

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Utilimaster Corporation
65266 State Road 19
65906 State Road 19
21 Ward Street
Wakarusa, Indiana 46573**

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

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

Operation Permit No.: T039-7087-00530	
Issued by: Janet McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 12, 2000
First Significant Permit Modification: 039-12572	Pages Affected: entire permit
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:

TABLE OF CONTENTS

A	SOURCE SUMMARY	5
A.1	General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]	
A.3	Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]	
A.4	Part 70 Permit Applicability [326 IAC 2-7-2]	
B	GENERAL CONDITIONS	8
B.1	Permit No Defense [IC 13]	
B.2	Definitions [326 IAC 2-7-1]	
B.3	Permit Term [326 IAC 2-7-5(2)]	
B.4	Enforceability [326 IAC 2-7-7(a)]	
B.5	Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]	
B.6	Severability [326 IAC 2-7-5(5)]	
B.7	Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]	
B.8	Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]	
B.9	Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]	
B.10	Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]	
B.11	Annual Compliance Certification [326 IAC 2-7-6(5)]	
B.12	Preventive Maintenance Plan [326 IAC 2-7-5(1),(3)and (13)][326 IAC 2-7-6(1)and(6)]	
B.13	Emergency Provisions [326 IAC 2-7-16]	
B.14	Permit Shield [326 IAC 2-7-15]	
B.15	Multiple Exceedances [326 IAC 2-7-5(1)(E)]	
B.16	Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]	
B.17	Permit Modification, Reopening, Revocation and Reissuance, or Termination	
B.18	Permit Renewal [326 IAC 2-7-4]	
B.19	Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]	
B.20	Permit Revision Under Economic Incentives and Other Programs	
B.21	Operational Flexibility [326 IAC 2-7-20]	
B.22	Construction Permit Requirement [326 IAC 2]	
B.23	Inspection and Entry [326 IAC 2-7-6(2)]	
B.24	Transfer of Ownership or Operation [326 IAC 2-7-11]	
B.25	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]	
B.26	Advanced Source Modification Approval [326 IAC 2-7-5(16)]	
C	SOURCE OPERATION CONDITIONS	19
	Emission Limitations and Standards [326 IAC 2-7-5(1)]	
C.1	Particulate Matter Emission Limitations For Processes with Process Weight Rates	
C.2	Opacity [326 IAC 5-1]	
C.3	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.5	Fugitive Dust Emissions [326 IAC 6-4]	
C.6	Operation of Equipment [326 IAC 2-7-6(6)]	
C.7	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]	
	Testing Requirements [326 IAC 2-7-6(1)]	
C.8	Performance Testing [326 IAC 3-6]	
	Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]	
C.9	Compliance Schedule [326 IAC 2-7-6(3)]	
C.10	Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]	
C.11	Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]	
C.12	Monitoring Methods [326 IAC 3]	
C.13	Pressure Gauge Specifications	

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.15 Risk Management Plan
- C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5]
- C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

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

- C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
- C.19 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
- C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)]
- C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

Stratospheric Ozone Protection

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

D.1 FACILITY OPERATION CONDITIONS - State Road 19 Plants 28

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

- D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]
- D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]
- D.1.3 Vehicle Weight Limit [326 IAC 8-2-2]
- D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]
- D.1.5 Best Available Control Technology [326 IAC 8-1-6]
- D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.1.7 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]
- D.1.8 Volatile Organic Compounds (VOC)
- D.1.9 VOC Emissions

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

- D.1.10 Particulate Matter (PM)
- D.1.11 Monitoring

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

- D.1.12 Record Keeping Requirements
- D.1.13 Reporting Requirements

D.2 FACILITY OPERATION CONDITIONS - Paint booth PB003, Touch up booth TB004 33

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

- D.2.1 Volatile Organic Compounds [326 IAC 8-2-9]
- D.2.2 PSD Minor Limit [326 IAC 2-2] [40 CPR 52.21]
- D.2.3 Particulate Matter (PM) [326 IAC 6-3-2]
- D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]
- D.2.6 Volatile Organic Compounds
- D.2.7 Volatile Organic Compounds

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

- D.2.8 Particulate Matter (PM)
- D.2.9 Monitoring

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

- D.2.10 Record Keeping Requirements
- D.2.11 Reporting Requirements

D.3 FACILITY OPERATION CONDITIONS - Insignificant Activities 36

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

- D.3.1 Cold Cleaner Degreaser Operation and Control [326 IAC 8-3-5]
- D.3.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Certification 38
Emergency/Deviation Occurrence Report 39
Quarterly Report 41
Quarterly Report 42
Quarterly Report 43
Quarterly Compliance Monitoring Report 44

SECTION A

SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a commercial vehicle assembly plant.

Responsible Official: Jim Orbik

Source Address: Plants EU3, EU4, EU5, EU6, EU7, EU8, EU10, EU11, EU12 & 32,
EU14, EU16, EU17, EU18:

65266 State Road 19, Wakarusa, Indiana 46573

Plants EU57, EU59, EU60:

21 Ward Street, Wakarusa, Indiana 46573

recreational vehicle assembly plant

65906 State Road 19, Wakarusa, Indiana 46573

Mailing Address: P.O. Box 585, Wakarusa, Indiana 46573

Phone Number: Dan Murray, 219-862-4561

SIC Code: 3713

County Location: Elkhart

County Status: Attainment for all criteria pollutants

Source Status: Part 70 Permit Program

Major Source, under PSD Rules;

Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

(a) Plant 3, identified as EU3, consisting of:

(1) One (1) final inspection area, with a maximum capacity of six and one half (6.5) truck bodies per hour, using no control, and exhausting to general ventilation GV9-1.

(b) Plant 5, identified as EU5, consisting of:

(1) One (1) painting operation, with a maximum capacity of three and three fourths (3.75) chassis per hour, using dry filters as control, and exhausting to general ventilation, SV8-1 to 2.

(c) Plant 6, identified as EU6, consisting of:

(1) One (1) final inspection operation with an maximum capacity of (7.5) trucks per hour, using no control, and exhausting to general ventilation, GV1-1 to 5.

(d) Plant 8, identified as EU8, consisting of:

(1) One (1) general assembly operation, with a maximum capacity of three (3) chassis per hour, using no control, and exhausting to general ventilation, GV2-1 to 3.

(e) Plant 10, identified as EU10, consisting of:

(1) One (1) general assembly operation, with a maximum capacity of two and one half (2.5) chassis per hour, using no control, and exhausting to general ventilation GV17-1 to 2.

(f) Plant 11, identified as EU11, consisting of:

- (1) One (1) general assembly operation, with a maximum capacity of nine and one half (9.5) truck bodies per hour, using no control, and exhausting to general ventilation, GV3-1 to 2.
 - (2) One (1) final inspection area, with a maximum capacity of nine and one half (9.5) truck bodies per hour, using no control, and exhausting to general ventilation, GV7-1.
- (g) Plants 12 & 32, identified as EU12 and EU32, consisting of:
- (1) One (1) service and repair operation, with a maximum capacity of one half (0.5) trucks per hour, using no control, and exhausting to general ventilation, GV18-1,
 - (2) One (1) painting operation, with a maximum capacity of one half (0.5) trucks per hour, using dry filters as control, and exhausting to general ventilation, GV18-2.
- (h) Plant 14, identified as EU14, consisting of:
- (1) Two (2) surface coating operations, with booths designated as B11-1 through B11-8, one with a maximum capacity of six and one half (6.5) truck bodies per hour and the other with a maximum capacity of five (5) steel racks per hour, using dry filters as control, and exhausting to general ventilation PB11-1 to 7 and SB11-8, respectively.
- (i) Plant 16, identified as EU16, consisting of:
- (1) One (1) general assembly operation, with a maximum capacity of two and one half (2.5) chassis per hour, using no control, and exhausting to general ventilation GV14-1 to 2, and
 - (2) One (1) general assembly operation, with a maximum capacity of five and one fourth (5.25) truck bodies and PDV per hour, using no control, and exhausting to general ventilation GV14-1 to 4.
- (j) Plant 18, identified as EU18, consisting of:
- (1) One (1) general assembly operation, with a maximum capacity of four (4) truck bodies per hour, using no control, and exhausting to general ventilation, GV16-1 to 7,
 - (2) One (1) undercoating booth, with a maximum capacity of thirteen and one half (13.5) chassis per hour, using dry filters as control, and exhausting to general ventilation, GV16-1 to 7.
- (k) Plant 57, identified as EU57, consisting of one (1) general assembly operation, producing 3.75 truck bodies per hour, using 2.07 gallons of adhesives per unit, 0.485 gallons of caulks or sealants per unit, using no control, and exhausting to general ventilation, GV57-1 to 3.
- (l) Plant 59, identified as EU59, consisting of one (1) general assembly operation, producing 3.75 truck bodies per hour, using no control, and exhausting to general ventilation, GV59-1.
- (m) Plant 60, identified as EU60, consisting of one (1) general assembly operation, producing 3.75 truck bodies per hour, using no control, and exhausting to general ventilation, GV60-1.
- (n) Plant 14 Paint Line #3, consisting of:

- (1) one (1) paint booth, identified as PB003, using an air atomization spray system, coating a maximum of four (4.0) aluminum truck bodies per hour, using dry filters for particulate matter control and exhausting to stacks 1 and 2,
- (2) one (1) touch-up paint booth, identified as TB004, using an air atomization spray system, coating a maximum of four (4.0) aluminum truck bodies per hour, using dry filters for particulate matter control and exhausting to stack 4,
- (3) one (1) natural gas fired curing oven, identified as C003, with a maximum heat input rate of 1.5 million Btu per hour, exhausting to stack 3, and
- (4) two (2) natural gas fired paint booth air make-up units, identified as 001 and 002, each with a maximum heat input rate of 1.5 MM Btu per hour, exhausting to stacks 1 and 2.

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

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

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, degreasing in Plant 8, Plant 10, Plants 12 & 32, Plant 16, Plant 18, Plant 15.
- (b) Plant 4, identified as EU4, consisting of one (1) welding operation.
- (c) Plant 7, identified as EU7, consisting of one (1) steel welding operation and one (1) aluminum welding operation.
- (d) Plant 17, identified as EU17, consisting of one (1) steel welding operation and one (1) aluminum welding operation.
- (e) Plant 18, identified as EU18, consisting of three (3) storage tanks, EU16-D (diesel fuel), EU16-G (gasoline), EU17-G (gasoline), each with storage capacities less than 10,500 gallons.

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

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

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for

modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

- (c) Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAQ, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

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

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

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

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

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

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

and

United States Environmental Protection Agency, Region V

Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

- (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, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

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

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

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

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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

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

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

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation

permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

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

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

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

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

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

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

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) An emergency as defined in 326 IAC 2-7-1(12); or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless such failure 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 is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

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

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

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list

contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

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

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

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

B.21 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

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

Such records shall consist of all information required to be submitted to IDEM,

OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:
 - (1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).
 - (2) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - (i) A brief description of the change within the source;
 - (ii) The date on which the change will occur;
 - (iii) Any change in emissions; and
 - (iv) Any permit term or condition that is no longer applicable as a result of the change.

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

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.22 Construction Permit Requirement [326 IAC 2]

A modification, construction, or reconstruction shall be approved if required by and in accordance with the applicable provisions of 326 IAC 2.

B.23 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, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]

B.24 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 Opacity [326 IAC 5-1]
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. The provisions of 326 IAC 9-1-2 are not federally enforceable.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]
- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

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

All required notifications shall be submitted to:

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

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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

- (a) 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, OAQ.

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 Quality
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, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, 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 "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.9 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

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

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

Compliance with applicable requirements shall be documented as required by this permit. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

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

C.11 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the

parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.12 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.13 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

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

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

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

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

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

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

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [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, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. 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. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

**C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]**

- (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, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAQ 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, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ 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, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

- (a) The Permittee shall submit 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 Quality
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, OAQ, on or before the date it is due.

C.19 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

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

- (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, OAQ, 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 within ninety (90) days of permit issuance.

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

- (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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 Quality
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, OAQ, 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 reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

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

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) Plant 3, identified as EU3, consisting of:
 - (1) One (1) final inspection area, with a maximum capacity of six and one half (6.5) truck bodies per hour, using no control, and exhausting to general ventilation GV9-1.

- (b) Plant 5, identified as EU5, consisting of:
 - (1) One (1) painting operation, with a maximum capacity of three and three fourths (3.75) chassis per hour, using dry filters as control, and exhausting to general ventilation, SV8-1 to

- (c) Plant 6, identified as EU6, consisting of:
 - (1) One (1) final inspection operation with an maximum capacity of (7.5) trucks per hour, using no control, and exhausting to general ventilation, GV1-1 to 5.

- (d) Plant 8, identified as EU8, consisting of:
 - (1) One (1) general assembly operation, with a maximum capacity of three (3) chassis per hour, using no control, and exhausting to general ventilation, GV2-1 to 3.

- (e) Plant 10, identified as EU10, consisting of:
 - (1) One (1) general assembly operation, with a maximum capacity of two and one half (2.5) chassis per hour, using no control, and exhausting to general ventilation GV17-1 to 2.

- (f) Plant 11, identified as EU11, consisting of:
 - (1) One (1) general assembly operation, with a maximum capacity of nine and one half (9.5) truck bodies per hour, using no control, and exhausting to general ventilation, GV3-1 to 2.

 - (2) One (1) final inspection area, with a maximum capacity of nine and one half (9.5) truck bodies per hour, using no control, and exhausting to general ventilation, GV7-1.

- (g) Plants 12 & 32, identified as EU18, consisting of:
 - (1) One (1) service and repair operation, with a maximum capacity of one half (0.5) trucks per hour, using no control, and exhausting to general ventilation, GV18-1,

 - (2) One (1) painting operation, with a maximum capacity of one half (0.5) trucks per hour, using dry filters as control, and exhausting to general ventilation, GV18-2.

- (h) Plant 14, identified as EU14, consisting of:
 - (1) Two (2) surface coating operations, with booths designated as B11-1 through B11-8, one with a maximum capacity of six and one half (6.5) truck bodies per hour and the other with a maximum capacity of five (5) steel racks per hour, using dry filters as control, and exhausting to general ventilation PB11-1 to 7 and SB11-8, respectively.

Facility Description [326 IAC 2-7-5(15)], continued:

- (i) Plant 16, identified as EU16, consisting of:
 - (1) One (1) general assembly operation, with a maximum capacity of two and one half (2.5) chassis per hour, using no control, and exhausting to general ventilation GV14-1 to 2, and
 - (2) One (1) general assembly operation, with a maximum capacity of five and one fourth (5.25) truck bodies and PDV per hour, using no control, and exhausting to general ventilation GV14-1 to 4.
- (j) Plant 18, identified as EU18, consisting of:
 - (1) One (1) general assembly operation, with a maximum capacity of four (4) truck bodies per hour, using no control, and exhausting to general ventilation, GV16-1 to 7,
 - (2) One (1) undercoating booth, with a maximum capacity of thirteen and one half (13.5) chassis per hour, using dry filters as control, and exhausting to general ventilation, GV16-1 to 7.

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

Emissions Limitations and Standards

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator:

- (a) at the State Road 19 site, vehicle body prime paint booth designated as EU-18, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.
- (b) at the State Road 19 site, the eight (8) paint booths designated as EU-14 (B11-1, B11-2, B11-3, B11-5, B11-6, B11-7, and B11-8), shall be limited to 3.5 pounds of VOC per gallon of coating less water, for air dried coatings.
- (c) at the State Road 19 site, the vehicle body non-customized top coat paint booth EU 14, B11-4, shall be limited to 4.3 pounds of VOCs 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 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) Pursuant to 326 IAC 2-2 and 40 CFR 52.21, these facilities located at the State Road 19 site, Plants EU3, EU6, EU8, EU10, EU12 & 32, EU14, EU16, EU17, EU18, shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive months. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable
- (b) Pursuant to 326 IAC 2-2 and 40 CFR 52.21, the facilities identified as Plants EU4, EU5, EU7, and EU11 located at the State Road 19 site shall use less than 40 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive months. This usage limit is required to limit the potential to emit of VOC to less than 40 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant

Deterioration) and 40 CFR 52.21 not applicable.

D.1.3 Vehicle Weight Limit [326 IAC 8-2-2]

Vehicles coated at the State Road 19 site shall:

- (a) be either rated at greater than 8500 pounds per vehicle; or
- (b) be manufactured truck bodies for sale separately or on purchased chassis rated at less than 8500 pounds per vehicle, so the requirements of 326 IAC 8-2-2 do not apply.

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the surface coating operations 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:

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

The control equipment shall be in operation at all times the surface coating booths are in operation, in order to comply with this limit.

D.1.5 Best Available Control Technology [326 IAC 8-1-6]

Pursuant to Construction Permit PC (20) 1830, 326 IAC 8-1-6 (Best Available Control Technology(BACT)) has been determined to be:

- (c) the use of high-solids top coat for the State Road 19 vehicle body top coat paint booth when engaged in customized top coating.
- (d) the State Road 19 vehicle body customized top coating shall be limited to less than 35 vehicles per day.

D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for surface coating operations and any control devices.

Compliance Determination Requirements

D.1.7 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC and PM limits specified in Conditions D.1.1, D.1.2, and D.1.4 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.8 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 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, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.9 VOC Emissions

Compliance with Condition D.1.2 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.

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

D.1.10 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2, the dry filters for PM control shall be in operation at all times when the surface coating are in operation.

D.1.11 Monitoring

- (a) The surface coating booths have applicable compliance monitoring conditions as specified below:
- (1) The dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the paint booths are in operation
 - (2) The Permittee shall implement an operator training program with the following requirements:
 - (A) All operators that perform painting operations or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within sixty (60) days of permit issuance. All new operators shall be trained upon hiring.
 - (B) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be in writing and retained on site. Copies of the training program, the list of trained operators, and training records shall be maintained on site or available within one (1) hour for inspection by IDEM.
 - (C) All operators shall be given refresher training annually.
 - (2) Records shall be maintained of any non-routine maintenance activities performed on the particulate emission control devices which have air flow greater than four thousand cubic feet per minute (4000 cfm).
 - (3) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

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

D.1.12 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

- (2) 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) To document compliance with D.1.5(b), the Permittee shall maintain records of the number of vehicles painted with customized top coating.
- (c) To document compliance with Condition D.1.11(a), the Permittee shall maintain the following:
- (1) Copies of the training program, the list of trained operators, and training records shall be maintained on site or available within one (1) hour for inspection by IDEM.
 - (2) Records any non-routine maintenance activities performed on the particulate emission control devices which have air flow greater than four thousand cubic feet per minute (4000 cfm).
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.13 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 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.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Plant (recreation vehicles manufacturing) , consisting of:

One (1) paint booth, identified as PB003, using an air atomization spray system, coating a maximum of four (4.0) aluminum truck bodies per hour, using dry filters for particulate matter control and exhausting to stacks 1 and 2,

One (1) touch-up paint booth, identified as TB004, using an air atomization spray system, coating a maximum of four (4.0) aluminum truck bodies per hour, using dry filters for particulate matter control and exhausting to stack 4,

One (1) natural gas fired curing oven, identified as C003, with a maximum heat input rate of 1.5 million Btu per hour, exhausting to stack 3, and

Two (2) natural gas fired paint booth air make-up units, identified as 001 and 002, each with a maximum heat input rate of 1.5 MM Btu per hour, exhausting to stacks 1 and 2.

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

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

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the Ward Street site which coat metal shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.

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

D.2.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The usage of VOC, including coatings, dilution solvents, and cleaning solvents, in the paint booths identified as PB003 and TB004 shall be limited to less than forty (40) tons per twelve (12) consecutive month period, rolled on a monthly basis. This limit will render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.2.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the surface coating operations identified as PB003 and TB004 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:

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

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

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

D.2.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.2.1 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, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.7 Volatile Organic Compounds (VOC)

Compliance with Condition D.2.2 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.

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

D.2.8 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2, the dry filters for PM control shall be in operation and control emissions from the surface coating booths at all times that the surface coating is in operation.

D.2.9 Monitoring

- (a) The dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the paint booths are in operation.
- (b) The Permittee shall implement an operator training program with the following requirements:
 - (1) All operators that perform painting operations or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within sixty (60) days of permit issuance. All new operators shall be trained upon hiring.
 - (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be in writing and retained on site. Copies of the training program, the list of trained operators, and training records shall be maintained on site or available within one (1) hour for inspection by IDEM.
 - (3) All operators shall be given refresher training annually.
- (c) Records shall be maintained of any non-routine maintenance activities performed on the particulate emission control devices which have air flow greater than four thousand cubic feet per minute (4000 cfm).
- (d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.2.10 Record Keeping Requirements

- (a) To document compliance with Condition D.2.2, 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 usage limits and/or the VOC emission limits established in Condition D.2.2.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) 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) To document compliance with Condition D.2.9, the Permittee shall maintain the following:
 - (1) Copies of the training program, the list of trained operators, and training records shall be maintained on site or available within one (1) hour for inspection by IDEM.
 - (2) Records any non-routine maintenance activities performed on the particulate emission control devices which have air flow greater than four thousand cubic feet per minute (4000 cfm).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, 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.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]	Insignificant Activities
(a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, degreasing in Plant 8, Plant 10, Plants 12 & 32, Plant 16, Plant 18, Plant 15.	
(b) Plant 4, identified as EU4, consisting of one (1) welding operation.	
(c) Plant 7, identified as EU7, consisting of one (1) steel welding operation and one (1) aluminum welding operation.	
(d) Plant 10, identified as EU10, consisting of one (1) woodworking operation.	
(e) Plant 17, identified as EU17, consisting of one (1) steel welding operation and one (1) aluminum welding operation.	
(f) Plant 12 & 32, identified as EU12 and EU32, consisting of one (1) woodworking operation, with a maximum capacity of two hundred (200) pounds of wood per hour, using a baghouse, DC18-4, as control, and exhausting to general ventilation within the building.	
(g) Plant 57, identified as EU57, consisting of two (2) welding lines, one for steel, with a maximum capacity of 0.85 pounds of wire per unit, and one for aluminum, with a maximum capacity of 0.294 pounds per unit, each producing 3.75 truck bodies per hour, using no control, and exhausting to general ventilation, GV57-1 to 3.	
(h) Plant 59, identified as EU59, consisting of two (2) welding lines, one for steel, with the maximum capacities for steel and aluminum wire included in the EU57 capacities, each producing 3.75 truck bodies per hour, using no control, and exhausting to general ventilation, GV59-1.	
(i) Plant 60, identified as EU60, consisting of two (2) welding lines, one for steel, with the maximum capacities for steel and aluminum wire included in the EU57 capacities, each producing 3.75 truck bodies per hour, using no control, and exhausting to general ventilation, GV60-1.	
(j) Plant 18, identified as EU18, consisting of: (1) three (3) storage tanks, EU16-D (diesel fuel), EU16-G (gasoline), EU17-G (gasoline), each with storage capacities less than 10,500 gallons. (2) one (1) woodworking operation, with a maximum capacity of two hundred (200) pounds of wood per hour, using a baghouse as control, and exhausting to general ventilation inside the building.	
(k) Steel and aluminum welding operations in Plants 10, 16, and 18.	
(l) One gasoline storage tank outside Plant 11 with storage capacity of less than 10,500 gallons.	
(m) One diesel and one gasoline storage tank outside Plant 57 with storage capacity of less than 10,500 gallons each.	
(n) Touch-up painting activity in Plant 14, using less than 500 gallons per year, using no controls, and exhausting to the indoors.	
(o) Touch-up painting activity in Plant 6, using less than 500 gallons per year, using no controls, and exhausting to the indoors.	
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)	

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

D.3.1 Cold Cleaner Degreaser Operation and Control [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));

- (B) the solvent is agitated; or
 - (C) the solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.3.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the Plant 12 & 32, identified as EU12 and EU32, and Plant 18, identified as EU18, woodworking operations shall each be limited to 0.88 pounds per hour based on a maximum capacity of two hundred (200) pounds of wood per hour.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Utilimaster
Source Address: 65266 State Road 19, Wakarusa, Indiana 46573
Mailing Address: P.O. Box 585, Wakarusa, Indiana 46573
Part 70 Permit No.: T039-7087-00530

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

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Utilimaster
Source Address: 65266 State Road 19, Wakarusa, Indiana 46573
Mailing Address: P.O. Box 585, Wakarusa, Indiana 46573
Part 70 Permit No.: T039-7087-00530

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2
<input checked="" type="radio"/> 1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
<input checked="" type="radio"/> 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(C) C The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

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

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

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

Part 70 Quarterly Report

Source Name: Utilimaster
Source Address: 65266 State Road 19, Wakarusa, Indiana 46573
Mailing Address: P.O. Box 585, Wakarusa, Indiana 46573
Part 70 Permit No.: T039-7087-00530
Facility: Plants EU3, EU6, EU8, EU10, EU12 & 32, EU14, EU16, EU17, EU18
Parameter: VOC
Limit: 250 tons per 12 consecutive months

YEAR: _____

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

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

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

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

Part 70 Quarterly Report

Source Name: Utilimaster Corporation
Source Address: 65906 State Road 19, Wakarusa, IN 46573
Mailing Address: P.O. Box 585, Wakarusa, IN 46573
Significant Source Mod No.: 039-11906-00530
Facility: Paint booth (PB003) and touch-up booth (TB004)
Parameter: VOC usage
Limit: VOC emissions less than 40 tons per twelve (12) consecutive month period rolled on a monthly basis

YEAR: _____

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

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

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

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

Part 70 Quarterly Report

Source Name: Utilimaster
Source Address: 65266 State Road 19, Wakarusa, Indiana 46573
Mailing Address: P.O. Box 585, Wakarusa, Indiana 46573
Part 70 Permit No.: T039-7087-00530
Facility: Plants EU4, EU5, EU7, EU11
Parameter: VOC
Limit: 40 tons per 12 consecutive months

YEAR: _____

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

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

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

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

**PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Utilimaster
Source Address: 65266 State Road 19, Wakarusa, Indiana 46573
Mailing Address: P.O. Box 585, Wakarusa, Indiana 46573
Part 70 Permit No.: T039-7087-00530

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name:	Utilimaster Corporation
Source Location:	65266 State Road 19, 65906 State Road 19, and 21 Ward Street, Wakarusa, Indiana 46573
County:	Elkhart
SIC Code:	3713
Operation Permit No.:	T 039-7087-00530
Operation Permit Issuance Date:	June 12, 2000
Permit Modification No.:	SPM 039-12572-00530
Permit Reviewer:	Holly M. Stockrahm

The Office of Air Quality (OAQ) has reviewed a modification application from Utilimaster Corporation relating to the operation of commercial vehicle assembly plant.

History

Utilimaster Corporation was issued a Part 70 permit on June 12, 2000. On June 15, 2000, Utilimaster Corporation submitted an application to the OAQ requesting to amend the Title V permit to include revisions already approved in the sources TSD addendum yet not incorporated into the final permit, and to remove PM monitoring and recordkeeping requirements from the Ward Street Plant 57, 59, and 60 operations. Those assembly operations use a roll-on method of application which will result in no PM emissions. Therefore, 326 IAC 6-3-2(c) does not apply, and, consequently, the monitoring and recordkeeping required for that rule no longer apply. This change was considered a significant permit change because of the removal of monitoring and recordkeeping. Additionally, the changes being requested affect many of the pages and the numbering of the entire permit, therefore, as a result of this modification, the complete permit will be reissued. The changes requested are as follows (changes have been bolded and deletions have been struck out):

- (a) Plant 7, while listed in A.3, and containing only insignificant activities, should also be listed in section D.3 as a Utilimaster permitted building.

OAQ agrees that Plant 7 should have appeared in Section D.3, Insignificant Activities with rule applicability. Section D.3 Plant 7 description is added as follows:

“(c) Plant 7, identified as EU7, consisting of one (1) steel welding operation and one (1) aluminum welding operation.”

- (b) Sections D.1(c) and (d) list plants 6 and 8 as having woodworking operations. The OAQ’s Response to Comment No. 16 in the TSD addendum acknowledges our previous comment that Plants 6 and 8 do not have woodworking operations and states that they have been deleted. Sections D.1(c)(2) and (d)(2) should then be deleted. Section A.2 (d) (2) referencing Plant 8’s woodworking operation should also be deleted.

OAQ agrees. A.2 (d)(2) is deleted as follows:

“(d) Plant 8, identified as EU8, consisting of:

~~(1)~~ **One one (1) general assembly operation, with a maximum capacity of three (3) chassis per hour, using no control, and exhausting to general ventilation, GV2-1 to 3.”**

~~(2) One (1) woodworking operation, with a maximum capacity of two thousand (2000) pounds of wood per hour, using a cyclone, DC2-4, as control, and exhausting to general ventilation, GV2-1.~~

D.1(c)(2) and (d)(2) are deleted as follows:

~~“(c) (2) One (1) woodworking operation, with a maximum capacity of two thousand (2000) pounds of wood per hour, using a cyclone, DC1-7, as control, and exhausting to general ventilation, GV1-1 to 5.”~~

~~“(d) (2) One (1) woodworking operation, with a maximum capacity of two thousand (2000) pounds of wood per hour, using a cyclone, DC2-4, as control, and exhausting to general ventilation, GV2-1.”~~

- (c) Previously submitted comments that sought to correct Plant 10's listed activities were acknowledged in OAQ's Response to Comment No. 16 of the TSD addendum, but not changed in sections A or D. Section A.2(e)(1) does not reflect the 2.5 trucks per hour rate. Section D.1(e)(2) still lists the woodworking operation in the OAQ's Response to Comment No. 16 states that it has been added to the insignificant activities. Please correct these sections.

OAQ agrees. Section A.2(e)(1) is corrected and Section D.1(e)(2) is deleted as follows:

“(e) Plant 10, identified as EU10, consisting of:

~~(1) One (1) general assembly operation, with a maximum capacity of two one and one half (2.5 4.5) chassis per hour, using no control, and exhausting to general ventilation GV17-1 to 2.”~~

and

~~“(e) (2) One (1) woodworking operation, with a maximum capacity of two hundred (200) pounds of wood per hour, using a baghouse as control, and exhausting to general ventilation within the building.”~~

- (d) The revision to Plant 11's description was acknowledged in the OAQ Response to Comment No. 16 in the TSD addendum, but not properly revised. Sections A.2(f) and D.1(f) should read as follows:
- (a) One (1) general assembly operation, with a maximum capacity of nine and one half (9.5) truck bodies per hour, using no control, and exhausting to general ventilation GV3-1 to 2.
- (b) One (1) final inspection area with a maximum capacity of nine and one half (9.5) truck bodies per hour, using no control, and exhausting to general ventilation GV7-1.

OAQ agrees. Sections A.2 (f) and D.1(f) description has been changed as follows:

“(a) Plant 11, identified as EU11, consisting of:

(1) One (1) general assembly operation, with a maximum capacity of **nine one** and one half (9.5 4.5) **truck bodies** chassis per hour, using no control, and exhausting to general ventilation, GV3-1 to 2.

(2) One (1) ~~general assembly operation~~ **final inspection area**, with a maximum capacity of ~~one (1) chassis~~ **nine and one half (9.5) truck bodies** per hour, using no control, and exhausting to general ventilation, GV7-1.”

- (e) Firstly, the revision to Plants 12 & 32 description was acknowledged in the OAQ's

Response to Comment No. 16 of the TSD addendum but was not properly revised. The woodworking operation was properly included in section D.3(e) as an insignificant activity, but is also still listed and in need of removal from sections A.2(g)(3) and D.2(g)(3). Secondly, Section A.2(g)(4) also still lists the cold cleaner degreaser unit that in the OAQ's Response to Comment No. 16 of the TSD addendum was stated to be moved to section D.3 as an insignificant activity. Thirdly, Sections A.3(a) and D.3(a), which lists the insignificant degreasing operation, have not been updated to include Plants 12 & 32.

In the first instance, OAQ agrees. Sections A.2 (g)(3) and D.1(g)(3) have been deleted as follows:

“(g) Plants 12 & 32, identified as EU18, consisting of:

-
- (3) ~~One (1) woodworking operation, with a maximum capacity of two hundred (200) pounds of wood per hour, using a baghouse, DC18-4, as control, and exhausting to general ventilation within the building.~~

In the second instance, OAQ agrees. Section A.2 (g)(4) has been deleted as follows:

“(g) Plants 12 & 32, identified as EU18, consisting of:

-
- (4) ~~One (1) cold cleaner degreaser, and exhausting to general ventilation, GV18-1.”~~

In the third instance, OAQ agrees. Sections A.3(a) and D.3(a) have been changed as follows:

“(a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, degreasing in Plant 8, Plant 10, **Plants 12 and 32**, Plant 16, Plant 18, Plant 15.

(f) The revision to the Plant 18 description was acknowledged in the OAQ's Response to Comment No. 16 in the addendum to the TSD but not properly revised. Our comment sought to revise the number of trucks per hour to (4) in the general assembly operation and not the undercoating booth. Firstly, Section A.2 (j)(1) should be changed to four (4) truck bodies per hour and, secondly, Section D.1(j)(2) should be changed back to the original thirteen and one half (13.5) chassis per hour. Thirdly, Section A.2(j)(3) still lists the (3) storage tanks that were stated by the OAQ to have been moved to the insignificant activity section. Fourthly, the insignificant woodworking operation in Plant 18, which was listed in our Comment No.16, was not acknowledged in the OAQ's Response to Comment No.16 in the TSD addendum. Plant 18's woodworking operation is similar to the woodworking operation in Plants 12 & 32, and, subsequently, should be listed in section D.3.

In the first instance, OAQ agrees. Section A.2(j)(1) has been changed as follows:

“(j)(1) One (1) general assembly operation, with a maximum capacity of ~~two and one half (2.5) chassis~~ **four (4) truck bodies** per hour, using no control, and exhausting to general ventilation, GV16-1 to 7,”

In the second instance, OAQ agrees. Section D.1(j)(2) has been changed as follows:

“(j)(2) One (1) undercoating booth, with a maximum capacity of ~~four (4.0) trucks~~ **thirteen and one half (13.5) chassis** per hour, using dry filters as control, and exhausting to general ventilation, GV16-1 to 7.”

In the third instance, OAQ agrees. Section A.2(j)(3) has been moved to A.3(e) as follows:

“(e) **Three (3) storage tanks, EU16-D (diesel fuel), EU16-G (gasoline), EU17-G (gasoline), each with storage capacities less than 10,500 gallons.”**

In the fourth instance, OAQ agrees. Section D.3 has been modified as follows:

“(h)(2) **One (1) woodworking operation, with a maximum capacity of two hundred (200) pounds of wood per hour, using a baghouse as control, and**

exhausting to general ventilation in the building.”

Condition D.3.2 must be modified to include the woodworking operation from Plant 18, therefore, it has been modified as follows:

D.3.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the Plant 12 & 32, identified as EU12 and EU32, **and Plant 18, identified as EU18**, woodworking operations shall **each** be limited to 0.88 pounds per hour based on a maximum capacity of two hundred (200) pounds of wood per hour.

- (g) In sections A.2 (k), (l), and (m), Plants 57, 59, and 60 welding activities are listed. Into the OAQ's Response to Comment No. 14 in the TSD addendum, the OAQ concurred with our comment and these welding operations were moved to section D.3 as they are insignificant activities and should be removed from section A.2.

OAQ agrees, Section A.2 (k), (l) and (m) shall be removed and moved to Section A.3 as

“(k) Plant 57, identified as EU57, consisting of:

- (1) ~~two (2) welding lines, one for steel, with a maximum capacity of 0.85 pounds of wire per unit, and one for aluminum, with a maximum capacity of 0.294 pounds per unit, each producing 3.75 truck bodies per hour, using no control, and exhausting to general ventilation, GV57-1 to 3,~~

- ~~(2) one (1) general assembly operation, producing 3.75 truck bodies per hour, using 2.07 gallons of adhesives per unit, 0.485 gallons of caulks or sealants per unit, using no control, and exhausting to general ventilation, GV57-1 to 3.~~

(l) Plant 59, identified as EU59, consisting of:

- (1) ~~two (2) welding lines, one for steel, with the maximum capacities for steel and aluminum wire included in the EU57 capacities, each producing 3.75 truck bodies per hour, using no control, and exhausting to general~~

- ~~(2) one (1) general assembly operation, producing 3.75 truck bodies per hour, using no control, and exhausting to general ventilation, GV59-1.~~

(m) Plant 60, identified as EU60, consisting of

- (1) ~~two (2) welding lines, one for steel, with the maximum capacities for steel and aluminum wire included in the EU57 capacities, each producing 3.75 truck bodies per hour, using no control, and exhausting to general ventilation, GV60-1, and~~

- ~~(2) one (1) general assembly operation, producing 3.75 truck bodies per hour, using no control, and exhausting to general ventilation, GV60-1.”~~

- (h) Section D.2 addresses only Plants 57, 59, and 60. There are many requirements that pertain to a surface coating operation at our Ward Street site. There is no surface coating operation, booths, or related equipment at the Ward Street site. These plants contain identical operations to Plants 10, 11, 16, and 18 as general assembly operations producing the listed numbers of truck bodies. Sections D.2.1, D.2.2, D.2.3, D.2.4, D.2.5, D.2.6, D.2.7, and D.2.8 are only applicable to a “spray” surface coating operation, hence, do not apply to these operations.

In the comment under (h), the Permittee states that the Ward Street site assembly operations, identified as EU57, EU59, and EU60, do not involve “spray” surface coating and, therefore, none of the conditions stated in Section D.2 apply. Miscellaneous Metal Coating (326 IAC 8-2-9) does not apply to EU57, EU59, and EU60, because the source uses a hot melt adhesive that does not contain VOC. Therefore, D.2.1 Miscellaneous Metal Coating does not apply. The brush or roll

on application method does not yield particulate emissions, therefore, particulate matter emissions limitations pursuant to 326 IAC 6-3-2 do not apply. Consequently, any conditions pertaining to the monitoring or recordkeeping of VOC, pursuant to 326 IAC 8-2-9, and PM, pursuant to 326 IAC 6-3-2 are not applicable. Therefore, Section D.2, Conditions D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9], D.2.2 Particulate Matter (PM) [326 IAC 6-3-2(c)], D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)], D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11], D.2.5 Volatile Organic Compounds (VOC), D.2.6 Particulate Matter (PM), D.2.7 Monitoring, and D.2.8 Record Keeping Requirements shall be deleted. The entire Section D.2 of this permit pertaining to assembly operations identified as EU57, EU 59, and EU60 have be deleted. The descriptions of assembly operations, identified as EU57, EU59, and EU60, shall remain under Section A.2. Section D.2 shall be used to incorporate the significant source modification SM 039-11906-00530, for that was issued May, 2000. New Section D.2 is as follows:

SECTION D.2 FACILITY OPERATION CONDITIONS

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

One (1) paint booth, identified as PB003, using an air atomization spray system, coating a maximum of 4 aluminum truck bodies per hour, using dry filters for particulate matter control and exhausting to stacks 1 and 2;

One (1) touch-up booth, identified as TB004, using an air atomization spray system, coating a maximum of 4 aluminum truck bodies per hour, using dry filters for particulate matter control and exhausting to stack 4;

One (1) natural gas fired curing oven, identified as C003, with a maximum heat input rate of 1.5 million (MM) British thermal units (Btu) per hour, exhausting to stack 3; and

Two (2) natural gas fired paint booth air make-up units, identified as 001 and 002, each with a maximum heat input rate of 1.5 MMBtu per hour, exhausting to stacks 1 and 2.

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

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

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coatings applied to the aluminum truck body shall be limited to 3.5 pounds of VOC per gallon of coating less water delivered to the applicator.**
- (b) Solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.**

D.2.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The usage of VOC, including coatings, dilution solvents, and cleaning solvents, in the paint booth, identified as PB003, and the touch-up booth, identified as TB004, shall be limited to less than 40 tons per twelve (12) consecutive month period, rolled on a monthly basis. This limit will render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.2.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the paint booth (PB003) and the touch-up booth (TB003) 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:

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

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.2 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.2.7 VOC Emissions

Compliance with Condition D.1.2 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.

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

D.2.8 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the paint booth (PB003) and the touch-up booth (TB004) are in operation.

D.2.9 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 paint and touch-up booth stacks (1, 2 and 4) 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 2-7-5(3)] [326 IAC 2-7-19]

D.2.10 Record Keeping Requirements

- (a) **To document compliance with Condition D.2.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.2.**
- (1) **The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;**
 - (2) **A log of the dates of use;**
 - (3) **The cleanup solvent usage for each month;**
 - (5) **The total VOC usage for each month; and**
 - (6) **The weight of VOCs emitted for each compliance period.**
- (b) **To document compliance with Condition D.2.7, 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.2.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, 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.

- (i) **The revision to the Plant 17 description was acknowledged in the OAQ's Response to Comment No. 16 in the addendum, but not properly revised. Section A.3 (d) does not list the welding operations in Plant 17.**

OAQ agrees. Section A.3(d) shall be modified as follows:

- (d) **Plant 17, identified as EU17, consisting of: ~~one (1) caulking and sealing operation, one (1) metalworking, one (1) woodworking operation, one (1) cleaning solvent degreaser.~~ **one (1) steel welding operation, and one (1) aluminum welding operation.****
- (j) **Section C.21 (g) requires the first Quarterly Compliance Monitoring Report to be submitted by July 30th, 2000, covering the period commencing on the date of issuance of this permit and ending the last date of the reporting period. This report would then cover only the 18 days between June 12th and June 30th. Section C.10 states that we have 90 days to implement all monitoring and record keeping requirements. It is not feasible for**

Utilimaster to have in place all required record keeping requirements and compliance monitoring provisions in order to meet this July 30th reporting deadline. We recognize the importance of these reports and have always taken the necessary steps to remain in compliance with all applicable requirements. We wish to conclude the 2nd quarter of this year with the filing of the same quarterly reports required by our previous operating permits and begin the 3rd quarter with these new requirements. This will allow us the time needed and allowed by section C.10 to develop and implement all necessary compliance monitoring and record keeping requirements.

OAQ agrees. No change to the permit is necessary.

All other conditions of the permit shall remain unchanged and in effect. The table of contents and the permit shall be renumbered to reflect the changes listed above. The Significant Source Modification 039-11906-00530 which was issued on May 22, 2000, is also incorporated into the Title V operation permit through this Significant Permit Modification. Please replace your current permit copy with this most recent version created as a result of this First Significant Permit Modification 039-12572-00530 to T039-7087-00530.

Existing Approvals

The source was issued a Part 70 Operating Permit (T039-7087-00530) on June 12, 2000. The source has since received no administrative amendments, source or permit modifications.

Enforcement Issue

- (a) IDEM is aware that the the Ward Street assembly operations in Plants 57, 59, and 60 are not subject to the PM monitoring and record keeping required at this time because those operations do not include spray coating. IDEM is in agreement with this source that those requirements are not appropriate for non-spray operations.
- (b) There are no enforcement actions pending.

Recommendation

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

Unless otherwise stated, information used in this review was derived from the revision request letter received on June 15, 2000 submitted by the applicant.

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 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.”

Pollutant	Potential To Emit (tons/year)
PM	17.958
PM-10	67.929
SO ₂	0
VOC	1061.095
CO	0
NO _x	0

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

HAP's	Potential To Emit (tons/year)
single	greater than 10
combined	greater than 25
TOTAL	greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1996 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.002
PM-10	0.002
SO ₂	0
VOC	94.741
CO	0
NO _x	0
HAP (specify)	greater than 25

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
State Road 19, Plants EU3, EU6, EU8, EU10, EU12 & 32, EU14, EU16, EU17, EU18				<250			
State Road 19, EU4, EU5, EU7, and EU11				<40			

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment or unclassifiable
SO ₂	attainment or unclassifiable
NO ₂	attainment or unclassifiable
Ozone	attainment or unclassifiable
CO	attainment or unclassifiable
Lead	attainment or unclassifiable

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

Federal Rule Applicability

This modification changes no Federal Rule applicability for this source.

State Rule Applicability - Entire Source

This modification corrects the application of 326 IAC 6-3 PM limitations on a roll on application process.

State Rule Applicability - Individual Facilities

This modification removes the applicability of 326 IAC 6-3 to Plants 57, 59 and 60 because they do not include any spray coating applications. The removal of this applicability results in the removal of monitoring and reporting conditions that were contained in the permit as a result of the error in application, and, therefore, requires a significant permit modification.

Compliance Requirements

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

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

This modification removes the compliance monitoring requirements applicable Plants 57, 59, and 60 because they do not include spray coating operations.

Conclusion

The operation of this commercial vehicle assembly plant shall be subject to the conditions of the attached proposed Significant Permit Modification No. T 039-12572-00530.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Significant Modification to a Part 70 Operating Permit

Source Name:	Utilimaster Corporation
Source Location:	65266 State Road 19, 65906 State Road 19, and 21 Ward Street, Wakarusa, Indiana 46573
County:	Elkhart
SIC Code:	3713
Operation Permit No.:	T 039-7087-00530
Operation Permit Issuance Date:	June 12, 2000
Permit Modification No.:	SPM 039-12572-00530
Permit Reviewer:	Holly M. Stockrahm

On March 1, 2001, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Utilimaster Corporation had applied for a significant permit modification to the Part 70 Operating Permit to operate a commercial vehicle assembly plant. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On March 28, 2001, OAQ received the comments from the source. If revisions to the permit are required, bolded language shall indicate language that has been added, language with a line through it has been deleted.

Comment 1:

Section A.2(n) and D.2 refer to the Plant 14 modification as "Plant (recreation vehicles)". The four (1-4) subsections of (n) and the D.2 block are the line #3 paint booth (1), touch-up booth (2), cure oven (3), and air make-up units (4). An accurate descriptive name for this modification would be Plant 14 Paint Line #3.

Response to Comment 1:

IDEM agrees. The description under A.2 and D.2 has been changed as follows:

Plant (~~recreation vehicles~~) **14 Paint Line #3**, consisting of:

- (1) one (1) paint booth, identified as PB003, using an air atomization spray system, coating a maximum of four (4.0) aluminum truck bodies per hour, using dry filters for particulate matter control and exhausting to stacks 1 and 2,
- (2) one (1) touch-up paint booth, identified as TB004, using an air atomization spray system, coating a maximum of four (4.0) aluminum truck bodies per hour, using dry filters for particulate matter control and exhausting to stack 4,
- (3) one (1) natural gas fired curing oven, identified as C003, with a maximum heat input rate of 1.5 million Btu per hour, exhausting to stack 3, and
- (4) two (2) natural gas fired paint booth air make-up units, identified as 001 and 002, each with a maximum heat input rate of 1.5 MM Btu per hour, exhausting to stacks 1 and 2.

Comment 2:

In both Sections A and D(g), Plants 12 & 32, which occupy the same building, are identified as EU18. Plant 18 has also been identified as EU18 in Section A(j) and Section D.1(g). Plants 12 & 32 are identified in D.1(f) as EU 12 and EU 12 and 32. Sections A and D (g) should be corrected to read Plants 12 & 32 identified as EU12 and EU32 to be accurate and remain consistent.

Response to Comment 2:

Sections A and D(g) have been changed as follows:

Plants 12 & 32, identified as ~~EU18~~ **EU12 & EU32**, consisting of:

- (1) One (1) service and repair operation, with a maximum capacity of one half (0.5) trucks per hour, using no control, and exhausting to general ventilation, GV18-1,
- (2) One (1) painting operation, with a maximum capacity of one half (0.5) trucks per hour, using dry filters as control, and exhausting to general ventilation, GV18-2.

Comment 3:

Section D.2.9 and D.2.10(b) Monitoring for Plant 14's Paint Line #3 contains the same provisions that were removed from the other paint spray operations monitoring requirements during the previous November 1999 comment period stage of this permit. The IDEM-OAM agreed to allow an operator training program as indicated in Section D.1.11 in lieu of these inspections for overspray requirements. As this is an identical operation, it is reasonable to believe that the IDEM-OAM will allow the operator training program in this case also. Please replace the requirements of D.2.9 and D.2.10 (b) with the requirements of D.1.11 as previously agreed upon by the IDEM-OAM in order to keep monitoring requirements consistent within our paint booths.

Response to Comment 3:

IDEM agrees. Conditions D.2.9 and D.2.10 (b) have been changed as follows:

D.2.9 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 paint and touch-up booth stacks (1, 2 and 4) 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.~~
- (a) The dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the paint booths are in operation.**

- (b) The Permittee shall implement an operator training program with the following requirements:**
 - (1) All operators that perform painting operations or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within sixty (60) days of permit issuance. All new operators shall be trained upon hiring.**
 - (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be in writing and retained on site. Copies of the training program, the list of trained operators, and training records shall be maintained on site or available within one (1) hour for inspection by IDEM.**
 - (3) All operators shall be given refresher training annually.**
- (c) Records shall be maintained of any non-routine maintenance activities performed on the particulate emission control devices which have air flow greater than four thousand cubic feet per minute (4000 cfm).**
- (d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.**

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

D.2.10 Record Keeping Requirements

- (a) To document compliance with Condition D.2.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.2.**
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;**
 - (2) A log of the dates of use;**
 - (3) The cleanup solvent usage for each month;**
 - (5) The total VOC usage for each month; and**
 - (6) The weight of VOCs emitted for each compliance period.**
- (b) ~~To document compliance with Condition D.2.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.~~ To document compliance with Condition D.2.9, the Permittee shall maintain the following:**
 - (1) Copies of the training program, the list of trained operators, and training records shall be maintained on site or available within one (1) hour for inspection by IDEM.**

(2) Records any non-routine maintenance activities performed on the particulate emission control devices which have air flow greater than four thousand cubic feet per minute (4000 cfm).

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

Comment 4:

Section D.2.10(a)(2) contains a requirement for the retention of a log of the dates of use for the Plant 14 Paint Line #3. This requirement was previously removed from the other Plant 14 paint booths during the 1999 comment period. Please remove this requirement from D.2.10(a)(2) also as this is an identical operation, was previously agreed upon by the IDEM-OAM and will keep the permitting requirements consistent between our paint booths.

Response to Comment 4:

IDEM agrees. Condition D.2.10 (a) (2) has been deleted as follows:

(a) (2) ~~A log of the dates of use;~~