

**CONSTRUCTION PERMIT  
OFFICE OF AIR MANAGEMENT  
and the  
ANDERSON OFFICE OF AIR MANAGEMENT**

**Delphi Interior and Lighting Systems  
2915 Pendleton Avenue  
Anderson, Indiana 46016**

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-095-9440-00005	
Issued by: Paul Dubenetzky, Branch Chief 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), and presented in the permit application.

### A.1 General Information

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The Permittee owns and operates a surface coating line for plastic automobile lamp lenses.

Responsible Official: Michael K. Stout  
Source Address: 2915 Pendleton Avenue, Anderson, Indiana 46016  
Mailing Address: 2915 Pendleton Avenue, Mail Box 18, Anderson, Indiana 46016  
SIC Code: 3714, 3647  
County Location: Madison  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Major Source, under PSD Rules

### A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) one (1) parts washer, identified as K-37-1P IPA wash, using isopropyl alcohol to wash plastic automobile lamp lenses, with a maximum capacity of 300 lenses per hour and using 0.00333 gallons of isopropyl alcohol per lense, with emissions exhausting to stack K-37-1P IPA wash;
- (b) one (1) spray coating booth, identified as K-37-1P booth, with:
  - (a) a maximum capacity of 300 plastic automobile lamp lenses per hour,
  - (b) dry filters as control devices for overspray, and
  - (c) one (1) 10 pound per square inch (psi) spray coating gun, with an orifice size of 0.02 inches and using 0.00153 gallons of UVT200-AC5 coating per lense, with emissions exhausting to stack K-37-1P booth;
- (c) one (1) infrared flash off tunnel, identified as K-37-1P IR flash, with a maximum capacity of 300 lenses per hour, with emissions exhausting to stack K-37-1P IR flash;
- (d) one (1) ultraviolet curing oven, identified as K-37-1P UV cure, with a maximum capacity of 300 lenses per hour, with emissions exhausting to stack K-37-1P UV cure; and
- (e) one (1) material pumphouse, identified as K-37-1P Material pumphouse, used to recover and recycle coating from the spray booth and isopropyl alcohol from the parts washer, with a maximum capacity of 5 pounds of coating and/or isopropyl alcohol per hour, with emissions exhausting to stack K-37-1P Material pumphouse.

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

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This existing source has submitted their Part 70 (T-095-6894-00005) application on October 11, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

## **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**

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- (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 construct 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]**

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

#### **B.3 Revocation of Permits [326 IAC 2-1-9(b)]**

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Pursuant to 326 IAC 2-1-9(b)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

#### **B.4 Permit Review Rules [326 IAC 2]**

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Notwithstanding Operation Condition B.7, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

#### **B.5 Local Agency Requirement**

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That an application for an operation permit renewal must be made ninety (90) days before operation permit expiration to:

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

The operation permit issued by the Anderson Office of Air Management shall contain as a minimum the conditions in the Operation Conditions section of this permit.

#### **B.6 First Time Operation Permit [326 IAC 2-1-4]**

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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 Anderson Office of Air Management, verifying that the facilities were constructed as proposed in the application. The facilities covered in the Construction Permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to the Anderson Office of Air Management.

- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) Permittee shall receive an Operation Permit Validation Letter from the Director of the Anderson Office of Air Management and attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-7-19 (Fees).

## Operation Conditions

### B.7 General Operation Conditions

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

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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 and the Anderson Office of Air Management upon request and shall be subject to review and approval.

### B.9 Transfer of Permit [326 IAC 2-1-6]

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

- (a) In the event that ownership of this surface coating facility for plastic lamp lenses 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.10 Permit Revocation [326 IAC 2-1-9]**

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Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and 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.11 Availability of Permit [326 IAC 2-1-3(l)]**

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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, the Anderson Office of Air Management, or other public official having jurisdiction.

**SECTION C**

**SOURCE OPERATION CONDITIONS**

Entire Source
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**Emission Limitation and Standards**

**C.1 Major Source**

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

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

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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 Operation of Equipment**

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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.

## Compliance Monitoring Requirements

### C.4 Compliance Monitoring

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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 shall notify:

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

and;

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

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

### C.5 Monitoring Methods [326 IAC 3]

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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.

## Record Keeping and Reporting Requirements

### C.6 Annual Emission Reporting [326 IAC 2-6]

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That pursuant to 326 IAC 2-6 (Emission Reporting), the Permittee must annually submit an emission statement for the source. This statement 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 statement must be submitted to:

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

and;

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

The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 30.

### C.7 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, or Anderson Office of Air Management 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.

### C.8 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

and;

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, 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.
- (f) Any corrective actions or response steps taken as a result of an exceedance of a limit, an excursion from the parametric values, or a malfunction that may have caused excess emissions must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the postmarked submission date of the Affidavit of Construction.

#### C.9 Malfunction Condition

That pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

## SECTION D FACILITY CONDITIONS

- a) one (1) parts washer, identified as K-37-1P IPA wash, using isopropyl alcohol to wash plastic automobile lamp lenses, with a maximum capacity of 300 lenses per hour and using 0.00333 gallons of isopropyl alcohol per lense, with emissions exhausting to stack K-37-1P IPA wash;
- b) one (1) spray coating booth, identified as K-37-1P booth, with:
  - (i) a maximum capacity of 300 plastic automobile lamp lenses per hour,
  - (ii) dry filters as control devices for overspray, and
  - (iii) one (1) 10 pound per square inch (psi) spray coating gun, with an orifice size of 0.02 inches and using 0.00153 gallons of UVT200-AC5 coating per lense, with emissions exhausting to stack K-37-1P booth;
- c) one (1) infrared flash off tunnel, identified as K-37-1P IR flash, with a maximum capacity of 300 lenses per hour, with emissions exhausting to stack K-37-1P IR flash;
- d) one (1) ultraviolet curing oven, identified as K-37-1P UV cure, with a maximum capacity of 300 lenses per hour, with emissions exhausting to stack K-37-1P UV cure; and
- e) one (1) material pumphouse, identified as K-37-1P Material pumphouse, used to recover and recycle coating from the spray booth and isopropyl alcohol from the parts washer, with a maximum capacity of 5 pounds of coating and/or isopropyl alcohol per hour, with emissions exhausting to stack K-37-1P Material pumphouse.

### Emissions Limitation and Standards

#### D.1.1 BACT Minor Limitation

- (a) The input VOC including clean up solvent, minus the VOC solvent shipped out, delivered to the applicators in the parts washer and spray booth shall be limited to 24 tons per 12 month period, rolled on a monthly basis. Therefore, the Best Available Control Technology (BACT) requirements of 326 IAC 8-1-6 will not apply.
- (b) During the first 12 months of operation, the input raw material usage shall be limited such that the total VOC usage divided by the accumulated months of operation shall not exceed 2 tons per month.

#### D.1.2 Particulate Matter (PM) Process Operation (326 IAC 6-3)

The PM from the surface coating booth shall not exceed the pound per hour emission rate in the 326 IAC 6-3-2 (c) table. For process weight rates that are less than 60,000 pounds per hour and not specifically listed in this table, the following formula shall be used for interpolation of the rate of emission:

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

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

#### D.1.3 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.1.4 Volatile Organic Compounds**

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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 coating 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.

### **D.1.5 Particulate Matter (PM)**

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The dry filters for particulate matter overspray control shall be in place at all times when the spray booth is in operation.

## **Compliance Monitoring Requirements**

### **D.1.6 Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the dry filters.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

## **Record Keeping and Reporting Requirements**

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

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- (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 each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each calendar month; and
  - (5) 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.

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

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A quarterly summary of the 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, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

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

### Quarterly Report

Source Name: Delphi Interior and Lighting Systems  
 Source Address: 2915 Pendleton Avenue, Anderson, Indiana 46016  
 Mailing Address: 2915 Pendleton Avenue, Mail Box 18, Anderson, Indiana 46016  
 Construction Permit No.: CP095-9440-00005  
 Facility: One (1) parts washer, identified as K-37-1P IPA wash, and one (1) spray booth, identified as K-37-1P booth  
 Parameter: Volatile Organic Compounds  
 Limit: 24 tons (48,000 pounds) per 12 month period, rolled on a monthly basis

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

Submitted by: \_\_\_\_\_  
 Title / Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_



**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 SO<sub>2</sub>, 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:

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

Technical Support Document (TSD) for New Construction and Operation

**Source Background and Description**

Source Name:	Delphi Interior and Lighting Systems
Source Location:	2915 Pendleton Avenue, Anderson, IN 46016
County:	Madison
Construction Permit No.:	CP-095-9440-00005
SIC Code:	3714, 3647
Permit Reviewer:	Jon Akin

The Office of Air Management (OAM) has reviewed an application from Delphi Interior and Lighting Systems relating to the construction and operation of a surface coating line for plastic automobile lamp lenses, consisting of the following equipment:

- (a) one (1) parts washer, identified as K-37-1P IPA wash, using isopropyl alcohol to wash plastic automobile lamp lenses, with a maximum capacity of 300 lenses per hour and using 0.00333 gallons of isopropyl alcohol per lense, with emissions exhausting to stack K-37-1P IPA wash;
- (b) one (1) spray coating booth, identified as K-37-1P booth, with:
  - (i) a maximum capacity of 300 plastic automobile lamp lenses per hour,
  - (ii) dry filters as control devices for overspray, and
  - (iii) one (1) 10 pound per square inch (psi) spray coating gun, with an orifice size of 0.02 inches and using 0.00153 gallons of UVT200-AC5 coating per lense, with emissions exhausting to stack K-37-1P booth;
- (c) one (1) infrared flash off tunnel, identified as K-37-1P IR flash, with a maximum capacity of 300 lenses per hour, with emissions exhausting to stack K-37-1P IR flash;
- (d) one (1) ultraviolet curing oven, identified as K-37-1P UV cure, with a maximum capacity of 300 lenses per hour, with emissions exhausting to stack K-37-1P UV cure; and
- (e) one (1) material pumphouse, identified as K-37-1P Material pumphouse, used to recover and recycle coating from the spray booth and isopropyl alcohol from the parts washer, with a maximum capacity of 5 pounds of coating and/or isopropyl alcohol per hour, with emissions exhausting to stack K-37-1P Material pumphouse.

**Stack Summary**

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
K-37-1P IPA wash	Parts washer	51	1	2000	ambient
K-37-1P booth	Spray booth	51	2.5	4000	ambient
K-37-1P IR flash	Infrared flash off tunnel	51	0.5	200	180
K-37-1P UV cure	Ultraviolet curing oven	51	2.5	5000	180
K-37-1P Material pumphouse	Material pumphouse	51	0.5	150	ambient

**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 February 4, 1998, with additional information received on February 26, 1998.

**Emissions Calculations**

See Appendix A (Emissions Calculation Spreadsheets) for detailed calculations (two 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)	4.24	1.57
Particulate Matter (PM10)	-	-
Sulfur Dioxide (SO <sub>2</sub> )	-	-
Volatile Organic Compounds (VOC)	-	37.75
Carbon Monoxide (CO)	-	-
Nitrogen Oxides (NO <sub>x</sub> )	-	-
Single Hazardous Air Pollutant (HAP)	-	0.02
Combination of HAPs	-	0.04

- (a) Allowable emissions are determined from the applicability of rule 326 IAC 6-3. See calculations in the State Rule Applicability section.
- (b) The potential emissions before control are less than the allowable emissions, therefore, the potential emissions before control are used for the permitting determination.
- (c) 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. Madison 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) Madison County has been classified as attainment or unclassifiable for carbon monoxide (CO), particulate matter (PM-10), sulfur dioxide (SO<sub>2</sub>), total suspended particles (TSP), oxides of nitrogen (NO<sub>x</sub>), and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

### 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	less than 250
PM10	less than 250
SO <sub>2</sub>	less than 250
VOC	greater than 250
CO	less than 250
NO <sub>x</sub>	less than 250

- (a) This existing source is a major stationary source because at least one attainment regulated pollutant is emitted at a rate of 250 tons per year.

- (b) These emissions were based on the actual emissions from the source from the 1995 OAM emission data.

**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 <sub>2</sub> (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO <sub>x</sub> (ton/yr)
Proposed Modification	0.02	-	-	24	-	-
Contemporaneous Increases	0.02	-	-	24	-	-
Contemporaneous Decreases	-	-	-	-	-	-
Net Emissions	0.02	-	-	24	-	-
PSD Significant Level	25	15	40	40	100	40

- (a) This modification to an existing major stationary source is not major because the emissions 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.
- (b) The input VOC is limited to 24 tons/year, therefore, the BACT requirements of 326 IAC 8-1-6 do not apply.

**Part 70 Permit Determination**

326 IAC 2-7 (Part 70 Permit Program)

This existing source has submitted their Part 70 (T-095-6894-00005) application on October 11, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

**Federal Rule Applicability**

- (a) There are no New Source Performance Standards (326 IAC 12) and 40 CFR Part 60 applicable to this facility.
- (b) The parts washer is not subject to the National Emission Standard for Hazardous Air Pollutants, 326 IAC 14, (40 CFR 63.460, Subpart T) because it does not use any halogenated HAP solvents.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (40 CFR 63, 40 CFR 61, and 326 IAC 14) applicable to this source.

## State Rule Applicability

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

This facility is subject to 326 IAC 2-6 (Emission Reporting), because the source emits more than 100 tons/yr of VOC. Pursuant to this rule, the owner/operator of this facility must annually submit an emission statement of the facility. The annual statement must be received by July 1 of each year and must contain the minimum requirements as specified in 326 IAC 2-6-4.

### 326 IAC 6-3 (PM process operation)

The source is subject to this rule for the PM overspray from the surface coating operations because no other 326 IAC 6 rules apply:

The surface coating booth shall comply with 326 IAC 6-3-2(c) using the following equation:

$$E = 4.10P^{0.67} \quad \text{where: } E = \text{rate of emission in pounds per hour,} \\ P = \text{process weight in tons per hour, if} \\ P \text{ is equal to or less than 60,000 lbs/hr (30 tons/hr)}$$

The surface coating booth complies with this rule by using dry filters as overspray control devices.

### 326 IAC 8-1-6 (New facilities; general reduction requirements)

The surface coating line is subject to this rule since it is a new facility which is not subject to any other 326 IAC 8 rules and it has potential volatile organic compound (VOC) emissions of 25 tons per year or more. The applicant has chosen to accept a VOC limitation of 24 tons per year for the surface coating line. Therefore, the applicant is not subject to 326 IAC 8-1-6 or BACT analysis (Best Available Control Technology).

## 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 surface coating line for plastic automobile lamp lenses 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 source 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 surface coating line for plastic automobile lamp lenses will be subject to the conditions of the attached proposed **Construction Permit No. CP-095-9440-00005**.

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

Addendum to the  
 Technical Support Document for New Construction and Operation

Source Name: Delphi Interior and Lighting Systems  
 Source Location: 2915 Pendleton Avenue, Anderson, IN 46016  
 County: Madison  
 Construction Permit No.: CP-095-9440-00005  
 SIC Code: 3714, 3647  
 Permit Reviewer: Jon Akin

On March 23, 1998, the Office of Air Management (OAM) had a notice published in the Anderson Herald, Anderson, Indiana, stating that Delphi Interior and Lighting Systems had applied for a construction permit to construct and operate a surface coating line for plastic automobile lamp lenses with dry filters as overspray control devices. The notice also stated that OAM proposed to issue a permit for this installation 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 April 27, 1998, Delphi Interior and Lighting Systems submitted comments on the proposed construction permit. The summary of the comments and corresponding responses is as follows (changes are bolded for emphasis):

Comment 1: Page 4 of 19, Section A, Condition A.1  
 The responsible official is Michael K. Stout, not Michael W. McFall.

Response 1: The Office of Air Management agrees with the proposed comment. Condition No. A.1 is revised as follows:

The Permittee owns and operates a surface coating line for plastic automobile lamp lenses.

Responsible Official: **Michael K. Stout**  
 Source Address: 2915 Pendleton Avenue, Anderson, Indiana 46016  
 Mailing Address: 2915 Pendleton Avenue, Mail Box 18, Anderson, Indiana 46016  
 SIC Code: 3714, 3647  
 County Location: Madison  
 County Status: Attainment for all criteria pollutants  
 Source Status: Part 70 Permit Program  
 Major Source, under PSD Rules

Comment 2: Page 5 of 19, Section B, Condition B.5  
 The statement "that an application for an operation permit must be made ninety (90) days before start up..." is inconsistent with Condition B.6 which states "this document shall also be a first-time operation permit..." Delphi requests that the initial statement in B.5 be removed to be consistent with B.6.

Response 2: The affidavit of construction will be submitted to the Anderson Office of Air Management as the first time operation permit application. The Anderson OAM will subsequently issue the first time operation approval by a validation letter. An operation permit application for renewal shall be submitted to the Anderson OAM ninety (90) days prior to the operation permit expiration. Condition No. B.5 is revised as follows:

That an application for an operation permit **renewal** must be made ninety (90) days before ~~start up to operation permit expiration to:~~

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

~~and;~~

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

The operation permit issued by the Anderson Office of Air Management shall contain as a minimum the conditions in the Operation Conditions section of this permit.

Additionally, Condition No. B.6 is revised as follows:

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 **Anderson** 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 Construction Permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to ~~IDEM~~ **the Anderson Office of Air Management**.
- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) Permittee shall receive an Operation Permit Validation Letter from the ~~Chief of the Permit Administration & Development Section~~ **Director of the Anderson Office of Air Management** and attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-7-19 (Fees).

- Comment 3: Page 8 of 19, Section C, Condition C.3  
Remove open burning requirements because they are inappropriate, duplicative, and unnecessarily restrictive to paint booth construction and operation.
- Response 3: Condition C.3 is a general prohibition against improper open burning that applies to all sources. This condition shall be addressed in the Permittee's Part 70 Operating Permit. At the request of the applicant this condition shall be removed.
- Comment 4: Page 8 of 19, Section C, Condition C.4  
Remove incineration requirements because they are inappropriate, duplicative, and unnecessarily restrictive to paint booth construction and operation.
- Response 4: Condition C.4 is a general prohibition against improper incineration that applies to all sources, whether the source has incinerators or not. Waste material can only be burned in equipment that meets the cited requirements. This condition shall be addressed in the Permittee's Part 70 Operating Permit. At the request of the applicant this condition shall be removed.
- Comment 5: Page 8 of 19, Section C, Condition C.5  
Remove fugitive dust emissions requirements because they are inappropriate, duplicative, and unnecessarily restrictive to paint booth construction and operation.
- Response 5: Condition C.5 is a general prohibition against fugitive dust emissions that applies to all sources. This condition shall be addressed in the Permittee's Part 70 Operating Permit. At the request of the applicant this condition shall be removed.
- Comment 6: Page 8 of 19, Section C, Condition C.7  
Remove asbestos abatement projects-accreditation requirements because they are inappropriate, duplicative, and unnecessarily restrictive to paint booth construction and operation.
- Response 6: Condition C.7 is a general prohibition for asbestos abatement projects-accreditation requirements that applies to all sources. This condition shall be addressed in the Permittee's Part 70 Operating Permit. At the request of the applicant this condition shall be removed.
- Comment 7: Page 9 of 19, Section C, Condition C.8  
The terms "installing any necessary equipment" and "initiating any required monitoring related to that equipment" are vague and ambiguous. Any requirements for installing equipment and initiating monitoring should be addressed in specific terms in section D of the permit. Delphi requests that Condition C.8 be removed.
- Response 7: Any specific monitoring requirements will be noted in Section D. Depending upon what monitoring is required, this will determine what equipment for that monitoring the source may have to install. This condition is not changed.
- Comment 8: Page 9 of 19, Section C, Condition C.9  
The comma after the word "performed" appears to make this a requirement to conduct monitoring rather than a description of methods. Delphi requests that the comma be removed.

- Response 8: At the request of the applicant, the comma specified shall be removed from Condition No. C.9.
- Comment 9: Page 9 of 19, Section C, Condition C.10  
Remove asbestos abatement projects requirements because they are inappropriate, duplicative, and unnecessarily restrictive to paint booth construction and operation.
- Response 9: Condition C.10 is a general prohibition against improper asbestos abatement projects that applies to all sources. This condition shall be addressed in the Permittee's Part 70 Operating Permit. At the request of the applicant this condition shall be removed.
- Comment 10: Page 10 of 19, Section C, Condition C.11  
While an emission statement submitted pursuant to 326 IAC 2-6 would include the emissions from this paint booth, as well as all other paint booths operated at Delphi, the requirement to submit the emission statement in a paint booth construction permit unnecessarily duplicates a requisite already established by regulation. Delphi requests that C.11 be removed.
- Response 10: It is the Office of Air Management's policy to include 326 IAC 2-6 in all state construction and operation permits for facilities at sources that are applicable to this rule. This condition is not changed.
- Comment 11: Page 11 of 19, Section C, Condition C.12  
None of the subparagraphs in C.12 have any relation to the subject of "Monitoring Data Availability." This section seems to refer to monitoring or record keeping provisions that can be addressed more effectively in sections relating to specific monitoring or record keeping requirements. Delphi requests that C.12 be removed.
- Response 11: It is correct that the title may not match the impact of the listed conditions. However, OAM believes that the condition provides information about the collection of data. This condition shall be addressed in the Permittee's Part 70 Operating Permit. At the request of the applicant this condition shall be removed.
- Comment 12: Page 11 of 19, Section C, Condition C.13  
The requirement in subsection (a) to make records kept on site available within one hour upon verbal request by an agency representative is not supported by regulation. Delphi requests that the sentence be changed as follows, "These records shall be kept at the source location ~~and available within one (1) hour upon verbal request of an IDEM, OAM and Anderson Office of Air Management representative,~~ for a minimum of three years." The requirements in subsection (d) is vague. Record keeping should be specified in the record keeping requirements of section D. Delphi requests that C.13(d) be removed.
- Response 12: Condition No. C.13 requires that records necessary to document compliance be kept at the source for a period of three (3) years, and then may be stored elsewhere for the next two (2) years provided the records can be made available within thirty (30) days after written request. Because the most recent three years worth of records must be kept at the source, it is reasonable to assume that such records can be produced within a short time frame when OAM staff requests such data. In OAM's experience, practical requests for compliance related records can be made available within one hour. Condition No. C.13 (a) is not changed. The OAM agrees with the proposed comment concerning Condition No. C.13 (d). Condition No. C.13 (d) shall be removed.

- (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, or Anderson Office of Air Management 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.~~

Comment 13: Page 12 of 19, Section C, Condition C.14  
The final sentence in subsection (e) regarding failure to respond is not appropriate to the heading "General Reporting Requirements" and is not supported by regulation. Delphi requests that the final sentence in C.14(e) be removed.

Response 13: The Office of Air Management agrees with the proposed comment. Condition No. C.14 is revised as follows:

- (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

and;

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, 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.~~ **as a result of an exceedance of a limit, an excursion from the parametric values, or a malfunction that may have caused excess emissions 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~~ **on the postmarked submission date of the Affidavit of Construction.**

Comment 14: Page 13 of 19, Section C, Condition C.15  
Remove stratospheric ozone protection requirements because they are inappropriate, duplicative, and unnecessarily restrictive to paint booth construction and operation.

Response 14: Condition C.15 is a general prohibition for stratospheric ozone protection that applies to all sources. This condition shall be addressed in the Permittee's Part 70 Operating Permit. At the request of the applicant this condition shall be removed.

Comment 15: Page 14 of 19, Section D, Condition D.1.1  
The intent of the requirement of subsection (b) is unclear. Delphi requests the condition be changed as shown: "During the first 12 months of operation, the input raw material usage shall be limited such that the total VOC usage divided by the accumulated months of operation shall not exceed ~~the limit specified~~ 2 tons per month."

Response 15: At the request of the applicant, Condition No. D.1.1 shall be revised as follows:

- (a) The input VOC including clean up solvent, minus the VOC solvent shipped out, delivered to the applicators in the parts washer and spray booth shall be limited to 24 tons per 12 month period, rolled on a monthly basis. Therefore, the Best Available Control Technology (BACT) requirements of 326 IAC 8-1-6 will not apply.
- (b) During the first 12 months of operation, the input raw material usage shall be limited such that the total **VOC** usage divided by the accumulated months of operation shall not exceed ~~the limit specified~~ **2 tons per month.**

Comment 16: Page 14 of 19, Section D, Condition D.1.2  
The cited regulation limits particulate matter to values in the table with formulas for interpolation and extrapolation. Delphi requests that the condition be changed as shown: ~~"The PM from the surface coating booth shall not exceed the pound per hour emission rate established as E in the following formula: the value for the paint booth's process weight found in the table in 326 IAC 6-3-2 (c) except that the formula in note 1 of the table for E may be used for interpolation up to a process weight of 60,000 lb/hr:~~

~~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:~~

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

Response 16: At the request of the applicant, Condition No. D.1.2 shall be revised as follows:

The PM from the surface coating booth shall not exceed the ~~pound per hour emission rate established as E in the following formula:~~ **pound per hour emission rate in the 326 IAC 6-3-2 (c) table. For process weight rates that are less than 60,000 pounds per hour and not specifically listed in this table, the following formula shall be used for interpolation of the rate of emission:**

~~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:~~

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

Comment 17: Page 14 of 19, Section D, Condition D.1.3  
Extension of the preventive maintenance plan requirement to the "facility" is not supported by regulation (326 IAC 1-6-3). Delphi requests that the condition be changed as shown: "A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit is required for ~~this facility and~~ any control devices that are a part of this emission unit."

Response 17: The requirements in 326 IAC 1-6-1 and 326 IAC 1-6-3 specify that the requirement to maintain a Preventive Maintenance Plan is applicable to any facility that is required to obtain a permit under 326 IAC 2-1-2 (Registration) and 326 IAC 2-1-4 (Operating Permits). This condition is not changed.

Comment 18: Page 15 of 19, Section D, Condition D.1.5  
The statement of this condition is confusing. Delphi requests that the statement be changed as shown: "Dry filters for particulate matter overspray control shall be in ~~operation~~ place at all times when the spray booth is in operation."

Response 18: At the request of the applicant, Condition No. D.1.5 shall be revised as follows:  
The dry filters for particulate matter overspray control shall be in ~~operation~~ **place** at all times when the spray booth is in operation.

Comment 19: Page 15 of 19, Section D, Condition D.1.6  
In subsection (a), paint booth filters are replaced on a regular schedule that coincides with the productive use of that booth. The filter media remains in place until removed during the next replacement. In addition, daily observation of overspray is neither practical nor safe because of limited access to the building roof and inclement weather. These requirements are unnecessarily burdensome. Delphi requests that D.1.6 (a) be replaced with the following requirement: "Paint booth filters will be replaced and properly positioned at the conclusion of paint booth cleaning activity. Placement and integrity will be documented by initialing and dating a checklist."

In subsection (b), weekly observation of the overspray deposited on the rooftop is neither practical nor safe because of limited access to the building roof and inclement weather. A Compliance Response containing troubleshooting contingency and response steps is not supported by an applicable requirement. Finally, section C - Compliance Monitoring Requirements contains no response steps. A requirement to follow them becomes irrelevant. Delphi requests that D.1.6 (b) be removed.

In subsection (c), reference to “additional inspections and preventative measures” is not supported by an applicable requirement. Elements of the preventive maintenance plan should be addressed in conditions relating specifically to that applicable requirement. Delphi requests that D.1.6 (c) be removed.

Response 19: The Office of Air Management agrees with the proposed comments relating to D.1.6 subsections (a) and (b). However, subsection (c) shall be renumbered as subsection (b) due to the requirements in 326 IAC 1-6-1 and 326 IAC 1-6-3. Daily inspections of the dry filters are still required to maintain compliance with 326 IAC 6-3. Condition No. D.1.6 is revised as follows:

- (a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the dry filters. ~~To monitor the performance of the dry filters, daily observations shall be made of the overspray while the booth is in operation. Failure to take response steps in accordance with Section C – Compliance Monitoring Requirements, 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. Compliance response 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. Failure to take response steps in accordance with Section C – Compliance Monitoring Requirements, shall be considered a violation of this permit.~~
- ~~(c)~~ (b) Additional inspections and preventative measures shall be performed as prescribed in the Preventive Maintenance Plan.

Comment 20: Page 15 of 19, Section D, Condition D.1.7  
In subsection (a), record keeping requirements are not consistent with condition D.1.1 and are unnecessarily burdensome. Daily record keeping is not required to demonstrate compliance with a monthly limit. Also, notwithstanding the requirement to demonstrate applicability of 326 IAC 2-1-3.4, the condition to record HAP content is not supported by an applicable requirement. Finally, solvents are not normally used for cleanup. Any solvent used in this manner would be collected for off-site disposal and not be a factor of VOC emissions. Delphi requests that D.1.7 be changed as shown:

- (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 3) shall be taken daily and 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 and HAPs content monthly volume 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) 2~~ The volume weighted VOC content of the coatings used ~~for each calendar day~~ that month; and
- ~~(4)~~ The cleanup solvent usage for each month;
- ~~(5)~~ The total VOC usage for each ~~calendar day and month~~; and
- ~~(6) 3~~ The weight of VOC emitted for each compliance period.

Response 20: The Office of Air Management agrees with the proposed comments concerning daily record keeping and HAP content of the coating materials. Condition No. D.1.7 is revised as follows:

- (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 ~~daily and~~ 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 ~~and HAPs~~ 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 calendar day~~;
  - ~~(4) 3~~ The cleanup solvent usage for each month;
  - ~~(5) 4~~ The total VOC usage for each ~~calendar day and~~ month; and
  - ~~(6) 5~~ 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.

Upon further review, OAM has made the following changes (changes are bolded for emphasis):

Comment 21: A new Condition No. C.15 shall be added to address malfunction conditions. The previous Condition No. C.15 shall be renumbered as C.16. The new Condition C.15 shall be as follows:

**That pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):**

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) or appointed representative upon request.**
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.**
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).**
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]**

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

Delphi Interior and Lighting Systems  
2915 Pendleton Avenue, Mail Box 18  
Anderson, Indiana 46016

**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 Delphi Interior and Lighting Systems, 2915 Pendleton Avenue, Anderson, Indiana 46016, has constructed the surface coating line for plastic automobile lamp lenses in conformity with the requirements and intent of the construction permit application received by the Office of Air Management on February 4, 1998 and as permitted pursuant to **Construction Permit No. CP-095-9440, Plant ID No. 095-00005** 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:** Delphi Interior and Lightning Systems  
**Address City IN Zip:** 2915 Pendleton Avenue, Mail Box 18, Anderson, IN 46016  
**CP:** 095-9440  
**Plt ID:** 095-00005  
**Reviewer:** Jon Alkin  
**Date:** 02/12/98

Material	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/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
UVT200-AC5	7.6	58.82%	0.0%	58.8%	0.0%	32.54%	0.00153	300.000	4.45	4.45	2.04	48.99	8.94	1.56	13.67	75%
Isopropyl Alcohol	6.6	100.00%	0.0%	100.0%	0.0%	0.00%	0.00333	300.000	6.58	6.58	6.58	157.86	28.81	0.00	ERR	100%

**State Potential Emissions**

**Add worst case coating to all solvents**

**8.62                      206.85                      37.75                      1.56**

**Particulate Potential After Control:                      0.03**  
(98% efficient dry filters)

**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:** Delphi Interior and Lightning Systems  
**Plant Location:** 2915 Pendleton Avenue, Mail Box 18, Anderson, IN 46016  
**County:** Madison  
**Permit Reviewer:** Jon Akin  
**Date:** 02/12/98

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Benzene	Weight % Hexane	Weight % Glycol Ethers	Xylene Emissions (ton/yr)	Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)
UVT200-AC5	7.6	0.00153	300.000	0.11%	0.00%	0.00%	0.16%	0.02	0.00	0.00	0.02
Total State Potential Emissions								<b>0.02</b>	<b>0.00</b>	<b>0.00</b>	<b>0.02</b>

**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