

**CONSTRUCTION PERMIT
and MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR MANAGEMENT**

**ROADMASTER, LLC
310 Steury Avenue
Goshen, Indiana 46526**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 039-11527-00532	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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SECTION A

SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates stationary cargo trailer manufacturing source.

Authorized Individual: Mr. A.J. Paul
Source Address: 310 Steury Avenue, Goshen, Indiana 46526
Mailing Address: 310 Steury Avenue, Goshen, Indiana 46526
Phone Number: (219) 262-0144
SIC Code: 3799
County Location: Elkhart
County Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD Rules;
Minor Source, Section 112 of the Clean Air Act

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

- (a) One (1) paint room, identified as PR, for undercoating and painting metal chasses, equipped with two (2) airless spray guns and dry filters as overspray control, exhausting through stacks SV28 and SV32 through SV39, capacity: 7.5 cargo trailers per hour.
- (b) Eleven (11) natural gas-fired space heaters, identified as SV1 through SV11, exhausting through stacks SV1 through SV11, maximum heat input capacity: 0.2 million British thermal units per hour, each.
- (c) Seven (7) natural gas-fired space heaters, identified as SV12 through SV18, exhausting through stacks SV12 through SV18, maximum heat input capacity: 0.175 million British thermal units per hour, each.
- (d) One (1) natural gas-fired space heater, identified as SV19, exhausting through stack SV19, maximum heat input capacity: 0.128 million British thermal units per hour.
- (e) Five (5) natural gas-fired space heaters, identified as SV20 through SV24, exhausting through stacks SV20 through SV24, maximum heat input capacity: 0.150 million British thermal units per hour, each.
- (f) Three (3) natural gas-fired space heaters, identified as SV25 through SV27, exhausting through stacks SV25 through SV27, maximum heat input capacity: 0.94 million British thermal units per hour, each.
- (g) One (1) natural gas-fired air makeup unit, identified as SV28, exhausting through stack SV28, maximum heat input capacity: 4.9 million British thermal units per hour.

- (h) One (1) plywood department, equipped with three (3) table saws identified as S1, S2 and S3, two (2) miter saws identified as S4 and S5, one (1) chop saw identified as S6, and four (4) shop-vac dust collectors identified as DC1, DC2, DC3 and DC4, capacity: 4,875 pounds of plywood per hour, total.
- (i) Twenty-eight (28) MIG welders, identified as W1 through W28, maximum capacity: 33.75 pounds of MIG wire per hour, total.
- (j) One (1) portable stick welder for maintenance, identified as W29, maximum capacity: 10 pounds of stick per hour.
- (k) One (1) exterior trim department for applying adhesive and sealant to metal and/or wood using aerosol cans and a caulking gun, respectively, capacity: 7.5 cargo trailers per hour.
- (l) One (1) roofing department for applying sealant to metal and/or wood using a caulking gun, capacity: 7.5 cargo trailers per hour.
- (m) One (1) final finish area for applying touch-up paint using aerosol cans, capacity: 7.5 metal chasses per hour.

SECTION B GENERAL CONSTRUCTION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

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 2-1.1-1 shall prevail.

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

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

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section.
 - (1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
 - (2) If the Affidavit of Construction does not verify that the facilities covered in this Construction Permit were constructed as proposed in the application, then the Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section prior to beginning operation of the facilities.
- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

- (c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).
- (e) Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. 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 until the renewal permit has been issued or denied. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

- (a) The total source potentials to emit of VOC, PM and PM₁₀ are less than 250 tons per year. 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 to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAM prior to making the change.

C.2 Preventive Maintenance Plan [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) after issuance of this permit, including the following information on each emissions unit:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan 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. IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAM within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.4 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, 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)]

C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)]:

- (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.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAM, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.6 Permit Revocation [326 IAC 2-1-9]

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

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.7 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

C.8 Fugitive Dust Emissions [326 IAC 6-4]

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

C.10 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

Testing Requirements

C.11 Performance Testing [326 IAC 3-6] [326 IAC 2-1.1-11]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

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

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

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

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, if the source submits

to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

C.12 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.13 Monitoring Methods [326 IAC 3]

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

C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]

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

Response Plan would be unreasonable.

- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.

C.15 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 emissions unit 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 emissions unit.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.16 Malfunctions Report [326 IAC 1-6-2]

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) or appointed representative upon request.

- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.17 Annual Emission Statement [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. 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.

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.18 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

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

- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-6.1-2]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

- (d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.20 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) A malfunction as described in 326 IAC 1-6-2; or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

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

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

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

C.21 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Management stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Data Section, Office of Air Management
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015
- (d) The notification 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.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) paint room, identified as PR, for undercoating and painting metal chasses, equipped with two (2) airless spray guns and dry filters as overspray control, exhausting through stacks SV28 and SV32 through SV39, capacity: 7.5 cargo trailers per hour.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(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 coatings delivered to the applicators at the paint room shall be limited to 3.5 pounds of VOC per gallon of coating less water.

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

D.1.2 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-6] [326 IAC 2-1-3.4][326 IAC 2-4.1-1]

- (a) The Best Available Control Technology (BACT) Conditions 13 and 14 of CP 039-9698-00496, issued to Tiara Motor Coach on October 22, 1998, are no longer applicable since BACT is not applicable to this source since the fiberglass operations do not exist at ROADMASTER, LLC.
- (b) Operating Condition 16 of CP 039-9698-00496, issued to Tiara Motor Coach on October 22, 1998, that source shall limit the usage of single HAP and total HAPs to 9.9 and 24.0 tons per twelve (12) month period, respectively, is not applicable because the potentials to emit any single HAP and total HAPs are less than 10 tons per year and 25 tons per year, respectively. Therefore, no limit is required to make 326 IAC 2-1-3.4 and 326 IAC 2-4.1-1 not applicable.

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

- (a) The PM from the paint room 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:

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

or

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

$E = 55.0 P^{0.11} - 40$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

- (b) Condition 10(b) of CP 039-9698-00496, issued to Tiara Motor Coach on October 22, 1998, which requires that pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emissions from fiberglass grinding equipment (controlled by baghouse DC-1) are 0.72 lb/hr when operating at the maximum process weight rate of 150 lb/hr, the allowable PM emissions from woodworking equipment (controlled by baghouse DC-2) are 0.39 lb/hr when operating at the maximum process weight rate of 60 lb/hr, the allowable PM emissions from woodworking equipment (controlled by baghouse DC-3) are 0.39 lb/hr when operating at the maximum process weight rate of 60 lb/hr, and the allowable emissions from fiberglass grinding and woodworking operations are calculated using $E=4.10 * P^{0.67}$ (for process weight rates up to 60,000 pounds per hour), where E is the maximum allowable PM emission rate (lbs/hr) and P is the process weight (tons/hr) is not applicable because the fiberglass and woodworking operations existing at Tiara Motor Coach when that permit was issued are not existing at ROADMASTER, LLC.

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements [326 IAC 2-1.1-11]

D.1.5 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content limitation contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) 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.

D.1.7 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the paint room is in operation.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks SV28 and SV32 through SV39 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a

violation of this permit.

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.9 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken monthly, and shall be complete and sufficient to establish compliance with the VOC content limit established in Condition D.1.1.
 - (1) The amount and VOC content of each coating material and solvent used each month. 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; and
 - (2) The cleanup solvent usage for each month.
- (b) To document compliance with Condition D.1.7 and D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
- (d) Operation Condition 19 of CP 039-9698-00496, issued to Tiara Motor Coach on October 22, 1998, that records of HAP usages shall be kept is not applicable, because HAP limitations do not exist in this permit since the potentials to emit any single HAP and total HAPs are less than 10 tons per year and 25 tons per year, respectively.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (b) Eleven (11) natural gas-fired space heaters, identified as SV1 through SV11, exhausting through stacks SV1 through SV11, maximum heat input capacity: 0.2 million British thermal units per hour, each.
- (c) Seven (7) natural gas-fired space heaters, identified as SV12 through SV18, exhausting through stacks SV12 through SV18, maximum heat input capacity: 0.175 million British thermal units per hour, each.
- (d) One (1) natural gas-fired space heater, identified as SV19, exhausting through stack SV19, maximum heat input capacity: 0.128 million British thermal units per hour.
- (e) Five (5) natural gas-fired space heaters, identified as SV20 through SV24, exhausting through stacks SV20 through SV24, maximum heat input capacity: 0.150 million British thermal units per hour, each.
- (f) Three (3) natural gas-fired space heaters, identified as SV25 through SV27, exhausting through stacks SV25 through SV27, maximum heat input capacity: 0.94 million British thermal units per hour, each.
- (g) One (1) natural gas-fired air makeup unit, identified as SV28, exhausting through stack SV28, maximum heat input capacity: 4.9 million British thermal units per hour.
- (h) One (1) plywood department, equipped with three (3) table saws identified as S1, S2 and S3, two (2) miter saws identified as S4 and S5, one (1) chop saw identified as S6, and four (4) shop-vac dust collectors identified as DC1, DC2, DC3 and DC4, capacity: 4,875 pounds of plywood per hour, total.
- (i) Twenty-eight (28) MIG welders, identified as W1 through W28, maximum capacity: 33.75 pounds of MIG wire per hour, total.
- (j) One (1) portable stick welder for maintenance, identified as W29, maximum capacity: 10 pounds of stick per hour.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(1)]

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

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the one (1) plywood department, equipped with three (3) table saws identified as S1, S2 and S3, two (2) miter saws identified as S4 and S5, one (1) chop saw identified as S6, and four (4) shop-vac dust collectors identified as DC1, DC2, DC3 and DC4 shall not exceed 7.44 pounds per hour when operating at a process weight rate of 4,875 pounds per hour.
- (b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the twenty-eight (28) MIG welders and one (1) stick welder shall not exceed 0.551 pounds per hour when operating at a process weight rate of less than 100 pounds per hour.

The pounds per hour limitations were calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 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

Compliance Determination Requirements [326 IAC 2-1.1-11]

D.2.2 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the PM limits specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (k) One (1) exterior trim department for applying adhesive and sealant to metal and/or wood using aerosol cans and a caulking gun, respectively, capacity: 7.5 cargo trailers per hour.
- (l) One (1) roofing department for applying sealant to metal and/or wood using a caulking gun, capacity: 7.5 cargo trailers per hour.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(1)]

D.3.1 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 coatings delivered to the applicators at the exterior trim department and roofing department when coating metal shall be limited to 3.5 pounds of VOC per gallon of coating less water.

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.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The VOC usage, including clean-up solvents, at the one (1) exterior trim department and one (1) roofing department shall be limited to less than 25 tons per consecutive twelve (12) month period, rolled on a monthly basis. This will limit VOC emissions from the combination of the exterior trim department and roofing department to less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6, New Facilities; General reduction requirements, are not applicable.

D.3.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the one (1) exterior trim department and one (1) roofing department 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:

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

or

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Compliance Determination Requirements [326 IAC 2-1.1-11]

D.3.4 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.3.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.3.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.3.1 and D.3.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) 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.

D.3.6 VOC Emissions

Compliance with Condition D.3.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.3.7 Record Keeping Requirements

(a) To document compliance with Conditions D.3.1 and D.3.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly, and shall be complete and sufficient to establish compliance with the VOC content and VOC usage and emission limits established in Conditions D.3.1 and D.3.2.

- (1) The amount and VOC content of each coating material and solvent used each month. 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) The cleanup solvent usage for each month;
- (3) The total VOC usage for each month; and
- (4) The weight of VOCs emitted for each compliance period.

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

D.3.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(m) One (1) final finish area for applying touch-up paint using aerosol cans, capacity: 7.5 metal chasses per hour.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(1)]

D.4.1 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 coatings delivered to the applicators at the final finish area shall be limited to 3.5 pounds of VOC per gallon of coating less water.

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.4.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the final finish area 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:

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

or

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Compliance Determination Requirements [326 IAC 2-1.1-11]

D.4.3 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.4.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.4.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content limitation contained in Condition D.4.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) 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.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.4.5 Record Keeping Requirements

- (a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken monthly, and shall be complete and sufficient to establish compliance with the VOC content limit established in Condition D.4.1.
 - (1) The amount and VOC content of each coating material and solvent used each month. 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; and
 - (2) The cleanup solvent usage for each month.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

Company Name: ROADMASTER, LLC
Location: 310 Steury Avenue, Goshen, Indiana 46526
Permit No.: MSOP 039-11527-00532
Source/Facility: One (1) exterior trim department and one (1) roofing department
Parameter/Pollutant: VOC usage
Limitation: Less than 25 tons per consecutive twelve (12) month period, total

Year: _____

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

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

MALFUNCTION REPORT

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

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

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES ?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100 TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

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

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

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

COMPANY: _____ PHONE NO. _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

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

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

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for New Source Construction and Minor Source Operating Permit

Source Background and Description

Source Name: ROADMASTER, LLC
Source Location: 310 Steury Avenue, Goshen, Indiana 46526
County: Elkhart
SIC Code: 3799
Operation Permit No.: MSOP 039-11527-00532
Permit Reviewer: CarrieAnn Ortolani

The Office of Air Management (OAM) has reviewed an application from ROADMASTER, LLC relating to the construction and operation of a cargo trailer manufacturing source. The source was most recently owned by Tiara Motor Coach and operated under CP 039-9698-00496. ROADMASTER, LLC will operate some of the existing equipment and additional equipment.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) paint room, identified as PR, for undercoating and painting metal chasses, equipped with two (2) airless spray guns and dry filters as overspray control, exhausting through stacks SV28 and SV32 through SV39, capacity: 7.5 cargo trailers per hour.
- (b) Eleven (11) natural gas-fired space heaters, identified as SV1 through SV11, exhausting through stacks SV1 through SV11, maximum heat input capacity: 0.2 million British thermal units per hour, each.
- (c) Seven (7) natural gas-fired space heaters, identified as SV12 through SV18, exhausting through stacks SV12 through SV18, maximum heat input capacity: 0.175 million British thermal units per hour, each.
- (d) One (1) natural gas-fired space heater, identified as SV19, exhausting through stack SV19, maximum heat input capacity: 0.128 million British thermal units per hour.
- (e) Five (5) natural gas-fired space heaters, identified as SV20 through SV24, exhausting through stacks SV20 through SV24, maximum heat input capacity: 0.150 million British thermal units per hour, each.
- (f) Three (3) natural gas-fired space heaters, identified as SV25 through SV27, exhausting through stacks SV25 through SV27, maximum heat input capacity: 0.94 million British thermal units per hour, each.

- (g) One (1) natural gas-fired air makeup unit, identified as SV28, exhausting through stack SV28, maximum heat input capacity: 4.9 million British thermal units per hour.

Unpermitted Emission Units and Pollution Control Equipment

According to the application received on November 8, 1999 and the information received on December 13, 1999, the source also consists of the following unpermitted facilities/units which began operation in November 1999:

- (h) One (1) plywood department, equipped with three (3) table saws identified as S1, S2 and S3, two (2) miter saws identified as S4 and S5, one (1) chop saw identified as S6, and four (4) shop-vac dust collectors identified as DC1, DC2, DC3 and DC4, capacity: 4,875 pounds of plywood per hour, total.
- (i) Twenty-eight (28) MIG welders, identified as W1 through W28, maximum capacity: 33.75 pounds of MIG wire per hour, total.
- (j) One (1) portable stick welder for maintenance, identified as W29, maximum capacity: 10 pounds of stick per hour.
- (k) One (1) exterior trim department for applying adhesive and sealant to metal and/or wood using aerosol cans and a caulking gun, respectively, capacity: 7.5 cargo trailers per hour.
- (l) One (1) roofing department for applying sealant to metal and/or wood using a caulking gun, capacity: 7.5 cargo trailers per hour.
- (m) One (1) final finish area for applying touch-up paint using aerosol cans, capacity: 7.5 metal chasses per hour.

New Emission Units and Pollution Control Equipment

There is no new equipment proposed for this source that has not already been operated.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

CP 039-9698-00496, issued to Tiara Motor Coach on October 22, 1998

All conditions from previous approvals were incorporated into this permit except the following:

- (a) Condition 10(b): That pursuant to 326 IAC 6-3 (Process Operations), the allowable particulate matter emissions from surface coating and woodworking operations are as follows:

Fiberglass grinding and woodworking operations:

- (1) Allowable PM emissions from fiberglass grinding equipment (controlled by baghouse DC-1) are 0.72 lb/hr when operating at the maximum process weight rate of 150 lb/hr.
- (2) Allowable PM emissions from woodworking equipment (controlled by baghouse DC-2) are 0.39 lb/hr when operating at the maximum process weight rate of 60 lb/hr.

- (3) Allowable PM emissions from woodworking equipment (controlled by baghouse DC-3) are 0.39 lb/hr when operating at the maximum process weight rate of 60 lb/hr.

Allowable emissions from fiberglass grinding and woodworking operations are calculated using the following equation:

$$E = 4.10 * P^{0.67} \text{ (for process weight rates up to 60,000 pounds per hour)}$$

Where E = maximum allowable PM emission rate (lbs/hr)
 P = process weight (tons/hr)

Reason not incorporated: The fiberglass and woodworking operations existing at Tiara Motor Coach when the permit was issued do not exist at ROADMASTER, LLC.

- (b) The Best Available Control Technology (BACT) Conditions 13 and 14 are no longer applicable since 326 IAC 8-1-6 is not applicable to this source. The fiberglass operations do not exist at ROADMASTER, LLC, and the applicability of BACT is evaluated in the State Rule Applicability section of this document.
- (c) Condition 16: That source shall limit the usage of single hazardous air pollutant (HAP) and total HAPs to 9.9 and 24.0 tons per twelve (12) month period, respectively. During the first 12 months of operation, single HAP and total HAPs usages shall be limited such that the single HAP and total HAPs used divided by accumulated days of operations shall not exceed the limits specified. Therefore, the requirements of 326 IAC 2-1-3.4 do not apply.

Reason not incorporated: Since the fiberglass operations do not exist at this source, the potentials to emit any single HAP and total HAPs are less than 10 tons per year and 25 tons per year, respectively. Therefore, no limit is required to make 326 IAC 2-1-3.4 and 326 IAC 2-4.1-1 not applicable.

- (d) Condition 19: The Record Keeping requirements included HAP usages. HAP limitations will not exist in this permit, and the Record Keeping requirements will coincide with different permit conditions.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
SV1-SV11	Eleven (11) heaters	27.8, each	0.67, each	200	77
SV12-SV18	Seven (7) heaters	27.8, each	0.5, each	200	77
SV19-SV24	Six (6) heaters	27.8, each	0.67, each	200	77
SV25-SV27	Three (3) heaters	28.3, each	0.67, each	200	77
SV28	Make-up Air Unit	37.5	2.83	12,200	77 to 140
SV32-SV39	Spray Room	28.5, each	2.0, each	5,400 each	77 to 140

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the construction and operation 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.

A complete application for the purposes of this review was received on November 8, 1999, with additional information received on December 13, 1999.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 6 of 6).

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	51.4
PM ₁₀	51.6
SO ₂	0.032
VOC	96.9
CO	4.42
NO _x	5.26

HAPs	Potential To Emit (tons/year)
Manganese	0.027
Nickel	0.0003
Cobalt Compounds	0.070
Chromium	0.0002
Styrene	0.672
Toluene	5.28
Naphthalene	3.36
MEK	0.672
Glycol Ethers	1.87
Benzene	0.0001
Dichlorobenzene	0.00006
Formaldehyde	0.004
Hexane	0.095
Lead	0.00003
Cadmium	0.00006
TOTAL	11.9

- (a) The potentials to emit (as defined in the Indiana Rule) of PM, PM₁₀ and VOC are equal to or greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-5 and 326 IAC 2-6.
- (b) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (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 applicability.

Actual Emissions

No previous emission data has been received from the source.

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPS
One (1) paint room (PR)	1.35	1.35	0.00	65.5	0.00	0.00	5.59
Twenty-seven (27) natural gas-fired space heaters and one (1) air make-up unit	0.100	0.399	0.032	0.289	4.42	5.26	0.099
One (1) plywood department	1.75	1.75	0.00	0.00	0.00	0.00	0.00
Twenty-eight (28) MIG welders and one (1) portable stick welder	1.70	1.70	0.00	0.00	0.00	0.00	0.027
One (1) exterior trim department and one (1) roof department	9.20	9.20	0.00	< 25.0	0.00	0.00	5.28
One (1) final finish area	4.49	4.49	0.00	5.01	0.00	0.00	0.98
Total Emissions	18.6	18.9	0.032	< 95.8	4.42	5.26	11.9

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

- (b) Elkhart County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 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 applicability.

Source Status

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

There are no actual emissions on file for this source. This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories. This was determined using the potential to emit of the entire source.

Proposed Modification

PTE from the recent modification which consists of the emission units constructed and operated in November 1999 without the proper approval (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Pollutant	PM (ton/yr)	PM ₁₀ (ton/yr)	SO ₂ (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO _x (ton/yr)
Proposed Modification	17.1	17.1	0.00	30.0	0.00	0.00
PSD Threshold Level	250	250	250	250	250	250

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

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the new equipment, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

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

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

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 326 IAC 20; and 40 CFR Part 61 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

Since this is not one of the twenty-eight (28) listed source categories, the source is located in Elkhart County, and the potential to emit of each regulated pollutant is less than 250 tons per year, this source is not a major source pursuant to 326 IAC 2-2, PSD, and the requirements of 326 IAC 2-2 are not applicable.

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 ten (10) tons per year of VOC in Elkhart County. 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 April 15 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 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1-1 (New Source Toxics Control)

Since the potential to emit each individual hazardous air pollutant (HAP) is less than 10 tons per year and the potential to emit total HAPs is less than 25 tons per year, the requirements of 326 IAC 2-4.1-1 are not applicable.

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

Since there are no boilers, or sources of indirect heating, at this source, the requirements of 326 IAC 6-2 are not applicable.

326 IAC 6-3-2 (Process Operations)

- (a) The particulate matter (PM) from the paint room, exterior trim department, roofing department and final finish area 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:

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

or

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The dry filters shall be in operation at all times the paint room is in operation, in order to comply with this limit.

- (b) Pursuant to 326 IAC 6-3-2, Process Operations, the PM emissions from the one (1) plywood department, equipped with three (3) table saws identified as S1, S2 and S3, two (2) miter saws identified as S4 and S5, one (1) chop saw identified as S6, and four (4) shop-vac dust collectors identified as DC1, DC2, DC3 and DC4 shall not exceed 7.44 pounds per hour when operating at a process weight rate of 4,875 pounds per hour. Since the potential to emit before controls is 0.400 pounds per hour, the one (1) plywood department will comply with this rule. Operation of the four (4) shop-vac dust collectors is not required to comply with this rule according to the information supplied in the application.

This limitation is calculated using the following equation:

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:

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

- (c) Pursuant to 326 IAC 6-3-2, Process Operations, the PM emissions from the twenty-eight (28) MIG welders and one (1) stick welder shall not exceed 0.551 pounds per hour when operating at a process weight rate of less than 100 pounds per hour. Since the potential to emit is 0.39 pounds per hour, the twenty-eight (28) MIG welders and one (1) stick welder will comply with this rule.

These limitations are calculated using the following equation:

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:

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

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

Since there are no other 326 IAC 8 rules for applying to adhesive and sealant to wood parts and the potential to emit VOC at the exterior trim department and the roof department are greater than 25 tons per year, the requirements of 326 IAC 8-1-6 can be applicable. The applicant has agreed to limit VOC usage from the combination of the exterior trim department and the roofing department

to less than 25 tons per consecutive twelve (12) month period, total. Therefore, the VOC emissions will be less than 25 tons per year and the requirements of 326 IAC 8-1-6 are not applicable.

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

- (a) Since the potentials to emit VOC at the paint room and the final finish area are greater than 15 pounds per day, each, and metal parts are coated in these areas, the requirements of 326 IAC 8-2-9, Miscellaneous Metal Coating, are applicable. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating and adhesive delivered to the applicators at the paint room and the final finish area shall be limited to 3.5 pounds of VOC per gallon of coating less water.

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 room and the final finish area are in compliance with this requirement.

- (b) Since the potentials to emit VOC at the exterior trim department and roofing department are greater than 15 pounds per day, each, and adhesive and sealant can be applied to metal parts in these areas, the requirements of 326 IAC 8-2-9, Miscellaneous Metal Coating, are applicable. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating and adhesive delivered to the applicators at the exterior trim department and roofing department for use on metal parts shall be limited to 3.5 pounds of VOC per gallon of coating less water.

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 exterior trim department and roofing department are in compliance with this requirement.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Construction Permit Application Form Y.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See attached calculations for detailed air toxic calculations. (Pages 2, 4 and 6 of 6)

Conclusion

The construction and operation of this cargo trailer manufacturing source shall be subject to the conditions of the attached proposed New Source Construction and Minor Source Operating Permit 039-11527-00532.

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) ~~through (3)~~ and (2) below. Records maintained for (1) ~~through (3)~~ and (2) shall be taken ~~daily or monthly, as indicated~~, and shall be complete and sufficient to establish compliance with the VOC content limit established in Condition D.1.1.
- (1) The amount and VOC content of each coating material and solvent used **each month**. 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; **and**
- ~~(2) A log of the dates of use; and~~
- ~~(3)~~(2) The cleanup solvent usage for each month.

Comment 2:

Section D.1.9(b) (page 19 of 29) appears to contain language that was inserted by error. The condition indicates "To document compliance with Condition D.1.7 and D.1.8, the Permittee shall maintain a log of weekly overspray observations, weekly observations of the water level in the pans..."

The Paint Room at ROADMASTER does not include any type of pans with water. The Paint Room utilizes a dry filter bank system to remove oversprayed solids, but does not include any water process for removal of solids.

Triad requests that the language "weekly observations of the water levels in the pans" be removed.

Response 2:

Condition D.1.9 (b) has been corrected as follows:

- (b) To document compliance with Condition D.1.7 and D.1.8, the Permittee shall maintain a log of weekly overspray observations, ~~weekly observations of the water level in the pans~~, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

Comment 3:

Section D.3.4 (page 23 of 29) indicates a Preventive Maintenance Plan (PMP) is required for the trim and roofing departments.

As detailed in Section C.1 (page 8 of 29) a PMP covers maintenance related to emission control devices. The trim and roofing departments at ROADMASTER consist of the application of adhesives and sealants using aerosol cans and caulking guns. There are no control devices associated with these processes and therefore, PMP does not apply to these processes.

Triad requests the PMP requirement be removed from Section D.3.

Response 3:

The requirements in 326 IAC 1-6-1 and 326 IAC 1-6-3 specify that the requirement to maintain a Preventive Maintenance Plan is applicable to any facility that is required to obtain a permit under 326 IAC 2. IDEM's preventive maintenance plan guidance states that a preventive maintenance plan is required only for:

- (a) the unit emits particulate matter, sulfur dioxide, or volatile organic compounds; and
- (b) the unit has existing applicable requirements; and
- (c) the unit is subject to a NSPS or NESHAP (for these units current requirements will satisfy as a compliance monitoring plan); or
- (d) the unit has a control device and the allowable emissions exceed 10 pounds per hour; or
- (e) the unit does not have a control device and has actual emissions exceeding 25 tons per year.

The guidance does not state that if a facility does not meet the above requirements, preventive maintenance will never be necessary, it does state that a preventive maintenance plan is not required to be submitted with the application. In most cases, the requirement to maintain a preventive maintenance plan and perform preventive maintenance has followed the same guidelines as specified above. However, there are some types of operations (e.g. surface coating) that the OAM has determined that compliance monitoring and preventive maintenance plans are necessary to ensure continuous compliance with 326 IAC 6-3-2. However, these facilities have no control devices, only use caulking guns and aerosol cans for coating, and PM only results from the aerosol cans. Therefore, it has been determined that Preventive Maintenance Plan would not be sufficiently useful for ensuring compliance with 326 IAC 6-3-2. Therefore, the Preventive Maintenance Plan requirement will be removed from Section D.3, as follows, and Section D.3 has been renumbered accordingly:

~~D.3.4 Preventive Maintenance Plan [326 IAC 1-6-3]~~

~~A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for these emissions units.~~

Comment 4:

Section D.3.8 (page 23 of 29) record keeping requirements do not make it clear whether daily or monthly records shall be kept on the coatings and amounts of coatings used in the trim and roofing departments. (Same language as found in D.1.9 and discussed in Item Number 1 of this letter.)

This record keeping is being required to demonstrate compliance with Condition D.3.1, the VOC limitation of 3.5 pounds of VOC per gallon of coating less water, and with the 25 ton rolling 12-month limit on VOC accepted by ROADMASTER for the trim and roofing departments to avoid 326 IAC 8-1-6.

Since the total potential to emit from BOTH departments is 26.09 tons per year of VOC, based on the maximum hourly usage rates being used every hour of the year (8,760 hours/year), it is highly unlikely that ROADMASTER will emit close to the allowed 25 tons per year. ROADMASTER operates 1 shift per day, 5 days per week. Even if that doubles within the life of the Permit, the VOC emissions from these departments will still be well within the 25 ton limit. Because of that and the fact that the coatings are compliant without the aid of averaging or controls, daily record keeping is unnecessary. Monthly records can be used to calculate monthly and 12-month rolling emission rates and Material Safety Data Sheets (MSDSs) will serve as documentation of compliance with the 3.5 VOC limitation.

Triad requests that in Section D.3.8(a)(1), "each month" be added to the end of the first sentence with currently reads "The amount and VOC content of each coating material and solvent used." Please change to "The amount and VOC content of each coating material and solvent used each month." Also, Triad requests that (a)(2) of Section D.3.8 be removed, to eliminate the requirement of recording dates coatings/solvents are used.

Response 4:

Monthly record keeping is not acceptable for documenting compliance with 326 IAC 8-2-9 if non-compliant coatings are used, because 326 IAC 8-2-9 requires daily volume weighted averaging. According to the potential to emit calculations in Appendix A to the Technical Support Document, all materials used at the trim and roofing departments will comply with 326 IAC 8-2-9. Therefore, Condition D.3.8 (a) (now D.3.7 (a)) has been revised as follows:

- (a) To document compliance with Conditions D.3.1 and D.3.2, the Permittee shall maintain records in accordance with (1) through ~~(5)~~ **(4)** below. Records maintained for (1) through ~~(5)~~ **(4)** shall be taken ~~daily or monthly, as indicated~~; and shall be complete and sufficient to establish compliance with the VOC content and VOC usage and emission limits established in Conditions D.3.1 and D.3.2.
- (1) The amount and VOC content of each coating material and solvent used **each month**. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- ~~(2) A log of the dates of use;~~
- ~~(3)~~**(2)** The cleanup solvent usage for each month;
- ~~(4)~~**(3)** The total VOC usage for each month; and
- ~~(5)~~**(4)** The weight of VOCs emitted for each compliance period.

Comment 5:

Section D.4.5 (page 25 of 29) record keeping requirements do not make it clear whether daily or monthly records shall be kept on the coatings and amounts of coatings used in the final finish area. (Same language as found in D.1.9 and discussed in item number 1 of this letter.)

This record keeping is being required to demonstrate compliance with Condition D.4.1, the VOC limitation of 3.5 pounds of VOC per gallon of coating less water. The final finish area consists of minor touch-up painting with aerosol cans. There is no emission limit on the final finish area and the potential to emit is only 5 tons per year.

Since there is no emission limit on the final finish area and the coatings are compliant without the aid of averaging or controls, daily record keeping is unnecessary. Monthly records can be used to calculate yearly emissions for the Annual Emission Statement and Material Safety Data Sheets (MSDSs) will serve as documentation of compliance with the 3.5 VOC limitation.

Triad requests that in Section D.4.5(a)(1), "each month" be added to the end of the first sentence with currently reads "The amount and VOC content of each coating material and solvent used." Please change to "The amount and VOC content of each coating material and solvent used each month." Also, Triad requests that (a)(2) of Section D.4.5 be removed, to eliminate the requirement of recording dates coatings/solvents are used.

Response 5:

Monthly record keeping is not acceptable for documenting compliance with 326 IAC 8-2-9 if non-compliant coatings are used, because 326 IAC 8-2-9 requires daily volume weighted averaging. According to the potential to emit calculations in Appendix A to the Technical Support Document, all materials used at the trim and roofing departments will comply with 326 IAC 8-2-9. Therefore, Condition D.4.5 (a) has been revised as follows:

- (a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) ~~through (3)~~ **and (2)** below. Records maintained for (1) ~~through (3)~~ **and (2)** shall be taken ~~daily or monthly, as indicated~~, and shall be complete and sufficient to establish compliance with the VOC content limit established in Condition D.4.1.
- (1) The amount and VOC content of each coating material and solvent used **each month**. 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; **and**
- ~~(2)~~ — A log of the dates of use; and
- ~~(3)~~**(2)** The cleanup solvent usage for each month.

Indiana Department of Environmental Management Office of Air Management

Addendum to the
Technical Support Document for New Construction and Operation

Source Name:	ROADMASTER, LLC
Source Location:	310 Steury Avenue, Goshen, Indiana 46526
County:	Elkhart
Construction Permit No.:	MSOP 039-11527-00532
SIC Code:	3799
Permit Reviewer:	CarrieAnn Ortolani

On January 8, 2000, the Office of Air Management (OAM) had a notice published in the Goshen News, Goshen, Indiana, stating that ROADMASTER, LLC had applied for a construction permit to construct and operate a cargo trailer manufacturing source with dry filters and dust collectors as air pollution control. The notice also stated that OAM proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On February 3, 2000, Sara R. Cupp of Triad Engineering, submitted comments on the proposed construction permit. The comments and corresponding responses are as follows (The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded**):

Comment 1:

Section D.1.9(a) (page 19 of 29) indicates that various information must be recorded to demonstrate compliance with Condition D.1.1, the volatile organic compound (VOC) limitation of 3.5 pounds of VOC per gallon of coating less water. The condition indicates records "shall be taken daily or monthly, as indicated...", but then it does not specify under Section D.1.9(a)(1) whether daily or monthly is required. Section D.1.9(a)(2) indicates ROADMASTER should maintain "a log of the dates of use" of the coatings and solvents suggesting that daily records must be kept of coating usages.

Since there is no emission limit on the Paint Room, and the coatings are compliant without the aid of averaging or controls, daily record keeping is unnecessary. Monthly records can be used to calculate yearly emissions for the Annual Emission Statement and Material Safety Data Sheets (MSDSs) will serve as documentation of compliance with the 3.5 VOC limitation.

Triad requests that in Section D.1.9(a)(1), "each month" be added to the end of the first sentence which currently reads "The amount and VOC content of each coating material and solvent used." Please change to "The amount and VOC content of each coating material and solvent used each month." Also, Triad requests that (a)(2) of Section D.1.9 be removed, to eliminate the requirement of recording dates coatings/solvents are used.

Response 1:

Monthly record keeping is not acceptable for documenting compliance with 326 IAC 8-2-9 if non-compliant coatings are used, because 326 IAC 8-2-9 requires daily volume weighted averaging. According to the information provided in the application, a small amount of a material with a VOC content greater than 3.5 pounds per gallon of coating less water is used at the Paint Room (see page 3 of 6 of TSD Appendix A). Since this material is only used as a cleanup solvent the Material Safety Data Sheets (MSDS) of the coatings will show compliance with 326 IAC 8-2-9. Condition D.1.9(a) has been revised as follows:

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) ~~through (3)~~ and (2) below. Records maintained for (1) ~~through (3)~~ and (2) shall be taken ~~daily or monthly, as indicated~~, and shall be complete and sufficient to establish compliance with the VOC content limit established in Condition D.1.1.
- (1) The amount and VOC content of each coating material and solvent used **each month**. 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; **and**
- ~~(2) A log of the dates of use; and~~
- ~~(3)~~(2) The cleanup solvent usage for each month.

Comment 2:

Section D.1.9(b) (page 19 of 29) appears to contain language that was inserted by error. The condition indicates "To document compliance with Condition D.1.7 and D.1.8, the Permittee shall maintain a log of weekly overspray observations, weekly observations of the water level in the pans..."

The Paint Room at ROADMASTER does not include any type of pans with water. The Paint Room utilizes a dry filter bank system to remove oversprayed solids, but does not include any water process for removal of solids.

Triad requests that the language "weekly observations of the water levels in the pans" be removed.

Response 2:

Condition D.1.9 (b) has been corrected as follows:

- (b) To document compliance with Condition D.1.7 and D.1.8, the Permittee shall maintain a log of weekly overspray observations, ~~weekly observations of the water level in the pans~~, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

Comment 3:

Section D.3.4 (page 23 of 29) indicates a Preventive Maintenance Plan (PMP) is required for the trim and roofing departments.

As detailed in Section C.1 (page 8 of 29) a PMP covers maintenance related to emission control devices. The trim and roofing departments at ROADMASTER consist of the application of adhesives and sealants using aerosol cans and caulking guns. There are no control devices associated with these processes and therefore, PMP does not apply to these processes.

Triad requests the PMP requirement be removed from Section D.3.

Response 3:

The requirements in 326 IAC 1-6-1 and 326 IAC 1-6-3 specify that the requirement to maintain a Preventive Maintenance Plan is applicable to any facility that is required to obtain a permit under 326 IAC 2. IDEM's preventive maintenance plan guidance states that a preventive maintenance plan is required only for:

- (a) the unit emits particulate matter, sulfur dioxide, or volatile organic compounds; and
- (b) the unit has existing applicable requirements; and
- (c) the unit is subject to a NSPS or NESHAP (for these units current requirements will satisfy as a compliance monitoring plan); or
- (d) the unit has a control device and the allowable emissions exceed 10 pounds per hour; or
- (e) the unit does not have a control device and has actual emissions exceeding 25 tons per year.

The guidance does not state that if a facility does not meet the above requirements, preventive maintenance will never be necessary, it does state that a preventive maintenance plan is not required to be submitted with the application. In most cases, the requirement to maintain a preventive maintenance plan and perform preventive maintenance has followed the same guidelines as specified above. However, there are some types of operations (e.g. surface coating) that the OAM has determined that compliance monitoring and preventive maintenance plans are necessary to ensure continuous compliance with 326 IAC 6-3-2. However, these facilities have no control devices, only use caulking guns and aerosol cans for coating, and PM only results from the aerosol cans. Therefore, it has been determined that Preventive Maintenance Plan would not be sufficiently useful for ensuring compliance with 326 IAC 6-3-2. Therefore, the Preventive Maintenance Plan requirement will be removed from Section D.3, as follows, and Section D.3 has been renumbered accordingly:

~~D.3.4 Preventive Maintenance Plan [326 IAC 1-6-3]~~

~~A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for these emissions units.~~

Comment 4:

Section D.3.8 (page 23 of 29) record keeping requirements do not make it clear whether daily or monthly records shall be kept on the coatings and amounts of coatings used in the trim and roofing departments. (Same language as found in D.1.9 and discussed in Item Number 1 of this letter.)

This record keeping is being required to demonstrate compliance with Condition D.3.1, the VOC limitation of 3.5 pounds of VOC per gallon of coating less water, and with the 25 ton rolling 12-month limit on VOC accepted by ROADMASTER for the trim and roofing departments to avoid 326 IAC 8-1-6.

Since the total potential to emit from BOTH departments is 26.09 tons per year of VOC, based on the maximum hourly usage rates being used every hour of the year (8,760 hours/year), it is highly unlikely that ROADMASTER will emit close to the allowed 25 tons per year. ROADMASTER operates 1 shift per day, 5 days per week. Even if that doubles within the life of the Permit, the VOC emissions from these departments will still be well within the 25 ton limit. Because of that and the fact that the coatings are compliant without the aid of averaging or controls, daily record keeping is unnecessary. Monthly records can be used to calculate monthly and 12-month rolling emission rates and Material Safety Data Sheets (MSDSs) will serve as documentation of compliance with the 3.5 VOC limitation.

Triad requests that in Section D.3.8(a)(1), "each month" be added to the end of the first sentence with currently reads "The amount and VOC content of each coating material and solvent used." Please change to "The amount and VOC content of each coating material and solvent used each month." Also, Triad requests that (a)(2) of Section D.3.8 be removed, to eliminate the requirement of recording dates coatings/solvents are used.

Response 4:

Monthly record keeping is not acceptable for documenting compliance with 326 IAC 8-2-9 if non-compliant coatings are used, because 326 IAC 8-2-9 requires daily volume weighted averaging. According to the potential to emit calculations in Appendix A to the Technical Support Document, all materials used at the trim and roofing departments will comply with 326 IAC 8-2-9. Therefore, Condition D.3.8 (a) (now D.3.7 (a)) has been revised as follows:

- (a) To document compliance with Conditions D.3.1 and D.3.2, the Permittee shall maintain records in accordance with (1) through ~~(5)~~ **(4)** below. Records maintained for (1) through ~~(5)~~ **(4)** shall be taken ~~daily or monthly, as indicated~~; and shall be complete and sufficient to establish compliance with the VOC content and VOC usage and emission limits established in Conditions D.3.1 and D.3.2.
- (1) The amount and VOC content of each coating material and solvent used **each month**. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- ~~(2) A log of the dates of use;~~
- ~~(3)~~**(2)** The cleanup solvent usage for each month;
- ~~(4)~~**(3)** The total VOC usage for each month; and
- ~~(5)~~**(4)** The weight of VOCs emitted for each compliance period.

Comment 5:

Section D.4.5 (page 25 of 29) record keeping requirements do not make it clear whether daily or monthly records shall be kept on the coatings and amounts of coatings used in the final finish area. (Same language as found in D.1.9 and discussed in item number 1 of this letter.)

This record keeping is being required to demonstrate compliance with Condition D.4.1, the VOC limitation of 3.5 pounds of VOC per gallon of coating less water. The final finish area consists of minor touch-up painting with aerosol cans. There is no emission limit on the final finish area and the potential to emit is only 5 tons per year.

Since there is no emission limit on the final finish area and the coatings are compliant without the aid of averaging or controls, daily record keeping is unnecessary. Monthly records can be used to calculate yearly emissions for the Annual Emission Statement and Material Safety Data Sheets (MSDSs) will serve as documentation of compliance with the 3.5 VOC limitation.

Triad requests that in Section D.4.5(a)(1), "each month" be added to the end of the first sentence with currently reads "The amount and VOC content of each coating material and solvent used." Please change to "The amount and VOC content of each coating material and solvent used each month." Also, Triad requests that (a)(2) of Section D.4.5 be removed, to eliminate the requirement of recording dates coatings/solvents are used.

Response 5:

Monthly record keeping is not acceptable for documenting compliance with 326 IAC 8-2-9 if non-compliant coatings are used, because 326 IAC 8-2-9 requires daily volume weighted averaging. According to the potential to emit calculations in Appendix A to the Technical Support Document, all materials used at the trim and roofing departments will comply with 326 IAC 8-2-9. Therefore, Condition D.4.5 (a) has been revised as follows:

- (a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) ~~through (3)~~ **and (2)** below. Records maintained for (1) ~~through (3)~~ **and (2)** shall be taken ~~daily or monthly, as indicated~~, and shall be complete and sufficient to establish compliance with the VOC content limit established in Condition D.4.1.
- (1) The amount and VOC content of each coating material and solvent used **each month**. 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; **and**
- ~~(2)~~ — A log of the dates of use; and
- ~~(3)~~**(2)** The cleanup solvent usage for each month.

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Twenty-seven (27) heaters and one (1) air makeup unit

Company Name ROADMASTER, LLC

Address City 310 Steury Avenue, Goshen, Indiana 46526

MSOP: 039-11527

Plt ID: 039-00532

Reviewer: CarrieAnn Ortolani

Date: November 8, 1999

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

12.0

105.1

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.100	0.399	0.032	5.26	0.289	4.42

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

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

See page 2 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions

Company Name ROADMASTER, LLC
Address City 310 Steury Avenue, Goshen, Indiana 46526
MSOP: 039-11527
Plt ID: 039-00532
Reviewer: CarrieAnn Ortolani
Date: November 8, 1999

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.10E-04	6.31E-05	3.94E-03	9.46E-02	1.79E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	2.63E-05	5.78E-05	7.36E-05	2.00E-05	1.10E-04

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

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

**Company Name: ROADMASTER, LLC
Address City: 310 Steury Avenue, Goshen, Indiana 46526
MSOP: 039-11527
Plt ID: 039-00532
Reviewer: CarrieAnn Ortolani
Date: November 8, 1999**

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
Exterior Trim Department																
Flam. Contact Adhesive Non-C	6.30	53.60%	0.0%	53.6%	0.0%	50.00%	0.20000	7.500	3.38	3.38	5.07	121.56	22.19	9.60	6.75	50%
SM 5732 Silicone	8.67	3.10%	0.0%	3.1%	0.0%	96.90%	0.07813	7.500	0.27	0.27	0.16	3.78	0.69	0.00	0.28	100%
Final Finish Area																
90-907 Black Gloss, QD WR E	8.52	35.80%	0.0%	35.8%	0.0%	23.30%	0.05000	7.500	3.05	3.05	1.14	27.45	5.01	4.49	13.09	50%
Roofing Department																
SM 6104	13.04	3.00%	0.0%	3.0%	0.0%	97.00%	0.25000	7.500	0.39	0.39	0.73	17.60	3.21	0.00	0.40	100%
Paint Room																
4-HAPMED, Lacquer Thinner	6.76	100.00%	81.5%	18.5%	82.0%	0.00%	0.03333	7.500	6.95	1.25	0.31	7.50	1.37	0.00	n/a	75%
ALK-300 Low VOC Alkyd	8.18	34.30%	0.0%	34.3%	0.0%	60.10%	0.25000	7.500	2.81	2.81	5.26	126.26	23.04	11.03	4.67	75%
Mineral Spirits Cutback Asphalt	8.01	31.20%	0.0%	31.2%	0.0%	75.00%	0.50000	7.500	2.50	2.50	9.37	224.92	41.05	22.63	3.33	75%

State Potential Emissions	Add worst case coating to all solvents	Paint Room PM	96.00%	Uncontrolled	22.0	529	96.6	47.8
				Controlled	22.0	529	96.6	15.4

METHODOLOGY

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

**Appendix A: Emission Calculations
HAP Emission Calculations**

Company Name **ROADMASTER, LLC**
 Address City | **310 Steury Avenue, Goshen, Indiana 46526**
 MSOP: **039-11527**
 Plt ID: **039-00532**
 Reviewer: **CarrieAnn Ortolani**
 Date: **November 8, 1999**

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hr)	Weight % Styrene	Weight % Toluene	Weight % Naphthalene	Weight % MEK	Weight % Glycol Ethers	Weight % Cobalt Comp	Styrene Emissions (tons/yr)	Toluene Emissions (tons/yr)	Naphthalene Emissions (tons/yr)	MEK Emissions (tons/yr)	Glycol Ethers Emissions (tons/yr)	Cobalt Com. Emissions (tons/yr)
Exterior Trim Department															
Flam. Contact Adhesive Non-Chlo	6.30	0.20000	7.500	0.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00	2.07	0.00	0.00	0.00	0.00
SM 5732 Silicone	8.67	0.07813	7.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Final Finish Area															
90-907 Black Gloss, QD WR EN	8.52	0.05000	7.500	0.00%	0.00%	0.00%	0.00%	7.00%	0.50%	0.00	0.00	0.00	0.00	0.98	0.07
Roofing Department															
SM 6104	13.04	0.25000	7.500	0.00%	3.00%	0.00%	0.00%	0.00%	0.00%	0.00	3.21	0.00	0.00	0.00	0.00
Paint Room															
4-HAPMED, Lacquer Thinner	6.76	0.03333	7.500	0.00%	0.00%	0.00%	0.00%	12.09%	0.00%	0.00	0.00	0.00	0.00	0.89	0.00
ALK-300 Low VOC Alkyd	8.18	0.25000	7.500	1.00%	0.00%	5.00%	1.00%	0.00%	0.00%	0.67	0.00	3.36	0.67	0.00	0.00
Mineral Spirits Cutback Asphalt	8.01	0.50000	7.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00

Total State Potential Emissions

0.672 5.28 3.36 0.672 1.87 0.070

METHODOLOGY

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

**Appendix A: Emission Calculations
Baghouse Operations**

Company Name: ROADMASTER, LLC
Address City IN : 310 Steury Avenue, Goshen, Indiana 46526
MSOP: 039-11527
Plt ID: 039-00532
Reviewer: CarrieAnn Ortolani
Date: November 8, 1999

Emission Unit	Stack	Flow Rate (acfm)	Stack tempera (deg. F)	Outlet Grain Load (gr/acf)	Controlled Emission Rate (lbs/hr)	Controlled Emission Rate (tons/yr)	Control Efficie	Potential Emiss (lbs/hr)	Potential Emiss (tons/yr)	Process Weight Rate (lbs/hr)	Allowable Emissions (lbs/hr)
Dust Collector:											
Shop-Vac	DC1	105	68	0.0111	0.010	0.044	90.0%	0.100	0.438	4875	7.45
Shop-Vac	DC2	105	68	0.0111	0.010	0.044	90.0%	0.100	0.438	4875	7.45
Shop-Vac	DC3	105	68	0.0111	0.010	0.044	90.0%	0.100	0.438	4875	7.45
Shop-Vac	DC4	105	68	0.0111	0.010	0.044	90.0%	0.100	0.438	4875	7.45
					0.040	0.175		0.400	1.75		

Methodology

scfm = acfm x [(459+68)/(459+stack temperature)]

Controlled Emissions (lbs/hr) = gr/dscf x scfm x 60 minutes/hr / 7000 gr/lb

Uncontrolled Emissions (lbs/hr) = Controlled Emissions (lbs/hr) / (1 - Control Efficiency)

Emissions (tons/yr) = Emissions (lbs/hr) * 8760 hrs/yr / 2000 lbs/ton

Process Weight Rate in lbs/hr the maximum total process weight rate.

Allowable Emissions (lbs/hr) = 4.10 x (Process weight (lbs/hr) / 2000 lbs/ton)^{0.67} [326 IAC 6-3-2]

Company **ROADMASTER, LLC**
 Address **Ci 310 Steury Avenue, Goshen, Indiana 46526**
 MSOP: **039-11527**
 Plt ID: **039-00532**
 Reviewer: **CarrieAnn Ortolani**
 Date: **November 8, 1999**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS * (lb pollutant / lb electrode)				EMISSIONS (lb/hr)				TOTAL HAPS (lb/hr)
				PM = PM10	Mn	Ni and Co	Cr	PM = PM10	Mn	Ni and Co	Cr	
WELDING												
Submerged Arc	0	0		0.036								0.000
Metal Inert Gas (MIG)(ER7 Stick (E7018 electrode)	28	1.21		0.0052	0.00018	1E-06	1E-06	0.176	6.10E-03	3.39E-05	3.39E-05	6.20E-03
Tungsten Inert Gas (TIG)(carbon steel)	1	10		0.0211				0.211				0.000
Oxyacetylene(carbon steel)	0	0		0.0055								0.000
	0	0		0.0055								0.000
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)				EMISSIONS (lbs/hr)				TOTAL HAPS (lb/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	0	0	0	0.1622	0.0005	0.0001	0.0003	0.000	0.000	0.000	0.000	0.000
Oxymethane	0	0	0	0.0815	0.0002		0.0002	0.000	0.000	0.000	0.000	0.000
Plasma	0	0	0					0.000	0.000	0.000	0.000	0.000
EMISSION TOTALS								PM = PM10	Mn	Ni and Co	Cr	Total HAPs
Potential Emissions lbs/hr								0.39	6.10E-03	3.39E-05	3.39E-05	6.20E-03
Potential Emissions lbs/day								9.29	1.46E-01	8.13E-04	8.13E-04	1.49E-01
Potential Emissions tons/yr								1.70	2.67E-02	1.48E-04	1.48E-04	2.72E-02

METHODOLGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column. Consult AP-42 or other reference for different electrode types.

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

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

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

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.

Plasma cutting emission factors are from the American Welding Society study published in Sweden (March 1994).

Welding and other flame cutting emission factors are from an internal training session document.
See AP-42, Chapter 12.19 for additional emission factors for welding.