

Rick Bossingham
Wabash National Corporation (East Plant)
3460 McCarty Lane,
Lafayette, Indiana 47905

Re: 157-12806
First Significant Permit Revision to
MSOP 157-10976

Dear Rick Bossingham:

Wabash National Corporation (East Plant) was issued a minor source operating permit on January 25, 2000 for truck and trailer manufacturing plant. A letter requesting a revision to this permit was received on October 6, 2000. Pursuant to the provisions of 326 IAC 2-6.1-6 a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of removing stack test requirements in the permit.

Pursuant to 326 IAC 2-6.1-6, the minor source operating permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this permit revision which includes this letter, the attached operating conditions applicable to these emission units, and revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Gurinder Saini, at OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Gurinder Saini or extension 3-0203, or dial (317) 233-0203.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

GS

cc: File - Tippecanoe County
U.S. EPA, Region V
Tippecanoe County Health Department
Air Compliance Section Inspector - Eric Courtright
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

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

**Wabash National Corporation (East Plant)
3460 McCarty Lane
Lafayette, Indiana 47905**

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

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

Operation Permit No.: MSOP 157-10976-00089	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: January 25, 2000
First Significant Permit Revision 157-12806	Pages affected: 13
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

- (a) one (1) paint booth identified as PB1S, with a maximum capacity of 1.25 trailer units per hour, with a maximum usage of white paint, gray paint, undercoating and the solvent of 3.75, 0.625, 0.625 and 0.05 gallons per hour, respectively. The application method is by airless air atomization spray guns. The particulate matter from the over spray are controlled by panel filters, exhausting to a stack PB1; and
- (b) one (1) paint booth identified as PB2S, with a maximum capacity of 0.41 trailer units per hour, with a maximum usage of white paint, gray paint, undercoating and the solvent of 1.23, 0.205, 0.205 and 0.0164 gallons per hour, respectively. The application method is by airless air atomization spray guns. The particulate matter from the over spray are controlled by panel filters, exhausting to a stack PB2.

D.1.1 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)

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 spray booths shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the PM from the two (2) paint booths (PBS1 and PBS2) 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.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 3-6]

The Permittee is not required to test these emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Significant Permit Revision to a Minor Source Operating Permit

Source Background and Description

Source Name:	Wabash National Corporation (East Plant)
Source Location:	3460 McCarty Lane, Lafayette, Indiana 47905
County:	Tippecanoe
SIC Code:	3715
Operation Permit No.:	MSOP 157-10976-00089
Operation Permit Issuance Date:	January 25, 2000
First Significant Permit Revision No.:	MSOP 157-12806
Permit Reviewer:	Gurinder Saini

The Office of Air Management (OAM) has reviewed or revision application from Wabash National Corporation (East Plant) relating to the operation of truck and trailer manufacturing plant.

History

On October 6, 2000, Wabash National Corporation (East Plant) submitted an application to the OAM requesting to remove stack testing condition from their Minor Source Operating Permit (MSOP). Wabash National Corporation (East Plant) was issued a MSOP on January 25, 2000.

Permit Changes

The Permittee has requested for removal of the Testing Requirements in condition D.1.4 for the PM and PM-10 for the paint booths from the permit. This is in light of discussions on the matter with Herm Carney and Steve Friend of OAM, IDEM. The OAM, IDEM has determined that this language will be replaced with standard model language of no-stack test requirement at present. Condition D.1.4 is revised as follows (with text added shown in **bold** and removed in ~~strikeout~~):

D.1.4 Testing Requirements [326 IAC 3-6]

~~The compliance test shall be performed within 60 days after achieving maximum production rate, but not later than 180 days after issuance of this permit. The Permittee shall perform PM and PM-10 testing utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM and Methods 201 or 201A and 202 (40 CFR 51, Appendix M) for PM-10, or other methods as approved by the Commissioner. This test shall be repeated at least once every two and half (2.5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensable PM-10. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance.~~

The Permittee is not required to test these emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Justification for the Revision

The Minor Source Operating permit is being modified through a MSOP Significant Permit Revision. This revision is being performed pursuant to 326 IAC 2-6.1-6 Permit Revisions (i)(1) "significant permit revisions are those changes that are not subject to subsection (d) or (g).."

Recommendation

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

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

A letter for the purposes of this review was received on October 6, 2000.

Conclusion

The operation of this truck and trailer manufacturing plant shall be subject to the conditions of the attached First Significant Permit Revision to MSOP 157-12806-00089.