NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding a Significant Modification to a Part 70 Operating Permit for Talbert Manufacturing, Inc. in Jasper County

Significant Source Modification No.:073-41464-00025
Significant Permit Modification No.: 073-41491-00025

The Indiana Department of Environmental Management (IDEM) has received an application from Talbert Manufacturing, Inc., located at 1628 West State Road 114, Rensselaer, Indiana 47978, for a significant modification of its Part 70 Operating Permit issued on September 12, 2017. If approved by IDEM’s Office of Air Quality (OAQ), this proposed modification would allow Talbert Manufacturing, Inc. to make certain changes at its existing source. Talbert Manufacturing, Inc. has applied to add a new paint booth, identified as P11.

A copy of the permit application and IDEM’s preliminary findings are available at:
Rensselaer Public Library
208 West Susan Street
Rensselaer, IN 47978

A copy of the preliminary findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

A copy of the preliminary findings is also available via IDEM’s Virtual File Cabinet (VFC.) Please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

How can you participate in this process?

The date that this notice is posted on IDEM’s website (https://www.in.gov/idem/5474.htm) marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the air pollution impact of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.
Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM’s mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SSM 073-41464-00025 and SPM 073-41491-00025 in all correspondence.

Comments should be sent to:

Pavithra Ethi Rajan
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Ms. Pavithra Ethi Rajan or (317) 233-7511
Or dial directly: (317) 233-7511
Fax: (317) 232-6749 attn: Pavithra Ethi Rajan
E-mail: Pethiraj@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens’ Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM’s response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM’s decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Ms. Pavithra Ethi Rajan of my staff at the above address.

[Signature]
Brian Williams, Section Chief
Permits Branch
Office of Air Quality
Stephanie Culp  
Talbert Manufacturing, Inc.  
1628 West State Road 114  
Rensselaer, IN 47978  

Re: 073-41491-00025  
Significant Permit Modification

Dear Ms. Stephanie Culp:  

Talbert Manufacturing, Inc. was issued Part 70 Operating Permit Renewal No. T073-38097-00025 on September 12, 2017 for a stationary truck trailer manufacturing operation located at 1628 West State Road 114, Rensselaer, Indiana 47978. An application requesting changes to this permit was received on May 20, 2019. Pursuant to the provisions of 326 IAC 2-7-12, a Significant Permit Modification to this permit is hereby approved as described in the attached Technical Support Document.  

Please find attached the entire Part 70 Operating Permit as modified, including the following new attachment:  

Attachment B: 40 CFR 63, Subpart HHHHHH, National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations new

The permit references the below listed attachment. Since this attachment has been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of this attachment with this modification:  


Previously issued approvals for this source containing these attachments are available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.  

Previously issued approvals for this source are also available via IDEM’s Virtual File Cabinet (VFC.) Please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.  

A copy of the permit is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/. A copy of the permit is also available via IDEM's Virtual File Cabinet (VFC.) Please go to http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.

If you have any questions regarding this matter, please contact Ms. Pavithra Ethi Rajan, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 233-7511 or (800) 451-6027, and ask for Ms. Pavithra Ethi Rajan or (317) 233-7511.

Sincerely,

Brian Williams, Section Chief
Permits Branch
Office of Air Quality

Attachments: Significant Permit Modification and Technical Support Document

cc: File - Jasper County
Jasper County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch
Talbert Manufacturing, Inc.
1628 West State Road 114
Rensselaer, Indiana 47978

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

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

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<td>Master Agency Interest ID.: 39675</td>
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<td>Jenny Acker, Branch Chief</td>
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<td>Permits Branch, Office of Air Quality</td>
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Attachment B: 40 CFR 63, Subpart HHHHHH - National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations
SECTION A  SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary truck trailer manufacturing operation.

| Source Address:  | 1628 West State Road 114, Rensselaer, Indiana 47978 |
| General Source Phone Number: | (219)-866-7141 |
| SIC Code: | 3715 (Truck Trailers) |
| County Location: | Jasper |
| Source Location Status: | Attainment for all criteria pollutants |
| Source Status: | Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories |

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

(a) One (1) shot blast facility, identified as P6, constructed in 2007, using aluminum oxide abrasive, with two (2) nozzles, each with an internal diameter of 0.4375 inches and a nozzle pressure of 90 pounds per square inch gauge, using a gravity air-wash separator to reclaim and recycle abrasive, with a maximum capacity of 3,090 pounds of shot blast media per hour, blasting 3,750 pounds of truck trailers per hour, equipped with a cartridge filter for particulate control, and exhausting inside the existing manufacturing building.

(b) One (1) surface coating booth, identified as P7, constructed prior to August 7, 1977, with a total maximum capacity of 0.5 truck trailers per hour, equipped with four (4) air assisted high-volume, low pressure (HVLP) spray guns and three (3) cup guns, with dry filters as overspray control, and exhausting to stacks S5, S6, and S7.

(c) One (1) surface coating booth, identified as P10, constructed in 2006, with a maximum capacity of 1.0 truck trailers per hour, using (1) high-volume low-pressure (HVLP) spray gun, with dry filters as overspray control, and exhausting to stack S10.

Under the NESHAP 40 CFR 63, Subpart HHHHHH, this is an existing affected facility.

(d) One (1) plasma arc cutting table, identified as P1, equipped with four (4) oxy-fuel flame cutting torches and two (2) plasma cutting torches operating at 150 amperes with a maximum total cutting speed of 120 inches per minute and a maximum process weight rate of 1,470 pounds per hour of sheet steel, and exhausting to stack S1.
(e) One (1) surface coating booth, identified as P11, approved in 2019 for construction, with a maximum capacity of 1.0 truck trailers per hour, using (1) high-volume low-pressure (HVLP) spray gun, with dry filters as overspray control, and exhausting to stack S11.

Under the NESHAP 40 CFR 63, Subpart HHHHHH, this is a new affected facility.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(14)]

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

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal units per hour (MMBtu/hr) each, with a total combined heat input capacity of 10.2 MMBtu/hr consisting of:

(1) One (1) natural gas-fired space heater, identified as H28, with a maximum heat input capacity of 2.7 million British thermal units per hour, installed in 2006, and exhausting to paint booth P7;

(2) Fourteen (14) space heaters;

(3) Three (3) forced air units; and

(4) Ten (10) radiant heaters.

(b) Any unit emitting greater than 1 pound per day but less than 12.5 pounds per day or 2.5 tons per year of any combination of HAPs and less than 5 pounds per hour of PM:

(1) One (1) gas metal arc welding facility, identified as P2, equipped with thirty-four (34) gas metal arc welding units, with a maximum total electrode usage rate of 62.9 pounds per hour and exhausting to stack S2.

(2) One (1) submerged arc welding facility, identified as P3, equipped with two (2) submerged arc welding units, with a maximum total electrode usage rate of 6.67 pounds per hour, and exhausting to stack S2.

(3) One (1) shielded metal arc welding facility, identified as P4, equipped with one (1) robotic and two (2) manual shielded metal arc welding units, each with a maximum electrode usage rate of 7.14 pounds per hour, and exhausting to stack S2.

(4) One (1) plasma arc cutting table, identified as P8, equipped with two (2) water-submerged plasma arc cutting torches, operating at 0-300 amperes, with a maximum total cutting speed of 500 inches per minute.

(5) One (1) high-definition plasma arc cutting table, identified as P9, equipped with one (1) plasma arc cutting torch, operating at 120 amperes, with a maximum total cutting speed of 140 inches per minute, and controlled by a cyclone and cartridge filter for particulate control.

(c) Woodworking operations, consisting of two (2) table saws and one (1) radial arm saw, with a maximum process weight rate of 1,200 pounds of wood per hour, with less than 5 pounds per hour of PM emissions, and with emissions controlled by a dust collector, and venting indoors.
(d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons, consisting of a five hundred (500) gallon storage tank, with a monthly throughput of less than 10,000 gallons. Under 40 CFR 63, Subpart CCCCCC this is an affected unit.

(e) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

(f) The following VOC and HAP storage containers: storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons; vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

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

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

(i) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, consisting of one (1) maintenance parts cleaner, installed between 1980 and 1990, using mineral spirits. [326 IAC 8-3-2]

(j) Cleaners and solvents characterized as follows: having a vapor pressure equal to or less than 2 kiloPascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38 degrees Celsius (100 degrees Fahrenheit); or having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20 degrees Celsius (68 degrees Fahrenheit); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(k) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under the control of the owner/operator, that is, an on-site sewage treatment facility.

(l) Any operation using aqueous solutions containing less than 1 percent by weight of VOC excluding HAPs.

(m) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(n) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

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

(p) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.

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

(r) On-site fire and emergency response training approved by the department.

(s) Filter or coalescer media changeout.
A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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

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

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

B.1 Definitions [326 IAC 2-7-1]
Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]
(a) This permit, T073-38097-00025, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]
Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7][IC 13-17-12]
Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability [326 IAC 2-7-5(5)]
The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]
(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.
B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

(1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) A "responsible official" is defined at 326 IAC 2-7-1(35).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

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

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

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

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

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

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

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

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

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

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

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

The Permittee shall implement the PMPs.
(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

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

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

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

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

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

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

   - Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
   - Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
   - Facsimile Number: 317-233-6865

5. For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

   Indiana Department of Environmental Management
   Compliance and Enforcement Branch, Office of Air Quality
   100 North Senate Avenue
   MC 61-53 IGCN 1003
   Indianapolis, Indiana 46204-2251

   within two (2) working days of the time when emission limitations were exceeded due to the emergency.
The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

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

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.

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

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

B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.
(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

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

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

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

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

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

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

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

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

(a) All terms and conditions of permits established prior to T073-38097-00025 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

The Permittee’s right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).
B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

1. That this permit contains a material mistake.
2. That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
3. That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(b) A timely renewal application is one that is:

1. Submitted at least nine (9) months prior to the date of the expiration of this permit; and
(2) 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, OAQ on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12][40 CFR 72]

| (a) | Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit. |
| (b) | Any application requesting an amendment or modification of this permit shall be submitted to: |
|     | Indiana Department of Environmental Management |
|     | Permit Administration and Support Section, Office of Air Quality |
|     | 100 North Senate Avenue |
|     | MC 61-53 IGCN 1003 |
|     | Indianapolis, Indiana 46204-2251 |
|     | Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). |
| (c) | The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)] |

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

| (a) | No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit. |
| (b) | Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA. |

B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

| (a) | The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (c) without a prior permit revision, if each of the following conditions is met: |
|     | (1) The changes are not modifications under any provision of Title I of the Clean Air Act; |
|     | (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained; |
(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

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

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

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b)(1) and (c)(1). The Permittee shall make such records available, upon reasonable request, for public review.

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

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(37)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(35).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating
scenarios that are described in the terms and conditions of this permit in accordance with
326 IAC 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit
shall not be considered alternative operating scenarios. Therefore, the notification
requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]
A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]
Upon presentation of proper identification cards, credentials, and other documents as may be
required by law, and subject to the Permittee's right under all applicable laws and regulations to
assert that the information collected by the agency is confidential and entitled to be treated as
such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform
the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions
related activity is conducted, or where records must be kept under the conditions of this
permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have
access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect
any facilities, equipment (including monitoring and air pollution control equipment),
practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample
or monitor substances or parameters for the purpose of assuring compliance with this
permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize
any photographic, recording, testing, monitoring, or other equipment for the purpose of
assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]
(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the
Permittee seeks to change the ownership or operational control of the source and no
other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source
shall contain a written agreement containing a specific date for transfer of permit
responsibility, coverage and liability between the current and new Permittee. The
application shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

B.23 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.
SECTION C  SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

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

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

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

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

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

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

2) If there is a change in the following:
   (A) Asbestos removal or demolition start date;
   (B) Removal or demolition contractor; or
   (C) Waste disposal site.

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable 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) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.
Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

(a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(35).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(35).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64][326 IAC 3-8]

(a) For new units:

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

(b) For existing units:

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance to begin such monitoring. If, due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:
in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.11 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

C.12 Emergency Reduction Plans [326 IAC 2-7-5][326 IAC 2-7-6]

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

(a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.

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

C.13 Risk Management Plan [326 IAC 2-7-5(11)][40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.14 Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5][326 IAC 2-7-6]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

1. initial inspection and evaluation;
2. recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
3. any necessary follow-up actions to return operation to normal or usual manner of operation.

A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

1. monitoring results;
2. review of operation and maintenance procedures and records; and/or
3. inspection of the control device, associated capture system, and the process.

Failure to take reasonable response steps shall be considered a deviation from the permit.

The Permittee shall record the reasonable response steps taken.

### C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.

A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.

IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19]

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

1. Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

2. Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:

(AA) All calibration and maintenance records.
(BB) All original strip chart recordings for continuous monitoring instrumentation.
(CC) Copies of all reports required by the Part 70 permit.

Records of required monitoring information include the following, where applicable:

(AA) The date, place, as defined in this permit, and time of sampling or measurements.
(BB) The dates analyses were performed.
(CC) The company or entity that performed the analyses.
(DD) The analytical techniques or methods used.
(EE) The results of such analyses.
(FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.
C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)][326 IAC 2-1.1-11][40 CFR 64][326 IAC 3-8]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B -Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(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, OAQ on or before the date it is due.

(d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.19 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 applicable standards for recycling and emissions reduction.
SECTION D.1  EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) shot blast facility, identified as P6, constructed in 2007, using aluminum oxide abrasive, with two (2) nozzles, each with an internal diameter of 0.4375 inches and a nozzle pressure of 90 pounds per square inch gauge, using a gravity air-wash separator to reclaim and recycle abrasive, with a maximum capacity of 3,090 pounds of shot blast media per hour, blasting 3,750 pounds of truck trailers per hour, equipped with a cartridge filter for particulate control, and exhausting inside the existing manufacturing building.

(d) One (1) plasma arc cutting table, identified as P1, equipped with four (4) oxy-fuel flame cutting torches and two (2) plasma cutting torches operating at 150 amperes with a maximum total cutting speed of 120 inches per minute and a maximum process weight rate of 1,470 pounds per hour of sheet steel, and exhausting to stack S1.

Insignificant Activity:

(c) Woodworking operations, consisting of two (2) table saws and one (1) radial arm saw, with a maximum process weight rate of 1,200 pounds of wood planks per hour, with less than 5 pounds per hour of PM emissions, and with emissions controlled by a dust collector, and venting indoors.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

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

D.1.1 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rates from the shot blast facility (P6) and the plasma arc cutting table (P1) shall not exceed the values listed in the table below when operating at the process weight rates listed in the table below.

<table>
<thead>
<tr>
<th>Unit</th>
<th>Maximum Process Weight Rate (ton/hr)</th>
<th>326 IAC 6-3-2 Allowable PM Emission Rate (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Shot blast facility (P6)</td>
<td>3.42</td>
<td>9.35</td>
</tr>
<tr>
<td>Plasma arc cutting table (P1)</td>
<td>0.74</td>
<td>3.34</td>
</tr>
</tbody>
</table>

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

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

\[ E = 4.10 P^{0.67} \]

where \( E \) = rate of emission in pounds per hour  
and \( P \) = process weight rate in tons per hour

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

(a) A Preventive Maintenance Plan is required for the shot blast facility (P6) and its control device and the plasma arc cutting table P1. Section B - Preventive Maintenance Plan contains the Permittee’s obligation with regard to the preventive maintenance plan required by this condition.
(b) In order to assure that the woodworking operations are exempt from the requirements of 326 IAC 6-3-2, a Preventive Maintenance Plan is required for the woodworking operations and the dust collector. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

D.1.3 Particulate Control

(a) In order to assure compliance with Condition D.1.1, the cartridge filter for particulate control shall be in operation and control emissions from the shot blast facility at all times the shot blast facility is in operation.

(b) In order to assure that the woodworking operations are exempt from the requirements of 326 IAC 6-3-2, the integral dust collector for particulate control shall be in operation and control emissions from the woodworking operations at all times the units are in operation and shall operate per manufacturer's specifications.

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

D.1.4 Particulate Control Inspection

(a) An inspection shall be performed at least semi-annually on the control device controlling particulate emissions from the shot blast facility (P6). Any defective parts shall be replaced.

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

D.1.7 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.4, the Permittee shall maintain records of the results of the inspections required under Condition D.1.4.

(b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.
SECTION D.2  EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(b) One (1) surface coating booth, identified as P7, constructed prior to August 7, 1977, with a total maximum capacity of 0.5 truck trailers per hour, equipped with four (4) air assisted high-volume, low pressure (HVLP) spray guns and three (3) cup guns, with dry filters as overspray control, and exhausting to stacks S5, S6, and S7.

(c) One (1) surface coating booth, identified as P10, constructed in 2006, with a maximum capacity of 1.0 truck trailers per hour, using (1) high-volume low-pressure (HVLP) spray gun, with dry filters as overspray control, and exhausting to stack S10.

Under the NESHAP 40 CFR 63, Subpart HHHHHH, this is an existing affected facility.

(e) One (1)surface coating booth, identified as P11, approved in 2019 for construction, with a maximum capacity of 1.0 truck trailers per hour, using (1) high-volume low-pressure (HVLP) spray gun, with dry filters as overspray control, and exhausting to stack S11.

Under the NESHAP 40 CFR 63, Subpart HHHHHH, this is a new affected facility.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

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

D.2.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]
Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating booths, identified as P7, P10, and P11, shall be controlled by dry particulate filters and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

D.2.2 Miscellaneous Metal Coating [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the Permittee shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator for the surface coating booths, identified as P10 and P11.

(b) Pursuant to 326 IAC 8-2-9(f) (Miscellaneous Metal and Plastic Parts Coating Operations), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:

(1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.

(2) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.

(3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.

Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

**D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]**

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

**Compliance Determination Requirements**

**D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]**

Compliance with the VOC limit contained in Condition D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**D.2.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]**

For the surface coating booths, identified as P10 and P11, compliance with the VOC content limit in condition D.2.2(a) shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

\[
A = \frac{\sum (C \times U)}{\sum U}
\]

Where:

- \(A\) is the volume weighted average in pounds VOC per gallon less water as applied;
- \(C\) is the VOC content of the coating in pounds VOC per gallon less water as applied;
- \(U\) is the usage rate of the coating in gallons per day.

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

**D.2.6 Monitoring**

(a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray of the surface coating booth stacks S5, S6, S7, S10, and S11 while one or more of the booths are in operation. If a condition exists which should result in a response, the Permittee shall take a reasonable response. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response required by this condition. Failure to take a reasonable response shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response required by this condition. Failure to take a reasonable response shall be considered a deviation from this permit.
Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19]

D.2.7 Record Keeping Requirement

(a) To document the compliance status with Condition D.2.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.2.2.

(1) The VOC content of each coating material and solvent used less water;

(2) The amount of each coating material and solvent used on a daily basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) For surface coating booths, identified as P10 and P11, the volume weighted average VOC content less water of the coatings used for each day.

(b) To document the compliance status with Condition D.2.6, the Permittee shall maintain a log of the weekly overspray observations, daily, and monthly inspections. The Permittee shall include in its record when an observation or inspection is not performed and the reason for the lack of an observation or inspection (e.g., the process did not operate that day, week, or month).

(c) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.
SECTION D.3  EMISSIONS UNIT OPERATION CONDITIONS

**Emissions Unit Description:**

Insignificant Activity:

(i) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, consisting of one (1) maintenance parts cleaner, installed between 1980 and 1990, using mineral spirits.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

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

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operation), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements; and

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.3.2 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), the Permittee shall not operate a cold cleaning degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for this facility and its associated control device. Section B - Preventive Maintenance Plan contains the Permittee’s obligation with regard to the preventive maintenance plan required by this condition.

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

D.3.4 Record Keeping Requirements

(a) To document the compliance status with Condition D.3.1, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.
(1) The name and address of the solvent supplier.

(2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).

(3) The type of solvent purchased.

(4) The total volume of the solvent purchased.

(5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

(b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.
SECTION E.1

NESHAP

Emissions Unit Description:

Insignificant Activity:

(d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons, consisting of a five hundred (500) gallon storage tank, with a monthly throughput of less than 10,000 gallons.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements
[326 IAC 2-7-5(1)]


(a) Pursuant to 40 CFR 63.11130 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart CCCCC.

E.1.2 Gasoline Dispensing Facilities Area Sources NESHAP [40 CFR Part 63, Subpart CCCCC]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart CCCCC (included as Attachment A to the operating permit).

(1) 40 CFR 63.11110
(2) 40 CFR 63.11111(a), (b), (e), (f), (h), (i), (j), (k)
(3) 40 CFR 63.11112(a), (d)
(4) 40 CFR 63.11113 (b)
(5) 40 CFR 63.11115
(6) 40 CFR 63.11116
(7) 40 CFR 63.11130
(8) 40 CFR 63.11131
(9) 40 CFR 63.11132
SECTION E.2 NESHAP

Emissions Unit Description:

(c) One (1) surface coating booth, identified as P10, constructed in 2006, with a maximum capacity of 1.0 truck trailers per hour, using (1) high-volume low-pressure (HVLP) spray gun, with dry filters as overspray control, and exhausting to stack S10.

Under the NESHAP 40 CFR 63, Subpart HHHHHH, this is an existing affected facility.

(e) One (1) surface coating booth, identified as P11, approved in 2019 for construction, with a maximum capacity of 1.0 truck trailers per hour, using (1) high-volume low-pressure (HVLP) spray gun, with dry filters as overspray control, and exhausting to stack S11.

Under the NESHAP 40 CFR 63, Subpart HHHHHH, this is an affected facility.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]


(a) Pursuant to 40 CFR 63.340(b) the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission units listed above, except as otherwise specified in 40 CFR Part 63, Subpart HHHHHH.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

E.2.2 National Emissions Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations [40 CFR Part 63, Subpart HHHHHH]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart HHHHHH (included as Attachment B to the operating permit).

The surface coating booth P10, constructed before September 17, 2007, is an existing affected source is subject to the following requirements:

(1) 40 CFR 63.11169(c)
(2) 40 CFR 63.11170(a)(3), (b)
(3) 40 CFR 63.11171(a), (e)
(4) 40 CFR 63.11172(b)
(5) 40 CFR 63.11173(e), (f), (g)(2)(3)
(6) 40 CFR 63.11174
(8) 40 CFR 63.11176(a)
(9) 40 CFR 63.11177(a), (b), (c), (d), (g), (h)
(10) 40 CFR 63.11178
(11) 40 CFR 63.11179
(12) 40 CFR 63.11180
(13) Table 1

The surface coating booth P11 constructed after January 9, 2008 P11 is a new affected source, and is subject to the following requirements:

(1) 40 CFR 63.11169(c)
(2) 40 CFR 63.11170(a)(3), (b)
(3) 40 CFR 63.11171(a), (c)
(4) 40 CFR 63.11172(a)(2)
(5) 40 CFR 63.11173(e), (f), (g)(1)(3)
(6) 40 CFR 63.11174
(8) 40 CFR 63.11176(a)
(9) 40 CFR 63.11177(a), (b), (c), (d), (g), (h)
(10) 40 CFR 63.11178
(11) 40 CFR 63.11179
(12) 40 CFR 63.11180
(13) Table 1
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Talbert Manufacturing, Inc.
Source Address: 1628 West State Road 114, Rensselaer, Indiana 47978
Part 70 Permit No.: T073-38097-00025

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

Please check what document is being certified:

- [ ] Annual Compliance Certification Letter
- [ ] Test Result (specify)
- [ ] Report (specify)
- [ ] Notification (specify)
- [ ] Affidavit (specify)
- [ ] Other (specify)

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

Signature: 
Printed Name: 
Title/Position: 
Phone:  
Date:  

Source Name: Talbert Manufacturing, Inc.
Source Address: 1628 West State Road 114, Rensselaer, Indiana 47978
Part 70 Permit No.: T073-38097-00025

This form consists of 2 pages

<table>
<thead>
<tr>
<th>□ This is an emergency as defined in 326 IAC 2-7-1(12)</th>
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<tbody>
<tr>
<td>- The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and</td>
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<tr>
<td>- The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.</td>
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If any of the following are not applicable, mark N/A

<table>
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<tr>
<th>Facility/Equipment/Operation:</th>
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<th>Permit Condition or Operation Limitation in Permit:</th>
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<th>Description of the Emergency:</th>
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<th>Describe the cause of the Emergency:</th>
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If any of the following are not applicable, mark N/A

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

Form Completed by:____________________________
Title / Position:____________________________
Date:____________________________
Phone:____________________________
This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C - General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

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<td>Response Steps Taken:</td>
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Form Completed by:____________________________

Title / Position: ______________________________

Date:____________________________

Phone:____________________________
Electronic Code of Federal Regulations

Title 40: Protection of Environment

PART 63—NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES

Subpart HHHHHH—National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

Source: 73 FR 1759, Jan. 9, 2008, unless otherwise noted.

What This Subpart Covers

§ 63.11169 What is the purpose of this subpart?

Except as provided in paragraph (d) of this section, this subpart establishes national emission standards for hazardous air pollutants (HAP) for area sources involved in any of the activities in paragraphs (a) through (c) of this section. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission standards contained herein.

(a) Paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl), Chemical Abstract Service number 75092, in paint removal processes;

(b) Autobody refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations;

(c) Spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), collectively referred to as the target HAP to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.

(d) This subpart does not apply to any of the activities described in paragraph (d)(1) through (6) of this section.

(1) Surface coating or paint stripping performed on site at installations owned or operated by the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State), the National Aeronautics and Space Administration, or the National Nuclear Security Administration.

(2) Surface coating or paint stripping of military munitions, as defined in § 63.11180, manufactured by or for the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State) or equipment directly and exclusively used for the purposes of transporting military munitions.

(3) Surface coating or paint stripping performed by individuals on their personal vehicles, possessions, or property, either as a hobby or for maintenance of their personal vehicles, possessions, or property. This subpart also does not apply when these operations are performed by individuals for others without compensation. An individual who spray applies surface coating to more than two motor vehicles or pieces of mobile equipment per year is subject to the requirements in this subpart that pertain to motor vehicle and mobile equipment surface coating regardless of whether compensation is received.

(4) Surface coating or paint stripping that meets the definition of “research and laboratory activities” in § 63.11180.
(5) Surface coating or paint stripping that meets the definition of “quality control activities” in § 63.11180.

(6) Surface coating or paint stripping activities that are covered under another area source NESHAP.

§ 63.11170  Am I subject to this subpart?

(a) You are subject to this subpart if you operate an area source of HAP as defined in paragraph (b) of this section, including sources that are part of a tribal, local, State, or Federal facility and you perform one or more of the activities in paragraphs (a)(1) through (3) of this section:

(1) Perform paint stripping using MeCl for the removal of dried paint (including, but not limited to, paint, enamel, varnish, shellac, and lacquer) from wood, metal, plastic, and other substrates.

(2) Perform spray application of coatings, as defined in § 63.11180, to motor vehicles and mobile equipment including operations that are located in stationary structures at fixed locations, and mobile repair and refinishing operations that travel to the customer's location, except spray coating applications that meet the definition of facility maintenance in § 63.11180. However, if you are the owner or operator of a motor vehicle or mobile equipment surface coating operation, you may petition the Administrator for an exemption from this subpart if you can demonstrate, to the satisfaction of the Administrator, that you spray apply no coatings that contain the target HAP, as defined in § 63.11180. Petitions must include a description of the coatings that you spray apply and your certification that you do not spray apply any coatings containing the target HAP. If circumstances change such that you intend to spray apply coatings containing the target HAP, you must submit the initial notification required by 63.11175 and comply with the requirements of this subpart.

(3) Perform spray application of coatings that contain the target HAP, as defined in § 63.11180, to a plastic and/or metal substrate on a part or product, except spray coating applications that meet the definition of facility maintenance or space vehicle in § 63.11180.

(b) An area source of HAP is a source of HAP that is not a major source of HAP, is not located at a major source, and is not part of a major source of HAP emissions. A major source of HAP emissions is any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit any single HAP at a rate of 9.07 megagrams (Mg) (10 tons) or more per year, or emit any combination of HAP at a rate of 22.68 Mg (25 tons) or more per year.

§ 63.11171  How do I know if my source is considered a new source or an existing source?

(a) This subpart applies to each new and existing affected area source engaged in the activities listed in § 63.11170, with the exception of those activities listed in § 63.11169(d) of this subpart.

(b) The affected source is the collection of all of the items listed in paragraphs (b)(1) through (6) of this section. Not all affected sources will have all of the items listed in paragraphs (b)(1) through (6) of this section.

(1) Mixing rooms and equipment;

(2) Spray booths, ventilated prep stations, curing ovens, and associated equipment;

(3) Spray guns and associated equipment;

(4) Spray gun cleaning equipment;

(5) Equipment used for storage, handling, recovery, or recycling of cleaning solvent or waste paint; and

(6) Equipment used for paint stripping at paint stripping facilities using paint strippers containing MeCl.

(c) An affected source is a new source if it meets the criteria in paragraphs (c)(1) and (c)(2) of this section.
(1) You commenced the construction of the source after September 17, 2007 by installing new paint stripping or surface coating equipment. If you purchase and install spray booths, enclosed spray gun cleaners, paint stripping equipment to reduce MeCl emissions, or purchase new spray guns to comply with this subpart at an existing source, these actions would not make your existing source a new source.

(2) The new paint stripping or surface coating equipment is used at a source that was not actively engaged in paint stripping and/or miscellaneous surface coating prior to September 17, 2007.

(d) An affected source is reconstructed if it meets the definition of reconstruction in § 63.2.

(e) An affected source is an existing source if it is not a new source or a reconstructed source.

General Compliance Requirements

§ 63.11172 When do I have to comply with this subpart?

The date by which you must comply with this subpart is called the compliance date. The compliance date for each type of affected source is specified in paragraphs (a) and (b) of this section.

(a) For a new or reconstructed affected source, the compliance date is the applicable date in paragraph (a)(1) or (2) of this section:

(1) If the initial startup of your new or reconstructed affected source is after September 17, 2007, the compliance date is January 9, 2008.

(2) If the initial startup of your new or reconstructed affected source occurs after January 9, 2008, the compliance date is the date of initial startup of your affected source.

(b) For an existing affected source, the compliance date is January 10, 2011.

§ 63.11173 What are my general requirements for complying with this subpart?

(a) Each paint stripping operation that is an affected area source must implement management practices to minimize the evaporative emissions of MeCl. The management practices must address, at a minimum, the practices in paragraphs (a)(1) through (5) of this section, as applicable, for your operations.

(1) Evaluate each application to ensure there is a need for paint stripping (e.g., evaluate whether it is possible to re-coat the piece without removing the existing coating).

(2) Evaluate each application where a paint stripper containing MeCl is used to ensure that there is no alternative paint stripping technology that can be used.

(3) Reduce exposure of all paint strippers containing MeCl to the air.

(4) Optimize application conditions when using paint strippers containing MeCl to reduce MeCl evaporation (e.g., if the stripper must be heated, make sure that the temperature is kept as low as possible to reduce evaporation).

(5) Practice proper storage and disposal of paint strippers containing MeCl (e.g., store stripper in closed, air-tight containers).

(b) Each paint stripping operation that has annual usage of more than one ton of MeCl must develop and implement a written MeCl minimization plan to minimize the use and emissions of MeCl. The MeCl minimization plan must address, at a minimum, the management practices specified in paragraphs (a)(1) through (5) of this section, as applicable, for your operations. Each operation must post a placard or sign outlining the MeCl minimization plan in each area where paint stripping operations subject to this subpart occur. Paint stripping operations with annual usage
of less than one ton of MeCl, must comply with the requirements in paragraphs (a)(1) through (5) of this section, as applicable, but are not required to develop and implement a written MeCl minimization plan.

(c) Each paint stripping operation must maintain copies of annual usage of paint strippers containing MeCl on site at all times.

(d) Each paint stripping operation with annual usage of more than one ton of MeCl must maintain a copy of their current MeCl minimization plan on site at all times.

(e) Each motor vehicle and mobile equipment surface coating operation and each miscellaneous surface coating operation must meet the requirements in paragraphs (e)(1) through (e)(5) of this section.

(1) All painters must be certified that they have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment. The minimum requirements for training and certification are described in paragraph (f) of this section. The spray application of surface coatings is prohibited by persons who are not certified as having completed the training described in paragraph (f) of this section. The requirements of this paragraph do not apply to the students of an accredited surface coating training program who are under the direct supervision of an instructor who meets the requirements of this paragraph.

(2) All spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure that meets the requirements of paragraph (e)(2)(i) of this section and either paragraph (e)(2)(ii), (e)(2)(iii), or (e)(2)(iv) of this section.

(i) All spray booths, preparation stations, and mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least 98-percent capture of paint overspray. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, “Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992” (incorporated by reference, see § 63.14 of subpart A of this part). The test coating for measuring filter efficiency shall be a high solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-HVLP) air-atomized spray gun operating at 40 pounds per square inch (psi) air pressure; the air flow rate across the filter shall be 150 feet per minute. Owners and operators may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement. The requirements of this paragraph do not apply to waterwash spray booths that are operated and maintained according to the manufacturer's specifications.

(ii) Spray booths and preparation stations used to refinish complete motor vehicles or mobile equipment must be fully enclosed with a full roof, four complete walls or complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls or preparation station curtains. However, if a spray booth is fully enclosed and has seals on all doors and other openings and has an automatic pressure balancing system, it may be operated at up to, but not more than, 0.05 inches water gauge positive pressure.

(iii) Spray booths and preparation stations that are used to coat miscellaneous parts and products or vehicle subassemblies must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so that air is drawn into the booth. The walls and roof of a booth may have openings, if needed, to allow for conveyors and parts to pass through the booth during the coating process.

(iv) Mobile ventilated enclosures that are used to perform spot repairs must enclose and, if necessary, seal against the surface around the area being coated such that paint overspray is retained within the enclosure and directed to a filter to capture paint overspray.

(3) All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which written approval has been obtained from the Administrator. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's “Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989” and “Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002” (incorporated by reference, see § 63.14 of subpart A of this part). The requirements of this paragraph do not apply to painting performed by students and instructors at paint training
centers. The requirements of this paragraph do not apply to the surface coating of aerospace vehicles that involves
the coating of components that normally require the use of an airbrush or an extension on the spray gun to properly
reach limited access spaces; to the application of coatings on aerospace vehicles that contain fillers that adversely
affect atomization with HVLP spray guns; or to the application of coatings on aerospace vehicles that normally have a
dried film thickness of less than 0.0013 centimeter (0.0005 in.).

(4) All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint
residue is not created outside of a container that collects used gun cleaning solvent. Spray gun cleaning may be done
with, for example, hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent
through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A
combination of non-atomizing methods may also be used.

(5) As provided in § 63.6(g), we, the U.S. Environmental Protection Agency, may choose to grant you permission to
use an alternative to the emission standards in this section after you have requested approval to do so according to
§ 63.6(g)(2).

(f) Each owner or operator of an affected miscellaneous surface coating source must ensure and certify that all new
and existing personnel, including contract personnel, who spray apply surface coatings, as defined in § 63.11180, are
trained in the proper application of surface coatings as required by paragraph (e)(1) of this section. The training
program must include, at a minimum, the items listed in paragraphs (f)(1) through (f)(3) of this section.

(1) A list of all current personnel by name and job description who are required to be trained;

(2) Hands-on and classroom instruction that addresses, at a minimum, initial and refresher training in the topics listed
in paragraphs (f)(2)(i) through (2)(iv) of this section.

(i) Spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper
fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate.

(ii) Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and
overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and
overlap, and reducing lead and lag spraying at the beginning and end of each stroke.

(iii) Routine spray booth and filter maintenance, including filter selection and installation.

(iv) Environmental spray booth and filter maintenance, including filter selection and installation.

(3) A description of the methods to be used at the completion of initial or refresher training to demonstrate, document,
and provide certification of successful completion of the required training. Owners and operators who can show by
documentation or certification that a painter's work experience and/or training has resulted in training equivalent to
the training required in paragraph (f)(2) of this section are not required to provide the initial training required by that
paragraph to these painters.

(g) As required by paragraph (e)(1) of this section, all new and existing personnel at an affected motor vehicle and
mobile equipment or miscellaneous surface coating source, including contract personnel, who spray apply surface
coatings, as defined in § 63.11180, must be trained by the dates specified in paragraphs (g)(1) and (2) of this section.
Employees who transfer within a company to a position as a painter are subject to the same requirements as a new
hire.

(1) If your source is a new source, all personnel must be trained and certified no later than 180 days after hiring or no
later than July 7, 2008, whichever is later. Painter training that was completed within five years prior to the date
training is required, and that meets the requirements specified in paragraph (f)(2) of this section satisfies this
requirement and is valid for a period not to exceed five years after the date the training is completed.

(2) If your source is an existing source, all personnel must be trained and certified no later than 180 days after hiring
or no later than January 10, 2011, whichever is later. Painter training that was completed within five years prior to the
date training is required, and that meets the requirements specified in paragraph (f)(2) of this section satisfies this
requirement and is valid for a period not to exceed five years after the date the training is completed.
(3) Training and certification will be valid for a period not to exceed five years after the date the training is completed, and all personnel must receive refresher training that meets the requirements of this section and be re-certified every five years.

[73 FR 1760, Jan. 9, 2008; 73 FR 8408, Feb. 13, 2008]

§ 63.11174 What parts of the General Provisions apply to me?

(a) Table 1 of this subpart shows which parts of the General Provisions in subpart A apply to you.

(b) If you are an owner or operator of an area source subject to this subpart, you are exempt from the obligation to obtain a permit under 40 CFR part 70 or 71, provided you are not required to obtain a permit under 40 CFR 70.3(a) or 71.3(a) for a reason other than your status as an area source under this subpart. Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart applicable to area sources.

Notifications, Reports, and Records

§ 63.11175 What notifications must I submit?

(a) Initial Notification. If you are the owner or operator of a paint stripping operation using paint strippers containing MeCl and/or a surface coating operation subject to this subpart, you must submit the initial notification required by § 63.9(b). For a new affected source, you must submit the Initial Notification no later than 180 days after initial startup or July 7, 2008, whichever is later. For an existing affected source, you must submit the initial notification no later than January 11, 2010. The initial notification must provide the information specified in paragraphs (a)(1) through (8) of this section.

(1) The company name, if applicable.

(2) The name, title, street address, telephone number, e-mail address (if available), and signature of the owner and operator, or other certifying company official;

(3) The street address (physical location) of the affected source and the street address where compliance records are maintained, if different. If the source is a motor vehicle or mobile equipment surface coating operation that repairs vehicles at the customer's location, rather than at a fixed location, such as a collision repair shop, the notification should state this and indicate the physical location where records are kept to demonstrate compliance;

(4) An identification of the relevant standard (i.e., this subpart, 40 CFR part 63, subpart HHHHHH);

(5) A brief description of the type of operation as specified in paragraph (a)(5)(i) or (ii) of this section.

(i) For all surface coating operations, indicate whether the source is a motor vehicle and mobile equipment surface coating operation or a miscellaneous surface coating operation, and include the number of spray booths and preparation stations, and the number of painters usually employed at the operation.

(ii) For paint stripping operations, identify the method(s) of paint stripping employed (e.g., chemical, mechanical) and the substrates stripped (e.g., wood, plastic, metal).

(6) Each paint stripping operation must indicate whether they plan to annually use more than one ton of MeCl after the compliance date.

(7) A statement of whether the source is already in compliance with each of the relevant requirements of this subpart, or whether the source will be brought into compliance by the compliance date. For paint stripping operations, the relevant requirements that you must evaluate in making this determination are specified in § 63.11173(a) through (d) of this subpart. For surface coating operations, the relevant requirements are specified in § 63.11173(e) through (g) of this subpart.
(8) If your source is a new source, you must certify in the initial notification whether the source is in compliance with each of the requirements of this subpart. If your source is an existing source, you may certify in the initial notification that the source is already in compliance. If you are certifying in the initial notification that the source is in compliance with the relevant requirements of this subpart, then include also a statement by a responsible official with that official’s name, title, phone number, e-mail address (if available) and signature, certifying the truth, accuracy, and completeness of the notification, a statement that the source has complied with all the relevant standards of this subpart, and that this initial notification also serves as the notification of compliance status.

(b) Notification of Compliance Status. If you are the owner or operator of a new source, you are not required to submit a separate notification of compliance status in addition to the initial notification specified in paragraph (a) of this subpart provided you were able to certify compliance on the date of the initial notification, as part of the initial notification, and your compliance status has not since changed. If you are the owner or operator of any existing source and did not certify in the initial notification that your source is already in compliance as specified in paragraph (a) of this section, then you must submit a notification of compliance status. You must submit a Notification of Compliance Status on or before March 11, 2011. You are required to submit the information specified in paragraphs (b)(1) through (4) of this section with your Notification of Compliance Status:

1. Your company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different.

2. The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance. For paint stripping operations, the relevant requirements that you must evaluate in making this determination are specified in § 63.11173(a) through (d). For surface coating operations, the relevant requirements are specified in § 63.11173(e) through (g).

3. The date of the Notification of Compliance Status.

4. If you are the owner or operator of an existing affected paint stripping source that annually uses more than one ton of MeCl, you must submit a statement certifying that you have developed and are implementing a written MeCl minimization plan in accordance with § 63.11173(b).

§ 63.11176 What reports must I submit?

(a) Annual Notification of Changes Report. If you are the owner or operator of a paint stripping, motor vehicle or mobile equipment, or miscellaneous surface coating affected source, you are required to submit a report in each calendar year in which information previously submitted in either the initial notification required by § 63.11175(a), Notification of Compliance, or a previous annual notification of changes report submitted under this paragraph, has changed. Deviations from the relevant requirements in § 63.11173(a) through (d) or § 63.11173(e) through (g) on the date of the report will be deemed to be a change. This includes notification when paint stripping affected sources that have not developed and implemented a written MeCl minimization plan in accordance with § 63.11173(b) used more than one ton of MeCl in the previous calendar year. The annual notification of changes report must be submitted prior to March 1 of each calendar year when reportable changes have occurred and must include the information specified in paragraphs (a)(1) through (2) of this section.

1. Your company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different.

2. The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance.

(b) If you are the owner or operator of a paint stripping affected source that has not developed and implemented a written MeCl minimization plan in accordance with § 63.11173(b) of this subpart, you must submit a report for any calendar year in which you use more than one ton of MeCl. This report must be submitted no later than March 1 of the following calendar year. You must also develop and implement a written MeCl minimization plan in accordance
with § 63.11173(b) no later than December 31. You must then submit a Notification of Compliance Status report containing the information specified in § 63.11175(b) by March 1 of the following year and comply with the requirements for paint stripping operations that annually use more than one ton of MeCl in §§ 63.11173(d) and 63.11177(f).

§ 63.11177 What records must I keep?

If you are the owner or operator of a surface coating operation, you must keep the records specified in paragraphs (a) through (d) and (g) of this section. If you are the owner or operator of a paint stripping operation, you must keep the records specified in paragraphs (e) through (g) of this section, as applicable.

(a) Certification that each painter has completed the training specified in § 63.11173(f) with the date the initial training and the most recent refresher training was completed.

(b) Documentation of the filter efficiency of any spray booth exhaust filter material, according to the procedure in § 63.11173(e)(3)(i).

(c) Documentation from the spray gun manufacturer that each spray gun with a cup capacity equal to or greater than 3.0 fluid ounces (89 cc) that does not meet the definition of an HVLP spray gun, electrostatic application, airless spray gun, or air assisted airless spray gun, has been determined by the Administrator to achieve a transfer efficiency equivalent to that of an HVLP spray gun, according to the procedure in § 63.11173(e)(4).

(d) Copies of any notification submitted as required by § 63.11175 and copies of any report submitted as required by § 63.11176.

(e) Records of paint strippers containing MeCl used for paint stripping operations, including the MeCl content of the paint stripper used. Documentation needs to be sufficient to verify annual usage of paint strippers containing MeCl (e.g., material safety data sheets or other documentation provided by the manufacturer or supplier of the paint stripper, purchase receipts, records of paint stripper usage, engineering calculations).

(f) If you are a paint stripping source that annually uses more than one ton of MeCl you are required to maintain a record of your current MeCl minimization plan on site for the duration of your paint stripping operations. You must also keep records of your annual review of, and updates to, your MeCl minimization plan.

(g) Records of any deviation from the requirements in § 63.11173, § 63.11174, § 63.11175, or § 63.11176. These records must include the date and time period of the deviation, and a description of the nature of the deviation and the actions taken to correct the deviation.

(h) Records of any assessments of source compliance performed in support of the initial notification, notification of compliance status, or annual notification of changes report.

§ 63.11178 In what form and for how long must I keep my records?

(a) If you are the owner or operator of an affected source, you must maintain copies of the records specified in § 63.11177 for a period of at least five years after the date of each record. Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two year period.

Other Requirements and Information

§ 63.11179 Who implements and enforces this subpart?

(a) This subpart can be implemented and enforced by us, the U.S. Environmental Protection Agency (EPA), or a delegated authority such as your State, local, or tribal agency. If the Administrator has delegated authority to your State, local, or tribal agency, then that agency (as well as the EPA) has the authority to implement and enforce this subpart. You should contact your EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to your State, local, or tribal agency.
(b) In delegating implementation and enforcement authority of this subpart to a State, local, or tribal agency under subpart E of this part, the authorities contained in paragraph (c) of this section are retained by the Administrator and are not transferred to the State, local, or tribal agency.

c) The authority in § 63.11173(e)(5) will not be delegated to State, local, or tribal agencies.

§ 63.11180 What definitions do I need to know?

Terms used in this subpart are defined in the Clean Air Act, in 40 CFR 63.2, and in this section as follows:

**Additive** means a material that is added to a coating after purchase from a supplier (e.g., catalysts, activators, accelerators).

**Administrator** means, for the purposes of this rulemaking, the Administrator of the U.S. Environmental Protection Agency or the State or local agency that is granted delegation for implementation of this subpart.

**Aerospace vehicle or component** means any fabricated part, processed part, assembly of parts, or completed unit, with the exception of electronic components, of any aircraft including but not limited to airplanes, helicopters, missiles, rockets, and space vehicles.

**Airless and air-assisted airless spray** mean any paint spray technology that relies solely on the fluid pressure of the paint to create an atomized paint spray pattern and does not apply any atomizing compressed air to the paint before it leaves the paint nozzle. Air-assisted airless spray uses compressed air to shape and distribute the fan of atomized paint, but still uses fluid pressure to create the atomized paint.

**Appurtenance** means any accessory to a stationary structure coated at the site of installation, whether installed or detached, including but not limited to: bathroom and kitchen fixtures; cabinets; concrete forms; doors; elevators; fences; hand railings; heating equipment, air conditioning equipment, and other fixed mechanical equipment or stationary tools; lamp posts; partitions; pipes and piping systems; rain gutters and downspouts; stairways, fixed ladders, catwalks, and fire escapes; and window screens.

**Architectural coating** means a coating to be applied to stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs.

**Cleaning material** means a solvent used to remove contaminants and other materials, such as dirt, grease, or oil, from a substrate before or after coating application or from equipment associated with a coating operation, such as spray booths, spray guns, racks, tanks, and hangers. Thus, it includes any cleaning material used on substrates or equipment or both.

**Coating** means, for the purposes of this subpart, a material spray-applied to a substrate for decorative, protective, or functional purposes. For the purposes of this subpart, coating does not include the following materials:

1) Decorative, protective, or functional materials that consist only of protective oils for metal, acids, bases, or any combination of these substances.

2) Paper film or plastic film that may be pre-coated with an adhesive by the film manufacturer.

3) Adhesives, sealants, maskants, or caulking materials.

4) Temporary protective coatings, lubricants, or surface preparation materials.

5) In-mold coatings that are spray-applied in the manufacture of reinforced plastic composite parts.

**Compliance date** means the date by which you must comply with this subpart.
Deviation means any instance in which an affected source, subject to this subpart, or an owner or operator of such a source fails to meet any requirement or obligation established by this subpart.

Dry media blasting means abrasive blasting using dry media. Dry media blasting relies on impact and abrasion to remove paint from a substrate. Typically, a compressed air stream is used to propel the media against the coated surface.

Electrostatic application means any method of coating application where an electrostatic attraction is created between the part to be coated and the atomized paint particles.

Equipment cleaning means the use of an organic solvent to remove coating residue from the surfaces of paint spray guns and other painting related equipment, including, but not limited to stir sticks, paint cups, brushes, and spray booths.

Facility maintenance means, for the purposes of this subpart, surface coating performed as part of the routine repair or renovation of the tools, equipment, machinery, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity. Facility maintenance also includes surface coating associated with the installation of new equipment or structures, and the application of any surface coating as part of janitorial activities. Facility maintenance includes the application of coatings to stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs. Facility maintenance also includes the refinishing of mobile equipment in the field or at the site where they are used in service and at which they are intended to remain indefinitely after refinishing. Such mobile equipment includes, but is not limited to, farm equipment and mining equipment for which it is not practical or feasible to move to a dedicated mobile equipment refinishing facility. Such mobile equipment also includes items, such as fork trucks, that are used in a manufacturing facility and which are refinished in that same facility. Facility maintenance does not include surface coating of motor vehicles, mobile equipment, or items that routinely leave and return to the facility, such as delivery trucks, rental equipment, or containers used to transport, deliver, distribute, or dispense commercial products to customers, such as compressed gas canisters.

High-volume, low-pressure (HVLP) spray equipment means spray equipment that is permanently labeled as such and used to apply any coating by means of a spray gun which is designed and operated between 0.1 and 10 pounds per square inch gauge (psig) air atomizing pressure measured dynamically at the center of the air cap and at the air horns.

Initial startup means the first time equipment is brought online in a paint stripping or surface coating operation, and paint stripping or surface coating is first performed.

Materials that contain HAP or HAP-containing materials mean, for the purposes of this subpart, materials that contain 0.1 percent or more by mass of any individual HAP that is an OSHA-defined carcinogen as specified in 29 CFR 1910.1200(d)(4), or 1.0 percent or more by mass for any other individual HAP.

Military munitions means all ammunition products and components produced or used by or for the U.S. Department of Defense (DoD) or for the U.S. Armed Services for national defense and security, including military munitions under the control of the Department of Defense, the U.S. Coast Guard, the National Nuclear Security Administration (NNSA), U.S. Department of Energy (DOE), and National Guard personnel. The term military munitions includes: confined gaseous, liquid, and solid propellants, explosives, pyrotechnics, chemical and riot control agents, smokes, and incendiaries used by DoD components, including bulk explosives and chemical warfare agents, chemical munitions, biological weapons, rockets, guided and ballistic missiles, bombs, warheads, mortar rounds, artillery ammunition, small arms ammunition, grenades, mines, torpedoes, depth charges, cluster munitions and dispensers, demolition charges, nonnuclear components of nuclear weapons, wholly inert ammunition products, and all devices and components of any items listed in this definition.

Miscellaneous parts and/or products means any part or product made of metal or plastic, or combinations of metal and plastic. Miscellaneous parts and/or products include, but are not limited to, metal and plastic components of the following types of products as well as the products themselves: motor vehicle parts and accessories for automobiles, trucks, recreational vehicles; automobiles and light duty trucks at automobile and light duty truck assembly plants; boats; sporting and recreational goods; toys; business machines; laboratory and medical equipment; and household and other consumer products.
Miscellaneous surface coating operation means the collection of equipment used to apply surface coating to miscellaneous parts and/or products made of metal or plastic, including applying cleaning solvents to prepare the surface before coating application, mixing coatings before application, applying coating to a surface, drying or curing the coating after application, and cleaning coating application equipment, but not plating. A single surface coating operation may include any combination of these types of equipment, but always includes at least the point at which a coating material is applied to a given part. A surface coating operation includes all other steps (such as surface preparation with solvent and equipment cleaning) in the affected source where HAP are emitted from the coating of a part. The use of solvent to clean parts (for example, to remove grease during a mechanical repair) does not constitute a miscellaneous surface coating operation if no coatings are applied. A single affected source may have multiple surface coating operations. Surface coatings applied to wood, leather, rubber, ceramics, stone, masonry, or substrates other than metal and plastic are not considered miscellaneous surface coating operations for the purposes of this subpart.

Mobile equipment means any device that may be drawn and/or driven on a roadway including, but not limited to, heavy-duty trucks, truck trailers, fleet delivery trucks, buses, mobile cranes, bulldozers, street cleaners, agriculture equipment, motor homes, and other recreational vehicles (including camping trailers and fifth wheels).

Motor vehicle means any self-propelled vehicle, including, but not limited to, automobiles, light duty trucks, golf carts, vans, and motorcycles.

Motor vehicle and mobile equipment surface coating means the spray application of coatings to assembled motor vehicles or mobile equipment. For the purposes of this subpart, it does not include the surface coating of motor vehicle or mobile equipment parts or subassemblies at a vehicle assembly plant or parts manufacturing plant.

Non-HAP solvent means, for the purposes of this subpart, a solvent (including thinners and cleaning solvents) that contains less than 0.1 percent by mass of any individual HAP that is an OSHA-defined carcinogen as specified in 29 CFR 1910.1200(d)(4) and less than 1.0 percent by mass for any other individual HAP.

Paint stripping and/or miscellaneous surface coating source or facility means any shop, business, location, or parcel of land where paint stripping or miscellaneous surface coating operations are conducted.

Paint stripping means the removal of dried coatings from wood, metal, plastic, and other substrates. A single affected source may have multiple paint stripping operations.

Painter means any person who spray applies coating.

Plastic refers to substrates containing one or more resins and may be solid, porous, flexible, or rigid. Plastics include fiber reinforced plastic composites.

Protective oil means organic material that is applied to metal for the purpose of providing lubrication or protection from corrosion without forming a solid film. This definition of protective oil includes, but is not limited to, lubricating oils, evaporative oils (including those that evaporate completely), and extrusion oils.

Quality control activities means surface coating or paint stripping activities that meet all of the following criteria:

(1) The activities associated with a surface coating or paint stripping operation are intended to detect and correct defects in the final product by selecting a limited number of samples from the operation, and comparing the samples against specific performance criteria.

(2) The activities do not include the production of an intermediate or final product for sale or exchange for commercial profit; for example, parts that are surface coated or stripped are not sold and do not leave the facility.

(3) The activities are not a normal part of the surface coating or paint stripping operation; for example, they do not include color matching activities performed during a motor vehicle collision repair.
(4) The activities do not involve surface coating or stripping of the tools, equipment, machinery, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity; that is, the activities are not facility maintenance.

**Research and laboratory activities** means surface coating or paint stripping activities that meet one of the following criteria:

1. Conducted at a laboratory to analyze air, soil, water, waste, or product samples for contaminants, or environmental impact.

2. Activities conducted to test more efficient production processes, including alternative paint stripping or surface coating materials or application methods, or methods for preventing or reducing adverse environmental impacts, provided that the activities do not include the production of an intermediate or final product for sale or exchange for commercial profit.

3. Activities conducted at a research or laboratory facility that is operated under the close supervision of technically trained personnel, the primary purpose of which is to conduct research and development into new processes and products and that is not engaged in the manufacture of products for sale or exchange for commercial profit.

**Solvent** means a fluid containing organic compounds used to perform paint stripping, surface prep, or cleaning of surface coating equipment.

**Space Vehicle** means vehicles designed to travel beyond the limit of the earth’s atmosphere, including but not limited to satellites, space stations, and the Space Shuttle System (including orbiter, external tanks, and solid rocket boosters).

**Spray-applied coating operations** means coatings that are applied using a hand-held device that creates an atomized mist of coating and deposits the coating on a substrate. For the purposes of this subpart, spray-applied coatings do not include the following materials or activities:

1. Coatings applied from a hand-held device with a paint cup capacity that is equal to or less than 3.0 fluid ounces (89 cubic centimeters).

2. Surface coating application using powder coating, hand-held, non-refillable aerosol containers, or non-atomizing application technology, including, but not limited to, paint brushes, rollers, hand wiping, flow coating, dip coating, electrodeposition coating, web coating, coil coating, touch-up markers, or marking pens.

3. Thermal spray operations (also known as metallizing, flame spray, plasma arc spray, and electric arc spray, among other names) in which solid metallic or non-metallic material is heated to a molten or semi-molten state and propelled to the work piece or substrate by compressed air or other gas, where a bond is produced upon impact.

**Surface preparation** or **Surface prep** means use of a cleaning material on a portion of or all of a substrate prior to the application of a coating.

**Target HAP** are compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).

**Target HAP containing coating** means a spray-applied coating that contains any individual target HAP that is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4) at a concentration greater than 0.1 percent by mass, or greater than 1.0 percent by mass for any other individual target HAP compound. For the purpose of determining whether materials you use contain the target HAP compounds, you may rely on formulation data provided by the manufacturer or supplier, such as the material safety data sheet (MSDS), as long as it represents each target HAP compound in the material that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other target HAP compounds.
Transfer efficiency means the amount of coating solids adhering to the object being coated divided by the total amount of coating solids sprayed, expressed as a percentage. Coating solids means the nonvolatile portion of the coating that makes up the dry film.

Truck bed liner coating means any coating, excluding color coats, labeled and formulated for application to a truck bed to protect it from surface abrasion.

### Table 1 to Subpart HHHHHH of Part 63—Applicability of General Provisions to Subpart HHHHHH of Part 63

<table>
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<td>General Applicability</td>
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<td>Initial Applicability Determination</td>
<td>Yes</td>
<td>Applicability of subpart HHHHHH is also specified in § 63.11170.</td>
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<td>Applicability After Standard Established</td>
<td>Yes</td>
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<td>§ 63.1(c)(2)</td>
<td>Applicability of Permit Program for Area Sources</td>
<td>Yes</td>
<td>(63.11174(b) of Subpart HHHHHH exempts area sources from the obligation to obtain Title V operating permits.</td>
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<td>§ 63.1(c)(5)</td>
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<td>Yes</td>
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<td>§ 63.1(e)</td>
<td>Applicability of Permit Program to Major Sources Before Relevant Standard is Set</td>
<td>No</td>
<td>(63.11174(b) of Subpart HHHHHH exempts area sources from the obligation to obtain Title V operating permits.</td>
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<tr>
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<td>Yes</td>
<td>Additional definitions are specified in § 63.11180.</td>
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<td>Construction/Reconstruction of major sources</td>
<td>No</td>
<td>Subpart HHHHHH applies only to area sources.</td>
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<td>Yes</td>
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<td>§ 63.6(b)(1)-(7)</td>
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<td>Yes</td>
<td>§ 63.11172 specifies the compliance dates.</td>
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<td>Compliance Dates for Existing Sources</td>
<td>Yes</td>
<td>§ 63.11172 specifies the compliance dates.</td>
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<td>Operation and Maintenance</td>
<td>Yes</td>
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<td>§ 63.6(e)(3)</td>
<td>Startup, Shutdown, and Malfunction Plan</td>
<td>No</td>
<td>No startup, shutdown, and malfunction plan is required by subpart HHHHHH.</td>
</tr>
<tr>
<td>§ 63.6(f)(1)</td>
<td>Compliance Except During Startup, Shutdown, and Malfunction</td>
<td>Yes</td>
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<td>No</td>
<td>Subpart HHHHHH does not establish opacity or visible emission standards.</td>
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<td>Extension of Compliance</td>
<td>Yes</td>
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<td>Presidential Compliance Exemption</td>
<td>Yes</td>
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<td>Citation</td>
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<td>No</td>
<td>No performance testing is required by subpart HHHHHH.</td>
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<td>No</td>
<td>Subpart HHHHHH does not require the use of continuous monitoring systems.</td>
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<td>Yes</td>
<td>§ 63.11175 specifies notification requirements.</td>
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<td>Notification of Performance Test</td>
<td>No</td>
<td>Subpart HHHHHH does not require performance tests.</td>
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<td>§ 63.9(f)</td>
<td>Notification of Visible Emissions/Opacity Test</td>
<td>No</td>
<td>Subpart HHHHHH does not have opacity or visible emission standards.</td>
</tr>
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<td>Additional Notifications When Using CMS</td>
<td>No</td>
<td>Subpart HHHHHH does not require the use of continuous monitoring systems.</td>
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<td>§ 63.9(h)</td>
<td>Notification of Compliance Status</td>
<td>No</td>
<td>§ 63.11175 specifies the dates and required content for submitting the notification of compliance status.</td>
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<td>Adjustment of Submittal Deadlines</td>
<td>Yes</td>
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<td>Yes</td>
<td>§ 63.11176(a) specifies the dates for submitting the notification of changes report.</td>
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<td>Yes</td>
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<td>Yes</td>
<td>Additional requirements are specified in § 63.11177.</td>
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<td>Recordkeeping Relevant to Startup, Shutdown, and Malfunction Periods and CMS</td>
<td>No</td>
<td>Subpart HHHHHH does not require startup, shutdown, and malfunction plans, or CMS.</td>
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<td>Waiver of recordkeeping requirements</td>
<td>Yes</td>
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<td>No</td>
<td>Subpart HHHHHH does not require the use of CEMS.</td>
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<td>Records supporting notifications</td>
<td>Yes</td>
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<td>§ 63.10(c)</td>
<td>Additional Recordkeeping Requirements for Sources with CMS</td>
<td>No</td>
<td>Subpart HHHHHH does not require the use of CMS.</td>
</tr>
<tr>
<td>§ 63.10(d)(1)</td>
<td>General Reporting Requirements</td>
<td>Yes</td>
<td>Additional requirements are specified in § 63.11176.</td>
</tr>
<tr>
<td>§ 63.10(d)(2)-(3)</td>
<td>Report of Performance Test Results, and Opacity or Visible Emissions Observations</td>
<td>No</td>
<td>Subpart HHHHHH does not require performance tests, or opacity or visible emissions observations.</td>
</tr>
<tr>
<td>§ 63.10(d)(4)</td>
<td>Progress Reports for Sources With Compliance Extensions</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§ 63.10(d)(5)</td>
<td>Startup, Shutdown, and Malfunction Reports</td>
<td>No</td>
<td>Subpart HHHHHH does not require startup, shutdown, and malfunction reports.</td>
</tr>
<tr>
<td>§ 63.10(e)</td>
<td>Additional Reporting requirements for Sources with CMS</td>
<td>No</td>
<td>Subpart HHHHHH does not require the use of CMS.</td>
</tr>
<tr>
<td>§ 63.10(f)</td>
<td>Recordkeeping/Reporting Waiver</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§ 63.11</td>
<td>Control Device Requirements/Flares</td>
<td>No</td>
<td>Subpart HHHHHH does not require the use of flares.</td>
</tr>
<tr>
<td>§ 63.12</td>
<td>State Authority and Delegations</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>Citation</td>
<td>Subject</td>
<td>Applicable to subpart HHHHHH</td>
<td>Explanation</td>
</tr>
<tr>
<td>----------</td>
<td>-------------------------------------------------------------------------</td>
<td>------------------------------</td>
<td>--------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>§ 63.13</td>
<td>Addresses of State Air Pollution Control Agencies and EPA Regional Offices</td>
<td>Yes</td>
<td>Test methods for measuring paint booth filter efficiency and spray gun transfer efficiency in § 63.11173(e)(2) and (3) are incorporated and included in § 63.14.</td>
</tr>
<tr>
<td>§ 63.14</td>
<td>Incorporation by Reference</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§ 63.15</td>
<td>Availability of Information/Confidentiality</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§ 63.16(a)</td>
<td>Performance Track Provisions—reduced reporting</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>§ 63.16(b)-(c)</td>
<td>Performance Track Provisions—reduced reporting</td>
<td>No</td>
<td>Subpart HHHHHH does not establish numerical emission limits.</td>
</tr>
</tbody>
</table>
Source Name: Talbert Manufacturing, Inc.
Source Location: 1628 West State Road 114, Rensselaer, IN 47978
County: Jasper
SIC Code: 3715 (Truck Trailers)
Operation Permit No.: T073-38097-00025
Operation Permit Issuance Date: September 12, 2017
Significant Source Modification No.: 073-41464-00025
Significant Permit Modification No.: 073-41491-00025
Permit Reviewer: Pavithra Ethi Rajan

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. T073-38097-00025 on September 12, 2017. There have been no subsequent approvals issued.

County Attainment Status

The source is located in Jasper County. The following attainment status designations are applicable to Jasper County:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO₂</td>
<td>Better than national standards.</td>
</tr>
<tr>
<td>CO</td>
<td>Unclassifiable or attainment effective November 15, 1990.</td>
</tr>
<tr>
<td>O₃</td>
<td>Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard.¹</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective April 15, 2015, for the annual PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>Unclassifiable effective November 15, 1990.</td>
</tr>
<tr>
<td>NO₂</td>
<td>Unclassifiable or attainment effective January 29, 2012, for the 2010 NO₂ standard.</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.</td>
</tr>
</tbody>
</table>

¹Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.

(a) **Ozone Standards**

Volatile organic compounds (VOC) and Nitrogen Oxides (NOₓ) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOₓ emissions are considered when evaluating the rule applicability relating to ozone. Jasper County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) **PM₂.₅**

Jasper County has been classified as attainment for PM₂.₅. Therefore, direct PM₂.₅, SO₂, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) **Other Criteria Pollutants**

Jasper County has been classified as attainment or unclassifiable in Indiana for all the other
criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

### Fugitive Emissions

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit applicability and source status under Section 112 of the Clean Air Act (CAA).

### Greenhouse Gas (GHG) Emissions

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at [http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf](http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf)) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court’s decision. U.S. EPA’s guidance states that U.S. EPA will no longer require PSD or Title V permits for sources “previously classified as ‘Major’ based solely on greenhouse gas emissions.”

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.
Source Status - Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM</th>
<th>PM₁₀¹</th>
<th>PM₂.₅₁₂</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP³</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitive Emissions*</td>
<td>171.49</td>
<td>133.30</td>
<td>133.31</td>
<td>0.03</td>
<td>4.38</td>
<td>170.75</td>
<td>3.68</td>
<td>2.58</td>
<td>12.53</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>10</td>
<td>25</td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Emission Offset Major Source Thresholds</td>
<td>---</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>--</td>
<td>--</td>
</tr>
</tbody>
</table>

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM₂.₅, not particulate matter (PM), are each considered as a "regulated air pollutant."
²PM₂.₅ listed is direct PM₂.₅.
³Single highest source-wide HAP is Toluene.
*Fugitive HAP emissions are always included in the source-wide emissions.

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(b) This existing source is not a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

(c) These emissions are based on the TSD of Part 70 Operating Permit Renewal No. T073-38097-00025 on September 12, 2017.

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed an application, submitted by Talbert Manufacturing, Inc. on May 20, 2019, relating to, the addition of a new paint booth, identified as P11.

The following is a list of the new emission unit and pollution control device:

(a) One (1) surface coating booth, identified as P11, approved in 2019 for construction, with a maximum capacity of 1.0 truck trailers per hour, using (1) high-volume low-pressure (HVLP) spray gun, with dry filters as overspray control, and exhausting to stack S11.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.
Permit Level Determination – Part 70 Modification to an Existing Source

Pursuant to 326 IAC 2-1.1-1(12), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM</th>
<th>PM_{10}</th>
<th>PM_{2.5}^{1}</th>
<th>SO_{2}</th>
<th>NO_{x}</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP^{2}</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Surface Coating Booth (P11)</td>
<td>17.25</td>
<td>17.25</td>
<td>17.25</td>
<td>-</td>
<td>-</td>
<td>36.14</td>
<td>-</td>
<td>1.34</td>
<td>2.36</td>
</tr>
<tr>
<td>Total PTE Before Controls of the New Emission Unit:</td>
<td>17.25</td>
<td>17.25</td>
<td>17.25</td>
<td>-</td>
<td>-</td>
<td>36.14</td>
<td>-</td>
<td>1.34</td>
<td>2.36</td>
</tr>
</tbody>
</table>

^{1}PM_{2.5} listed is direct PM_{2.5}.

^{2}Single highest HAP is HDI.

Appendix A of this TSD reflects the detailed potential emissions of the modification.

(a) Approval to Construct

Pursuant to 326 IAC 2-7-10.5(g)(4), a Significant Source Modification is required because this modification has the potential to emit VOC at greater than or equal to twenty-five (25) tons per year.

(b) Approval to Operate

Pursuant to 326 IAC 2-7-12(d)(1), this change to the permit is being made through a Significant Permit Modification because this modification does not qualify as a Minor Permit Modification or as an Administrative Amendment.
Permit Level Determination – PSD

The table below summarizes the potential to emit of the modification, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of the Part 70 source and modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}$</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Surface Coating Booth (P11)</td>
<td>17.25</td>
<td>17.25</td>
<td>17.25</td>
<td>-</td>
<td>-</td>
<td>36.14</td>
<td>-</td>
</tr>
<tr>
<td><strong>Total for Modification</strong></td>
<td><strong>17.25</strong></td>
<td><strong>17.25</strong></td>
<td><strong>17.25</strong></td>
<td>-</td>
<td>-</td>
<td><strong>36.14</strong></td>
<td>-</td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
</tr>
</tbody>
</table>

1PM$_{2.5}$ listed is direct PM$_{2.5}$.

This modification to an existing minor PSD stationary source is not major because the emissions increase of each PSD regulated pollutant is less than the PSD major source threshold. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

PTE of the Entire Source After Issuance of the Part 70 Modification

The table below summarizes the after issuance source-wide potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of the Part 70 source and permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Source-Wide Emissions After Issuance (ton/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM$^1$</td>
</tr>
<tr>
<td>Total PTE of Entire Source Excluding Fugitives$^*$</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
</tr>
</tbody>
</table>

1Under the Part 70 Permit program (40 CFR 70), PM$_{10}$ and PM$_{2.5}$, not particulate matter (PM), are each considered as a "regulated air pollutant."
2PM$_{2.5}$ listed is direct PM$_{2.5}$.
3Single highest source-wide HAP (Toluene)
$^*$Fugitive HAP emissions are always included in the source-wide emissions.

(a) This existing minor PSD stationary source will continue to be minor under 326 IAC 2-2 because the emissions of each PSD regulated pollutant will continue to be less than the PSD major source thresholds.

(b) This existing area source of HAP will continue to be an area source of HAP, as defined in 40 CFR 63.2, because HAP emissions will continue to be less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).
Federal Rule Applicability Determination

Due to the modification at this source, federal rule applicability has been reviewed as follows:

**New Source Performance Standards (NSPS):**

(a) The requirements of New Source Performance Standards for Surface Coating Operations to Metal Furniture, 40 CFR 60, Subpart EE, are not included in the permit, because this surface coating booth does not perform coating of metal furniture.

(b) The requirements of New Source Performance Standards for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM, are not included in the permit because this surface coating booth does not apply coatings to automobile or light duty truck parts. The truck trailers exceed 3,850 kilograms in gross vehicle weight.

(c) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

**National Emission Standards for Hazardous Air Pollutants (NESHAP):**

(a) The requirements of National Emission Standards for Hazardous Air Pollutants for Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR 63, Subpart III, are not included in the permit because the source is not a major source of hazardous air pollutants and because this surface coating booth does not apply coatings to automobiles or light duty trucks.

(b) The requirements of National Emission Standards for Hazardous Air Pollutants for Surface Coating of Metal Cans, 40 CFR 63, Subpart KKKK, are not included in the permit since the spray booths at this source do not coat metal cans as defined in §63.3561.

(c) The requirements of National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart MMMM, are not included in the permit since the source is not a major source of hazardous air pollutants.

(d) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Large Appliances, 40 CFR 63, Subpart NNNN, are not included in the permit, since this spray booth does not coat large appliances as defined in §63.4181.

(e) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products, 40 CFR 63, Subpart PPPP, are not included in the permit because the source is not a major source of hazardous air pollutants.

(f) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Wood Building Products, 40 CFR 63, Subpart QQQQ, are not included in the permit, since this spray booth does not coat wood building products as defined in §63.4781.

(g) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Metal Furniture, 40 CFR 63, Subpart RRRR are not included in the permit because the source does not perform coating of metal furniture, and is not a major source of HAPs.

(h) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Metal Coil, 40 CFR 63, Subpart SSSS, are not included in the permit, since this spray booth does not coat metal coil as defined in §63.5080.

(i) The requirements of the National Emission Standards for Hazardous Air Pollutants for Miscellaneous Surface Coating Manufacturing, 40 CFR 63, Subpart HHHHH, are not included in this permit because the source does not meet the requirements of a miscellaneous coating manufacturer.
The requirements of the National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH, are included in this permit for the surface coating booth P11. Pursuant to §63.11169(c), area sources involved in spray application of coatings containing target HAPs to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment. The surface coating booth P11 uses AHA0058 Duraspar 120 Gray Primer that contains chromium. Surface coating booth P11 is subject to the following requirements of 40 CFR 63, Subpart HHHHHH since chromium is a target HAP, and P11 is a new affected source, constructed after January 9, 2008:

1. 40 CFR 63.11169(c)
2. 40 CFR 63.11170(a)(3), (b)
3. 40 CFR 63.11171(a), (c)
4. 40 CFR 63.11172(a)(2)
5. 40 CFR 63.11173(e), (f), (g)(1)(3)
6. 40 CFR 63.11174
8. 40 CFR 63.11176(a)
9. 40 CFR 63.11177(a), (b), (c), (d), (g), (h)
10. 40 CFR 63.11178
11. 40 CFR 63.11179
12. 40 CFR 63.11180
13. Table 1

Previously permitted surface coating booth P10, is also subject to the requirements of 40 CFR 63, Subpart HHHHHH since Ordnance Green material used by this booth contains chromium. The surface coating booth P10, was constructed before September 17, 2007, hence is an existing affected source and is subject to the following requirements of 40 CFR 63, Subpart HHHHHH:

1. 40 CFR 63.11169(c)
2. 40 CFR 63.11170(a)(3), (b)
3. 40 CFR 63.11171(a), (e)
4. 40 CFR 63.11172(b)
5. 40 CFR 63.11173(e), (f), (g)(2)(3)
6. 40 CFR 63.11174
8. 40 CFR 63.11176(a)
9. 40 CFR 63.11177(a), (b), (c), (d), (g), (h)
10. 40 CFR 63.11178
11. 40 CFR 63.11179
12. 40 CFR 63.11180
13. Table 1

The provisions of 40 CFR 63 Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facilities described in this section except when otherwise specified in 40 CFR 63 Subpart HHHHHH.

The requirements of National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX, are not included in the permit because the source does not engage in the operations in one of the nine source categories listed in 40 CFR 63.11514(a)(1) through (9).

There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (40 CFR Part 63, 326 IAC 14, and 326 IAC 20) included in the permit for this proposed modification.
Compliance Assurance Monitoring (CAM):

(a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each pollutant-specific emission unit that meets the following criteria:

1. has a potential to emit before controls equal to or greater than the major source threshold for the regulated pollutant involved;
2. is subject to an emission limitation or standard for that pollutant (or a surrogate thereof); and
3. uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

(b) Pursuant to 40 CFR 64.2(b)(1)(i), emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act are exempt from the requirements of CAM. Therefore, an evaluation was not conducted for any emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act.

The following table is used to identify the applicability of CAM to new and modified emission unit and each emission limitation or standard for a specified pollutant based on the criteria specified under 40 CFR 64.2:

<table>
<thead>
<tr>
<th>Emission Unit/Pollutant</th>
<th>Control Device</th>
<th>Applicable Emission Limitation</th>
<th>Uncontrolled PTE (tons/year)</th>
<th>Controlled PTE (tons/year)</th>
<th>CAM Applicable (Y/N)</th>
<th>Large Unit (Y/N)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Surface Coating Booth (P11) / PM*</td>
<td>dry filter</td>
<td>326 IAC 6-3-2</td>
<td>&lt;100</td>
<td>&lt;100</td>
<td>N</td>
<td>N</td>
</tr>
<tr>
<td>Surface Coating Booth (P11) / PM10</td>
<td>dry filter</td>
<td>none</td>
<td>&lt;100</td>
<td>&lt;100</td>
<td>N</td>
<td>N</td>
</tr>
<tr>
<td>Surface Coating Booth (P11) / PM2.5</td>
<td>dry filter</td>
<td>none</td>
<td>&lt;100</td>
<td>&lt;100</td>
<td>N</td>
<td>N</td>
</tr>
</tbody>
</table>

Uncontrolled PTE (tpy) and controlled PTE (tpy) are evaluated against the Major Source Threshold for each pollutant. Major Source Threshold for criteria pollutants (PM10, PM2.5, SO2, NOX, VOC and CO) is 100 tpy, for a single HAP ten (10) tpy, and for total HAPs twenty-five (25) tpy.

Under the Part 70 Permit program (40 CFR 70), PM is not a regulated pollutant.

PM* For limitations under 326 IAC 6-3-2, 326 IAC 6.5, and 326 IAC 6.8, IDEM OAQ uses PM as a surrogate for the regulated air pollutant PM10. Therefore, uncontrolled PTE and controlled PTE reflect the emissions of the regulated air pollutant PM10.

N 1 CAM does not apply for PM because the uncontrolled PTE of PM is less than the major source threshold.

Emission units without air pollution controls are not subject to CAM. Therefore, they are not listed.

Based on this evaluation, the requirements of 40 CFR Part 64, CAM, are not applicable to any of the new or modified units as part of this modification.

State Rule Applicability Determination

Due to the modification at this source, state rule applicability has been reviewed as follows:

326 IAC 2-2 (PSD)
PSD applicability is discussed under the Permit Level Determination – PSD.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The operation of the surface coating booth (P11) will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.
326 IAC 2-6 (Emission Reporting)
This source, not located in Lake, Porter, or LaPorte County, is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7 (Part 70). The potential to emit of VOC and PM10 is less than 250 tons per year; and the potential to emit of CO, NOx, and SO2 is less than 2,500 tons per year. Therefore, pursuant to 326 IAC 2-6-3(a)(2), triennial reporting is required. An emission statement shall be submitted in accordance with the compliance schedule in 326 IAC 2-6-3 by July 1, 2020, and every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 2-7-6(5) (Annual Compliance Certification)
The U.S. EPA Federal Register 79 FR 54978 notice does not exempt Title V Permittees from the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D), but the submittal of the Title V annual compliance certification to IDEM satisfies the requirement to submit the Title V annual compliance certifications to EPA. IDEM does not intend to revise any permits since the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D) still apply, but Permittees can note on their Title V annual compliance certification that submission to IDEM has satisfied reporting to EPA per Federal Register 79 FR 54978. This only applies to Title V Permittees and Title V compliance certifications.

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Surface coating booth P11 is subject to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes). Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating booth P11 shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer’s specifications.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)
Surface coating booth P11 is not subject to the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), because P10 is subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations).

326 IAC 8-2-9 (Miscellaneous metal and plastic parts coating operations)
According to 326 IAC 8-2-1(a)(4), facilities for which construction commences after July 1, 1990 and have emissions of greater that fifteen (15) pounds of VOC per day before add-on controls are subject to 326 IAC 8-2-9 (Miscellaneous metal and plastic parts coating operations). Surface coating booth P11, constructed in 2019, has emissions of greater than fifteen (15) pounds of VOC per day before add-on controls. Therefore, surface coating booth P11 is subject to the requirements or 326 IAC 8-2-9.

Pursuant to 326 IAC 8-2-9(c), for the coating of metal parts using surface coating booth P11, the Permittee shall not allow the discharge into the atmosphere VOC in excess three and five-tenths (3.5) pounds of VOC per gallon of coating, for air dried or forced warm air dried, excluding water, as delivered to the applicator.

### Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to assure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.
If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source’s failure to take the appropriate corrective actions within a specific time period.

The Compliance Determination Requirements applicable to this modification are as follows:

(a) In order to ensure compliance with 326 IAC 8-2-9 for surface coating booth, P11, the VOC content contained shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) In order to determine compliance with 326 IAC 8-2-9 for surface coating booth, P11, the VOC content shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

\[ A = \frac{\sum (C \times U)}{\sum U} \]

Where: A = the volume weighted average in pounds VOC per gallon less water as applied; C = the VOC content of the coating in pounds VOC per gallon less water as applied; U = the usage rate of the coating in gallons per day.

The Compliance Monitoring Requirements applicable to this proposed modification are as follows:

<table>
<thead>
<tr>
<th>Emission Unit/Control</th>
<th>Operating Parameters</th>
<th>Frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>surface coating booth P11/ dry filter</td>
<td>placement, integrity, and particle loading of the filters</td>
<td>daily</td>
</tr>
<tr>
<td></td>
<td>observations of the overspray of the surface coating booth stack S11 while the booth is in operation</td>
<td>weekly</td>
</tr>
<tr>
<td></td>
<td>inspections of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground</td>
<td>monthly</td>
</tr>
</tbody>
</table>

These monitoring conditions are necessary because the dry filters for the surface coating booth P11 must operate properly to assure compliance with 326 IAC 6-3-2 (Particulate emission limitations, work practices, and control technologies) and 326 IAC 2-7 (Part 70).

Proposed Changes

The following changes listed below are due to the proposed revision. Deleted language appears as strikethrough text and new language appears as bold text:

(1) For this Part 70 Operating Permit Modification, IDEM OAQ has included IDEM’s Master Agency Interest Identification (ID) number of 39675 in the permit cover page signature box.

(2) The Part 70 Operating Permit has been modified as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

...
(c) One (1) surface coating booth, identified as P10, constructed in 2006, with a maximum capacity of 1.0 truck trailers per hour, using (1) high-volume low-pressure (HVLP) spray gun, with dry filters as overspray control, and exhausting to stack S10.

Under the NESHAP 40 CFR 63, Subpart HHHHHH, this is an existing affected facility.

... (e) One (1) surface coating booth, identified as P11, approved in 2019 for construction, with a maximum capacity of 1.0 truck trailers per hour, using (1) high-volume low-pressure (HVLP) spray gun, with dry filters as overspray control, and exhausting to stack S11.

Under the NESHAP 40 CFR 63, Subpart HHHHHH, this is a new affected facility.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

... (c) One (1) surface coating booth, identified as P10, constructed in 2006, with a maximum capacity of 1.0 truck trailers per hour, using (1) high-volume low-pressure (HVLP) spray gun, with dry filters as overspray control, and exhausting to stack S10.

Under the NESHAP 40 CFR 63, Subpart HHHHHH, this is an existing affected facility.

(e) One (1) surface coating booth, identified as P11, approved in 2019 for construction, with a maximum capacity of 1.0 truck trailers per hour, using (1) high-volume low-pressure (HVLP) spray gun, with dry filters as overspray control, and exhausting to stack S11.

Under the NESHAP 40 CFR 63, Subpart HHHHHH, this is a new affected facility.

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

D.2.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating booths, identified as P7, and P10, and P11, shall be controlled by dry particulate filters and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

D.2.2 Miscellaneous Metal Coating [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the Permittee shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicators for the surface coating booths, identified as P10 and P11.

... D.2.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

For the surface coating booths, identified as P10 and P11, compliance with the VOC content limit in condition D.2.2(a) shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

...
D.2.6 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray of the surface coating booth stacks S5, S6, S7, and S10, and S11 while one or more of the booths are in operation. If a condition exists which should result in a response, the Permittee shall take a reasonable response. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response required by this condition. Failure to take a reasonable response shall be considered a deviation from this permit.

D.2.7 Record Keeping Requirement

(a) To document the compliance status with Condition D.2.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.2.2.

1. The VOC content of each coating material and solvent used less water;

2. The amount of each coating material and solvent used on a daily basis.

   (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

   (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

3. For surface coating booths, identified as P10 and P11, the volume weighted average VOC content less water of the coatings used for each day.

D.3.3 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for this facility and its associated control device. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.4 Record Keeping Requirements

(a) To document the compliance status with Condition D.3.1, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.
SECTION E.2  NESHAP

Emissions Unit Description:

(c) One (1) surface coating booth, identified as P10, constructed in 2006, with a maximum capacity of 1.0 truck trailers per hour, using (1) high-volume low-pressure (HVLP) spray gun, with dry filters as overspray control, and exhausting to stack S10.

Under the NESHAP 40 CFR 63, Subpart HHHHHH, this is an existing affected facility.

(e) One (1) surface coating booth, identified as P11, approved in 2019 for construction, with a maximum capacity of 1.0 truck trailers per hour, using (1) high-volume low-pressure (HVLP) spray gun, with dry filters as overspray control, and exhausting to stack S11.

Under the NESHAP 40 CFR 63, Subpart HHHHHH, this is an affected facility.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements
[326 IAC 2-7-5(1)]


(a) Pursuant to 40 CFR 63.340(b) the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission units listed above, except as otherwise specified in 40 CFR Part 63, Subpart HHHHHH.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

E.2.2 National Emissions Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations [40 CFR Part 63, Subpart HHHHHH]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart HHHHHH (included as Attachment B to the operating permit).

The surface coating booth P10, constructed before September 17, 2007, is an existing affected source is subject to the following requirements:

(1) 40 CFR 63.11169(c)
(2) 40 CFR 63.11170(a)(3), (b)
(3) 40 CFR 63.11171(a), (e)
(4) 40 CFR 63.11172(b)
(5) 40 CFR 63.11173(e), (f), (g)(2)(3)
(6) 40 CFR 63.11174
(8) 40 CFR 63.11176(a)
(9) 40 CFR 63.11177(a), (b), (c), (d), (g), (h)
(10) 40 CFR 63.11178
(11) 40 CFR 63.11179
(12) 40 CFR 63.11180
(13) Table 1

The surface coating booth P11 constructed after January 9, 2008 P11 is a new affected source, and is subject to the following requirements:

(1) 40 CFR 63.11169(c)
(2) 40 CFR 63.11170(a)(3), (b)
(3) 40 CFR 63.11171(a), (c)
(4) 40 CFR 63.11172(a)(2)
(5) 40 CFR 63.11173(e), (f), (g)(1)(3)
(6) 40 CFR 63.11174
(8) 40 CFR 63.11176(a)
(9) 40 CFR 63.11177(a), (b), (c), (d), (g), (h)
(10) 40 CFR 63.11178
(11) 40 CFR 63.11179
(12) 40 CFR 63.11180
(13) Table 1

Conclusion and Recommendation

Unless otherwise stated, information 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 May 20, 2019.

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 073-41464-00025. The operation of this proposed modification shall be subject to the conditions of the attached Significant Permit Modification No. 073-41491-00025.

The staff recommends to the Commissioner that the Part 70 Significant Source Modification and Significant Permit Modification be approved.

IDEM Contact

(a) If you have any questions regarding this permit, please contact Ms. Pavithra Ethi Rajan, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 233-7511 or (800) 451-6027, and ask for Ms. Pavithra Ethi Rajan or (317) 233-751.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens’ Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.
## Appendix A: Emissions Calculations

### Modification Summary - New Unit

**Surface Coating Operations - P11**

Company Name: Talbert Manufacturing, Inc.
Source Address: 1628 West State Road 114, Rensselaer, Indiana 47978
Part 70 SSM No.: 073-41464-00025
Part 70 SPM No.: 073-41491-00025
Reviewer: Pavithra Ethi Rajan

### Material Properties and Emissions Calculations

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Weight % Volatile (H2O &amp; Organics)</th>
<th>Weight % Water</th>
<th>Weight % Organics</th>
<th>Volume % Water</th>
<th>Volume % Non-Volatiles (solids)</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Maximum (unit/hour)</th>
<th>Pounds VOC per gallon of coating less water</th>
<th>Pounds VOC per gallon of coating</th>
<th>Potential VOC pounds per hour</th>
<th>Potential VOC pounds per day</th>
<th>Potential VOC tons per year</th>
<th>Particulate Potential (ton/yr)</th>
<th>lb VOC/gal solids</th>
<th>Transfer Efficiency</th>
<th>Particulate Control Efficiency*</th>
<th>Controlled Particulate Emissions (ton/yr)</th>
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</thead>
<tbody>
<tr>
<td>AHA0058 Duraspar 120 Gray Primer</td>
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<td>22.01%</td>
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</table>

### Potential Emissions

<p>| | | | | | | | | | |</p>
<table>
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<tr>
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</thead>
<tbody>
<tr>
<td></td>
<td>Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)</td>
<td></td>
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<tr>
<td></td>
<td>Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)</td>
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<tr>
<td></td>
<td>Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)</td>
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<tr>
<td></td>
<td>Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hrs/day)</td>
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<tr>
<td></td>
<td>Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hrs/yr) * (1 ton/2000 lbs)</td>
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<tr>
<td></td>
<td>Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1-Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)</td>
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<tr>
<td></td>
<td>Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)</td>
<td></td>
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<td></td>
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<tr>
<td></td>
<td>Controlled Particulate Emissions (ton/yr) = Particulate Potential * (1 - Particulate Control Efficiency)</td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>

*IDEM applies a control efficiency value of 95% or lower. Control efficiency higher than 95% has to be federally enforceable.

### ETHODOLOGY

1. Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
2. Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
3. Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
4. Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hrs/day)
5. Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hrs/yr) * (1 ton/2000 lbs)
6. Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1-Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
7. Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
8. Controlled Particulate Emissions (ton/yr) = Particulate Potential * (1 - Particulate Control Efficiency)

Per manufacturer specification, GFS Wave Paint Booth Filter = 99.94% particulate control efficiency - information provided by source.

*IDEM applies a control efficiency value of 95% or lower. Control efficiency higher than 95% has to be federally enforceable.
### Appendix A: Emissions Calculations

**Modification Summary - New Unit**

**Surface Coating Operations - P11**

**Company Name**: Talbert Manufacturing, Inc.

**Source Address**: 1628 West State Road 114, Rensselaer, Indiana 47978

**Part 70 SSM No.**: 073-41464-00025

**Part 70 SPM No.**: 073-41491-00025

**Reviewer**: Pavithra Ethi Rajan

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Gallons of Material (gal/unit)</th>
<th>Maximum (unit/hour)</th>
<th>Weight % Cyanide Compounds</th>
<th>Monomer Release % for HDI</th>
<th>Weight % Toluene</th>
<th>Weight % Methyl Isobutyl Ketone</th>
<th>Weight % Ethylbenzene</th>
<th>Weight % Xylene</th>
<th>Weight % Chromium Compounds</th>
<th>Weight % Cobalt Compounds</th>
<th>HDI Emissions (ton/yr)</th>
<th>Toluene Emissions (ton/yr)</th>
<th>Methyl Isobutyl Ketone Emissions (ton/yr)</th>
<th>Ethylbenzene Emissions (ton/yr)</th>
<th>Xylene Emissions (ton/yr)</th>
<th>Chromium Compounds Emissions (ton/yr)</th>
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</tr>
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<tbody>
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**Total Potential Emissions**: 1.34 0.00 0.00 0.22 0.65 0.16 0.00

**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

Cyanide Compounds emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * Monomer Release % for HDI * 8760 hrs/yr * 1 ton/2000 lbs

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### Appendix A: Emission Calculations

#### 38097 Summary

**Company Name:** Talbert Manufacturing, Inc.  
**Source Address:** 1628 West State Road 114, Rensselaer, Indiana 47978  
**Part 70 SSM No.:** 073-41464-00025  
**Part 70 SPM No.:** 073-41491-00025  
**Reviewer:** Pavithra Ethi Rajan

#### Unrestricted Potential to Emit

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**TOTAL Incl. Fugitives**

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## Appendix A: Emission Calculations

### Emissions Summary

**Company Name:** Talbert Manufacturing, Inc.
**Source Address:** 1628 West State Road 114, Rensselaer, Indiana 47978
**Part 70 SSM No.:** 073-41464-00025
**Part 70 SPM No.:** 073-41491-00025
**Reviewer:** Pavithra Ethi Rajan

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<td><strong>2.36</strong></td>
<td><strong>8.27E-02</strong></td>
<td><strong>1.29</strong></td>
<td><strong>14.89</strong></td>
</tr>
</tbody>
</table>

* *Weight % HAP based on weight % aromatic hydrocarbons listed on the SDS. No individual HAPs were listed, so a conservative approach was used for determining total HAPs.*
Appendix A: Emission Calculations
Abraasive Blasting - Confined

Company Name: Talbert Manufacturing, Inc.
Source Address: 1628 West State Road 114, Rensselaer, Indiana 47978
Part 70 SSM No.: 073-41464-00025
Part 70 SPM No.: 073-41491-00025
Reviewer: Pavithra Ethi Rajan

Table 1 - Emission Factors for Abrasives

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>lb PM / lb abrasive</th>
<th>lb PM10 / lb PM</th>
<th>Emission Factor (EF)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sand</td>
<td>0.041</td>
<td>0.70</td>
<td></td>
</tr>
<tr>
<td>Grit</td>
<td>0.010</td>
<td>0.70</td>
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</tr>
<tr>
<td>Steel Shot</td>
<td>0.004</td>
<td>0.86</td>
<td></td>
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<tr>
<td>Other</td>
<td>0.010</td>
<td>1.00</td>
<td></td>
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</table>

Table 2 - Density of Abrasives (lb/ft³)

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>Density (lb/ft³)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Al oxides</td>
<td>160</td>
</tr>
<tr>
<td>Sand</td>
<td>99</td>
</tr>
<tr>
<td>Steel</td>
<td>487</td>
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</table>

Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)

Flow rate (FR1) of sand through a blasting nozzle as a function of nozzle pressure and internal diameter (ID1)

<table>
<thead>
<tr>
<th>Nozzle Pressure (psig)</th>
<th>No. 2 (1/8 inch)</th>
<th>No. 3 (3/16 inch)</th>
<th>No. 4 (1/4 inch)</th>
<th>No. 5 (5/16 inch)</th>
<th>No. 6 (3/8 inch)</th>
<th>No. 7 (7/16 inch)</th>
<th>No. 8 (1/2 inch)</th>
<th>No. 10 (5/8 inch)</th>
<th>No. 12 (3/4 inch)</th>
<th>No. 16 (1 inch)</th>
</tr>
</thead>
<tbody>
<tr>
<td>30</td>
<td>0.125</td>
<td>0.1875</td>
<td>0.25</td>
<td>0.3125</td>
<td>0.375</td>
<td>0.4375</td>
<td>0.5</td>
<td>0.625</td>
<td>0.75</td>
<td>1</td>
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<tr>
<td>40</td>
<td>28</td>
<td>65</td>
<td>109</td>
<td>205</td>
<td>285</td>
<td>385</td>
<td>503</td>
<td>820</td>
<td>1140</td>
<td>2030</td>
</tr>
<tr>
<td>50</td>
<td>35</td>
<td>80</td>
<td>136</td>
<td>247</td>
<td>355</td>
<td>472</td>
<td>615</td>
<td>990</td>
<td>1420</td>
<td>2460</td>
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<tr>
<td>60</td>
<td>42</td>
<td>94</td>
<td>168</td>
<td>292</td>
<td>417</td>
<td>560</td>
<td>725</td>
<td>1170</td>
<td>1670</td>
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<td>354</td>
<td>477</td>
<td>645</td>
<td>835</td>
<td>1336</td>
<td>1915</td>
<td>3340</td>
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<tr>
<td>80</td>
<td>55</td>
<td>122</td>
<td>221</td>
<td>377</td>
<td>540</td>
<td>755</td>
<td>945</td>
<td>1510</td>
<td>2160</td>
<td>3780</td>
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<tr>
<td>90</td>
<td>63</td>
<td>135</td>
<td>255</td>
<td>420</td>
<td>600</td>
<td>820</td>
<td>1050</td>
<td>1680</td>
<td>2400</td>
<td>4200</td>
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<tr>
<td>100</td>
<td>70</td>
<td>149</td>
<td>280</td>
<td>462</td>
<td>667</td>
<td>905</td>
<td>1160</td>
<td>1850</td>
<td>2630</td>
<td>5060</td>
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</tbody>
</table>

CALCULATIONS

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

Flow Rate (FR) = Abrasive flow rate (lb/hr) of abrasive at nozzle pressure and internal nozzle diameter (ID)

D1 = Density of sand from Table 2 = 99 lb/ft³
FR1 = Sand flow rate at nozzle pressure and internal diameter (ID1) from Table 3 = 905 lb/hr

D = Density of actual abrasive = 160 lb/ft³
ID = internal diameter of actual nozzle = 0.4375 inch
FR = Flow rate of actual abrasive (lb/hr) = 1462.63 lb/hr (per nozzle)

Potential to Emit Before Control

PM PM10 PM2.5

Potential to Emit (before control) = FR x EF x (1 - w/200) x N (where w should be entered in as a whole number (if w is 50%, enter 50))

Potential to Emit (after control) = [Potential to Emit (before control)] x [1 - control efficiency]

METHODOLOGY

PM2.5 emissions assumed equal to PM10 emissions.


Flow rate of actual abrasive (FR) (lb/hr) = FR1 x (ID/ID1)^2 x (D/D1)

Potential to Emit (before control) = EF x FR x (1 - w/200) x N (where w should be entered in as a whole number (if w is 50%, enter 50))

Potential to Emit (after control) = [Potential to Emit (before control)] x [1 - control efficiency]
### Material

|                | Density (Lb/Gal) | Weight % Volatile (H2O & Organics) | Weight % Organics | Volume % Water | Volume % Non-Volatiles (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 | Particulate Control Efficiency | Controlled Particulate Emissions (ton/yr) |
|----------------|-----------------|-----------------------------------|-------------------|----------------|---------------------------------|------------------------|---------------------|---------------------------------|---------------------------------|----------------------------|-----------------------------|-----------------------------|-----------------------------|----------------------------|-----------------|-------------------|-----------------------------|-----------------------------|
| AAA1023 Gray Duraspar 130 | 11.5             | 30.36%                             | 0.0%              | 30.4%          | 30.4%                           | 7.30000                | 0.500               | 3.48                           | 3.48                            | 12.70                       | 304.78                      | 55.62                       | 12.76                       | 6.73                        | 0%             | 95%               | 0.638                       |
| KXR0121 Red 7/1 Urethane | 10.1             | 34.64%                             | 0.0%              | 34.6%          | 34.6%                           | 4.05000                | 0.500               | 3.49                           | 3.49                            | 7.07                        | 169.70                      | 30.97                       | 5.84                        | 6.97                        | 90%            | 95%               | 0.292                       |
| KXA0121 Black 7/1 Urethane | 10.3             | 33.75%                             | 0.0%              | 33.8%          | 33.8%                           | 2.81000                | 0.500               | 3.49                           | 3.49                            | 4.90                        | 117.67                      | 21.48                       | 4.22                        | 6.67                        | 90%            | 95%               | 0.211                       |
| Thinner        | 6.7             | 50.00%                             | 0.0%              | 50.0%          | 50.0%                           | 4.42000                | 0.500               | 3.34                           | 3.34                            | 7.37                        | 176.89                      | 32.28                       | 0.00                        | NA                          | 100%           | N/A               | --                          |

### Potential Emissions

<p>| | | | | | | | | | | | | | | | | | |</p>
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<tr>
<th></th>
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<td>32.04</td>
<td>769.04</td>
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</tr>
</tbody>
</table>

### METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

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)

Controlled Particulate Emissions (ton/yr) = Particulate Potential * (1 - Particulate Control Efficiency)
### Material Emissions Calculations

#### 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 Particulate 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)

Controlled Particulate Emissions (ton/yr) = Particulate Potential * (1 - Particulate Control Efficiency)

### Table: Material Emissions Calculations

| Material               | Density (Lb/Gal) | Weight % Volatile (H2O & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating | 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 | Particulate Control Efficiency | Controlled Particulate Emissions (ton/yr) |
|------------------------|------------------|-----------------------------------|----------------|-------------------|----------------|--------------------------------|------------------------|----------------------|-----------------------------|-----------------------------|-----------------------------|-------------------------------|-----------------------------|-------------------------------|---------------------------------|----------------------|----------------------|-----------------------------|-----------------------------|
| AAA1023 Gray Duraspar 130 | 11.5             | 30.36%                            | 0.0%           | 30.4%             | 0.0%           | 51.66%                        | 0.333                  | 1                    | 3.48                        | 3.48                       | 1.16                        | 27.81                        | 5.07                         | 1.16                           | 6.73                               | 90%                     | 95%                  | 0.058                      |
| KXR0121 Red 7/1 Urethane | 10.1             | 34.64%                            | 0.0%           | 34.6%             | 0.0%           | 50.08%                        | 0.333                  | 1                    | 3.49                        | 3.49                       | 1.16                        | 27.91                        | 5.09                         | 0.96                           | 6.97                               | 90%                     | 95%                  | 0.048                      |
| KXA0121 Black 7/1 Urethane | 10.3            | 33.75%                            | 0.0%           | 33.8%             | 0.0%           | 52.34%                        | 0.333                  | 1                    | 3.49                        | 3.49                       | 1.16                        | 27.89                        | 5.09                         | 1.00                           | 6.67                               | 90%                     | 95%                  | 0.050                      |
| Thinner                | 6.67             | 50.00%                            | 0.0%           | 50.0%             | 0.0%           | 0.00%                         | 0.006                  | 1                    | 3.34                        | 3.34                       | 0.02                        | 0.34                         | 0.09                         | 0.09                           | N/A                                  | N/A                  | N/A                  | -                           |
| Ordnance Primer        | 11.18            | 25.02%                            | 0.0%           | 25.0%             | 0.0%           | 43.33%                        | 0.006                  | 56.33                | 2.60                        | 2.60                       | 0.93                        | 22.39                        | 4.09                         | 1.22                           | 6.46                               | 90%                     | 95%                  | 0.061                      |
| Ordnance Green         | 10.66            | 33.72%                            | 0.0%           | 33.7%             | 0.0%           | 49.15%                        | 0.006                  | 56.33                | 3.59                        | 3.59                       | 1.20                        | 28.77                        | 5.25                         | 1.03                           | 7.31                               | 90%                     | 95%                  | 0.052                      |

### Potential Emissions

<table>
<thead>
<tr>
<th>Material</th>
<th>Pounds VOC per Gallon Coating less Water</th>
<th>Pounds VOC per Gallon Coating</th>
<th>Potential VOC Pounds per Hour</th>
<th>Potential VOC Pounds per Day</th>
<th>Potential VOC Tons per Year</th>
<th>Particulate Potential (ton/yr)</th>
<th>lb VOC/gal solids</th>
<th>Transfer Efficiency</th>
<th>Particulate Control Efficiency</th>
<th>Controlled Particulate Emissions (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>AAA1023 Gray Duraspar 130</td>
<td>5.63</td>
<td>135.23</td>
<td>24.68</td>
<td>5.38</td>
<td>0.27</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
</tbody>
</table>

### Appendix A: Emissions Calculations

VOC and Particulate
From Surface Coating Operations - P10

Company Name: Talbert Manufacturing, Inc.
Source Address: 1628 West State Road 114, Rensselaer, Indiana 47978
Part 70 SSM No.: 073-41464-00025
Part 70 SPM No.: 073-41491-00025
Reviewer: Pavithra Ethi Rajan
### Material Properties and Emissions Calculations

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Weight % Volatile (H20 &amp; Organics)</th>
<th>Weight % Water</th>
<th>Weight % Organics</th>
<th>Volume % Water</th>
<th>Volume % Non-Volatiles (solids)</th>
<th>Gal of Mat. (gal/unit)</th>
<th>Maximum (unit/hour)</th>
<th>Pounds VOC per gallon of coating less water</th>
<th>Pounds VOC per gallon of coating</th>
<th>Potential VOC pounds per hour</th>
<th>Potential VOC pounds per day</th>
<th>Potential VOC tons per year</th>
<th>Particulate Potential (ton/yr)</th>
<th>Ib VOC/gal solids</th>
<th>Transfer Efficiency</th>
<th>Particulate Control Efficiency*</th>
<th>Controlled Particulate Emissions (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>AHA0058 Durasp 120 Gray Primer</td>
<td>11.9</td>
<td>22.01%</td>
<td>0.0%</td>
<td>22.01%</td>
<td>0.0%</td>
<td>74.55%</td>
<td>1.043</td>
<td>1</td>
<td>2.61</td>
<td>2.61</td>
<td>2.72</td>
<td>65.34</td>
<td>11.93</td>
<td>10.56</td>
<td>3.50</td>
<td>75% 95%</td>
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<tr>
<td>KPR0714 Valspar R-Cure 800 Talbert Red</td>
<td>9.4</td>
<td>37.27%</td>
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<td>37.27%</td>
<td>0.0%</td>
<td>62.73%</td>
<td>0.49</td>
<td>1</td>
<td>3.51</td>
<td>3.51</td>
<td>1.72</td>
<td>41.29</td>
<td>7.53</td>
<td>3.17</td>
<td>5.60</td>
<td>75% 95%</td>
<td>0.159</td>
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<tr>
<td>KPA0602 Valspar R-Cure 800 High Gloss Black Urethane</td>
<td>10.1</td>
<td>34.74%</td>
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<td>34.74%</td>
<td>0.0%</td>
<td>65.26%</td>
<td>0.49</td>
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<td>3.49</td>
<td>3.49</td>
<td>1.71</td>
<td>41.06</td>
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<td>3.52</td>
<td>5.35</td>
<td>75% 95%</td>
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<td>0.0%</td>
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<td>0%</td>
<td>N/A</td>
<td>-</td>
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</table>

**Potential Emissions**

| | 8.25 | 198.04 | 36.14 | 17.25 | 0.86 |

**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 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)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Controlled Particulate Emissions (ton/yr) = Particulate Potential * (1 - Particulate Control Efficiency)

Per manufacturer specification, GFS Wave Paint Booth Filter = 99.94% particulate control efficiency - information provided by source

*IDEM applies a control efficiency value of 95% or lower. Control efficiency higher than 95% has to be federally enforceable.
## Appendix A: Emission Calculations
### HAP Emission Calculations
#### Surface Coating Operations - Booth P7

**Company Name:** Talbert Manufacturing, Inc.  
**Source Address:** 1628 West State Road 114, Rensselaer, Indiana 47978  
**Part 70 SSM No.:** 073-41464-00025  
**Part 70 SPM No.:** 073-41491-00025  
**Reviewer:** Pavithra Ethi Rajan

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Gallons of Material (gal/unit)</th>
<th>Maximum (unit/hour)</th>
<th>Weight % Cyanide Compounds</th>
<th>Monomer Release % for HDI</th>
<th>HDI Emissions (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>AAA1023</td>
<td>11.5</td>
<td>7.30000</td>
<td>0.500</td>
<td>7.65%</td>
<td>6.30%</td>
<td>0.88</td>
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<td>Gray Duraspar 130</td>
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<tr>
<td>KXR0121</td>
<td>10.1</td>
<td>4.05000</td>
<td>0.500</td>
<td>10.60%</td>
<td>6.30%</td>
<td>0.60</td>
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<td>Red 7/1 Urethane</td>
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<tr>
<td>KXA0121</td>
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<td>2.81000</td>
<td>0.500</td>
<td>10.60%</td>
<td>6.30%</td>
<td>0.42</td>
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<tr>
<td>Black 7/1 Urethane</td>
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</table>

Total Potential Emissions: 1.90

### METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % Cyanide Compounds/Monomer Release % for HDI * 8760 hrs/yr * 1 ton/2000 lbs

## Appendix A: Emission Calculations

### HAP Emission Calculations

Surface Coating Operations - Booth P10

Company Name: Talbert Manufacturing, Inc.
Source Address: 1628 West State Road 114, Rensselaer, Indiana 47978
Part 70 SSM No.: 073-41464-00025
Part 70 SPM No.: 073-41491-00025
Reviewer: Pavithra Ethi Rajan

### Density Gallons of Material Maximum HDI Emissions

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (Lb/Gal)</th>
<th>Gallons of Material (gal/unit)</th>
<th>Maximum (unit/hour)</th>
<th>Weight % Cyanide Compounds</th>
<th>Monomer Release % for HDI</th>
<th>Weight % Toluene</th>
<th>Weight % Methyl Isobutyl Ketone</th>
<th>Weight % Ethylbenzene</th>
<th>Weight % Xylene</th>
<th>Weight % Chromium Compounds</th>
<th>Weight % Cobalt Compounds</th>
<th>HDI Emissions (ton/yr)</th>
<th>Toluene Emissions (ton/yr)</th>
<th>Methyl Isobutyl Ketone Emissions (ton/yr)</th>
<th>Ethylbenzene Emissions (ton/yr)</th>
<th>Xylene Emissions (ton/yr)</th>
<th>Chromium Compounds Emissions (ton/yr)</th>
<th>Cobalt Compounds Emissions (ton/yr)</th>
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<tbody>
<tr>
<td>AAA1023 Gray Duraspar 130</td>
<td>11.5</td>
<td>0.33300</td>
<td>1.000</td>
<td>7.65%</td>
<td>6.30%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0.081</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>KXR0121 Red 7/1 Urethane</td>
<td>10.1</td>
<td>0.33300</td>
<td>1.000</td>
<td>10.60%</td>
<td>6.30%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0.098</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>KXA0121 Black 7/1 Urethane</td>
<td>10.3</td>
<td>0.33300</td>
<td>1.000</td>
<td>10.60%</td>
<td>6.30%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0.101</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Ordnance Primer</td>
<td>11.2</td>
<td>0.33300</td>
<td>1.000</td>
<td>0%</td>
<td>6.30%</td>
<td>9.29%</td>
<td>0.19%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0.539</td>
<td>1.062</td>
<td>0.031</td>
<td>0.023</td>
<td>0</td>
<td>1.515</td>
<td>0</td>
</tr>
<tr>
<td>Ordnance Green</td>
<td>10.7</td>
<td>0.33300</td>
<td>1.000</td>
<td>55.00%</td>
<td>6.30%</td>
<td>6.83%</td>
<td>0%</td>
<td>2.74%</td>
<td>15.03%</td>
<td>10.93%</td>
<td>8.19%</td>
<td>0.000</td>
<td>0.426</td>
<td>2.337</td>
<td>1.699</td>
<td>1.273</td>
<td>1.699</td>
<td>1.273</td>
</tr>
</tbody>
</table>

Total Potential Emissions: 0.82

### 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

Cyanide Compounds emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * Monomer Release % for HDI * 8760 hrs/yr * 1 ton/2000 lbs

### Appendix A: Emission Calculations

**HAP Emission Calculations**

**Surface Coating Operations - Booth P11**

Company Name: Talbert Manufacturing, Inc.
Source Address: 1628 West State Road 114, Rensselaer, Indiana 47978
Part 70 SSM No.: 073-41464-00025
Part 70 SPM No.: 073-41491-00025
Reviewer: Pavithra Ethi Rajan

**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

Cyanide Compounds emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * Monomer Release % for HDI * 8760 hrs/yr * 1 ton/2000 lbs


**Table: Material Emission Calculations**

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (lb/gal)</th>
<th>Gallons of Material (gal/unit)</th>
<th>Maximum (unit/hr)</th>
<th>Weight % Cyanide Compounds</th>
<th>Monomer Release % for HDI</th>
<th>Weight % Toluene</th>
<th>Weight % Methyl Isobutyl Ketone</th>
<th>Weight % Ethylbenzene</th>
<th>Weight % Xylene</th>
<th>Weight % Chromium Compounds</th>
<th>Weight % Cobalt Compounds</th>
<th>HDI Emissions (ton/yr)</th>
<th>Toluene Emissions (ton/yr)</th>
<th>Methyl Isobutyl Ketone Emissions (ton/yr)</th>
<th>Ethylbenzene Emissions (ton/yr)</th>
<th>Xylene Emissions (ton/yr)</th>
<th>Chromium Compounds Emissions (ton/yr)</th>
<th>Cobalt Compounds Emissions (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>AHA0058 Duraspal 120 Gray Primer</td>
<td>11.9</td>
<td>1.04</td>
<td>1</td>
<td>26.36%</td>
<td>6.30%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0.3%</td>
<td>0%</td>
<td>0%</td>
<td>0.897</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.162</td>
</tr>
<tr>
<td>KPR0714 Valspar R-Cure 800 Talbert Red</td>
<td>9.4</td>
<td>0.49</td>
<td>1</td>
<td>26.36%</td>
<td>6.30%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0.336</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td>KPA0602 Valspar R-Cure 800 High Gloss Black Urethane</td>
<td>10.1</td>
<td>0.49</td>
<td>1</td>
<td>7.55%</td>
<td>6.30%</td>
<td>0%</td>
<td>0%</td>
<td>1%</td>
<td>3%</td>
<td>0%</td>
<td>0%</td>
<td>0.103</td>
<td>0.0</td>
<td>0.0</td>
<td>0.216</td>
<td>0.647</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td>Thinner</td>
<td>6.7</td>
<td>0.63</td>
<td>1</td>
<td>0%</td>
<td>6.30%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
</tr>
</tbody>
</table>

**Total Potential Emissions**

|                     | 1.34 | 0.00 | 0.00 | 0.22 | 0.65 | 0.16 | 0.00 |

**Total HAPs**

2.36 tons/year
### Appendix A: Emissions Calculations

**Welding and Thermal Cutting**

**Company Name:** Talbert Manufacturing, Inc.  
**Source Address:** 1628 West State Road 114, Rensselaer, Indiana 47978  
**Part 70 SSM No.:** 073-41464-00025  
**Part 70 SPM No.:** 073-41491-00025  
**Reviewer:** Pavithra Ethi Rajan

<table>
<thead>
<tr>
<th>PROCESS</th>
<th>Number of Stations</th>
<th>Max. electrode consumption per station (lbs/hr)</th>
<th>EMISSION FACTORS* (lb pollutant/lb electrode)</th>
<th>EMISSIONS (lbs/hr)</th>
<th>HAPS (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>WELDING</td>
<td></td>
<td></td>
<td>PM/PM10/PM2.5 Mn Ni Cr</td>
<td>PM/PM10/PM2.5 Mn Ni Cr</td>
<td></td>
</tr>
<tr>
<td>Submerged Arc (P3)</td>
<td>2</td>
<td>3.336</td>
<td>0.036 0.111</td>
<td>0.240 0.073 0.000</td>
<td>0.073</td>
</tr>
<tr>
<td>Stick (E7018 electrode) (P4)</td>
<td>3</td>
<td>7.14</td>
<td>0.021 0.0009</td>
<td>0.452 0.019 0.000</td>
<td>0.019</td>
</tr>
<tr>
<td>Gas Metal Arc Welding (E70S electrode) (P2)</td>
<td>34</td>
<td>1.85</td>
<td>0.0052 0.00318 0.00001 0.00001</td>
<td>0.327 0.200 0.001 0.000629</td>
<td>0.201</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>FLAME CUTTING</th>
<th>Number of Stations</th>
<th>Max. Metal Thickness Cut (in.)</th>
<th>Max. Metal Cutting Rate (in./minute)</th>
<th>EMISSION FACTORS* (lb pollutant/1,000 inches cut, 1&quot; thick)**</th>
<th>EMISSIONS (lbs/hr)</th>
<th>HAPS (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Oxyacetylene (P1)</td>
<td>4</td>
<td>0.25</td>
<td>120</td>
<td>0.1622 0.0005 0.0001 0.0003</td>
<td>1.168 1.46E-04 5.84E-08 1.46E-13</td>
<td>1.46E-04</td>
</tr>
<tr>
<td>Plasma** (P1)</td>
<td>2</td>
<td>120</td>
<td></td>
<td>0.0039</td>
<td>0.056 0 0 0</td>
<td>0</td>
</tr>
<tr>
<td>HD Plasma** (P9)</td>
<td>1</td>
<td>140</td>
<td></td>
<td>0.0039</td>
<td>0.033 0 0 0</td>
<td>0</td>
</tr>
</tbody>
</table>

**EMISSION TOTALS**

- Potential Emissions lbs/hr: 2.28 0.29 6.29E-04 6.29E-04 0.29
- Potential Emissions lbs/day: 54.62 7.03 0.02 0.02 7.06
- Potential Emissions tons/year: 9.97 1.28 2.76E-03 2.76E-03 1.29

**METHODOLOGY**

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

- **Emission Factors** are calculated using the following formula:
  
  \[
  \text{Emissions, lbs/hr} = \text{Number of Stations} \times \text{Max. electrode consumption per station (lbs/hr)} \times \text{Emission Factor (lb pollutant/lb electrode)}
  \]

- **Emission Factors** are based on default values for carbon steel unless a specific electrode type is noted in the Process column.

- **Emission Factors** for plasma cutting are from the American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with a 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

- **Emission Factors** for Oxyacetylene cutting are calculated using the following formula:
  
  \[
  \text{Emissions, lbs/hr} = \text{Number of Stations} \times \text{Max. Metal Thickness Cut (in.)} \times \text{Max. Metal Cutting Rate (in./minute)} \times \text{Emission Factor (lb pollutant/1,000 inches cut, 1" thick)**}
  \]

- Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

- **Plasma cutting emissions, lb/hr:** (# of stations)(max. cutting rate, in./min.)(60 min./hr)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

- **Cutting emissions, lb/hr:** (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

- **Welding emissions, lb/hr:** (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

- Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

- Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.
Appendix A: Emissions Calculations
Natural Gas Combustion (< 100 MMBtu/hr)

Company Name: Talbert Manufacturing, Inc.
Source Address: 1628 West State Road 114, Rensselaer, Indiana 47978
Part 70 SSM No.: 073-41464-00025
Part 70 SPM No.: 073-41491-00025
Reviewer: Pavithra Ethi Rajan

### PM, PM10, PM2.5, SO2, NOx, VOC, CO

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM*</th>
<th>PM10*</th>
<th>PM2.5*</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Natural Gas Fired Units</td>
<td>1.9</td>
<td>7.6</td>
<td>7.6</td>
<td>0.6</td>
<td>100.0</td>
<td>5.5</td>
<td>84.0</td>
</tr>
</tbody>
</table>

**see below

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Heat Input Capacity (MMBtu/hr)</th>
<th>Potential Throughput (MMCF/yr)</th>
<th>Potential Emission (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Natural Gas Fired Units</td>
<td>10.2</td>
<td>87.600</td>
<td>0.08</td>
</tr>
</tbody>
</table>

### Natural Gas Fired Units

Emission Factors are from AP-42, Tables 1.4-1 and 1.4-2.

*PM emission factor is filterable PM only. PM10 and PM2.5 emission factors are filterable and condensable particulate combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

### Benzene, Dichlorobenzene, Formaldehyde, Hexane, Toluene, Lead, Cadmium, Chromium, Manganese, Nickel

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Heat Input Capacity (MMBtu/hr)</th>
<th>Potential Throughput (MMCF/yr)</th>
<th>Potential Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Natural Gas Fired Units</td>
<td>10.2</td>
<td>87.600</td>
<td>9.2E-05</td>
</tr>
</tbody>
</table>

Emission Factors are from AP-42, Tables 1.4-3 and 1.4-4.

The five highest organic and metal HAPs emission factors are provided above. The total HAPs is the sum of all HAPs listed in AP-42, Tables 1.4-3 and 1.4-4. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

### Methodology
Heating Value of Natural Gas is assumed to be 1020 MMBtu/MMCF
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) * 8,760 hrs/yr * 1 MMCF/1,020 MMBtu
Potential Emission (tons/yr) = Throughput (MMCF/yr) * Emission Factor (lb/MMCF) * (1 ton/2,000 lb)
Appendix A: Emissions Calculations
Degreasing Operations

Company Name: Talbert Manufacturing, Inc.
Source Address: 1628 West State Road 114, Rensselaer, Indiana 47978
Part 70 SSM No.: 073-41464-00025
Part 70 SPM No.: 073-41491-00025
Reviewer: Pavithra Ethi Rajan

<table>
<thead>
<tr>
<th>Material</th>
<th>Density</th>
<th>Weight Organic</th>
<th>Maximum Material Usage</th>
<th>Potential VOC</th>
<th>Weight HAP</th>
<th>Potential HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mineral Spirits</td>
<td>6.7</td>
<td>100%</td>
<td>145</td>
<td>0.49</td>
<td>15%</td>
<td>0.07</td>
</tr>
</tbody>
</table>

Methodology
Potential VOC (tons/yr) = Density (lbs/gal) x % VOC x Gal of Material (gal/yr) x (1 ton/2000 lbs)
Potential HAP (ton/yr) = Density (lbs/gal) x % HAP x Gal of Material (gal/yr) x (1 ton/2000 lb)

Weight % HAP based on weight % aromatic hydrocarbons listed on the MSDS. No individual HAPs were listed, so a conservative approach was used for determining total HAPs.
## Appendix A: Emissions Calculations

### Woodworking Operations

**Company Name:** Talbert Manufacturing, Inc.  
**Source Address:** 1628 West State Road 114, Rensselaer, Indiana 47978  
**Part 70 SSM No.:** 073-41464-00025  
**Part 70 SPM No.:** 073-41491-00025  
**Reviewer:** Pavithra Ethi Rajan

<table>
<thead>
<tr>
<th>Operation</th>
<th>Cut Rate (in/hr)</th>
<th>Material Thickness (in)</th>
<th>Cut Width (in)</th>
<th>Material Loss (in^3/hr)</th>
<th>Wood Density (lb/ft^3)</th>
<th>Estimated Uncontrolled PM/PM10/PM2.5 (lb/hr)</th>
<th>Estimated Uncontrolled PM/PM10/PM2.5 (ton/yr)</th>
<th>Control Efficiency</th>
<th>Estimated Controlled PM/PM10/PM2.5 (lb/hr)</th>
<th>Estimated Controlled PM/PM10/PM2.5 (ton/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Woodworking Operations</td>
<td>130</td>
<td>1.3125</td>
<td>0.125</td>
<td>21.328</td>
<td>45.000</td>
<td>0.555</td>
<td>2.43</td>
<td>95.0%</td>
<td>0.028</td>
<td>0.122</td>
</tr>
</tbody>
</table>

### Methodology

Material Loss (in^3/hr) = Cut Rate (in/hr) x Material Thickness (in) x Cut Width (in)

Estimated PM/PM10/PM2.5 (lb/hr) = Material Loss (in^3/hr) x Material Density (lb/ft^3) x (1 in^3/12^3 ft^3)

Estimated PM/PM10/PM2.5 (ton/yr) = Estimated PM/PM10/PM2.5 (lb/hr) x (8,760 hrs/yr) x (1 ton/2,000 lb)

Estimated Controlled PM/PM10/PM2.5 (lb/hr) = Estimated Uncontrolled PM/PM10/PM2.5 (lb/hr) x (1 - Control Efficiency)

Estimated Controlled PM/PM10/PM2.5 (ton/yr) = Estimated Controlled PM/PM10/PM2.5 (lb/hr) x (8,760 hr/yr) x (1 ton/2,000 lb)
Appendix A: Emission Calculations
Fugitive Dust Emissions - Unpaved Roads

Company Name: Talbert Manufacturing, Inc.
Source Address: 1628 West State Road 114, Rensselaer, Indiana 47978
Part 70 SSM No.: 073-41464-00025
Part 70 SPM No.: 073-41481-00025
Reviewer: Pavithra Ethi Rajan

Unpaved Roads at Industrial Site
The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (11/2006).

Vehicle Information (provided by source)

<table>
<thead>
<tr>
<th>Type</th>
<th>Maximum number of vehicles</th>
<th>Maximum trips per day (trip/day)</th>
<th>Maximum Weight Loaded (tons/trip)</th>
<th>Total Weight driven per day (ton/day)</th>
<th>Maximum one-way distance (feet/trip)</th>
<th>Maximum one-way distance (miles/day)</th>
<th>Maximum one-way distance (miles/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle (entering plant) (one-way trip)</td>
<td>7.0</td>
<td>1.0</td>
<td>7.0</td>
<td>40.0</td>
<td>280.0</td>
<td>850</td>
<td>0.161</td>
</tr>
<tr>
<td>Vehicle (leaving plant) (one-way trip)</td>
<td>7.0</td>
<td>1.0</td>
<td>7.0</td>
<td>55.0</td>
<td>385.0</td>
<td>850</td>
<td>0.161</td>
</tr>
<tr>
<td>Totals</td>
<td>14.0</td>
<td>665.0</td>
<td>2.3</td>
<td>822.6</td>
<td>40</td>
<td>7 trucks/day</td>
<td></td>
</tr>
</tbody>
</table>

Average Vehicle Weight Per Trip = \(\frac{47.5\text{ tons/trip} \cdot 7.0\text{ trips/day}}{7\text{ trucks/day}}\)  
Average Miles Per Trip = \(\frac{0.16\text{ miles/trip} \cdot 7.0\text{ trips/day}}{7\text{ trucks/day}}\)  
Unmitigated Emission Factor, \(E_f = k \cdot \left(\frac{s}{12}\right)^a \cdot \left(\frac{W}{3}\right)^b\)  
where \(k = 4.9\)  
\(s = 6\)  
\(a = 0.7\)  
\(W = 47.5\)  
\(b = 0.45\)  

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, \(E_{ex} = E \cdot \frac{(365 - P)/365}{\text{days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)}}\)  
Mitigated Emission Factor, \(E_{ex} = \frac{E \cdot (365 - P)/365}{125}\)  
Dust Control Efficiency = 0%  

<table>
<thead>
<tr>
<th>Process</th>
<th>Unmitigated PTE of PM (tons/yr)</th>
<th>Unmitigated PTE of PM10 (tons/yr)</th>
<th>Unmitigated PTE of PM2.5 (tons/yr)</th>
<th>Mitigated PTE of PM (tons/yr)</th>
<th>Mitigated PTE of PM10 (tons/yr)</th>
<th>Mitigated PTE of PM2.5 (tons/yr)</th>
<th>Controlled PTE of PM (tons/yr)</th>
<th>Controlled PTE of PM10 (tons/yr)</th>
<th>Controlled PTE of PM2.5 (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle (entering plant) (one-way trip)</td>
<td>2.15</td>
<td>0.57</td>
<td>0.06</td>
<td>1.41</td>
<td>0.38</td>
<td>0.04</td>
<td>1.41</td>
<td>0.38</td>
<td>0.04</td>
</tr>
<tr>
<td>Vehicle (leaving plant) (one-way trip)</td>
<td>2.15</td>
<td>0.57</td>
<td>0.06</td>
<td>1.41</td>
<td>0.38</td>
<td>0.04</td>
<td>1.41</td>
<td>0.38</td>
<td>0.04</td>
</tr>
<tr>
<td>Totals</td>
<td>4.30</td>
<td>1.15</td>
<td>0.11</td>
<td>2.83</td>
<td>0.75</td>
<td>0.08</td>
<td>2.83</td>
<td>0.75</td>
<td>0.08</td>
</tr>
</tbody>
</table>

Methodology
Total Weight driven per day (ton/day) = \([\text{Maximum Weight Loaded (tons/trip) \cdot \text{Maximum trips per day (trip/day)}]}\)  
Maximum one-way distance (miles/yr) = \([\text{Maximum one-way distance (feet/trip) / 5280 ft/mile]}\)  
Average Vehicle Weight Per Trip (ton/trip) = \([\text{SUM(Total Weight driven per day (ton/day)) / SUM(Maximum trips per year (trip/day))}]\)  
Unmitigated PTE (tons/yr) = \([\text{SUM(Maximum one-way miles (miles/day)/SUM(Maximum trips per year (trip/day))]}\)  
Mitigated PTE (tons/yr) = \([\text{(Maximum one-way miles (miles/year)) \cdot (Unmitigated Emission Factor (b/mile)) \cdot (ton/2000 lbs)}]\)  
Controlled PTE (tons/yr) = \([\text{(Mitigated Emission Factor (b/mile)) \cdot (ton/2000 lbs)}}\)  

Abbreviations
PM = Particulate Matter  
PM10 = Particulate Matter (<10 um)  
PM2.5 = Particulate Matter (<2.5 um)  
PTE = Potential to Emit
August 5, 2019

Ms. Stephanie Culp
Talbert Manufacturing, Inc.
1628 West State Road 114
Rensselaer, IN 47978

Re: Public Notice
Talbert Manufacturing, Inc.
Permit Level: Title V Significant Source Modification and Significant Permit Modification
Permit Number: 073-41464-00025 and 073-41491-00025

Dear Ms. Culp:

Enclosed is a copy of your draft Title V Significant Source Modification and Significant Permit Modification, Technical Support Document, emission calculations, and the Public Notice.

The Public Notice period will begin the date the Notice is published on the IDEM Official Public Notice website. Publication has been requested and is expected within 2-3 business days. You may check the exact Public Notice begins and ends date here: https://www.in.gov/idem/5474.htm

Please note that as of April 17, 2019, IDEM is no longer required to publish the notice in a newspaper.

OAQ has submitted the draft permit package to the Rensselaer Public Library, 208 West Susan Street in Rensselaer, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Pavithra Ethi Rajan, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension (317) 233-7511 or dial (317) 233-7511.

Sincerely,

Vivian Haun
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter 4/12/19
August 5, 2019

To: Rensselaer Public Library

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

Subject: Important Information to Display Regarding a Public Notice for an Air Permit

Applicant Name: Talbert Manufacturing, Inc.
Permit Number: 073-41464-00025 and 073-41491-00025

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. Please make this information readily available until you receive a copy of the final package.

If you have any questions concerning this public review process, please contact Joanne Smiddle-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library updated 4/2019
Notice of Public Comment

August 5, 2019
Talbert Manufacturing, Inc.
073-41464-00025 and 073-41491-00025

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has posted on IDEM’s Public Notice website at https://www.in.gov/idem/5474.htm.

The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana’s Air Permitting Program.

Please Note: If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.
AFFECDTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD
DRAFT INDIANA AIR PERMIT

August 5, 2019

A 30-day public comment period has been initiated for:

Permit Number: 073-41464-00025 and 073-41491-00025
Applicant Name: Talbert Manufacturing, Inc.
Location: Rensselaer, Jasper County, Indiana

The public notice, draft permit and technical support documents can be accessed via the IDEM Air Permits Online site at:
http://www.in.gov/ai/appfiles/idem-caats/

Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

Indiana Department of Environmental Management
Office of Air Quality, Permits Branch
100 North Senate Avenue
Indianapolis, IN  46204

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at chammack@idem.IN.gov or (317) 233-2414.

Affected States Notification 1/9/2017
**Mail Code 61-53**

**IDEF Staff**

**VHAUN 8/5/2019 073-41464-00025 and 073-41491-00025 DRAFT**

**NAME AND ADDRESS OF SENDER**

**TALBERT MANUFACTURING INC**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**

**OFFICE OF AIR QUALITY – PERMITS BRANCH**

**100 N. SENATE**

**INDIANAPOLIS, IN 46204**

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**CERTIFICATE OF MAILING ONLY**

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<td>Mr. Kenny Haun P.O. Box 280 Rensselaer IN 47978 (Affected Party)</td>
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<td>Susan Grenzebach ST Environmental, LLC PO Box 40129 Austin TX 78704-0003 (Consultant)</td>
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