The Permittee owns and operates a metal seat belt parts dip coating plant.

Responsible Official: Dennis Oakes
Source Address: 1210 E. Seymour Street, Muncie, Indiana 47307
Mailing Address: P.O. Box 2465, Muncie, Indiana 47307-0465
SIC Code: 3479
County Location: Delaware
County Status: Attainment for all criteria pollutants
Source Status: Minor Source, under PSD Rules

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) coating dip tank, Throughput: 66,720 seat belt latches per hour, 21.3 pounds of paint solvent blend per hour, exhausting to stack E -2.
- (b) One (1) natural gas fired curing oven, with a heat input capacity of 1.0 million Btu per hour, exhausting to stack E - 3.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is not subject to the Part 70 Permit requirements established by 326 IAC 2-7-2 (Applicability) because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

SECTION B GENERAL CONSTRUCTION AND OPERATION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

Construction Conditions [326 IAC 2-1-3.4]

B.1 General Construction Conditions

- (a) The data and information supplied with the application shall be considered part of this permit. Prior to any proposed change in construction which may affect allowable emissions, the change must be approved by the Office of Air Management (OAM).
- (b) This permit to operate does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.3 Permit Review Rules [326 IAC 2]

Notwithstanding Construction Condition B.4, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of operation permits pursuant to 326 IAC 2 (Permit Review Rules).

B.4 First Time Operation Permit [326 IAC 2-1-4]

This document shall also become a first-time operation permit pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:

- (a) The attached affidavit of construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section, verifying that the facilities were constructed as proposed in the application. The facilities covered in the Operation Permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
- (b) Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.
- (c) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1-7.1(Fees).

Operation Conditions

B.5 General Operation Conditions

- (a) The data and information supplied in the application shall be considered part of this permit. Prior to any change in the operation which may result in an increase in allowable emissions exceeding those specified in 326 IAC 2-1-1 (Construction and Operating Permit Requirements), the change must be approved by the Office of Air Management (OAM).
- (b) The Permittee shall comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC13-17) and the rules promulgated thereunder.

B.6 Preventive Maintenance Plan [326 IAC 1-6-3]

Pursuant to 326 IAC 1-6-3 (Preventive Maintenance Plans), the Permittee shall prepare and maintain a preventive maintenance plan, including the following information:

- (a) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices.
- (b) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions.
- (c) Identification of the replacement parts which will be maintained in inventory for quick replacement.

The preventive maintenance plan shall be submitted to IDEM, OAM upon request and shall be subject to review and approval.

B.7 Transfer of Permit [326 IAC 2-1-6]

Pursuant to 326 IAC 2-1-6 (Transfer of Permits):

- (a) In the event that ownership of this metal seat belt parts dip coating plant is changed, the Permittee shall notify OAM, Permit Branch, within thirty (30) days of the change. Notification shall include the date or proposed date of said change.
- (b) The written notification shall be sufficient to transfer the permit from the current owner to the new owner.
- (c) The OAM shall reserve the right to issue a new permit.

B.8 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of 326 IAC 2-1 (Permit Review Rules).

B.9 Availability of Permit [326 IAC 2-1-3(l)]

Pursuant to 326 IAC 2-1-3(l), the Permittee shall maintain the applicable permit on the premises of the source and shall make this permit available for inspection by the IDEM, or other public official having jurisdiction.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitation and Standards

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

- (a) The total source potential emissions of volatile organic compounds (VOC) and particulate matter (PM-10) are less than 250 tons per year and it is not one of the 28 source categories listed under 326 IAC 2-2. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

- (b) Any change or modification which may increase the potential VOC emissions to 250 tons per year or more from the equipment covered in this permit must be approved by the Office of Air Management (OAM) before such change may occur.

C.2 Opacity Limitations [326 IAC 5-1-2]

Pursuant to 326 IAC 5-1-2 (Visible Emission Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the visible emissions shall meet the following:

- (a) visible emissions shall not exceed an average of 40% opacity in 24 consecutive readings.
- (b) visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

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

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

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

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

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

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

C.6 Operation of Equipment

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

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

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

Compliance Monitoring Requirements

C.8 Compliance Monitoring

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

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

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

C.9 Monitoring Methods [326 IAC 3]

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

C.10 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.

Record Keeping and Reporting Requirements

C.11 Monitoring Data Availability

- (a) 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.12 General Record Keeping Requirements

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location and available within one (1) hour upon verbal request of an IDEM, OAM, representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.
- (b) Records of required monitoring information shall include, where applicable:

- (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.13 General Reporting Requirements

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.

- (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) an excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) an emergency as defined in 326 IAC 2-7-1(12);
 - (3) failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation; or
 - (4) failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.
- A permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.14 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

- (a) One (1) coating dip tank, Throughput: 66,720 seat belt latches per hour, 21.3 pounds of paint solvent blend per hour, exhausting to stack E -2.
- (b) One (1) natural gas fired curing oven, with a heat input capacity of 1.0 million Btu per hour, exhausting to stack E - 3.

Emissions Limitation and Standards

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted monthly average volatile organic compound (VOC) content of coating applied to metal seat belt parts shall be limited to:

- (a) 3.00 pounds VOC per gallon of coating less water; or
- (b) 8.40 pounds VOC per gallon of solids deposited, as per 326 IAC 8-1-2 (a)(9)

as delivered to the applicator, for oven cured coatings.

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

D.1.2 Preventive Maintenance Plan

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.1.3 Volatile Organic Compounds

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

Record Keeping and Reporting Requirements

D.1.4 Record Keeping Requirements

- (a) To document compliance with Condition 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 of VOC content of the dip coating materials and solvents 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 dip coatings used for each calendar day;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each calendar day and month; and
 - (6) The weight of VOC emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
FAX NUMBER - 317 233-5967**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE: IT HAS POTENTIAL TO EMIT 25 LBS/HR PARTICULATES ? _____, 100 LBS/HR VOC ? _____, 100 LBS/HR SULFUR DIOXIDE ? _____ OR 2000 LBS/HR OF ANY OTHER POLLUTANT ? _____ EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: Certified Metal Finishers PHONE NO. (765)286-5800

LOCATION: (CITY AND COUNTY) Muncie / Delaware
PERMIT NO. 035-9338 AFS PLANT ID: 035-00042 AFS POINT ID: _____ INSP: _____

CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/19____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/19____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL * SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY:

TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

**Please note - This form should only be used to report malfunctions
applicable to Rule 326 IAC 1-6 and to qualify for
the exemption under 326 IAC 1-6-4.**

326 IAC 1-6-1 Applicability of rule

Sec. 1. The requirements of this rule (326 IAC 1-6) shall apply to the owner or operator of any facility which has the potential to emit twenty-five (25) pounds per hour of particulates, one hundred (100) pounds per hour of volatile organic compounds or SO₂, or two thousand (2,000) pounds per hour of any other pollutant; or to the owner or operator of any facility with emission control equipment which suffers a malfunction that causes emissions in excess of the applicable limitation.

326 IAC 1-2-39 “Malfunction” definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. (Air Pollution Control Board; 326 IAC 1-2-39; filed Mar 10, 1988, 1:20 p.m. : 11 IR 2373)

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for New Construction and Operation

Source Background and Description

Source Name: Certified Metal Finishers
 Source Location: 1210 E. Seymour Street, Muncie, Indiana 47307
 County: Delaware
 Construction Permit No.: CP-035-9338-00042
 SIC Code: 3479
 Permit Reviewer: Jon C. Akin

The Office of Air Management (OAM) has reviewed an application from Certified Metal Finishers relating to the construction and operation of a dip coating line, consisting of the following equipment:

- (a) One (1) coating dip tank, Throughput: 66,720 seat belt latches per hour, 21.3 pounds of paint solvent blend per hour, exhausting to stack E -2.
- (b) One (1) natural gas fired curing oven, with a heat input capacity of 1.0 million Btu per hour, exhausting to stack E - 3.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
E -2	Dip Tank	32	1	1000	70
E - 3	Curing Oven	32	2	2500	120

Recommendation

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

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

An application for the purposes of this review was received on December 29, 1997, with additional information received on February 16, March 3, March 23, and April 1, 1998.

Emissions Calculations

See Appendix A (Emissions Calculation Spreadsheets) for detailed calculations (three pages).

Total Potential and Allowable Emissions

Indiana Permit Allowable Emissions Definition (after compliance with applicable rules, based on 8,760 hours of operation per year at rated capacity):

Pollutant	Allowable Emissions (tons/year)	Potential Emissions (tons/year)
Particulate Matter (PM)	0.1	0.1
Particulate Matter (PM10)	0.1	0.1
Sulfur Dioxide (SO ₂)	-	-
Volatile Organic Compounds (VOC)	70.04	70.04
Carbon Monoxide (CO)	0.1	0.1
Nitrogen Oxides (NO _x)	0.4	0.4
Single Hazardous Air Pollutant (HAP)	7.48	7.48
Combination of HAPs	7.48	7.48

- (a) The potential emissions before control are equal to the allowable emissions, therefore, the allowable emissions are used for the permitting determination.
- (b) Allowable emissions (as defined in the Indiana Rule) of volatile organic compounds (VOC) are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, Sections 1 and 3, a construction permit is required.

County Attainment Status

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Delaware County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Delaware County has been classified as attainment or unclassifiable for particulate matter (PM-10), carbon monoxide (CO), sulfur dioxide (SO₂), lead, and total suspended particles (TSP). Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	-
PM10	-
SO ₂	-
VOC	14.54
CO	0.1
NO _x	0.5

- (a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.
- (b) These emissions were based on the previously issued Registration CP-035-3882-00042.

Proposed Modification

PTE from the proposed modification (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Pollutant	PM (ton/yr)	PM10 (ton/yr)	SO ₂ (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO _x (ton/yr)
Proposed Modification	0.1	0.1	-	12.0	0.1	0.4
PSD Threshold Level	250	250	250	250	250	250

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit **CP-035-9338-00042**, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This status is based on all the air approvals issued to the source. This status has been verified by the OAM inspector assigned to the source.

Federal Rule Applicability

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

There are no National Emission Standards for Hazardous Air Pollutants (40 CFR 61 and 63) applicable to this facility.

State Rule Applicability

326 IAC 2-6 (Emission Reporting)

This facility is not subject to 326 IAC 2-6 (Emission Reporting), because the source is located in Delaware County and emits less than 100 tons/yr of VOC.

326 IAC 5-1-2 (Visible Emissions Limitations)

The source is subject to this rule except as provided in 326 IAC 5-1-3 (Temporary Exemptions).

Pursuant to 326 IAC 5-1-2 the visible emissions shall meet the following:

- (a) visible emissions shall not exceed an average of 40% opacity in 24 consecutive readings.
- (b) visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

326 IAC 6-3-2 (PM Process Operation)

The source is not subject to this rule because the dip coating operation has no potential emissions for particulate matter (PM).

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

This facility is not subject to 326 IAC 8-1-6 because the rule 326 IAC 8-2-9 applies.

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

- (a) The dip coating line is subject to this rule because:
 - (i) it applies coatings to metal parts classified under the Standard Industrial Classification Code major group # 34;
 - (ii) it was constructed after July 1, 1990 with actual emissions greater than 15 pounds of VOC per day; and
 - (iii) it is not limited by any other sections of this rule.
- (b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coatings applied to metal seat belt components shall be limited to:

Coatings	Limit (pounds of VOC/gallon of coating less water delivered to the applicator)
Oven Cured Coat	3.00

- (c) Solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
- (d) The facility shall comply with this rule by using coatings with:
 - (i) a volume weighted monthly average VOC content of 3.00 lb VOC per gallon of coating less water; or
 - (ii) a volume weighted monthly average VOC content of 8.40 lb VOC per gallon of solids deposited, as per 326 IAC 8-1-2 (a)(9).

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) Construction Permit Application Form Y.

- (a) This new dip coating line will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Amendments to Clean Air Act.
- (b) See attached spreadsheets for detailed air toxic calculations.
- (c) This new dip coating line is not subject to 326 IAC 2-1-3.4 (New Source Toxics Control) because potential emissions of a single HAP are less than 10 tons per year and potential emissions of total HAPs are less than 25 tons per year.

Conclusion

The construction of this dip coating line will be subject to the conditions of the attached proposed **Construction Permit No. CP-035-9338-00042.**

Mail to: Permit Administration & Development Section
Office Of Air Management
100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015

Certified Metal Finishers
P.O. Box 2465
Muncie, Indiana 47307-0465

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)
4. I hereby certify that Certified Metal Finishers, 1210 E. Seymour Street, Muncie, Indiana, 47307, has constructed the dip coating operation in conformity with the requirements and intent of the construction permit application received by the Office of Air Management on December 29, 1997 and as permitted pursuant to **Construction Permit No. CP-035-9338, Plant ID No. 035-00042** issued on _____

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature

Date

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana on this _____ day of _____, 19 _____.

My Commission expires: _____

Signature

Name (typed or printed)

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Certified Metal Finishers
Address City IN Zip: 1210 E. Seymour St., Muncie, IN 47307-0465
CP: 035-9338
Plt. ID: 035-00042
Reviewer: Jon Alkin
Date: 04/03/98

Material	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)		Maximum gallon of coating per hour	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
EPC - 1586C	8.54	76.00%	60.0%	16.0%	61.5%	20.30%	1.00000	1.712	3.56	1.37	2.34	56.28	10.27	0.00	6.75	100%
Kolor-N-Kote	9.90	44.80%	31.5%	13.3%	37.4%	35.50%	1.00000	1.724	2.10	1.31	2.27	54.40	9.93	0.00	3.70	100%
Magni B06/SC 150 1st	10.55	49.33%	0.0%	49.3%	0.0%	23.17%	1.00000	1.723	5.20	5.20	8.97	215.21	39.28	0.00	22.46	100%
Magni B17/PM Acetate 2nd	9.15	62.81%	0.0%	62.8%	0.0%	25.85%	1.00000	2.225	5.75	5.75	12.79	306.90	56.01	0.00	22.23	100%
Magni B06/SC 150 1st	10.55	49.33%	0.0%	49.3%	0.0%	23.17%	1.00000	1.637	5.20	5.20	8.52	204.47	37.32	0.00	22.46	100%
Magni A04/ PM Acetate 2nd	9.22	70.25%	0.0%	70.3%	0.0%	18.78%	1.00000	1.062	6.48	6.48	6.88	165.09	30.13	0.00	34.49	100%
Magni B06/SC 150 1st	10.55	49.33%	0.0%	49.3%	0.0%	23.17%	1.00000	1.637	5.20	5.20	8.52	204.47	37.32	0.00	22.46	100%
Magni P06G/PM Acetate 2nd	8.82	75.07%	0.0%	75.1%	0.0%	16.52%	1.00000	2.415	6.62	6.62	15.99	383.76	70.04	0.00	40.08	100%

State Potential Emissions

Add worst case coating to all solvents

70.04

METHODOLOGY

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

HAP Emission Calculations

Company Name: Certified Metal Finishers
Plant Location: 1210 E. Seymour St., Muncie, IN 47307-0465
County: Delaware
Permit Reviewer: Jon Akin
Date: 04/03/98

Material	Density (Lb/Gal)		Maximum gallons of coating per hour	Weight % Xylene	Weight % Ethyl Benzene	Weight % Napthalene	Weight % Glycol Ethers	Xylene Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Napthalene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)
EPC - 1586C	8.54	1.0000	1.712	0.00%	0.00%	0.00%	7.00%	0.00	0.00	0.00	4.48
Kolor-N-Kote	9.90	1.0000	1.724	0.00%	0.00%	0.00%	10.00%	0.00	0.00	0.00	7.48
Magni B06/SC 150 1st	10.55	1.0000	1.723	0.00%	0.00%	1.54%	0.00%	0.00	0.00	1.23	0.00
Magni B17/PM Acetate 2nd	9.15	1.0000	2.225	1.38%	0.00%	0.00%	0.00%	1.23	0.00	0.00	0.00
Magni B06/SC 150 1st	10.55	1.0000	1.637	0.00%	0.00%	1.54%	0.00%	0.00	0.00	1.16	0.00
Magni A04/ PM Acetate 2nd	9.22	1.0000	1.062	0.81%	0.00%	0.00%	0.00%	0.35	0.00	0.00	0.00
Magni B06/SC 150 1st	10.55	1.0000	1.637	0.00%	0.00%	1.54%	0.00%	0.00	0.00	1.16	0.00
Magni P06G/PM Acetate 2nd	8.82	1.0000	2.415	1.05%	0.15%	0.00%	0.00%	0.98	0.14	0.00	0.00

Maximum Potential Emissions for a Single Coating	1.23	0.14	1.23	7.48
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METHODOLOGY

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

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

Company Name: Certified Metal Finishers
Address City IN Zip: 1210 E. Seymour St., Muncie, IN 47307-0465
CP: 035-9338
Plt ID: 035-00042
Reviewer: Jon Akin
Date: 04/03/98

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

1.0

8.8

Pollutant

	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	12.0	12.0	0.6	100.0	5.3	21.0
Potential Emission in tons/yr	0.1	0.1	0.0	0.4	0.0	0.1

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton