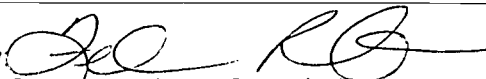


PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Arvin North American Automotive
1001 Hurricane Street
Franklin, Indiana 46131**

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

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

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| Operation Permit No.: T081-7483-00020 | |
| Issued by:  Felicia R. George, Assistant Commissioner Office of Air Management | Issuance Date: _____ |

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TABLE OF CONTENTS

| | | |
|----------|--|-----------|
| A | SOURCE SUMMARY | 5 |
| A.1 | General Information [326 IAC 2-7-4(c)] | 5 |
| A.2 | Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] | 5 |
| A.3 | Specifically Regulated Insignificant Activities [326 IAC 2-7-1(20)] [326 IAC 2-7-4(c)] | 5 |
| A.4 | Part 70 Permit Applicability [326 IAC 2-7-2] | 6 |
| A.5 | Prior Permit Conditions Superseded [326 IAC 2] | 6 |
| B | GENERAL CONDITIONS | 7 |
| B.1 | General Requirements [IC 13-15] [IC 13-17] | 7 |
| B.2 | Definitions [326 IAC 2-7-1] | 7 |
| B.3 | Permit Term [326 IAC 2-7-5(2)] | 7 |
| B.4 | Enforceability [326 IAC 2-7-7(a)] | 7 |
| B.5 | Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)] | 7 |
| B.6 | Severability [326 IAC 2-7-5(5)] [326 IAC 2-7-8(a)(4)] | 7 |
| B.7 | Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)] | 7 |
| B.8 | Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] | 7 |
| B.9 | Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)] | 8 |
| B.10 | Certification [326 IAC 2-7-4(f)] | 8 |
| B.11 | Annual Compliance Certification [326 IAC 2-7-6(5)] | 8 |
| B.12 | Preventive Maintenance Plan [326 IAC 2-7-5][326 IAC 2-7-6][326 IAC 1-6-3] | 9 |
| B.13 | Emergency Provisions [326 IAC 2-7-16] | 10 |
| B.14 | Permit Shield [326 IAC 2-7-15] | 11 |
| B.15 | Multiple Exceedances [326 IAC 2-7-5(1)(E)] | 12 |
| B.16 | Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)] | 12 |
| B.17 | Permit Modification, Reopening, Revocation and Reissuance, or Termination | 13 |
| B.18 | Permit Renewal [326 IAC 2-7-4] | 13 |
| B.19 | Administrative Permit Amendment [326 IAC 2-7-11] | 14 |
| B.20 | Minor Permit Modification [326 IAC 2-7-12] | 14 |
| B.21 | Significant Permit Modification [326 IAC 2-7-12(d)] | 15 |
| B.22 | Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] | 15 |
| B.23 | Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)] | 15 |
| B.24 | Operational Flexibility [326 IAC 2-7-20] | 15 |
| B.25 | Construction Permit Requirement [326 IAC 2] | 16 |
| B.26 | Inspection and Entry [326 IAC 2-7-6(2)] | 17 |
| B.27 | Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11] | 17 |
| B.28 | Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] | 17 |
| C | SOURCE OPERATION CONDITIONS | 18 |
| | Emission Limitations and Standards [326 IAC 2-7-5(1)] | |
| C.1 | PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21] | 18 |
| C.2 | Opacity [326 IAC 5-1] | 18 |
| C.3 | Open Burning [326 IAC 4-1] [IC 13-7-9] | 18 |
| C.4 | Incineration [326 IAC 4-2] [326 IAC 9-1-2(a)] | 18 |
| C.5 | Fugitive Dust Emissions [326 IAC 6-4] | 18 |
| C.6 | Operation of Equipment [326 IAC 2-7-6(6)] | 18 |
| C.7 | Stack Height [326 IAC 1-7] | 19 |
| C.8 | Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18-1] | 19 |
| | Testing Requirements [326 IAC 2-7-6(1)] | |
| C.9 | Performance Testing [326 IAC 3-2.1] | 19 |

DRAFT

| | |
|--|--|
| Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)] | |
| C.10 | Compliance Schedule [326 IAC 2-7-6(3)] 19 |
| C.11 | Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)] 20 |
| C.12 | Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(a)(iii)] 20 |
| C.13 | Monitoring Methods [326 IAC 3] 20 |
| C.14 | Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140] 20 |
| Corrective Actions [326 IAC 2-7-5] [326 IAC 2-7-6] | |
| C.15 | Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3] 21 |
| C.16 | Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215] 22 |
| C.17 | Compliance Monitoring Plan - Failure to Take Corrective Action [326 IAC 2-7-5(3)] ... 22 |
| C.18 | Actions Related to Noncompliance Demonstrated by a Stack Test 23 |
| Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19] | |
| C.19 | Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-6] [326 IAC 2-7-19] 24 |
| C.20 | Monitoring Data Availability 24 |
| C.21 | General Record Keeping Requirements [326 IAC 2-7-5(3)(B)] 24 |
| C.22 | General Reporting Requirements [326 IAC 2-7-5(3)(C)] 25 |
| Stratospheric Ozone Protection | |
| C.23 | Compliance with 40 CFR 82 and 326 IAC 22-1 26 |
| D.1 | FACILITY OPERATION CONDITIONS - Two (2) Paint Lines, CPB-1 and MPB-1 27 |
| Emission Limitations and Standards [326 IAC 2-7-5(1)] | |
| D.1.1 | Volatile Organic Compounds (VOC) [326 IAC 8-2-9] 27 |
| D.1.2 | Emission Minimization [326 IAC 8-2-9] 27 |
| D.1.3 | Particulate Matter (PM) Overspray [326 IAC 6-3-2(c)] 27 |
| D.1.4 | Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)] 27 |
| Compliance Determination Requirements | |
| D.1.5 | Testing Requirements [326 IAC 2-7-6(1)] 27 |
| D.1.6 | Particulate Matter (PM) Overspray 27 |
| Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)] | |
| D.1.7 | Monitoring 28 |
| Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19] | |
| D.1.8 | Record Keeping Requirements 28 |
| D.1.9 | Reporting Requirements 28 |
| D.2 | FACILITY OPERATION CONDITIONS - One (1) Cleaver Brooks boiler, B-4 29 |
| Emission Limitations and Standards [326 IAC 2-7-5(1)] | |
| D.2.1 | Particulate Matter (PM) [326 IAC 6-2-3] 29 |
| D.2.2 | Sulfur Dioxide (SO ₂) 29 |
| D.2.3 | Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)] 29 |
| Compliance Determination Requirements | |
| D.2.4 | Testing Requirements [326 IAC 2-7-6(1)] 29 |
| D.2.5 | Sulfur Dioxide Emissions and Sulfur Content 29 |

| | |
|---|-----------|
| Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)] | |
| D.2.6 Visible Emissions Notations | 30 |
| Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19] | |
| D.2.7 Record Keeping Requirements | 30 |
| D.2.8 Reporting Requirements | 31 |
| D.3 FACILITY OPERATION CONDITIONS - Natural Gas Combustion Sources | 32 |
| Emission Limitations and Standards [326 IAC 2-7-5(1)] | |
| D.3.1 Particulate Matter [326 IAC 6-2-3] | 32 |
| Compliance Determination Requirements | |
| D.3.2 Testing Requirements [326 IAC 2-7-6(1)] | 32 |
| Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19] | |
| D.3.3 Record Keeping and Reporting Requirements | 32 |
| D.4 FACILITY OPERATION CONDITIONS - No. 2 Fuel Oil Storage Tank | 33 |
| Emission Limitations and Standards [326 IAC 2-7-5(1)] | |
| D.4.1 Volatile Organic Liquid Storage Vessels [40 CFR 60.110b, Subpart Kb] [326 IAC 12] . | 33 |
| Compliance Determination Requirements | |
| D.4.2 Testing Requirements [326 IAC 2-7-6(1)] | 33 |
| Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19] | |
| D.4.3 Record Keeping Requirements | 33 |
| Certification Form | 34 |
| Deviation Occurrence Report | 35 |
| Quarterly Report Form | 36 |

DRAFT

SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary automobile components manufacturing plant.

Responsible Official: James L. Stegemiller, Vice President, GM Business Unit
Source Address: 1001 Hurricane Street, Franklin, Indiana, 46131
Mailing Address: 1001 Hurricane Street, Franklin, Indiana, 46131
SIC Code: 3714
County Location: Johnson County
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules;

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

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

- (1) The Cadillac paint line with one (1) spray paint booth, identified as CPB-1, with a rated capacity of 137 mufflers per hour, utilizing electrostatic air atomized guns, with overspray controlled by dry filters, and exhausting to stacks S-PB1 and 2;
- (2) The Mazda paint line with one (1) spray paint booth, identified as MPB-1, with a rated capacity of 112.5 assemblies per hour, utilizing low pressure - high volume guns, with overspray controlled by dry filters, and exhausting to stacks S-PB3 and 4.
- (3) One (1) Cleaver Brooks boiler, identified as B-4, with a capacity of 11.7 MMBtu per hour, using natural gas and No. 2 distillate fuel oil, and exhausting to stack S-B-4.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(20)] [326 IAC 2-7-4(c)]

This source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.
 - (a) One (1) dry off oven with a rated capacity of 6.4 MMBtu per hour of heat input, exhausting to stack S-3;
 - (b) Three (3) parts washer combustion units with a rated capacities of 1.5, 1.5 and 0.8 MMBtu per hour of heat input to each gas burner, exhausting to stack S-1;
 - (c) One (1) Kewanee boiler, with a capacity of 3.6 MMBtu per hour;
 - (d) Two (2) Cliff boilers, each with a capacity of 3.6 MMBtu per hour;
 - (e) One (1) Johnston boiler with a capacity of 2.7 MMBtu per hour;
 - (f) One (1) heater with a capacity of 0.8 MMBtu per hour for washing parts; and
 - (g) One (1) bake oven with a capacity of 1.2 MMBtu per hour.

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- (2) One (1) 58,753 gallon capacity No. 2 fuel oil storage tank with a fixed roof, emitting less than fifteen (15) pounds per day of VOC.

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

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

It is a major source, as defined in 326 IAC 2-7-1(21);

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

This permit supersedes the operating conditions of all construction and operating permits issued under 326 IAC 2 prior to the effective date of this Part 70 permit.

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SECTION B

GENERAL CONDITIONS

B.1 General Requirements [IC 13-15] [IC 13-17]

The Permittee shall comply with the provisions of IC 13-15 (Permits Generally), IC 13-17 (Air Pollution Control) and the rules promulgated thereunder.

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

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

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

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

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

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

B.6 Severability [326 IAC 2-7-5(5)] [326 IAC 2-7-8(a)(4)]

- (a) The provisions of this permit are severable, and if any provisions of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
- (b) Indiana rules from 326 IAC quoted in conditions in this permit are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.

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

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

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

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

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

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- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records directly to the U.S. EPA and IDEM, OAM, along with a claim of confidentiality.

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

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

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or for
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

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

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) This certification shall be submitted on the attached Certification Form.
- (c) A responsible official is defined at 326 IAC 2-7-1(33).

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

- (a) The Permittee shall annually certify that the source has complied with terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall be submitted in letter form no later than July 1 of each year to:

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

and

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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) This annual compliance certification report required by this permit shall be timely if delivered by any method and received and stamped by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM may require to determine the compliance status of the source.
- (d) The Permittee shall also annually certify that the source is in compliance with additional requirements as may be specified under Sections 114(a)(3) and 504(b) of the Clean Air Act.

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

- (a) The Permittee shall prepare, maintain and implement Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Corrective actions that will be implemented in the event an inspection indicates an out of specification situation;
 - (4) A time schedule for taking such corrective actions including a schedule for devising additional corrective actions for situations that may not have been predicted; and
 - (5) Identification and quantification of the replacement parts which will be maintained in inventory for quick replacement.
- (b) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

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

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

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

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

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

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

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

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(C)(33).

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- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (f) IDEM, OAM may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

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

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

- (a) Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided either of the following:
 - (1) The applicable requirements are included and specifically identified in this permit;
 - (2) IDEM, OAM, in acting on the Part 70 permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 permit includes the determination or a concise summary thereof.
- (b) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in, or subsequent to, the permit application.

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- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (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) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications.
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

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

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

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

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

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

Written notification shall be submitted on the attached Deviation Occurrence Reporting Form or the substantial equivalent.

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B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

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

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include, at minimum, 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(20).

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) The Permittee has a duty to submit a timely and complete permit renewal application. A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) Delivered by any method and received and stamped by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]

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

B.19 Administrative Permit Amendment [326 IAC 2-7-11]

- (a) An administrative permit amendment is a Part 70 permit revision that makes changes of the type specified under 326 IAC 2-7-11(a).
- (b) An administrative permit amendment may be made by IDEM, OAM, consistent with the procedures specified under 326 IAC 2-7-11(c).
- (c) The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Minor Permit Modification [326 IAC 2-7-12]

- (a) A Part 70 permit modification is any revision to this permit that cannot be accomplished under administrative permit amendments under 326 IAC 2-7-11.
- (b) Minor permit modification of this permit shall follow the procedures specified under 326 IAC 2-7-12(b).
- (c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-7-12(b) and shall include the information required in 326 IAC 2-7-12(b)(3)(A) through (E).
- (d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application unless the change is subject to the construction permit requirements of 326 IAC 2-1, 326 IAC 2-2, or 326 IAC 2-3. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM takes any of the actions specified in 326 IAC 2-7-12(b)(6)(a) through (6)(C), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-7-12(b)(7)]

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B.21 Significant Permit Modification [326 IAC 2-7-12(d)]

- (a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.
- (b) Every significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.
- (c) Nothing in 326 IAC 2-7-12(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-7 that would render existing permit compliance terms and conditions irrelevant.
- (d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-7, including those for application, public participation, review by the U.S. EPA, and availability of the permit shield, as they apply to permit issuance and renewal.

B.22 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]

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

B.23 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

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

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

B.24 Operational Flexibility [326 IAC 2-7-20]

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

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

and

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

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

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

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

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(C)(33).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable State Implementation Plan (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(a).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM or U.S. EPA is required.

B.25 Construction Permit Requirement [326 IAC 2]

Modification, construction, or reconstruction shall be permitted as required by and in accordance with 326 IAC 2.

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B.26 Inspection and Entry [326 IAC 2-7-6(2)]

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]

B.27 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

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

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner.
- (c) IDEM, OAM shall reserve the right to issue a new permit.

B.28 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, consistent with the fee schedule established in 326 IAC 2-7-19.
- (b) Failure to pay may result in administrative enforcement action, revocation of this permit, referral to the Office of the Attorney General for collection, or other appropriate measures.
- (c) The Permittee shall pay the annual fee within thirty (30) calendar days of receipt of a billing by IDEM, OAM or in a time period that is consistent with the payment schedule issued by IDEM, OAM.
- (d) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee shall call the following telephone numbers: 1-800-451-6027 or 317-233-5674 (ask for OAM, Data Support Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

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SECTION C

SOURCE OPERATION CONDITIONS

| |
|---------------|
| Entire Source |
|---------------|

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

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

The total source potential to emit VOC shall be below 250 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

C.2 Opacity [326 IAC 5-1]

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

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

C.3 Open Burning [326 IAC 4-1] [IC 13-7-9]

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.

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

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

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

The permittee shall be in violation of 326 IAC 6-4 (Fugitive Dust Emissions) if any of the criteria specified in 326 IAC 6-4-2(1) through (4) are violated. Observations of visible emissions crossing the property line of the source at or near ground level must be made by a qualified representative of IDEM. [326 IAC 6-4-5(c)]

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

- (a) All equipment that may emit pollutants into the ambient air shall be properly operated to meet the requirements of this permit and maintained in accordance with Section B - Preventive Maintenance Plan.
- (b) Unless otherwise stated in this permit, all air pollution control equipment listed in this permit shall be operated at all times that the emission unit vented to the control equipment is in operation.
- (c) The Permittee shall perform all necessary maintenance according to the Preventive Maintenance Plan and make all necessary attempts to keep all air pollution control equipment in proper operating condition at all times such that the requirements of this permit are met.

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C.7 Stack Height [326 IAC 1-7]

(a) The Permittee shall comply with the provisions of 326 IAC 1-7 (Stack Height Provisions), that apply to all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

(b) Stacks shall be constructed using good engineering practice (GEP) according to the following equation:

$$S = H + 1.5 (L)$$

where: S = Stack height in feet

H = Height of supporting or nearby structure
(whichever is largest) in feet

L = Lesser dimension (height or width) of
the structure chosen for H, (feet)

(c) Any changes in the applicable stacks require prior approval from IDEM, OAM.

C.8 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18-1]

Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector be Indiana accredited is not federally enforceable.

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

C.9 Performance Testing [326 IAC 3-2.1]

All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures), utilizing methods approved by IDEM, OAM.

A test protocol shall be submitted to:

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

No later than thirty-five (35) days before the intended test date.

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

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

The Permittee:

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

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

Compliance with applicable requirements shall be documented in accordance with the provisions of 326 IAC 2-7-5(3). The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

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

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

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(C)(33).

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

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

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the requirements of this permit shall be performed, whenever applicable according to the provisions of 326 IAC 3, or 40 CFR 60, Appendix A, as appropriate, unless some other method is specified in this permit.

C.14 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator if the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification regardless if asbestos is present.

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- (b) Written notification is to be sent on a form provided by the commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) asbestos removal or demolition start date;
 - (B) removal or demolition contractor; or
 - (3) Waste disposal site.
- (c) The Permittee shall postmark or deliver the notice according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

Corrective Actions [326 IAC 2-7-5] [326 IAC 2-7-6]

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

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

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

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

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

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

- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. If after this time, the Permittee does not submit an approvable ERP then IDEM, OAM, shall supply such a plan.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

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

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

C.17 Compliance Monitoring Plan - Failure to Take Corrective Action [326 IAC 2-7-5(3)]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;

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- (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) The Preventive Maintenance Plan described in Section B, Preventive Maintenance Plan, of this permit.
- (b) For each compliance monitoring condition of this permit appropriate corrective actions, as described in the Preventive Maintenance Plan, shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the corrective actions within the prescribed time contained within the Preventive Maintenance Plan shall constitute a violation of the permit unless taking the corrective action set forth in the Preventive Maintenance Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee may be excused from taking further corrective action for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further corrective actions providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The Permittee determines that the process has already returned to operating within "normal" parameters and no corrective action is required.
- (d) Records shall be kept of all instances in which the action values were not met and of all corrective actions taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of the stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, appropriate corrective actions shall be taken. A description of these corrective actions shall be submitted to IDEM, OAM, within thirty (30) days of receipt of the test results. These corrective actions shall be implemented immediately unless notified by IDEM, OAM that they are not acceptable. The Permittee shall make every effort to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM reserves the right to utilize enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

DRAFT

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

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

- (a) The Permittee shall submit a certified, annual emission statement that meets the requirements of 326 IAC 2-6 (Emission Reporting). This annual statement must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the time period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted to:

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

- (b) This annual emission statement required by this permit shall be timely if delivered by any method and received and stamped by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]

C.20 Monitoring Data Availability

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

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)(B)]

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

DRAFT

- (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of any required preventive maintenance and corrective actions that were implemented. Such records shall briefly describe what was done and indicate who did it. Such records may include, but are not limited to: work orders, quality assurance procedures, quality control procedures, operator's standard operating procedures, manufacturer's specifications or their equivalent, and equipment "troubleshooting" guidance.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) Reports required by Conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be timely if:
- (1) Delivered by U. S. mail and postmarked on or before the date it is due; or
 - (2) Delivered by any other method if it is received and stamped by IDEM, OAM, on or before the date it is due.
- (c) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the six (6) month reporting period.
- (d) All instances of deviations from any requirements of this permit must be clearly identified in such reports.

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- (e) Any corrective actions taken as a result of an exceedance of a limit, an excursion from the parametric values, or a malfunction that may have caused excess emissions must be clearly identified in such reports.
- (f) The first report shall cover the period commencing the date of issuance of this permit and ending the last day of the quarter being reported.

Stratospheric Ozone Protection

C.23 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

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SECTION D.1

FACILITY OPERATION CONDITIONS

- (1) The Cadillac paint line with one (1) spray paint booth, identified as CPB-1, with a rated capacity of 137 mufflers per hour, utilizing electrostatic air atomized guns, with overspray controlled by dry filters, and exhausting to stacks S-PB1 and 2;
- (2) The Mazda paint line with one (1) spray paint booth, identified as MPB-1, with a rated capacity of 112.5 assemblies per hour, utilizing low pressure - high volume guns, with overspray controlled by dry filters, and exhausting to stacks S-PB3 and 4.

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

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicators of the CPB-1 and MPB-1 spray booths shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance coatings.

D.1.2 Emission Minimization [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.3 Particulate Matter (PM) Overspray [326 IAC 6-3-2(c)]

The PM overspray from the two (2) paint booths (CPB-1 and MPB-1) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

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

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

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

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1)]

Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-7-6(1).

D.1.6 Particulate Matter (PM) Overspray

The dry filters for PM overspray control shall be in operation at all times when the two (2) paint booths (CPB-1 and MPB-1) are in operation.

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

D.1.7 Monitoring

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

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [26 IAC 2-7-19]

D.1.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.1.1.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each day;
 - (4) The cleanup solvent usage for each day;
 - (5) The total VOC usage for each day; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventative Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

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

SECTION D.2

FACILITY OPERATION CONDITIONS

- (3) One (1) Cleaver Brooks boiler, identified as B-4, with a capacity of 11.7 MMBtu per hour, using natural gas and No. 2 distillate fuel oil, and exhausting to stack S-B-4.

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

D.2.1 Particulate Matter (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-2 (Particulate Emissions Limitations for sources of Indirect Heating), the PM emissions from boiler B-4, shall be limited to 0.51 pounds per million Btu.

D.2.2 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) the SO₂ emissions from the eleven and seven-tenths (11.7) million Btu per hour oil-fueled boiler shall not exceed five tenths (0.5) pounds per million Btu heat input.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

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

Compliance Determination Requirements

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

Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-7-6(1).

D.2.5 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-3-4, the Permittee shall demonstrate that the fuel oil sulfur content does not exceed 0.5 % by weight by:
 - (1) Providing vendor analysis of fuel delivered, if accompanied by a certification;
 - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the 11.7 million Btu per hour boiler, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-2.1.

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

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

D.2.6 Visible Emissions Notations

- (a) Daily visible emission notations of the boiler stack exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

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

D.2.7 Record Keeping Requirements

- (a) To document compliance with Condition D.2.2, the Permittee shall maintain records in accordance with (1) through (6) below.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual usage since last compliance determination period and value calculated per limitation;
 - (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and
 - (4) Fuel supplier certifications.

The fuel supplier certification shall contain, as a minimum, the following:

- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of results of daily emission notations.

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- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

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SECTION D.3

FACILITY OPERATION CONDITIONS

Insignificant Activities:

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.
 - (a) One (1) Kewanee boiler, with a capacity of 3.6 MMBtu per hour, with No. 2 fuel oil back-up;
 - (b) Two (2) Cliff boilers, each with a capacity of 3.6 MMBtu per hour, with No. 2 fuel oil back-up;
 - (c) One (1) Johnston boiler with a capacity of 2.7 MMBtu per hour, with No. 2 fuel oil back-up;

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

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

Pursuant to 326 IAC 6-2-2 (Particulate Matter Emission Limitations for Sources of Indirect Heating, the PM emissions from the four (4) 3.6 million Btu per hour heat input boilers and the one (1) 2.7 million Btu per hour heat input boiler, shall each be limited to 0.51 pounds per million Btu heat input.

Compliance Determination Requirement

D.3.2 Testing Requirements [326 IAC 2-7-6(1)]

Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-7-6(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.3.3 Record Keeping and Reporting Requirements

There are no record keeping or reporting requirements for these facilities.

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SECTION D.4

FACILITY OPERATION CONDITIONS

Insignificant Activity

- (2) One (1) 58,753 gallon capacity No. 2 fuel oil storage tank with a fixed roof, emitting less than fifteen (15) pounds per day of VOC.

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

D.4.1 Volatile Organic Liquid Storage Vessels [40 CFR 60.110b, Subpart Kb] [326 IAC 12]

Pursuant to 40 CFR 60; Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels), the Permittee shall:

- (a) Keep readily accessible records showing the dimensions of the storage vessel, and an analysis showing the capacity of the storage vessel; (for the life of the source)
- (b) Notify the Administrator within 30 days when the maximum true vapor pressure of the liquid exceeds 0.745 psia (5.2 kPa).

Compliance Determination Requirements

D.4.2 Testing Requirements [326 IAC 2-7-6(1)]

Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-7-6(1).

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

D.4.3 Record Keeping Requirements

To document compliance with Condition D.4.1, the Permittee shall maintain readily accessible records showing the dimensions of the storage vessel, and an analysis showing the capacity of the storage vessel, for the life of the source.

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State Form 47738 (5-96)

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Arvin North American Automotive
Source Address: 1001 Hurricane Street, Franklin, Indiana 46131
Mailing Address: 1001 Hurricane Street, Franklin, Indiana 46131
Part 70 Permit No.: T081-7483-00020

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
- ☐ Deviation Occurrence Reporting Form (For Control Equipment Monitoring)
- ☐ Deviation Occurrence Reporting Form (For Material Usage, Quality, Etc.)
- ☐ Test Result (specify) _____
- ☐ Report (specify) _____
- ☐ Notification (specify) _____
- ☐ Other (specify) _____

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

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State Form 47741 (5-96)

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

**PART 70 OPERATING PERMIT
DEVIATION OCCURRENCE REPORT**

Source Name: Arvin North American Automotive
Source Address: 1001 Hurricane Street, Franklin, Indiana 46131
Mailing Address: 1001 Hurricane Street, Franklin, Indiana 46131
Part 70 Permit No.: T081-7483-00020

A separate copy of this report must be submitted for **each** material type, quantity usage and operation limitation (except control equipment monitoring) listed in this permit .
Attach a signed certification to complete this report.

Stack/Vent ID:

Equipment/Operation:

Parameter Subject to Material Type, Quantity Usage or Operation Limitations Specified in the Permit:
(ex: 2500 lb/day, 300 hours/yr, 5000 gallons/month)

Determination Period for this Parameter:
(ex: 365-day rolling sum, fixed monthly rate)

☐ Permit Has No Rate Limitations for this Parameter.

Content Restriction for this Parameter:
(ex: maximum of 40% VOC in inks, 0.5% sulfur content)

Demonstration Method for this Parameter:
(ex: MSDS, Supplier, material sampling & analysis)

☐ Permit Has No Content Limitations for this Parameter.

Comments:

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

Part 70 Quarterly Report

Source Name: Arvin North American Automotive
Source Address: 1001 Hurricane Street, Franklin, Indiana 46131
Mailing Address: 1001 Hurricane Street, Franklin, Indiana 46131
Part 70 Permit No.: T081-7483-00020
Facility: Boiler B-4
Parameter: Average sulfur content of No. 2 fuel oil burned, average heating value of No. 2 fuel oil burned, equivalent Sulfur dioxide emissions.
Limit: 0.5% Sulfur and Sulfur dioxide emissions of 0.5 lb/MMBtu heat input

YEAR: _____

| Month | Average Sulfur Content of No. 2 fuel oil (%) | Average Heating Value of No. 2 fuel oil (MMBtu/gallon) | Equivalent Sulfur Dioxide Emissions (lb/MMBtu) |
|---------|--|--|--|
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

- ☐ No deviation occurred in this month.
- ☐ Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

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

Source Background and Description

Source Name: Arvin North American Automotive
Source Location: 1001 Hurricane Street, Franklin, Indiana 46131
County: Johnson County
SIC Code: 3714
Operation Permit No.: T081-7483-00020
Permit Reviewer: Dana L. Brown

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Arvin North American Automotive, Franklin Plant, relating to the operation of an automotive component manufacturing plant.

Permitted Emission Units and Pollution Control Equipment

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

- (1) The Cadillac paint line with one (1) spray paint booth, identified as CPB-1, with a rated capacity of 137 mufflers per hour, utilizing electrostatic air atomized guns, with over spray controlled by dry filters, and exhausting to stacks S-PB1 and 2;
- (2) The Mazda paint line with one (1) spray paint booth, identified as MPD-1, with a rated capacity of 112.5 assemblies per hour, utilizing low pressure - high volume guns, with overspray controlled by dry filters, and exhausting to stacks S-PB3 and 4.
- (3) One (1) Cleaver Brooks boiler, identified as B-4, with a capacity of 11.7 MMBtu per hour, and exhausting to stack S-B-4.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source at the time of this review.

Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)

There are no new facilities to be reviewed under the ENSR process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.
 - (a) One (1) dry off oven with a rated capacity of 6.4 MMBtu per hour of heat input, exhausting to stack S-3;
 - (b) Three (3) parts washer combustion units with a rated capacities of 1.5, 1.5 and 0.8 MMBtu per hour of heat input to each gas burner, exhausting to stack S-1;
 - (c) One (1) Kewanee boiler, with a capacity of 3.6 MMBtu per hour;

- (d) Two (2) Cliff boilers, each with a capacity of 3.6 MMBtu per hour;
 - (e) One (1) Johnston boiler with a capacity of 2.7 MMBtu per hour;
 - (f) One (1) heater with a capacity of 0.8 MMBtu per hour for washing parts; and
 - (g) One (1) bake oven with a capacity of 1.2 MMBtu per hour.
- (2) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (3) The following VOC and HAP storage containers:
- (a) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons. (One (1) horizontal 300 gallon capacity diesel fuel storage tank, two (2) horizontal 300 gallon capacity regular gasoline storage tanks, and one (1) 300 gallon capacity unleaded gasoline storage tank.)
 - (b) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (4) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. (Cadillac Line Heated Parts Washer)
- (5) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (6) Paved and unpaved roads and parking lots with public access.
- (7) Other categories with emissions below insignificant thresholds:
- (a) Milling operations with PM-10 emission less than twenty-five (25) pounds per day. (Tube Mills 1 and 2)
 - (b) One (1) 58,753 gallon capacity No. 2 fuel oil storage tank with a fixed roof, emitting less than fifteen (15) pounds per day of VOC.

Existing Approvals

The source has been operating under the following approvals:

- (1) CP 081-4910, issued on April 3, 1996;
- (2) Registration CP 081-2328, issued on November 6, 1992.

Enforcement Issue

There are no Enforcement actions pending.

Recommendation

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

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

An administratively complete Part 70 permit application for the purposes of this review was received on December 11, 1996.

Emission Calculations

See Appendix A of this document for detailed emissions calculations of pounds of VOC per gallon of coating and combustion units. (11 pages)

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

| Pollutant | Potential Emissions (tons/year) |
|-----------------|---------------------------------|
| PM | <100 |
| PM-10 | <100 |
| SO ₂ | <100 |
| VOC | <100 |
| CO | <100 |
| NO _x | <100 |

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

| HAP's | Potential Emissions (tons/year) |
|-------|---------------------------------|
| TOTAL | >10 |

- (a) The potential emissions (as defined in Indiana Rule) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential emissions (as defined in Indiana Rule) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1995 OAM emission data.

| Pollutant | Actual Emissions (tons/year) |
|-----------------|------------------------------|
| PM | 4.03 |
| PM-10 | -- |
| SO ₂ | 0.246 |
| VOC | 14.83 |
| CO | 8.26 |
| HAP (specify) | -- |
| NO _x | 40.5 |

County Attainment Status

The source is located in Johnson County.

| Pollutant | Status (attainment or unclassifiable/severe, moderate, marginal, or maintenance nonattainment) |
|-----------------|--|
| TSP | Attainment |
| PM-10 | Attainment |
| SO ₂ | Attainment |
| NO ₂ | Attainment |
| Ozone | Attainment |
| CO | Attainment |
| Lead | Attainment |

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

Part 70 Permit Conditions

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

- (1) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (2) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (1) Pursuant to CP 081-2328 and 40 CFR 60.110b (c), the 58,753 gallon capacity No. 2 fuel oil storage tank is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110b, Subpart Kb). Pursuant to NSPS Subpart Kb, the Permittee shall keep readily accessible records showing the dimensions of the storage vessel, and an analysis showing the capacity of the storage vessel for the life of the source. The owner or operator of each storage vessel with a design capacity greater than or equal to 151 cubic meters storing a liquid with a maximum true vapor pressure that is normally less than 0.745 psia (5.2kPa), shall notify the Administrator within 30 days when the maximum true vapor pressure of the liquid exceeds 0.745 psia (5.2kPa).
- (2) The 11.7 MMBtu per hour heat input capacity boiler, constructed prior to 1989, is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc) because of construction prior to the June 9, 1989 applicability date.
- (3) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

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

326 IAC 5-1 (Visible Emissions Limitations)

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

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

State Rule Applicability - Individual Facilities

326 IAC 6-2: Particulate Emissions Limitations for Sources of Indirect Heating

The five natural gas fired boilers with No. 2 fuel oil back-up (Boilers B-1, B-2a, B-2b, B-3 and B-4), all constructed prior to September 21, 1983, are subject to 326 IAC 6-2.

- (1) Pursuant to 326 IAC 6-2-2, the particulate matter emissions from facilities constructed prior to June 8, 1972, shall be limited by the following equation (B-2a, B-2b and B-3):

$$Pt = \frac{0.87}{Q^{0.16}} \quad \text{Where: } Pt = \text{pounds of PM emitted per MMBtu heat input}$$

$Q = \text{source max. operating capacity on June 8, 1972,}$
 $= 9.9 \text{ MMBtu/hr}$

$$= \frac{0.87}{1.44} = 0.60 \text{ lb/MMBtu}$$

For Boilers B-2a, and B-2b emissions are:

$$\frac{0.2 \text{ tons}}{\text{year}} \times \frac{1 \text{ year}}{8760 \text{ hrs}} \times \frac{1 \text{ hour}}{3.6 \text{ MMBtu}} \times \frac{2000 \text{ lbs}}{1 \text{ ton}} = \frac{0.013 \text{ lbs}}{\text{MMBtu}} \text{ for each boiler}$$

For Boiler B-3 emissions are:

$$\frac{0.2 \text{ tons}}{\text{year}} \times \frac{1 \text{ year}}{8760 \text{ hrs}} \times \frac{1 \text{ hour}}{2.7 \text{ MMBtu}} \times \frac{2000 \text{ lbs}}{1 \text{ ton}} = \frac{0.017 \text{ lbs}}{\text{MMBtu}}$$

Therefore, boilers B-2a, B-2b and B-3 are in compliance with 326 IAC 6-2.

- (2) Pursuant to 326 IAC 6-2-2, the particulate matter emissions from facilities constructed after June 8, 1972 and prior to September 21, 1983 shall be limited individually by the following equation (B-1, and B-4):

For boiler B-1:

$$Pt = \frac{0.87}{Q^{0.16}} \quad \text{Where: } Pt = \text{pounds of PM emitted per MMBtu heat input}$$
$$Q = \text{source max. operating capacity at time of construction of B-1}$$
$$= 13.5 \text{ MMBtu/hr}$$

$$= \frac{0.87}{1.55} = 0.57 \text{ lb/MMBtu}$$

For boiler B-1 emissions are:

$$\frac{0.2 \text{ tons}}{\text{year}} \times \frac{1 \text{ year}}{8760 \text{ hrs}} \times \frac{1 \text{ hour}}{3.6 \text{ MMBtu}} \times \frac{2000 \text{ lbs}}{1 \text{ ton}} = \frac{0.013 \text{ lbs}}{\text{MMBtu}}$$

Therefore, boiler B-1 is in compliance with 326 IAC 6-2.

For Boiler B-4:

$$Pt = \frac{0.87}{Q^{0.16}} \quad \text{Where: } Pt = \text{pounds of PM emitted per MMBtu heat input}$$
$$Q = \text{source max. operating capacity at time of construction of B-4}$$
$$= 25.2 \text{ MMBtu/hr}$$

$$= \frac{0.87}{1.67} = 0.52 \text{ lb/MMBtu}$$

For boiler B-4 emissions are:

$$\frac{0.7 \text{ tons}}{\text{year}} \times \frac{1 \text{ year}}{8760 \text{ hrs}} \times \frac{1 \text{ hour}}{11.7 \text{ MMBtu}} \times \frac{2000 \text{ lbs}}{1 \text{ ton}} = \frac{0.014 \text{ lbs}}{\text{MMBtu}}$$

Therefore, boiler B-1 is in compliance with 326 IAC 6-2.

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) overspray from the spray booths, CPB-1 and MPB-1, shall be limited by the following:

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

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

Compliance with this requirement is shown by the use of dry filters for overspray control.

326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)

Pursuant to this rule, the distillate oil combusted in the 11.7 MMBtu per hour boiler shall not exceed five-tenths (0.5) pounds per million Btu of Sulfur dioxide emissions. Based on a heating value of 140,000 Btu per gallon of distillate oil, the fuel oil sulfur content shall be limited to 0.49 percent (%) Sulfur.

$$\frac{0.5 \text{ lb}}{\text{MMBtu}} = \frac{142S \text{ lb}}{\text{kgal}} \times \frac{1 \text{ kgal}}{1000 \text{ gal}} \times \frac{1 \text{ gallon}}{0.14 \text{ MMBtu}}$$

$$S = 0.49 \%$$

Based on the information submitted, the boiler uses distillate oil with a maximum of 0.5% Sulfur. Therefore, the boiler is in compliance with this rule.

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicators of the CPB-1 and MPB-1 spray booths shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance coatings.

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

Based on the MSDS submitted by the source and calculations made, the paint booths are in compliance with this requirement. If, in the future, a coating greater than 3.5 pounds of VOC per gallon of coating less water is used, compliance with this rule shall be based on the following equation for daily volume weighted average:

$$\frac{\text{lb VOC}}{\text{gallon less water}} = \frac{\sum \text{coatings } [D * O * Q / [1 - W * Dc / Dw]]}{\sum C}$$

Dc = density of coating, lb/gal

Dw = density of water, lb/gal

O = weight percent organics, %

Q = quantity of coating, gal/unit

W = percent volume water, %

C = total of coatings used, gal/unit

Compliance Requirements

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

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

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

1. The boilers, B-1, B-2a, B-2b, B-3, and B-4 have applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emissions notations of exhaust from each of the boilers shall be performed during normal daylight operations when any boiler is burning No. 2 fuel oil. A trained employee will record whether emissions are normal or abnormal.

- (b) Boiler B-4 (11.7 MMBtu) is also required to do testing of each delivery of fuel oil to determine sulfur content, and assure compliance with 326 IAC 7-1.1-2. Vender certification is acceptable in lieu of testing.

These monitoring conditions are necessary to ensure compliance with 326 IAC 5-1 and 326 IAC 7-1.1-2.

Air Toxic Emissions

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

This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Amendments to the Clean Air Act.

Conclusion

The operation of this automotive component manufacturing plant shall be subject to the conditions of the attached proposed **Part 70 Permit No. T081-7483-00020**.

Table 1

| | | |
|---|--|---|
| Emission Unit: Boiler B4 natural gas primary, #2 fuel oil back-up | | |
| Date of Construction: pre-1989 | | |
| Pollution Control Equipment: none | | |
| General Description of Requirement: | Sulfur content during back-up fuel usage | daily visible emission notations |
| Numerical Emission Limit: | Sulfur content of 0.49% | none |
| Regulation/Citation: | 326 IAC 7-1.1-2 | 326 IAC 6 |
| Compliance Demonstration: | Sulfur content of fuel | normal emissions |
| PERFORMANCE TESTING | | |
| Parameter/Pollutant to be Tested: | n/a | n/a |
| Testing Method/Analysis: | n/a | n/a |
| Testing Frequency/Schedule: | n/a | n/a |
| Submittal of Test Results: | n/a | n/a |
| COMPLIANCE MONITORING | | |
| Monitoring Description: | n/a | n/a |
| Monitoring Method: | n/a | n/a |
| Monitoring Regulation/Citation: | n/a | n/a |
| Monitoring Frequency: | n/a | n/a |
| RECORD KEEPING | | |
| Parameter/Pollutant to be Recorded: | back-up fuel usage and sulfur content of back-up fuel | "normal" or "abnormal" emissions |
| Recording Frequency: | when back-up fuel is used | daily when using back-up fuel |
| Submittal Schedule of Reports: | quarterly | upon request |
| REPORTING REQUIREMENTS | | |
| Information in Report: | times of back-up fuel usage and sulfur content of back-up fuel | "normal" or "abnormal" emission notations |
| Reporting Frequency/Submittal: | quarterly | upon request |
| Additional Comments: | | |

Table 2

| | |
|--|---|
| Emission Unit: | Boilers B-1, B-2a, B-2b and B-3 natural gas primary, #2 fuel oil back-up |
| Date of Construction: | |
| Pollution Control Equipment: | |
| General Description of Requirement: | daily visible emission notations |
| Numerical Emission Limit: | none |
| Regulation/Citation: | 326 IAC 6 |
| Compliance Demonstration: | normal emissions |
| PERFORMANCE TESTING | |
| Parameter/Pollutant to be Tested: | n/a |
| Testing Method/Analysis: | n/a |
| Testing Frequency/Schedule: | n/a |
| Submittal of Test Results: | n/a |
| COMPLIANCE MONITORING | |
| Monitoring Description: | n/a |
| Monitoring Method: | n/a |
| Monitoring Regulation/Citation: | n/a |
| Monitoring Frequency: | n/a |
| RECORD KEEPING | |
| Parameter/Pollutant to be Recorded: | "normal" or "abnormal" emissions |
| Recording Frequency: | daily when using back-up fuel |
| Submittal Schedule of Reports: | upon request |
| REPORTING REQUIREMENTS | |
| Information in Report: | "normal" or "abnormal" emission notations |
| Reporting Frequency/Submittal: | upon request |
| Additional Comments: | |

From Surface Coating Operations

Company Name: Arvin North American Automotive - Gladstone Plant
Address City IN Zip: 1001 Hurricane Street, Franklin, Indiana 46131

Reviewer: Dana L. Brown
Date: May 9, 1997

[illegible]

State Potential Emissions

Add worst case coating to all solvents

8.26

198.23

5.18

29.35

METHODOLOGY

$$\text{Pounds of VOC per Gallon Coating less Water} = (\text{Density (lb/gal)} \times \text{Weight \% Organics}) / (1 - \text{Volume \% water})$$

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gall/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs.

$$\text{Particulate Potential Tons per Year} = (\text{units/hour}) * (\text{gal/unit}) * (\text{lbs/gal}) * (1 - \text{Weight \% Volatiles}) * (1 - \text{Transfer efficiency}) * (8760 \text{ hrs/yr}) * (1 \text{ ton}/2000 \text{ lbs})$$
$$\text{Pounds VOC per Gallon of Solids} = (\text{Density (lbs/gal)} \cdot \text{Weight \% organics}) / (\text{Volume \% solids})$$
$$\text{Total} = \text{Worst Coating} + \text{Sum of all solvents used}$$

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors
#1 and #2 Fuel Oil
B-1

Page 2 of 11 TSD App A

Company Name: Arvin North American Automotive
Address City IN Zip: 1001 Hurricane Street, Franklin, Indiana 46131

T: 81-7483

Plt ID: 00020

Reviewer: Dana L. Brown

Date: May 13, 1997

Heat Input Capacity
MMBtu/hr

3.6

Potential Throughput
kgals/year

225,257,143

S = Weight % Sulfur
0.5

| Emission Factor in lb/kgal | Pollutant | | | | |
|-------------------------------|-----------|----------------|------|------|-----|
| | PM | SO2 | NOx | VOC | CO |
| | 2.0 | 71 (142.0S) | 20.0 | 0.34 | 5.0 |
| Potential Emission in tons/yr | 0.2 | 8.0 | 2.3 | 0.0 | 0.6 |

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-2 and 1.3-4 (SCC 1-03-005-01/02/03)

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

Appendix A: Emission Calculations
Natural Gas Combustion Only

MM Btu/hr 0.3 - < 10
Commercial Boiler B-1

Company Name: Arvin North American Automotive
Address City IN Zip: 1001 Hurricane Street, Franklin, Indiana 46131
T: 81-7483

Pit ID: 00020
Reviewer: Dana L. Brown
Date: May 13, 1997

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

3.6

31.5

| Emission Factor in lb/MMCF | Pollutant | | | | | |
|-------------------------------|-----------|------|-----|-------|-----|------|
| | PM | PM10 | SO2 | NOx | VOC | CO |
| 12.0 | 12.0 | 12.0 | 0.6 | 100.0 | 5.3 | 21.0 |
| Potential Emission in tons/yr | 0.2 | 0.2 | 0.0 | 1.6 | 0.1 | 0.3 |

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

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

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

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors
#1 and #2 Fuel Oil
B-2a

Page 4 of 11 TSD App A

Company Name: Arvin North American Automotive

Address City IN Zip: 1001 Hurricane Street, Franklin, Indiana 46131

T: 81-7483

Plt ID: 00020

Reviewer: Dana L. Brown

Date: May 13, 1997

Heat Input Capacity
MMBtu/hr

Potential Throughput
kgals/year

S = Weight % Sulfur
0.5

3.6

225,257,143

| Emission Factor in lb/kgal | Pollutant | | | | |
|-------------------------------|-----------|----------------|------|------|-----|
| | PM | SO2 | NOx | VOC | CO |
| | 2.0 | 71 (142.0S) | 20.0 | 0.34 | 5.0 |
| Potential Emission in tons/yr | 0.2 | 8.0 | 2.3 | 0.0 | 0.6 |

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-2 and 1.3-4 (SCC 1-03-005-01/02/03)

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

Appendix A: Emission Calculations
Natural Gas Combustion Only

MM Btu/hr 0.3 - < 10

Commercial Boiler B-2a

Company Name: Arvin North American Automotive

Address City IN Zip: 1001 Hurricane Street, Franklin, Indiana 46131

T: 81-7483

Pit ID: 00020

Reviewer: Dana L. Brown

Date: May 13, 1997

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

3.6

31.5

| | Pollutant | | | | | |
|-------------------------------|-----------|------|-----|-------|-----|------|
| | PM | PM10 | SO2 | NOx | VOC | CO |
| Emission Factor in lb/MMCF | 12.0 | 12.0 | 0.6 | 100.0 | 5.3 | 21.0 |
| Potential Emission in tons/yr | 0.2 | 0.2 | 0.0 | 1.6 | 0.1 | 0.3 |

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

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

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

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors
#1 and #2 Fuel Oil
B-2b

Page 6 of 11 TSD App A

Company Name: Arvin North American Automotive
Address City IN Zip: 1001 Hurricane Street, Franklin, Indiana 46131

T: 81-7483

Plt ID: 00020

Reviewer: Dana L. Brown

Date: May 13, 1997

Heat Input Capacity
MMBtu/hr

Potential Throughput
kgals/year

S = Weight % Sulfur
0.5

3.6

225,257,143

| Emission Factor in lb/kgal | Pollutant | | | | |
|-------------------------------|-----------|-----------------|-----------------|------|-----|
| | PM | SO ₂ | NO _x | VOC | CO |
| | 2.0 | 71 (142.0S) | 20.0 | 0.34 | 5.0 |
| Potential Emission in tons/yr | 0.2 | 8.0 | 2.3 | 0.0 | 0.6 |

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-2 and 1.3-4 (SCC 1-03-005-01/02/03)

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

Appendix A: Emission Calculations

Natural Gas Combustion Only

MM Btu/hr 0.3 - < 10

Commercial Boiler B-2b

Company Name: Arvin North American Automotive

Address City IN Zip: 1001 Hurricane Street, Franklin, Indiana 46131

T: 81-7483

Plt ID: 00020

Reviewer: Dana L. Brown

Date: May 13, 1997

Heat Input Capacity

MMBtu/hr

3.6

Potential Throughput

MMCF/yr

31.5

| | Pollutant | | | | | |
|-------------------------------|-----------|------|-----|-------|-----|------|
| | PM | PM10 | SO2 | NOx | VOC | CO |
| Emission Factor in lb/MMCF | 12.0 | 12.0 | 0.6 | 100.0 | 5.3 | 21.0 |
| Potential Emission in tons/yr | 0.2 | 0.2 | 0.0 | 1.6 | 0.1 | 0.3 |

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

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

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

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors
#1 and #2 Fuel Oil
B-3

Page 8 of 11 TSD App A

Company Name: Arvin North American Automotive

Address City IN Zip: 1001 Hurricane Street, Franklin, Indiana 46131

T: 81-7483

Plt ID: 00020

Reviewer: Dana L. Brown

Date: May 13, 1997

| | | |
|----------------------------|-----------------------------|----------------------------|
| Heat Input Capacity | Potential Throughput | S = Weight % Sulfur |
| MMBtu/hr | kgals/year | |
| 2.7 | 168,942857 | 0.5 |

| Emission Factor in lb/kgal | Pollutant | | | | |
|-------------------------------|-----------|----------------|------|------|-----|
| | PM | SO2 | NOx | VOC | CO |
| | 2.0 | 71 (142.0S) | 20.0 | 0.34 | 5.0 |
| Potential Emission in tons/yr | 0.2 | 6.0 | 1.7 | 0.0 | 0.4 |

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-2 and 1.3-4 (SCC 1-03-005-01/02/03)

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

Appendix A: Emission Calculations
Natural Gas Combustion Only

MM Btu/hr 0.3 - < 10

Commercial Boiler B-3

Company Name: Arvin North American Automotive

Address City IN Zip: 1001 Hurricane Street, Franklin, Indiana 46131

T: 81-7483

Plt ID: 00020

Reviewer: Dana L. Brown

Date: May 13, 1997

Heat Input Capacity
MMBtu/hr

2.7

Potential Throughput
MMCF/yr

23.7

| | Pollutant | | | | | |
|-------------------------------|-----------|------|-----|-------|-----|------|
| | PM | PM10 | SO2 | NOx | VOC | CO |
| Emission Factor in lb/MMCF | 12.0 | 12.0 | 0.6 | 100.0 | 5.3 | 21.0 |
| Potential Emission in tons/yr | 0.1 | 0.1 | 0.0 | 1.2 | 0.1 | 0.2 |

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

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

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

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors
#1 and #2 Fuel Oil
B-4

Company Name: Arvin North American Automotive
Address City IN Zip: 1001 Hurricane Street, Franklin, Indiana 46131
T: 81-7483
Pit ID: 00020
Reviewer: Dana L. Brown
Date: May 13, 1997

Heat Input Capacity **S = Weight % Sulfur**
MMBtu/hr **Potential Throughput**
kgals/year

11.7
732.085714
0.5

| | Pollutant | | | | |
|-------------------------------|-----------|----------------|------|------|-----|
| | PM | SO2 | NOx | VOC | CO |
| Emission Factor in lb/kgal | 2.0 | 71 (142.0S) | 20.0 | 0.34 | 5.0 |
| Potential Emission in tons/yr | 0.7 | 26.0 | 7.3 | 0.1 | 1.8 |

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-2 and 1.3-4 (SCC 1-03-005-01/02/03)

Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ion

Appendix A: Emissions Calculations

Natural Gas Combustion Only

10 < MM BTU/HR < 100

Small Industrial Boiler, B-4

Company Name: Arvin North American Automotive

Address City IN Zip: 1001 Hurricane Street, Franklin, Indiana 46131

T: 81-7483

Pit ID: 00020

Reviewer: Dana L. Brown

Date: May 13, 1997

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

11.7

102.5

| Emission Factor in lb/MMCF | Pollutant | | | | | |
|-------------------------------|-----------|------|-----|-------|-----|------|
| | PM | PM10 | SO2 | NOx | VOC | CO |
| Emission Factor in lb/MMCF | 13.7 | 13.7 | 0.6 | 140.0 | 2.8 | 35.0 |
| Potential Emission in tons/yr | 0.7 | 0.7 | 0.0 | 7.2 | 0.1 | 1.8 |

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: Uncontrolled = 140, Low NOx Burner = 81, Flue gas recirculation = 30

Emission Factors for CO: Uncontrolled = 35, Low NOx Burner = 61, Flue gas recirculation = 37

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

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live

Frank O'Bannon
Governor

John M. Hamilton
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Telephone 317-232-8603
Environmental Helpline 1-800-451-6027

VIA FEDERAL EXPRESS

November 17, 1997

Ms. Debra Chelf
Arvin North American Automotive
1531 13th Street, Box Number 3002
Columbus, IN 47202

Re: Part 70 Operating Permit Application
Part 70 No.:T005-7443-00008
Part 70 No.:T005-7481-00058
Part 70 No.:T081-7483-00020

Dear Debra:

Enclosed is a draft copy of the addendum that will accompany permit T005-7481-00058 for your Gladstone plant in Columbus. Changes noted in this addendum are consistent with changes that will be made to the permits for the 17th Street plant and the Franklin plant. Please take this opportunity to comment on any changes that will be made to your permits. IDEM, OAM intends to issue these permits before the end of the year.

If you have any questions or comments, please call Dana L. Brown at 317-233-2638 or 1-800-451-6027 (ext 3-2638).

Sincerely,

Dana L. Brown, Senior Environmental Manager
Permits Branch
Office of Air Management

DLB

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

Addendum to the
Technical Support Document for Part 70 Operating Permit

| | |
|------------------------------|---|
| Source Name: | Arvin North American Automotive |
| Source Location: | 601 South Gladstone, Columbus, Indiana 47201 |
| County: | Bartholomew County |
| SIC Code: | 3714 |
| Operation Permit No.: | T005-7481-00058 |
| Permit Reviewer: | Dana L. Brown |

On July 1, 1997, the Office of Air Management (OAM) had a notice published in The Republic, Columbus, Indiana, stating that Arvin North American Automotive had applied for a Part 70 Operating Permit to operate a manufacturing plant to produce metal motor vehicle components. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On July 31, 1997, Arvin North American Automotive submitted comments on the proposed Part 70 permit. The summary of the comments is as follows:

Comment 1:

The calculation of daily average VOC usage in Condition D.1.8, on page 26 of 29 of the draft permit, for compliance with 326 IAC 8-2-9 is unnecessary because each coating used at the source will meet the 3.5 pounds of VOC per gallon content. Also, the maintenance of daily cleanup solvent usage should be eliminated because it is not related to any applicable requirements.

Response to Comment 1:

The calculation of daily volume weighted average of the coatings used, is a method of compliance with 326 IAC 8-2-9 that should be used on any day that any coating with a VOC content of greater than 3.5 pounds per gallon is used. Therefore, this condition will not be deleted from the final permit.

The requirement to maintain the daily solvent usage records is necessary to prove that the source is not subject to 326 IAC 2-2 (PSD), because emissions are below 250 tons per year. Reporting of this information is not required on a quarterly basis, but the records shall be kept so that reporting can be submitted upon request of OAM. Therefore, this condition will not be deleted from the final permit.

Comment 2:

There are three (3) categories of insignificant activities from GSD-10a of the Part 70 permit application that were inadvertently left out of the application. These should be added to the permit.

Response to Comment 1:

The three (3) insignificant activity categories do not have any specific requirements for compliance and do not need to be added to the final permit. It should be noted that the insignificant list on page 1 of 6 of the Technical Support Document (TSD) should include these categories. Originally the list was as follows:

DRAFT

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.
- (2) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (3) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (4) Paved and unpaved roads and parking lots with public access.
- (5) Other categories with emissions below insignificant thresholds:
 - (a) Three (3) GM Welding/Assembly operations;
 - (b) Three (3) Ford Passenger Car Welding/Assembly operations;
 - (c) Three (3) Ford Truck Welding/Assembly operations;
 - (d) Two (2) Ford Pipe Welding/Assembly operation.

The following changes (bolded for emphasis) should be noted:

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.
- (2) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (3) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (4) Paved and unpaved roads and parking lots with public access.
- (5) **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.**
- (6) **A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.**
- (7) **Forced and induced draft cooling tower system not regulated under a NESHAP.**
- (8) Other categories with emissions below insignificant thresholds:
 - (a) Three (3) GM Welding/Assembly operations
 - (b) Three (3) Ford Passenger Car Welding/Assembly operations;
 - (c) Three (3) Ford Truck Welding/Assembly operations;

DRAFT

(d) Two (2) Ford Pipe Welding/Assembly operation.

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

1. The first paragraph on the title page of the permit was changed from:

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

to be as follows on the title page of the final permit:

(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.

2. The following rule cite was added to the title lines of Conditions A.1 (General Information), and A.2 (Emission Units and Pollution Control Equipment Summary), on page 4 of 32 of the final permit:

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

3. Condition A.3 (Specifically Regulated Insignificant Activities), on page 4 of 29 of the proposed permit has been changed from:

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(20)] [326 IAC 2-7-4(c)]

This source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(20) that have applicable requirements.

to be as follows, on page 4 of 32 of the final permit:

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

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

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

4. Condition A.4 (Part 70 Applicability), on page 4 of 29 of the proposed permit, has been changed from:

It is a major source, as defined in 326 IAC 2-7-1(21);

to be as follows on page 4 of 32 of the final permit:

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

5. Condition A.5 (Prior Permit Conditions Superseded), on page 4 of 29 of the proposed permit has been changed from:

DRAFT

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

This permit supersedes the conditions of all construction and operating permits issued under 326 IAC 2 prior to the effective date of this Part 70 permit.

to be as follows, on page 4 of 32 of the final permit:

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

The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.

6. Condition B.1, on page 5 of 29 of the proposed permit, has been changed from:

B.1 General Requirements [IC 13-15] [IC 13-17]

The Permittee shall comply with the provisions of IC 13-15 (Permits Generally), IC 13-17 (Air Pollution Control) and the rules promulgated thereunder.

to be as follows on page 5 of 32 of the final permit:

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

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

7. Condition B.6 (Severability), on page 5 of 29 of the proposed permit, has been changed from:

B.6 Severability [326 IAC 2-7-5(5)] [326 IAC 2-7-8(a)(4)]

- (a) The provisions of this permit are severable, and if any provisions of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
- (b) Indiana rules from 326 IAC quoted in conditions in this permit are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.

to be as follows, on page 5 of 32 of the final permit:

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

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

8. Subsection (c) of Condition B.8 (Duty to Supplement and Provide Information), on page 6 of 29 of the proposed permit, has been changed from:

DRAFT

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records directly to the U.S. EPA and IDEM, OAM, along with a claim of confidentiality.

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

to be as follows, on page 6 of 32 of the final permit:

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records to **IDEM, OAM**, along with a claim of confidentiality under **326 IAC 17**. **If requested by IDEM, OAM, or the U.S. EPA, the Permittee shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.**

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

9. Condition B.10 (Certification), on page 6 of 29 of the proposed permit, has been changed from:

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

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) This certification shall be submitted on the attached Certification Form.
- (c) A responsible official is defined at 326 IAC 2-7-1(33).

to be as follows, on page 6 of 32 of the final permit:

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

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) **One (1) certification shall be included, on the attached Certification Form, with each submittal.**
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

10. Subsections (a) and (b) of Condition B.11 (Annual Compliance Certification), on page 6 of 29 of the proposed permit, have been changed from:

- (a) The Permittee shall annually certify that the source has complied with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall be submitted in letter form no later than

DRAFT

July 1 of each year to:

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

and

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

- (b) This annual compliance certification report required by this permit shall be timely if delivered by any method and received and stamped by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]

to be as follows, on page 6 of 32 of the final permit:

- (a) The Permittee shall annually certify that the source has complied with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. **The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:**

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

and

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

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

11. Subsection (d) of Condition B.11 (Annual Compliance Certification), on page 7 of 29 of the proposed permit has been removed from the condition and the following sentence has been added at the end of the condition on page 7 of 32 of the final permit:

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

12. Condition B.12 (Preventive Maintenance Plan and Compliance Monitoring Plan) on page 7 of 29 of the proposed permit, has been changed from:

DRAFT

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

- (a) The Permittee shall prepare, maintain and implement Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Corrective actions that will be implemented in the event an inspection indicates an out of specification situation;
 - (4) A time schedule for taking such corrective actions including a schedule for devising additional corrective actions for situations that may not have been predicted; and
 - (5) Identification and quantification of the replacement parts which will be maintained in inventory for quick replacement.
- (b) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

to be as follows, on page 7 of 32 of the final permit:

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

- (a) **If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:**
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and associated emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) **Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.**
- (b) **The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.**
- (c) **PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.**

13. The statement following subsection (5)(C) of Condition B.13 (Emergency Provisions), on page 8 of 29 of the proposed permit has been changed from:

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(53).

DRAFT

to be as follows on page 8 of 32 of the final permit:

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

14. Subsections (b), (e), and (f) of Condition B.14 (Permit Shield), on page 9 of 29 of the proposed permit, has been changed from:

- (b) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in, or subsequent to, the permit application.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications.

to be as follows on page 9 of 32 of the final permit:

- (b) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information **supplied in the permit application.**
- (e) This permit shield is not applicable to any change made under 326 IAC **2-7-20(b)(2)** (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC **2-7-20(c)(2)** (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. **[326 IAC 2-7-12(c)(7)]**

15. Condition B.16 (Deviations from Permit Requirements and Conditions), on page 10 of 29 of the proposed permit, has been changed from:

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

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

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

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

- (b) Written notification shall be submitted on the attached Deviation Occurrence Reporting Forms or the substantial equivalent.

to be as follows on page 10 of 32 of the final permit (subsection (c) has been added):

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

- (a) Deviations from **any permit** requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any

DRAFT

response steps or preventive measures taken shall be reported to:

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

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

- (b) Written notification shall be submitted on the attached **Emergency/Deviation Occurrence Reporting Form** or its substantial equivalent.
- (c) **Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.**

16. The first paragraph of subsection (a), and subsection (b)(1) of Condition B.18 (Permit Renewal), on page 11 of 29 of the proposed permit, have been changed from:

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include, at minimum, 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(20).
- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) The Permittee has a duty to submit a timely and complete permit renewal application. A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) Delivered by any method and received and stamped by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]

to be as follows on page 11 of 32 of the final permit:

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, **and shall include the information specified in 326 IAC 2-7-4.** Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC **2-7-1(21).**
- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) **A timely renewal application is one that is:**
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) **If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.** [326 IAC 2-5-3]

17. Subsections (a), (b) and (d), of Condition B.20 (Minor Permit Modification), on page 11 of 29 of the proposed permit, have been changed from:

- (a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendments under 326 IAC 2-7-11.
- (b) Minor modification to this permit shall follow the procedures specified under 326 IAC 2-7-12(b).
- (d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application unless the change is subject to the construction permit requirements of 326 IAC 2-1, 326 IAC 2-2, or 326 IAC 2-3. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM takes any of the actions specified in 326 IAC 2-7-12(b)(6)(A) through (C), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-7-12(b)(7)]

to be as follows on page 12 of 32 of the final permit:

- (a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit **amendment** under 326 IAC 2-7-11.
- (b) Minor modification to this permit shall follow the procedures specified under 326 IAC 2-7-12(b), **except as provided by 326 IAC 2-7-12(c)**.
- (d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application **provided that the change has received any approval required by 326 IAC 2-1**. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM, takes any of the actions specified in 326 IAC 2-7-12(b)(6)(A) through (C), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-7-12(b)(7)]

18. Subsection (d) of Condition B.21 (Significant Permit Modification), on page 13 of 29 of the proposed permit has been changed from:

- (d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-7, including those for application, public participation, review by the U.S. EPA, and availability of the permit shield, as they apply to permit issuance and renewal.

to be as follows on page 13 of 32 of the final permit:

- (d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-7, including those for application, public participation, **review by affected states**, review by the U.S. EPA, and availability of the permit shield, as they apply to permit issuance and renewal.

DRAFT

19. Condition B.22 (Permit Revision Under Economic Incentives and Other Programs), on page 13 of 29 of the proposed permit, has been changed from:

B.22 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

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

to be as follows on page 13 of 32 of the final permit:

B.22 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

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

20. The first sentence of Condition B.23 (Changes Under Section 502(b)(10) of the Clean Air Act), on page 13 of 29 of the proposed permit, has been changed from:

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

to be as follows, on page 13 of 32 of the final permit:

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

21. The word "therein" in subsection (a)(3) of Condition B.24 (Operational Flexibility), on page 13 of 29 of the proposed permit, has been changed to "herein" on page 14 of 32 of the final permit.
22. Subsections (b), and (c) of Condition B.24 (Operational Flexibility), on page 14 of 29 of the proposed permit, have been changed from:

- (b) For each such 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

DRAFT

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

- (c) **Emission Trades [326 IAC 2-7-20(c)]**
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(a).

to be as follows, on page 14 of 32 of the final permit:

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

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

- (c) **Emission Trades [326 IAC 2-7-20(c)]**
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

23. Condition B.25 (Construction Permit Requirement), on page 15 of 29 of the proposed permit, has been changed from:

B.25 Construction Permit Requirement [326 IAC 2]

Modification, construction, or reconstruction shall be permitted as required by and in accordance with 326 IAC 2.

to be as follows on page 15 of 32 of the final permit:

B.25 Construction Permit Requirement [326 IAC 2]

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

24. Subsection (b) of Condition B.27 (Transfer of Ownership), on page 15 of 29 of the proposed permit, has been changed from:

- (b) The written notification shall be sufficient to transfer the permit to the new owner.

to be as follows, on page 15 of 32 of the final permit:

DRAFT

- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11.

25. Condition B.28 (Annual Fee Payment), on page 15 of 29 of the proposed permit, has been changed from:

B.28 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, consistent with the fee schedule established in 326 IAC 2-7-19.
- (b) Failure to pay may result in administrative enforcement action, revocation of this permit, referral to the Office of the Attorney General for collection, or other appropriate measures.
- (c) The Permittee shall pay the annual fee within thirty (30) calendar days of receipt of a billing by IDEM, OAM or in a time period that is consistent with the payment schedule issued by IDEM, OAM.
- (d) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee shall call the following telephone numbers: 1-800-451-6027 or 317-233-5674 (ask for OAM, Data Support Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

to be as follows on page 15 of 32 of the final permit:

B.28 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, **within thirty (30) calendar days of receipt of a billing, or in a time period** consistent with the fee schedule established in 326 IAC 2-7-19.
- (b) **Failure to pay may result in administrative enforcement action, or revocation of this permit.**
- (c) **If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.**

26. Condition B.29 on page 16 of 29 of the proposed permit has been removed because this permit does not incorporate an enhanced new source review.

26. Condition C.1 (PSD Minor Source Status) on page 17 of 29 of the proposed permit, has been changed from:

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

The total source potential emissions of criteria pollutants are less than 250 tons per 365 consecutive day period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

to be as follows on page 17 of 32 of the final permit:

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

- (a) The total source potential emissions of criteria pollutants are less than 250 tons per 365 consecutive day period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) **Any change or modification which may increase potential emissions to 250 tons per twelve (12) consecutive month period, from the equipment covered in this permit, shall require a PSD permit pursuant to 326 IAC 2-2, before such change may occur.**

27. The phrase "This condition is not federally enforceable" has been added to the end of Condition C.2 (Opacity) on page 17 of 29 of the proposed permit (page 17 of 32 of the final permit).

28. Condition C.3 (Open Burning); on page 17 of 29 of the proposed permit, has been changed from:

C.3 Open Burning [326 IAC 4-1] [IC 13-7-9]

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.

to be as follows on page 17 of 32 of the final permit:

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

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

29. Condition C.4 (Incineration), on page 17 of 29 of the proposed permit, has been changed from:

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

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

to be as follows on page 17 of 32 of the final permit:

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

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

30. Condition C.5 (Fugitive Dust Emissions), on page 17 of 29 of the proposed permit, has been changed from:

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

The Permittee shall be in violation of 326 IAC 6-4 (Fugitive Dust Emissions) if any of the criteria specified in 326 IAC 6-4-2(1) through (4) are violated. Observations of visible emissions crossing the property line of the source at or near ground level must be made by a qualified representative of IDEM. [326 IAC 6-4-5(c)]

to be as follows on page 17 of 32 of the final permit:

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

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

31. Condition C.6 (Operation of Equipment), on page 17 of 29 of the proposed permit, has been changed from:

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

- (a) All equipment that may emit pollutants into the ambient air shall be properly operated to meet the requirements of this permit and maintained in accordance with Section B - Preventive Maintenance Plan.
- (b) Unless otherwise stated in this permit, all air pollution control equipment listed in this permit shall be operated at all times that the emission units vented to the control equipment are in operation.
- (c) The Permittee shall perform all necessary maintenance according to the Preventive Maintenance Plan and make all necessary attempts to keep all air pollution control equipment in proper operating condition at all times such that the requirements of this permit are met.

to be as follows on page 17 of 32 of the final permit:

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

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

32. Condition C.7 (Stack Height), on page 18 of 29 of the proposed permit, has been changed from:

C.7 Stack Height [326 IAC 1-7]

- (a) The Permittee shall comply with the provisions of 326 IAC 1-7 (Stack Height Provisions), that apply to all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.
- (b) Stacks shall be constructed using good engineering practice (GEP) according to the following equation:
$$S = H + 1.5 (L)$$

where: S = Stack height, (feet)
H = Height of supporting or nearby structure
(whichever is largest), (feet)
L = Lesser dimension (height or width) of
the structure chosen for H, (feet)
- (c) Any changes in the applicable stacks require prior approval from IDEM, OAM.

to be as follows on page 17 of 32 of the final permit:

C.8 Stack Height [326 IAC 1-7]

- (a) The Permittee shall comply with the provisions of 326 IAC 1-7 (Stack Height Provisions), **for all** exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

DRAFT

- (b) Any change in an applicable stack shall require prior approval from IDEM, OAM.

32. Condition C.8 (Asbestos Abatement Projects - Accreditation), on page 18 of 29 of the proposed permit, has been changed from:

C.8 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18-1]

Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector be Indiana accredited is not federally enforceable.

to be as follows on page 18 of 32 of the final permit:

**C.8 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18]
[40 CFR 61, Subpart M]**

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

33. Condition C.9 (Performance Testing), on page 18 of 29 of the proposed permit, has been changed from:

C.9 Performance Testing [326 IAC 3-2.1]

All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures), utilizing methods approved by IDEM, OAM.

A test protocol shall be submitted to:

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

no later than thirty-five (35) days before the intended test date.

to be as follows on page 18 of 32 of the final permit:

C.9 Performance Testing [326 IAC 3-2.1]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures), **except as provided elsewhere in this permit**, utilizing methods approved by IDEM, OAM.

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

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

DRAFT

no later than thirty-five (35) days before the intended test date.

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

34. The first sentence of Condition C.11 (Compliance Monitoring), on page 19 of 29 of the proposed permit has been changed from:

Compliance with applicable requirements shall be documented in accordance with the provisions of 326 IAC 2-7-5(3).

to be as follows on page 18 of 32 of the final permit:

Compliance with applicable requirements shall be documented as required by this permit.

35. The last sentence of Condition C.11 (Compliance Monitoring), on page 19 of 29 of the proposed permit has been changed from:

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

to be as follows on page 19 of 32 of the final permit:

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

37. Condition C.12 (Monitoring Methods), on page 19 of 29 of the proposed permit, has been changed from:

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the requirements of this permit shall be performed, whenever applicable according to the provisions of 326 IAC 3, or 40 CFR 60, Appendix A, as appropriate, unless some other method is specified in this permit.

to be as follows on page 19 of 32 of the final permit:

C.12 Monitoring Methods [326 IAC 3]

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

38. Condition C.13 (Asbestos Abatement Projects), on page 19 of 29 of the proposed permit, has been changed from:

C.13 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator if the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification regardless of whether asbestos is present.

DRAFT

- (b) Written notification is to be sent on a form provided by the commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) asbestos removal or demolition start date;
 - (B) removal or demolition contractor; or
 - (3) Waste disposal site.
- (c) The Permittee shall postmark or deliver the notice according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

to be as follows on page 19 of 32 of the final permit:

C.13 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

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

DRAFT

- (b) **The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:**
- (1) **When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or**
- (2) **If there is a change in the following:**
- (A) **asbestos removal or demolition start date;**
- (B) **removal or demolition contractor; or**
- (3) **Waste disposal site.**
- (c) **The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).**
- (d) **The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).**

All required notifications shall be submitted to:

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

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

39. The heading "Corrective Actions" on page 20 of 29 of the proposed permit, has been changed to "Corrective Actions and Response Steps" on page 20 of 32 of the final permit.
40. The first sentence of Condition C.15 (Risk Management Plan), on page 21 of 29 of the proposed permit, has been changed from:

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

to be as follows on page 20 of 32 of the final permit:

DRAFT

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

41. Condition C.16 (Compliance Monitoring Plan - Failure to Take Corrective Action), on page 21 of 29 of the proposed permit, has been changed from:

C.16 Compliance Monitoring Plan - Failure to Take Corrective Action [326 IAC 2-7-5(3)]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) The Preventive Maintenance Plan described in Section B, Preventive Maintenance Plan, of this permit.
- (b) For each compliance monitoring condition of this permit appropriate corrective actions, as described in the Preventive Maintenance Plan, shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the corrective actions within the prescribed time contained within the Preventive Maintenance Plan shall constitute a violation of the permit unless taking the corrective action set forth in the Preventive Maintenance Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee may be excused from taking further corrective action for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further corrective actions providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The Permittee determines that the process has already returned to operating within "normal" parameters and no corrective action is required.
- (d) Records shall be kept of all instances in which the action values were not met and of all corrective actions taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

to be as follows on page 21 of 32 of the final permit:

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5(3)]

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

DRAFT

- (4) **The process** has already returned to operating within "normal" parameters and no **response steps** are required.
- (d) Records shall be kept of all instances in which the **compliance related information was** not met and of all **response steps** taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
42. Condition C.17 (Actions Related to Noncompliance Demonstrated by a Stack Test), on page 22 of 29 of the proposed permit, has been changed from:

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of the stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, appropriate corrective actions shall be taken. A description of these corrective actions shall be submitted to IDEM, OAM, within thirty (30) days of receipt of the test results. These corrective actions shall be implemented immediately unless notified by IDEM, OAM that they are not acceptable. The Permittee shall make every effort to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM reserves the right to utilize enforcement activities to resolve the noncompliant stack test.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

to be as follows on page 22 of 32 of the final permit:

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test

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

43. Condition C.18 (Emission Statement) on page 22 of 29 of the proposed permit has been changed from:

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C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-6] [326 IAC 2-7-19]

- (a) The Permittee shall submit a certified, annual emission statement that meets the requirements of 326 IAC 2-6 (Emission Reporting). This annual statement must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the time period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted to:

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

- (b) This annual emission statement required by this permit shall be timely if delivered by any method and received and stamped by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]

to be as follows on page 22 of 32 of the final permit (subsection (c) has been added):

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
[326 IAC 2-6]

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

- (1) **Contain actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);**
- (2) **Contain actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.**

- (b) **The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:**

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

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

44. Subsections (a), and (b) of Condition C.19 (Monitoring Data Availability), on page 23 of 29 of the proposed permit has been changed from:

- (a) All observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

DRAFT

- (b) When the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

to be as follows on page 23 of 32 of the final permit:

- (a) **With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.**
- (b) **As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.**

45. Subsection (c)(4) of Condition C.20 (General Record Keeping Requirements), on page 24 of 29 of the proposed permit, has been changed from:

- (4) Records of any required preventive maintenance and corrective actions that were implemented. Such records shall briefly describe what was done and indicate who did it. Such records may include, but are not limited to: work orders, quality assurance procedures, quality control procedures, operator's standard operating procedures, manufacturer's specifications or their equivalent, and equipment "troubleshooting" guidance.

to be as follows on page 24 of 32 of the final permit:

- (4) **Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.**

46. Subsections (b), (d), and (e) of Condition C.21 (General Reporting Requirements), on page 24 of 29 of the proposed permit, have been changed from:

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be timely if delivered by U.S. mail and postmarked on or before the date it is due; or delivered by any other method and received and stamped by IDEM, OAM, on or before the date it is due. [306 IAC 2-5-1]
- (d) All instances of deviations from any requirements of this permit must be clearly identified in such reports.

DRAFT

- (e) Any corrective actions taken as a result of an exceedance of a limit, an excursion from the parametric values, or a malfunction that may have caused excess emissions must be clearly identified in such reports.

to be as follows on page 24 of 32 of the final permit:

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

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

- (e) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

51. Condition D.1.5 (Testing), on page 25 of 29 of the proposed permit has been changed from:

D.1.5 Testing Requirements [326 IAC 2-7-6(1)]

Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-7-6(1).

to be as follows on page 26 of 32 of the final permit:

D.1.5 Testing Requirements [326 IAC 2-7-6(1)]

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

DRAFT

52. Condition D.1.6 (Volatile Organic Compounds), on page 25 of 29 of the proposed permit, has been changed from:

D.1.6 Volatile Organic Compounds

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

to be as follows on page 26 of 32 of the final permit:

D.1.6 Volatile Organic Compounds

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) **and 326 IAC 8-1-2(a)(7)** using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

52. The following compliance monitoring conditions for the water wash system used to control particulate matter emissions from GMPB-1 and GMPB-2 have been added as Condition D.1.8 on page 27 of 32 of the final permit:

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

D.1.8 Monitoring

- (a) Daily inspections shall be performed to verify that the water flow rate is sufficient to produce a uniform water curtain.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Subsequent conditions have been renumbered.

53. Condition D.1.7 (Particulate Matter (PM) Overspray, on page 26 of 29 of the proposed permit has been moved to under the Compliance Monitoring Requirements heading on page 27 of 32 of the final permit.
54. The following has been added as subset (b) of Condition D.1.8 (Record Keeping Requirements) on page 26 of 29 of the proposed permit (renumbered as D.1.9 on page 27 of 32 of the final permit:
- (b) To document compliance with Condition D.1.8, the Permittee shall maintain a log of daily inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
52. The Certification Form on page 27 of 29 of the proposed permit has been replaced with a revised Certification Forms on pages 29 of 32 of the final permit (state form numbers have been removed).
53. The Deviation Occurrence Forms on pages 28 and 29 of 29 of the proposed permit have been replaced with the Emergency/Deviation Occurrence Form on pages 30 and 31 of 32 of the final permit.
54. A Compliance Report Form has been added on page 32 of 32 of the final permit.
55. The Table of Contents has been updated to reflect the above mentioned changes.

DRAFT

Permit Processing: General Letter

Check off when completed

Mark N/A when not applicable

Company Name: Arvin North American Automotive

Identification Number: T 005-7481-00058

Engineering Secretary

- 11/17-97*
- ☒ KRS Receive the General Letter in a gray or blue folder
 - ☒ 11/17 ☒ Make sure all "copies enclosed" are included
 - ☒ ☒ Date letter and prepare Certified Mail
 - ☒ Check CC's and determine how many copies of letter to make
 - Make ☒ copies and check off:
 - ☒ Original to Applicant, Certified Mail
 - ☒ One copy to Planner/Engineer
 - ☒ One copy to Compliance Branch Inspector
 - ☒ One copy to Modeling and Technical Support
 - ☒ One copy to County Health Department
 - ☒ One copy to JM (keep in gray/blue folder)
 - ☒ N/A One copy to Northwest Office
 - ☒ N/A One copy to Local Agency
 - ☒ N/A If Local Agency: one copy of document to Winter Bottom (AWB)
 - ☒ One copy to gray/blue folder, with this checklist
 - ☒ Two copies One copy to other: Cross Reference to T005-7443-00008 & T081-7423-00020
 - ☒ Route gray/blue folder to AA.