

Mr. Charles Madison
Truck Accessories Group, Inc., dba Leer Midwest
58288 Ventura Drive
Elkhart, IN 46517

Re: 039-15637
Fourth Administrative Amendment to
Part 70 039-7561-00097

Dear Mr. Madison:

J. B. Pointdexter and Company, Inc., d/b/a Leer, Inc., was issued a Part 70 permit on March 22, 1999, for a stationary source manufacturing and coating of fiberglass reinforced pickup truck caps and tonneau covers. A letter requesting some changes was received on February 26, 2002. According to 326 IAC 2-7-11(a)(8), an administrative amendment may be used for a modification that "revises descriptive information where the revision will not trigger a new applicable requirement or violate a permit term". Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows (~~strike-out to~~ show deletions and **bold** to show additions):

(a) The name of the source as identified in the permit is changed to "Truck Accessories Group, Inc., dba Leer Midwest".

(b) Charles Madison meets the requirements of a responsible official under 326 IAC 2-7-1(34). He is the plant General Manager. Therefore, the responsible official name has been changed in Section A.1 as follows:

Responsible Official:	Pat Hare Charles Madison
Source Address:	Plant 1: 58288 Ventura Drive, Plant 2: 58360 Ventura Drive, and Plant 3: 28858 Ventura Drive, Elkhart, Indiana 46517
Mailing Address:	58288 Ventura Drive, Elkhart, Indiana 46517
SIC Code:	3792
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

(c) The description of Plant 1 in Section A.2 is amended to add some emission units and activities. The potential to emit of these additional processes and activities, including the three (3) laminating ledge stations, was determined to be at exempt levels.

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:

Plant 1:

- (1) One (1) mold preparation operation, identified as Plant 1, with a maximum capacity to

coat 10.0 fiberglass molds per hour.

- (2) Two (2) HVLP gelcoat booths **and their associated cleanup operations**, identified as Plant 1, with a maximum capacity to coat 10.0 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stacks **P1GN, P1GS, and P1GP E 8-1 and E9-1**.
- (3) Two (2) chop booths (laminating process) **and neat rail operation and their associated cleanup operations**, identified as Plant 1, with a maximum capacity to laminate 10.0 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stacks ~~E-6-1 and E7-1~~ **P1E1, P1E2, P1E3, P1E4, P1W1, P1W2, P1W3, P1W4**.
- (4) **Three (3) laminating ledge stations, and roll out area. The laminating ledge operation has a maximum capacity to laminate 10.0 fiberglass molds per hour, using 5.5 pounds of resin per mold, using dry filters to control particulate matter emissions. The roll-out area exhausts to ceiling exhausts identified as P1R1 and P1R2. The laminating ledge area exhausts to stack identified as P1LL.**
- (4 5) One (1) hand wipe and HVLP final finish and liner insert operation, **and their associated clean up operations**, identified as Plant 1, with a maximum capacity of 10.0 fiberglass truck covers per hour, ~~using dry filters for the HVLP process to control particulate matter emissions, exhausting to a vent (fugitive).~~
- (5 6) Two (2) HVLP paint booths (prep. and paint process) **and their associated clean up operations**, identified as Plant 1, with a maximum capacity of 10.0 fiberglass truck covers per hour, using dry filters to control particulate matter emissions, ~~exhausting to stacks E1-1, E2-1, E3-1, E4-1, and E5-1.~~ **Each paint booth is divided into three (3) partitions with base, clear, and bake areas, and exhaust through stacks identified as P1B1, P1B2, P1B3, P1B4, P1C1, P1C2, P1C3, P1C4, and P1H1.**
- (6 7) One (1) handgrinding and water jet cutter operation, identified as Plant 1, with a maximum capacity to grind 1189.15 pounds of fiberglass truck covers per hour, using a baghouse to control particulate matter emissions, exhausting to stack ~~P4-1~~ **P1DC**.
- (7 8) Two (2) above ground resin storage tanks, identified as Tank 1 and Tank 2, each with an annual throughput of 130,000 gallons per year (each tank has a capacity of 5,000 gallons). Tank 1 was constructed in 1981 and Tank 2 was constructed in 1982.

(d) The description of Plant 2 and Plant 3 in Section A.2 is amended as follows:

Plant 2:

- (8) ~~One (1) hand application touch-up area, identified as B4, with a maximum capacity to coat 12.5 laminated parts per hour, exhausting to stacks PV1, PV2, and PV3.~~
- (9) Two (2) HVLP coating booths **and their associated cleanup operations**, identified as B5 and B6, each with a maximum capacity to coat 12.5 laminated parts per hour, using dry filters to control particulate matter emissions, ~~with B5 exhausting to stacks V13, V14,~~

V15, and V16 and B6 exhausting to V17, V18, V19, and V20. **exhausting to stacks P2B1, P2B2, P2B3, P2B4, P2C1, P2C2, P2C3, and P2C4.**

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- (10) One (1) reactive injection molding unit, with a maximum capacity of 820 pounds per hour used for production of tonneau caps at the rate of 10 units per hour.
- (11) **One (1) fiberglass sanding operation, using a dust collector to control particulate matter emissions, exhausting to stack P2T1.**

Plant 3:

- (12) One (1) air-assisted airless laminating area **and the associated cleanup operations**, identified as E1, with a maximum capacity to laminate 0.05 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stack E1.
- (13) One (1) air-assisted airless gelcoating booth **and the associated cleanup operations**, identified as E2, with a maximum capacity to coat 0.05 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to E2.

(e) The description of insignificant activities is amended as follows:

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):

Plant 1:

- (1) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (2) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

Other categories with emissions below significant thresholds:

- (3) **Two (2) gun clean-up stations utilizing solvent bowls for clean-up.**
- (4) **One (1) paint mix room, exhausting to stack identified as MIX1.**
- (5) **One (1) mold repair area, to repair and clean mold surface for re-use.**

Plant 2:

- (3 6) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (7) **Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device, such as a bag filter or cyclone.**

Other categories with emissions below significant thresholds:

- (8) **Grinding and machining operations with potential uncontrolled PM-10 emissions of less than twenty-five (25) pounds per day, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.**

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- (9) **One (1) paint mix room, exhausting to stack identified as P2MR.**
(10) **One (1) barrel top adhesive mixer, maximum capacity 55 gallons.**

Plant 3:

- (11) **Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.**

All plants:

- (12) **Miscellaneous welding units.**
(13) **Compressors using blowdown for cleanup.**
(14) **One (1) large propane tank filling station with a capacity less than ten thousand five hundred (10,500) gallons and a throughput less than three thousand five hundred (3,500) gallons per day.**
(15) **Water based adhesives that are less than or equal to five percent (5%) by volume of VOCs excluding HAPs.**

Other categories with emissions below significant thresholds:

- (16) **Miscellaneous lift trucks.**

(f) The facility description in Section D.1 is modified as follows:

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

Plant 1: 58288 Ventura Drive

- (1) One (1) mold preparation operation, identified as Plant 1, with a maximum capacity to coat 10.0 fiberglass molds per hour.
- (2) Two (2) HVLP gelcoat booths **and their associated cleanup operations**, identified as Plant 1, with a maximum capacity to coat 10.0 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stacks **P1GN, P1GS, and P1GP E 8-1 and E9-1**.
- (3) Two (2) chop booths (laminating process) **and neat rail operation and their associated cleanup operations**, identified as Plant 1, with a maximum capacity to laminate 10.0 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stacks ~~E-6-1 and E7-1~~ **P1E1, P1E2, P1E3, P1E4, P1W1, P1W2, P1W3, P1W4**.

(4) **Three (3) laminating ledge stations, and roll out area. The laminating ledge operation has a maximum capacity to laminate 10.0 fiberglass molds per hour, using 5.5 pounds of resin per mold, using dry filters to control particulate matter emissions. The roll-out area exhausts to ceiling exhausts identified as P1R1 and P1R2. The laminating ledge area exhausts to stack identified as P1LL.**

(4 5) One (1) hand wipe and HVLP final finish and liner insert operation, **and their associated clean up operations**, identified as Plant 1, with a maximum capacity of 10.0 fiberglass truck covers per hour, ~~using dry filters for the HVLP process to control particulate matter emissions, exhausting to a vent (fugitive).~~

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(5 6) Two (2) HVLP paint booths (prep. and paint process) **and their associated clean up operations**, identified as Plant 1, with a maximum capacity of 10.0 fiberglass truck covers per hour, using dry filters to control particulate matter emissions. ~~exhausting to stacks E1-1, E2-1, E3-1, E4-1, and E5-1.~~ **Each paint booth is divided into three (3) partitions with base, clear, and bake areas, and exhaust through stacks identified as P1B1, P1B2, P1B3, P1B4, P1C1, P1C2, P1C3, P1C4, and P1H1.**

(6 7) One (1) handgrinding and water jet cutter operation, identified as Plant 1, with a maximum capacity to grind 1189.15 pounds of fiberglass truck covers per hour, using a baghouse to control particulate matter emissions, exhausting to stack ~~P1-1~~ **P1DC.**

(7 8) Two (2) above ground resin storage tanks, identified as Tank 1 and Tank 2, each with an annual throughput of 130,000 gallons per year (each tank has a capacity of 5,000 gallons). Tank 1 was constructed in 1981 and Tank 2 was constructed in 1982.

Insignificant Activities:

- (1) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (2) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

Other categories with emissions below significant thresholds:

- (3) **Two (2) gun clean-up stations utilizing solvent bowls for clean-up.**
- (4) **One (1) paint mix room, exhausting to stack identified as MIX1.**
- (5) **One (1) mold repair area, to repair and clean mold surface for re-use.**

(g) The facility description in Section D.2 is modified as follows:

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

Plant 2: 58288 Ventura Drive

(8) ~~One (1) hand application touch-up area, identified as B4, with a maximum capacity to coat 12.5 laminated parts per hour, exhausting to stacks PV1, PV2, and PV3.~~

(9) Two (2) HVLP coating booths **and their associated cleanup operations**, identified as B5 and B6, each with a maximum capacity to coat 12.5 laminated parts per hour, using dry filters to control particulate matter emissions, ~~with B5 exhausting to stacks V13, V14, V15, and V16 and B6 exhausting to V17, V18, V19, and V20.~~ **exhausting to stacks**

P2B1, P2B2, P2B3, P2B4, P2C1, P2C2, P2C3, and P2C4.

- (10) One (1) reactive injection molding unit, with a maximum capacity of 820 pounds per hour used for production of tonneau caps at the rate of 10 units per hour.
- (11) One (1) fiberglass sanding operation, using a dust collector to control particulate matter emissions, exhausting to stack P2T1.**

Insignificant Activity:

- (1) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.**

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- (2) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device, such as a bag filter or cyclone.**

Other categories with emissions below significant thresholds:

- (3) Grinding and machining operations with potential uncontrolled PM-10 emissions of less than twenty-five (25) pounds per day, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.**
- (4) One (1) paint mix room, exhausting to stack identified as P2MR.**
- (5) One (1) barrel top adhesive mixer, maximum capacity 55 gallons.**

- (h) The facility description in Section D.3 is modified as follows:

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

Plant 3:

- (11) One (1) air-assisted airless laminating area **and the associated cleanup operations**, identified as E1, with a maximum capacity to laminate 0.05 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stack E1.
- (12) One (1) air-assisted airless gelcoating booth **and the associated cleanup operations**, identified as E2, with a maximum capacity to coat 0.05 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to E2.

Insignificant Activity: Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

- (i) References to the Office of Air Management (OAM) have been changed to the Office of Air Quality (OAQ).

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following 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 Madhurima Moulik, at (800) 451-6027, press 0 and ask for Madhurima Moulik or extension 3-0868, or dial (317) 233-0868.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

mm

cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Paul Karkiewicz
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Truck Accessories Group, Inc., dba Leer Midwest
58288 Ventura Drive and 28858 Ventura Drive
Elkhart, Indiana 46517**

(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 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-7561-00097	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: March 22, 1999

First Administrative Amendment No. 039-11649	Issuance Date: February 8, 2000
First Minor Source Modification No. 039- 10828	Issuance Date: January 24, 2001
First Minor Permit Modification No. 039-13586	Issuance Date: February 16, 2001
Second Administrative Amendment No. 039-14054	Issuance Date: May 1, 2001
Third Administrative Amendment No. 039-14936	Issuance Date: October 25, 2001

4 th Administrative Amendment No.: 039-15637	Pages Modified: 5, 6, 7, 29, 29a, 32, 32a, 37
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:

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 stationary emission source manufacturing and coating fiberglass reinforced pickup truck caps and tonneau covers.

Responsible Official: Charles Madison
 Source Address: Plant 1: 58288 Ventura Drive, Plant 2: 58360 Ventura Drive, and
 Plant 3: 28858 Ventura Drive, Elkhart, Indiana 46517
 Mailing Address: 58288 Ventura Drive, Elkhart, Indiana 46517
 SIC Code: 3792
 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:

Plant 1:

- (1) One (1) mold preparation operation, identified as Plant 1, with a maximum capacity to coat 10.0 fiberglass molds per hour.
- (2) Two (2) HVLP gelcoat booths and their associated cleanup operations, identified as Plant 1, with a maximum capacity to coat 10.0 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stacks P1GN, P1GS, and P1GP.
- (3) Two (2) chop booths (laminating process) and neat rail operation and their associated cleanup operations, identified as Plant 1, with a maximum capacity to laminate 10.0 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stacks P1E1, P1E2, P1E3, P1E4, P1W1, P1W2, P1W3, P1W4.
- (4) Three (3) laminating ledge stations, and roll out area. The laminating ledge operation has a maximum capacity to laminate 10.0 fiberglass molds per hour, using 5.5 pounds of resin per mold, using dry filters to control particulate matter emissions. The roll-out area exhausts to ceiling exhausts identified as P1R1 and P1R2. The laminating ledge area exhausts to stack identified as P1LL.
- (5) One (1) hand wipe and HVLP final finish and liner insert operation and their associated cleanup operations, identified as Plant 1, with a maximum capacity of 10.0 fiberglass truck covers per hour.

- (6) Two (2) HVLP paint booths (prep. and paint process) and their associated cleanup operations, identified as Plant 1, with a maximum capacity of 10.0 fiberglass truck covers per hour, using dry filters to control particulate matter emissions. Each paint booth is divided into three (3) partitions with base, clear, and bake areas, and exhaust through stacks identified as P1B1, P1B2, P1B3, P1B4, P1C1, P1C2, P1C3, P1C4, and P1H1.

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Modified By: Madhurima D. Moulik

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Permit Reviewer: Angie Lee/Catherine Moore

- (7) One (1) handgrinding and water jet cutter operation, identified as Plant 1, with a maximum capacity to grind 1189.15 pounds of fiberglass truck covers per hour, using a baghouse to control particulate matter emissions, exhausting to stack P1DC.
- (8) Two (2) above ground resin storage tanks, identified as Tank 1 and Tank 2, each with an annual throughput of 130,000 gallons per year (each tank has a capacity of 5,000 gallons). Tank 1 was constructed in 1981 and Tank 2 was constructed in 1982.

Plant 2:

- (9) Two (2) HVLP coating booths and their associated cleanup operations, identified as B5 and B6, each with a maximum capacity to coat 12.5 laminated parts per hour, using dry filters to control particulate matter emissions, exhausting to stacks P2B1, P2B2, P2B3, P2B4, P2C1, P2C2, P2C3, and P2C4.
- (10) One (1) reactive injection molding unit, with a maximum capacity of 820 pounds per hour used for production of tonneau caps at the rate of 10 units per hour.
- (11) One (1) fiberglass sanding operation, using a dust collector to control particulate matter emissions, exhausting to stack P2T1.

Plant 3:

- (12) One (1) air-assisted airless laminating area and the associated cleanup operations, identified as E1, with a maximum capacity to laminate 0.05 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stack E1.
- (13) One (1) air-assisted airless gelcoating booth and the associated cleanup operations, identified as E2, with a maximum capacity to coat 0.05 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to E2.
- (14) One (1) final finish operation, identified as Mold and FF, with a maximum capacity of 0.05 fiberglass molds per hour.
- (15) One (1) sanding operation, identified as Plant 3, with a maximum capacity to sand 50 pounds of fiberglass mold per hour, using a cloth filter to control particulate matter emissions, exhausting to stacks GV1 and GV2.

A.3 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, as defined in 326 IAC 2-7-1(21):

Plant 1:

- (1) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (2) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or

equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

Other categories with emissions below significant thresholds:

- (3) Two (2) gun clean-up stations utilizing solvent bowls for clean-up.
- (4) One (1) paint mix room, exhausting to stack identified as MIX1.
- (5) One (1) mold repair area, to repair and clean mold surface for re-use.

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Permit Reviewer: Angie Lee/Catherine Moore

Plant 2:

- (6) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (7) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device, such as a bag filter or cyclone.

Other categories with emissions below significant thresholds:

- (8) Grinding and machining operations with potential uncontrolled PM-10 emissions of less than twenty-five (25) pounds per day, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (9) One (1) paint mix room, exhausting to stack identified as P2MR.
- (10) One (1) barrel top adhesive mixer, maximum capacity 55 gallons.

Plant 3:

- (11) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

All plants:

- (12) Miscellaneous welding units.
- (13) Compressors using blowdown for cleanup.
- (14) One (1) large propane tank filling station with a capacity less than ten thousand five hundred (10,500) gallons and a throughput less than three thousand five hundred (3,500) gallons per day.
- (15) Water based adhesives that are less than or equal to five percent (5%) by volume of VOCs excluding HAPs.

Other categories with emissions below significant thresholds:

- (16) Miscellaneous lift trucks.

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).

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Permit Reviewer: Angie Lee/Catherine Moore

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SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]**Plant 1:**

- (1) One (1) mold preparation operation, identified as Plant 1, with a maximum capacity to coat 10.0 fiberglass molds per hour.
- (2) Two (2) HVLP gelcoat booths and their associated cleanup operations, identified as Plant 1, with a maximum capacity to coat 10.0 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stacks P1GN, P1GS, and P1GP.
- (3) Two (2) chop booths (laminating process) and neat rail operation and their associated cleanup operations, identified as Plant 1, with a maximum capacity to laminate 10.0 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stacks P1E1, P1E2, P1E3, P1E4, P1W1, P1W2, P1W3, P1W4.
- (4) Three (3) laminating ledge stations, and roll out area. The laminating ledge operation has a maximum capacity to laminate 10.0 fiberglass molds per hour, using 5.5 pounds of resin per mold, using dry filters to control particulate matter emissions. The roll-out area exhausts to ceiling exhausts identified as P1R1 and P1R2. The laminating ledge area exhausts to stack identified as P1LL.
- (5) One (1) hand wipe and HVLP final finish and liner insert operation and their associated cleanup operations, identified as Plant 1, with a maximum capacity of 10.0 fiberglass truck covers per hour.
- (6) Two (2) HVLP paint booths (prep. and paint process) and their associated cleanup operations, identified as Plant 1, with a maximum capacity of 10.0 fiberglass truck covers per hour, using dry filters to control particulate matter emissions, exhausting to stacks. Each paint booth is divided into three (3) partitions with base, clear, and bake areas, and exhaust through stacks identified as P1B1, P1B2, P1B3, P1B4, P1C1, P1C2, P1C3, P1C4, and P1H1.
- (7) One (1) handgrinding and water jet cutter operation, identified as Plant 1, with a maximum capacity to grind 1189.15 pounds of fiberglass truck covers per hour, using a baghouse to control particulate matter emissions, exhausting to stack P1DC.
- (8) Two (2) above ground resin storage tanks, identified as Tank 1 and Tank 2, each with an annual throughput of 130,000 gallons per year (each tank has a capacity of 5,000 gallons). Tank 1 was constructed in 1981 and Tank 2 was constructed in 1982.

Insignificant Activities:

- (1) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (2) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

Other categories with emissions below significant thresholds:

- (3) Two gun clean-up stations utilizing solvent bowls for clean-up.
- (4) One (1) paint mix room, exhausting to stack identified as MIX1.
- (5) One (1) mold repair area, to repair and clean mold surface for re-use.

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

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the surface coating operations, trimmers (insignificant activity), grinding and machining equipment (insignificant activity) 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 60,000 pounds per hour shall be accomplished by use of the equation:

SECTION D.2**FACILITY OPERATION CONDITIONS****Facility Description [326 IAC 2-7-5(15)]****Plant 2:**

- (9) Two (2) HVLP coating booths and their associated cleanup operations, identified as B5 and B6, each with a maximum capacity to coat 12.5 laminated parts per hour, using dry filters to control particulate matter emissions, exhausting to stacks P2B1, P2B2, P2B3, P2B4, P2C1, P2C2, P2C3, and P2C4.
- (10) One (1) reactive injection molding unit, with a maximum capacity of 820 pounds per hour used for production of tonneau caps at the rate of 10 units per hour.
- (11) One (1) fiberglass sanding operation, using a dust collector to control particulate matter emissions, exhausting to stack P2T1.

Insignificant Activity:

- (1) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (2) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device, such as a bag filter or cyclone.

Other categories with emissions below significant thresholds:

- (3) Grinding and machining operations with potential uncontrolled PM-10 emissions of less than twenty-five (25) pounds per day, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (4) One (1) paint mix room, exhausting to stack identified as P2MR.
- (5) One (1) barrel top adhesive mixer, maximum capacity 55 gallons.

Emission Limitations and Standards [326 IAC 2-7-5(1)]**D.2.1 Volatile Organic Compound (VOC) [326 IAC 2-2]**

Pursuant to CP No. 039-5284-00097, issued on July 21, 1996, the input volatile organic compounds delivered to the applicators of Booths B4, B5, and B6, including clean-up solvents shall be limited, in total, to 3.25 tons per month. Therefore 326 IAC 2-2 and 40 CFR 52.21 (PSD rules) does not apply.

D.2.2 Volatile Organic Compound (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 and CP No. 039-5284-00097, issued on July 21, 1996, Booths B4, B5, B6, shall use Best Available Control Technology (BACT). The BACT determined for these facilities are:

- (a) The use of High Volume Low Pressure (HVLP) application systems for Booths B5 and B6;
- (b) Hand application method for Area B4;
- (c) The HVLP applicators shall be used at all times during which Booths B5 and B6 are operated; and

(d) Hand applicators shall be used at all times during which Area B4 is operated.

D.2.3 Volatile Organic Compound (VOC) [326 IAC 8-3-5]

Pursuant to 326 IAC 8-3-5(a) (Cold cleaner degreaser operation and control), 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

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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

SECTION D.3 FACILITY OPERATION CONDITIONS**Facility Description [326 IAC 2-7-5(15)]****Plant 3:**

- (12) One (1) air-assisted airless laminating area and the associated cleanup operations, identified as E1, with a maximum capacity to laminate 0.05 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to stack E1.
- (13) One (1) air-assisted airless gelcoating booth and the associated cleanup operations, identified as E2, with a maximum capacity to coat 0.05 fiberglass molds per hour, using dry filters to control particulate matter emissions, exhausting to E2.
- (14) One (1) final finish operation, identified as Mold and FF, with a maximum capacity of 0.05 fiberglass molds per hour.
- (15) One (1) sanding operation, identified as Plant 3, with a maximum capacity to sand 50 pounds of fiberglass mold per hour, using a cloth filter to control particulate matter emissions, exhausting to stacks GV1 and GV2.

Insignificant Activity: Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

Emission Limitations and Standards [326 IAC 2-7-5(1)]**D.3.1 Volatile Organic Compound (VOC) [326 IAC 8-1-6]**

Pursuant to 326 IAC 8-1-6 (General provisions relating to VOC rules: general reduction requirements for new facilities):

- (a) Use of gel coats, resins, cleanup solvents, and other material containing volatile organic compounds (VOC) shall be limited such that the potential to emit (PTE) VOC shall be less than twenty-five (25) tons per twelve (12) consecutive months. Compliance with this limit shall be determined based upon the following criteria:
 - (1) Monthly usage by weight, monomer content, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. VOC emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be

obtained from the reference approved by IDEM, OAQ.

- (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "CFA Emission Models for the Reinforced Plastics Industries," Composites Fabricators Association, February 29, 1998, or its updates. For the purposes of these emission calculations, monomer in resins and gel coats that is not styrene shall be considered as styrene on an equivalent basis.

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

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the surface coating operations and the sanding operation 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 60,000 pounds per hour shall be accomplished by use of the equation: