



Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

June 30, 2003

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant

RE: **20th Century Fiberglass 039-16836-00109**

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within (18) eighteen days of the mailing of this notice.** The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for consideration at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosure



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Governor

Lori F. Kaplan
Commissioner

6015

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Indianapolis, Indiana 46206-

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June 30, 2003

Mr. Michael Stephenson
Truck Accessories, Group, Inc.,
dba 20th Century Fiberglass - Plant 4
1131 D. I. Drive
Elkhart, Indiana 46514

Re: 039-16836-00109
First Significant Permit Revision to
MSOP 039-15858-00109

Dear Mr. Stephenson:

Truck Accessories, Group, Inc., dba 20th Century Fiberglass - Plant 4 was issued a minor source operating permit on February 5, 2003 for a pickup truck cover coating operation. A letter requesting a revision to this permit was received on February 24, 2003. 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 increasing the VOC usage limit for the existing paint and clear coat booth (PC) from 25 tons per year to 54.1 tons per year.

The following construction conditions are applicable to the proposed project:

1. The data and information supplied with the application shall be considered part of this permit revision approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Pursuant to IC 13-15-5-3, this approval to construct becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

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 find attached a copy of the revised permit.

Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Yu-Lien Chu, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7871 to speak directly to Ms. Chu. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original signed by
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

ERG/YC

cc: File - Elkhart County
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Tony Pelath
Compliance Data Section - Karen Nowak
Administrative and Development - Sara Cloe
Technical Support and Modeling - Michele Boner



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MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**Truck Accessories Group, Inc.,
dba 20th Century Fiberglass Plant #4
28722 Jami Street,
Elkhart, Indiana 46514**

(herein known as the Permittee) is hereby authorized to 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 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 039-15858-00109	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: February 5, 2003 Expiration Date: February 5, 2008
First Significant Permit Revision No.: 039-16836-00109	Pages Affected: 4, 7, 16-20

Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: June 30, 2003
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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air 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 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary pickup truck cover surface coating operation.

Responsible Official:	President and General Manager
Source Address:	28722 Jami Street, Elkhart, Indiana, 46514
Mailing Address:	1131 D.I. Drive, Elkhart, Indiana, 46514
General Source Number:	(574) 264-7528
SIC Code:	3792
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions unit and pollution control device:

- (a) One (1) paint/clear coat booth and its associated drying booth and cleanup operations, identified as PC, constructed in 1993, with two (2) HVLP spray guns, with a maximum throughput rate of 3.5 truck covers and related parts per hour, using dry filters to control particulate matter emissions, with the emissions from the booth being exhausted to two (2) stacks (PC1 and PC2), and the emissions from the drying booth being exhausted to one (1) stack (D01).
- (b) One (1) natural gas-fired drying oven, identified as DO1, constructed in 1993, with a maximum heat input rate of 1.5 MMBtu/hr, exhausting through stack DOH1.
- (c) Two (2) natural gas-fired air make-up units, identified as A1 and A2, constructed in 1993, each with a maximum heat input rate of 0.83 MMBtu/hr, exhausting through stacks A1 and A2, respectively.
- (d) One (1) diesel fuel tank, constructed in 1993, with a maximum capacity of 300 gallons and maximum throughput rate of 1,800 gallons per year.
- (e) Paved and unpaved roads and parking lots with public access.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is not required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is not a major source, as defined in 326 IAC 2-7-1(22);

- (b) It is not an affected source under Title IV (Acid Deposition Control) of the Clean Air Act, as defined in 326 IAC 2-7-1(3); and
- (c) It is not 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 CONSTRUCTION CONDITIONS

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

B.1 Permit No Defense [IC 13]

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

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

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

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

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

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

B.5 Modification to Permit [326 IAC 2]

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

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

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

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

- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).
- (e) Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. If IDEM, 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 until the renewal permit has been issued or denied. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.

B.7 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.
- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.3 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

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 permitted 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 this title or the conditions of this permit or any operating permit revisions;
- (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (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.

C.4 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

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

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

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

C.5 Permit Revocation [326 IAC 2-1-9]

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

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.6 Opacity [326 IAC 5-1]

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

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

C.7 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.

Testing Requirements

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

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, 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 the 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 "authorized individual" as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

C.9 Compliance Monitoring [326 IAC 2-1.1-11]

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

C.10 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.11 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, 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.

Record Keeping and Reporting Requirements

C.12 Malfunctions Report [326 IAC 1-6-2]

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.13 Annual Emission Statement [326 IAC 2-6]

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

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air 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.

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

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

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

C.15 General Record Keeping Requirements [326 IAC 2-6.1-2]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, 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 when operation begins.

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air 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 report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) A malfunction as described in 326 IAC 1-6-2; or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

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

- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.17 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:
- Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015
- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Facility Description:

- (a) One (1) paint/clear coat booth and its associated drying booth and cleanup operations, identified as PC, constructed in 1993, with two (2) HVLP spray guns, with a maximum throughput rate of 3.5 truck covers and related parts per hour, using dry filters to control particulate matter emissions, with the emissions from the booth being exhausted to two (2) stacks (PC1 and PC2), and the emissions from the drying booth being exhausted to one (1) stack (D01).

(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 2-6.1]

D.1.1 Volatile Organic Compounds (VOC), Emission Limit [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (BACT), the input of volatile organic compounds (VOC) to the Paint/Clear booth, including the VOC usage for clean-up activities, shall be limited to less than 54.1 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

D.1.2 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2(d), the particulate from the Paint/Clear booth shall be controlled by a dry particulate filter, and the Permittee shall operate and maintain the control device in accordance with the manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
- (1) repair the control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground, or
 - (2) operate the equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground;
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.1.3 MSOP [326 IAC 2-6.1]

Pursuant to 326 IAC 2-6.1 (MSOP):

- (a) The potential to emit a single HAP from the entire source is less than ten (10) tons per year. Any change or modification which may increase the potential to emit a single HAP from the entire source to greater than ten (10) tons per year must be approved by the Office of Air Quality before any such change may occur.
- (b) The potential to emit total HAPs from the entire source is less than twenty-five (25) tons per year. Any change or modification which may increase the potential to emit total HAPs from the entire source to greater than twenty-five (25) tons per year must be approved by the Office of Air Quality before any such change may occur.

Therefore, the requirements of 326 IAC 2-7 are not applicable.

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

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

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

D.1.5 VOC and HAPs Emission Limits [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC usage limit in Condition D.1.1 and the HAP usage limit in Condition D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAPs data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.6 Monitoring

-
- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (PC1 and PC2) 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. Preparation, Implementation, Records, and Reports in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.7 Record Keeping Requirements

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- (a) To document compliance with the VOC and HAP usage limits in Conditions D.1.1 and D.1.3, the Permittee shall maintain the 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 and HAP usage limits in Conditions D.1.1 and D.1.3.
- (1) The VOC and HAP content of each coating material and solvent used.
- (2) The amount of coating material and solvent less water used on a monthly basis.
- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

- (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (3) The cleanup solvent usage for each month;
- (4) The total VOC and HAP usages for each month; and
- (5) The weight of VOCs and HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.6, 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.1.8 Reporting Requirements

A quarterly summary of the information to document compliance with the VOC usage limit in Condition D.1.1 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. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Facility Description:

- (b) One (1) natural gas-fired drying oven, identified as DO1, constructed in 1993, with a maximum heat input rate of 1.5 MMBtu/hr, exhausting through stack DOH1.
- (c) Two (2) natural gas-fired air make-up units, identified as A1 and A2, constructed in 1993, each with a maximum heat input rate of 0.83 MMBtu/hr, exhausting through stacks A1 and A2, respectively.
- (d) One (1) diesel fuel tank, constructed in 1993, with a maximum capacity of 300 gallons and maximum throughput rate of 1,800 gallons per year.
- (e) Paved and unpaved roads and parking lots with public access.

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

Emission Limitations and Standards

No specifically applicable requirements apply to these units.

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

Minor Source Operating Permit Quarterly Report

Source Name: Truck Accessories Group, Inc., dba 20th Century Fiberglass Plant #4
 Source Address: 28722 Jami Street, Elkhart, Indiana 46514
 Mailing Address: 1131 D.I. Drive, Elkhart, Indiana, 46514
 Permit No.: 039-15858-00109
 Facility: Paint/Clear Booth
 Parameter: VOC Usage
 Limit/Determination: Less than 54.1 tons VOC per 12 consecutive month period, with compliance determined at the end of each month

Quarter: _____ **Year:** _____

Month	(1) Tons VOC This Month	(2) Tons VOC Past 11 Months	(1) + (2) Rolling Total VOC Emissions (Tons)

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
 Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Truck Accessories Group, Inc., dba 20th Century Fiberglass Plant #4
Address:	28722 Jami Street
City:	Elkhart, Indiana 46514
Phone #:	(574) 264-7528
MSOP #:	039-15858-00109

I hereby certify that Truck Accessories Group, Inc., dba 20th Century Fiberglass Plant #4 is

- still in operation.
- no longer in operation.

I hereby certify that Truck Accessories Group, Inc., dba 20th Century Fiberglass Plant #4 is

- in compliance with the requirements of MSOP 039-15858-00109.
- not in compliance with the requirements of MSOP 039-15858-00109.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:



MALFUNCTION REPORT

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

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: ____/____/20____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

—

—

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

June 30, 2003

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name:	Truck Accessories Group, Inc., dba 20th Century Fiberglass - Plant 4
Source Location:	28722 Jami Street, Elkhart, Indiana 46514
County:	Elkhart
SIC Code:	3792
Operation Permit No.:	039-15858-00109
Operation Permit Issuance Date:	February 5, 2003
Significant Permit Revision:	039-16836-00109
Permit Reviewer:	ERG/YC

The Office of Air Quality (OAQ) has reviewed an application from Truck Accessories Group, Inc., dba 20th Century Fiberglass - Plant 4 relating to an increase in VOC emission limits for the existing paint/clear coat booth (PC).

History

On February 24, 2003, Truck Accessories Group, Inc. dba 20th Century Fiberglass - Plant 4 (referred to as "the Permittee") submitted an application to the OAQ requesting to increase the throughput rate and VOC usage in the following existing unit:

- (a) One (1) paint/clear coat booth, identified as PC, constructed in 1993, equipped with two (2) HVLP pray guns and one (1) drying booth, with a total maximum throughput rate of 3.0 truck covers per hour, using dry filters for particulate control, exhausting through stacks PC1 and PC2, and D01.

The VOC usage in this coating booth was limited to less than 25 tons per twelve (12) consecutive month period in MSOP #039-15859-00109, issued on February 5, 2003, pursuant to 326 IAC 8-1-6 (BACT). The Permittee plans to increase the production rate from 3.0 truck covers per hour to 3.5 covers per hour, therefore, the Permittee requested to revise the VOC usage limit from 25 to 54.1 tons per twelve (12) consecutive month period. In addition, this coating booth is also used to paint other smaller parts, other than truck covers. There will be no physical change required for the existing paint/clear coat booth (#PC) to accomplish the proposed change in the VOC usage limit. Since this coating booth was constructed after January 1, 1980 and will have potential VOC emissions greater than 25 tons/yr, this booth will be required to use the Best Available Control Technology (BACT).

In addition, the source stated that the following existing emission units should be included in the revised MSOP:

- (a) One (1) natural gas-fired drying oven, identified as DO1, constructed in 1993, with a maximum heat input rate of 1.5 MMBtu/hr, exhausting through stack DOH1.
- (b) Two (2) natural gas-fired air make-up units, identified as A1 and A2, constructed in 1993, each with a maximum heat input rate of 0.83 MMBtu/hr, exhausting through stacks A1 and A2, respectively.
- (c) One (1) diesel fuel tank, constructed in 1993, with a maximum capacity of 300 gallons and maximum throughput rate of 1,800 gallons per year.
- (d) Paved and unpaved roads and parking lots with public access.

Combined with the emissions from all the existing units above, the potential to emit VOC from the entire source is still less than 100 tons/yr after this permit revision. Therefore, the source will maintain MSOP status.

Existing Approvals

The Permittee was issued a MSOP (039-15858-00109) on February 5, 2003 to operate. No other air approvals have been issued since the issuance of the MSOP.

Source Definition

Truck Accessories Group, Inc. owns the following two (2) plants in Elkhart, Indiana:

- (a) Plant 1, located at 1131 D.I. Drive, Elkhart, Indiana 46517 (Plant ID #039-00076); and
- (b) Plant 4, located at 28722 Jami Street, Elkhart, Indiana 46517 (Plant ID #039-00109).

These two (2) plants are located about 0.4 miles apart, have the same SIC codes and are owned by one (1) company. However, these two (2) plants do not have a supporting relationship. Therefore, IDEM has determined that these two (2) plants are two (2) separate sources. This determination was made in the review for MSOP #039-15858-00109, issued on February 5, 2003, and will apply to this Significant Permit Revision also.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
PC1	HVLP paint gun	30	2	9,600	85
PC2	HVLP paint gun	30	2	9,600	85
D01	Drying Oven	30	3	19,200	85
DOH1	Paint gun cleaner	22	0.33	1,500	450

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.

An application for the purposes of this review was received on February 24, 2003.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 3).

Potential To Emit of Revision Before Controls

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

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	10.9
PM-10	10.9
SO ₂	Negligible
VOC	50.8
CO	1.16
NO _x	1.38

HAP's	Potential To Emit (tons/year)
Ethylbenzene	1.21
MIBK	0.77
Xylene	9.89
MEK	0.39
Toluene	4.71
Total	17.0

Justification for Permit Revision

This revision is being performed as a significant permit revision pursuant to 326 IAC 2-6.1-6(i)(1)(C) because this modification is subject to 326 IAC 8-1-6 (BACT).

Potential to Emit After Revision

The table below summarizes the total potential to emit, reflecting all limits, of the emission units after control. The control equipment is considered federally enforceable only after issuance of this Permit Revision.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Paint/Clear Coat Booth (#PC)	Less than 0.26 2.16	Less than 0.26 2.16	-	Less than 25.0 54.1	-	-	8.45 9.89 for a single HAP and 47.2 17.0 for total HAPs
NG Combustion Units	0.11	0.11	Negligible	0.08	1.16	1.38	Negligible
Diesel Tank	-	-	Negligible	-	-	-	Negligible
Total Emissions	Less than	Less than	Negligible	Less than	1.16	1.38	9.89 for a
Title V Major Source Thresholds	NA	100	100	100	100	100	Less than 10 for a single HAP and 25 for total HAPs.

After this permit revision, the potential to emit of criteria pollutants from the entire source is still less than the Title V major source thresholds. Therefore, the requirements of 326 IAC 2-7 are not applicable to this source.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Maintenance Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Elkhart County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

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

Pollutant	Emissions (ton/yr)
PM	0.26
PM10	0.26
SO ₂	Negligible
VOC	25.0
CO	Negligible
NO _x	Negligible

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.
- (b) These emissions were based on the Technical Support Document (TSD) for the MSOP 039-15858-00109, issued on February 5, 2003.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit 039-16836-00109, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

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

This status is based on all the air approvals issued to the source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) The source does not perform surface coating operations to metal furniture. Therefore, the New Source Performance Standards for Surface Coating of Metal Furniture (40 CFR Part 60.310 - 60.316, Subpart EE) are not applicable.
- (c) This source is not an automobile assembly plant. Therefore, the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations (40 CFR 60.390 - 60.398, Subpart MM) are not applicable to this source.
- (d) The source does not perform metal coil surface coating operations. Therefore, the New Source Performance Standards for Metal Coil Surface Coating (40 CFR Part 60.460 - 60.466, Subpart TT) are not applicable.
- (e) The diesel storage tank has a capacity less than 40 cubic meters (10,560 gallons). Therefore, the New Source Performance Standards for Volatile Organic Liquid Storage Vessels for which construction, reconstruction, or modification commenced after July 23,

1984 (40 CFR 60.110b - 117b, Subpart Kb) are not applicable to this tank.

- (f) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source was constructed in 1993 and modified in 2003 (this permit revision). This source is not in 1 of the 28 source categories defined in 326 IAC 2-2-1(p)(1) and the potential to emit each criteria pollutant and PM from the entire source is less than 250 tons/yr before control. Therefore, the requirements of 326 IAC 2-2 are not applicable.

326 IAC 2-4.1 (New Sources of Hazardous Air Pollutants)

This source was constructed in 1993 and modified in 2003 (this permit revision). The potential to emit HAPs from the entire source after this revision is less than 10 tons/yr for a single HAP and less than 25 tons/yr for any combination of HAPs. Therefore, the requirements of 326 IAC 2-4.1(MACT) are not applicable to this revision.

326 IAC 2-6.1 (MSOP)

Pursuant to 326 IAC 2-6.1 (MSOP):

- (a) The potential to emit a single HAP from the entire source is less than ten (10) tons per year. Any change or modification which may increase the potential to emit a single HAP from the entire source to greater than ten (10) tons per year must be approved by the Office of Air Quality before any such change may occur.
- (b) The potential to emit total HAPs from the entire source is less than twenty-five (25) tons per year. Any change or modification which may increase the potential to emit total HAPs from the entire source to greater than twenty-five (25) tons per year must be approved by the Office of Air Quality before any such change may occur.

Therefore, the requirements of 326 IAC 2-7 are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

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

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

State Rule Applicability - Paint/Clear Coat Booth (PC)

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)

This paint/clear coat booth (PC) applies coating to plastic surfaces. The potential VOC emissions from this coating booth will be greater than 25 tons/yr and there are no other applicable 326 IAC 8 rules that apply to this booth. Therefore, the requirements of 326 IAC 8-1-6 (Best Available Control Technology) are applicable to the paint/clear coat booth (PC).

The source has submitted a BACT analysis and a summary of this analysis is provided in Appendix B. IDEM, OAQ has reviewed the analysis and has accepted that a VOC usage limit of 54.1 tons/yr with no add-on VOC control is the BACT for this paint/clear coat booth (PC). Therefore, the VOC delivered to booth PC, including the VOC usage for clean-up activities, shall not exceed 54.1 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

This coating booth uses more than 5 gallons per day of coatings. Pursuant to 326 IAC 6-3-2(d), particulate from the paint/clear coat booth (PC) shall be controlled by dry filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

State Rule Applicability - Diesel Storage Tank

326 8-4-3 (Petroleum Liquid Storage Facilities)

This storage tank has a capacity less than 39,000 gallons. Therefore, the requirements of 326 IAC 8-4-3 are not applicable to this tank.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

This source is not located in Clark, Floyd, Lake, or Porter County. Therefore, the requirements of 326 IAC 8-9-1 are not applicable to this tank.

Proposed Changes

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

The Permittee owns and operates a stationary pickup truck cover surface coating operation.

Responsible Official: ~~Michael Stephenson~~ **President and General Manager**
Source Address: 28722 Jami Street, Elkhart, Indiana, 46514
Mailing Address: 1131 D.I. Drive, Elkhart, Indiana, 46514

General Source Number: (574) 264-7528
SIC Code: 3792
County Location: Elkhart
County Source Location Status: Attainment for all criteria pollutants
Source Status: **Minor Source Operating Permit**
Minor Source, under PSD
Minor Source, Section 112 of the Clean Air Act
Not 1 of 28 Source Categories

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions unit and pollution control device:

- (a) One (1) paint/clear coat booth and its associated drying booth and cleanup operations, **identified as PC, constructed in 1993**, with two (2) HVLP spray guns, ~~identified as Paint/Clear~~, with a maximum capacity to paint ~~263.29 pounds of product~~ **throughput rate of 3.5 truck covers and related parts** per hour, using dry filters to control particulate matter emissions, with the emissions from the booth being exhausted to two (2) stacks (**PC1 and PC2**), and the emissions from the drying booth being exhausted to one (1) stack (**D01**).
- (b) One (1) natural gas-fired drying oven, identified as **DO1**, constructed in **1993**, with a maximum heat input rate of **1.5 MMBtu/hr**, exhausting through stack **DOH1**.
- (c) Two (2) natural gas-fired air make-up units, identified as **A1 and A2**, constructed in **1993**, each with a maximum heat input rate of **0.83 MMBtu/hr**, exhausting through stacks **A1 and A2**, respectively.
- (d) One (1) diesel fuel tank, constructed in **1993**, with a maximum capacity of **300 gallons** and maximum throughput rate of **1,800 gallons per year**.
- (e) Paved and unpaved roads and parking lots with public access.

B.7 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Facility Description:

- (a) One (1) paint/clear coat booth and its associated drying booth and cleanup operations, **identified as PC, constructed in 1993**, with two (2) HVLP spray guns, ~~identified as Paint/Clear~~, with a maximum capacity to paint ~~263.29 pounds of product~~ **throughput rate of 3.5 truck covers and related parts** per hour, using dry filters to control particulate matter emissions, with the emissions from the booth being exhausted to two (2) stacks (**PC1 and PC2**), and the emissions from the drying booth being exhausted to one (1) stack (**D01**).

(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)2-6.1]

D.1.1 Volatile Organic Compounds (VOC), Emission Limit [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (BACT), the input of volatile organic compounds (VOC) from to the Paint/Clear booth, including the VOC usage for clean-up activities, shall be limited to less than 25 54.1 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit shall render 326 IAC 8-1-6 not applicable in this case.

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

- (a) Pursuant to 326 IAC 6-3-2(d), the particulate matter (PM) ~~overspray~~ from the Paint/Clear booth shall be controlled by a dry particulate filter, ~~water wash, or equivalent control system.~~ **and the owner or operator Permittee shall operate and maintain the control device in accordance with the manufacturer's specifications.**
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the ~~owner or operator Permittee~~ shall: ~~(a)~~ inspect the control device and do either of the following no later than four (4) hours after such observation:
- (1) repair the control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground, or
 - (2) operate the equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground;
- and
- (bc) **If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.**

D.1.3 MSOP [326 IAC 2-6.1]

Pursuant to 326 IAC 2-6.1 (MSOP):

- (a) **The potential to emit a single HAP from the entire source is less than ten (10) tons per year. Any change or modification which may increase the potential to emit a single HAP from the entire source to greater than ten (10) tons per year must be approved by the Office of Air Quality before any such change may occur.**
- (b) **The potential to emit total HAPs from the entire source is less than twenty-five (25) tons per year. Any change or modification which may increase the potential to**

emit total HAPs from the entire source to greater than twenty-five (25) tons per year must be approved by the Office of Air Quality before any such change may occur.

Therefore, the requirements of 326 IAC 2-7 are not applicable.

~~D.1.3 Particulate Matter (PM) Overspray, Additional Operating Requirements~~

~~The dry filters for PM control shall be in operation at all times when Paint/Clear booth is in operation.~~

~~D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13) 1-6-3]~~

~~A Preventive Maintenance Plan, in accordance with Section BC - Preventive Maintenance Plan, of this permit, is required for the emission units and any control devices.~~

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

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

~~The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time 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.1.65 VOC and HAPs Emission Limits [326 IAC 8-1-2] [326 IAC 8-1-4]~~

~~To determine compliance with the VOC usage limit in Condition D.1.1 and the HAP usage limit in Condition D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAPs data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4. the owner or operator shall on a monthly basis:~~

- ~~(a) draft a list of all coatings, additives, and solvents used at the Paint/Clear booth that contain VOCs;~~
- ~~(b) determine the following for each coating, additive, and solvent listed in Part (a) of this Condition based on material properties and formulation data supplied by the coating manufacturer and the applicable material volatile organic compound usage for the most recent month:
 - ~~(1) the amount and VOC content, and~~
 - ~~(2) the VOC emissions;~~~~
- ~~(c) the sum total coating, additive, and solvent VOC emissions;~~
- ~~(d) the sum total VOC emissions from the previous 11 months; and~~
- ~~(e) the 12 month rolling total VOC emissions.~~

~~The IDEM, OAQ, reserves the authority to require compliance determination using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4 and material volatile organic compound usage.~~

Compliance Monitoring Requirements ~~[326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)] [326 IAC 2-5.1-3(e)] [326 IAC 2-6.1-5(a)(2)]~~

~~D.1.7 VOC Emission Limit~~

~~To demonstrate compliance with the VOC emission limit of Condition D.1.1, the owner or operator shall record the information determined in Condition D.1.6.~~

~~D.1.8 Particulate Matter (PM) Overspray Requirements~~

~~To demonstrate compliance with the requirements of Condition D.1.2, the owner or operator shall perform:~~

~~(a) Weekly inspections of the dry filters to verify their placement, integrity and particle loading. 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 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;~~

~~and~~

~~(d) Weekly visible emission notations of the Paint/Clear booth stack exhaust. Said visible emission notations shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal:~~

~~(1) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut-down time.~~

~~(2) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~

~~(3) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~

~~(4) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.~~

D.1.6 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly

observations shall be made of the overspray from the surface coating booth stacks (PC1 and PC2) 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. Preparation, Implementation, Records, and Reports in accordance with Section C - Compliance Response Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.**
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.**

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

D.1.97 Record Keeping Requirements

- (a) To document compliance with the VOC and HAP usage limits in ~~limit of Conditions D.1.1 and D.1.3~~, the owner or operator Permittee shall maintain the records of the information required in ~~Condition D.1.7~~ in accordance with (1) through (5) below. Said records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage emission limits of in Conditions D.1.1 and D.1.3.**
 - (1) The VOC and HAP content of each coating material and solvent used.**
 - (2) The amount of coating material and solvent less water used on a monthly basis.**
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.**
 - (3) The cleanup solvent usage for each month;**
 - (4) The total VOC and HAP usages for each month; and**
 - (5) The weight of VOCs and HAPs emitted for each compliance period.**
- (b) To document compliance with ~~PM overspray requirements of Condition D.1.2~~ D.1.6, the owner or operator Permittee shall maintain a log of: weekly overspray observations, ~~(4) the daily and weekly~~ monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan, and the visible emission notations required in ~~Condition D.1.8~~, and**
 - (2) ~~all actions taken as a result of the requirements of Condition D.1.2.~~**

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

D.1.408 Reporting Requirements

A quarterly summary of the information to document compliance with the VOC **usage** limit of in Condition D.1.1 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. **The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).**

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-6.1]:

- (b) One (1) natural gas-fired drying oven, identified as DO1, constructed in 1993, with a maximum heat input rate of 1.5 MMBtu/hr, exhausting through stack DOH1.
- (c) Two (2) natural gas-fired air make-up units, identified as A1 and A2, constructed in 1993, each with a maximum heat input rate of 0.83 MMBtu/hr, exhausting through stacks A1 and A2, respectively.
- (d) One (1) diesel fuel tank, constructed in 1993, with a maximum capacity of 300 gallons and maximum throughput rate of 1,800 gallons per year.
- (e) Paved and unpaved roads and parking lots with public access.

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

Emission Limitations and Standards

No specifically applicable requirements apply to these units.

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

Minor Source Operating Permit Quarterly Report

Source Name: Truck Accessories Group, Inc., dba 20th Century Fiberglass Plant #4
 Source Address: 28722 Jami Street, Elkhart, Indiana 46514
 Mailing Address: 1131 D.I. Drive, Elkhart, Indiana, 46514
 Permit No.: 039-15858-00109
 Facility: Paint/Clear Booth
 Parameter: ~~VOC Emissions~~ Usage
 Limit/Determination: Less than ~~25~~ **54.1** Tons VOC per 12 consecutive month period, with compliance determined at the end of each month

Quarter: _____ Year: _____

Month	(1) Tons VOC This Month	(2) Tons VOC Past 11 Months	(1) + (2) Rolling Total VOC Emissions (Tons)

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

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Conclusion

The operation of this pickup truck cover coating operation shall be subject to the conditions of the attached proposed Significant Permit Revision 039-16836-00109.

**Appendix A: Emission Calculations
VOC and PM/PM10 Emissions
From the Paint/Clear Coat Booth (PC)**

**Company Name: Truck Accessories Group, Inc. dba 20th Century Fiberglass - Plant 4
Address: 28722 Jami Street, Elkhart, IN 46514
SPR: 039-16836-00109
Reviewer: ERG/YC
Date: March 31, 2003**

Material	Density (Lb/Gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % Organics	Maximum Throughput (unit/hr)	Maximum Usage (gal/unit)	Pounds VOC per gallon of coating	Potential VOC (lbs/hr)	Potential VOC (lbs/day)	Potential VOC (tons/yr)	*PM/PM10 Potential (lb/hr)	*PM/PM10 Potential (ton/yr)	Transfer Efficiency	PM/PM10 Control Efficiency	Potential to Emit PM/PM10 (lb/hr)	Potential to Emit PM/PM10 (tons/yr)
Base Coat	7.34	74.78%	0.0%	74.8%	3.5	0.337	5.49	6.47	155.38	28.36	0.76	3.35	65%	80%	0.15	0.67
Clear Coat	8.36	50.73%	0.0%	50.7%	3.5	0.337	4.24	5.00	120.06	21.91	1.70	7.45	65%	80%	0.34	1.49
Cleaning Solvent (MEK)	6.76	100.00%	0.0%	100.0%	3.5	0.0037	6.76	0.09	2.10	0.38	0.00	0.00	65%	100%	0.00	0.00
Total									277.5	50.7		10.8				2.16

*Assume all the PM emissions are PM10 emissions.

METHODOLOGY

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

Potential VOC (lbs/hr) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit)

Potential VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit) * (24 hr/day)

Potential VOC (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit) * (8760 hr/yr) * (1 ton/2000 lbs)

Potential PM/PM10 (lbs/hr) = Max. Throughput (unit/hr) * Max. Usage (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer efficiency)

Potential PM/PM10 (tons/yr) = Max. Throughput (unit/hr) * Max. Usage (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

Potential to Emit PM/PM10 (lbs/hr) = Potential PM/PM10 (lbs/hr) * (1 - PM/PM10 Control Efficiency)

Potential to Emit PM/PM10 (tons/yr) = Potential PM/PM10 (lbs/hr) * (1 - PM/PM10 Control Efficiency) * (8760 hr/yr) x (1 ton/2000 lbs)

**Appendix A: Emission Calculations
HAP Emissions
From the Paint/Clear Coat Booth (PC)**

**Company Name: Truck Accessories Group, Inc. dba 20th Century Fiberglass - Plant 4
Address: 28722 Jami Street, Elkhart, IN 46514
SPR: 039-16836-00109
Reviewer: ERG/YC
Date: March 31, 2003**

Material	Density (Lb/Gal)	Maximum Throughput (unit/hr)	Maximum Usage (gal/unit)	Weight % Ethylbenzene	Ethylbenzene Emissions (tons/yr)	Weight % MIBK	MIBK (tons/yr)	Weight % Toluene	Toluene (tons/yr)	Weight % Xylene	Xylene (tons/yr)	Weight % MEK	MEK (tons/yr)
Base Coat	7.34	3.5	0.337	2.85%	1.08	2.04%	0.77	0.68%	0.26	24.18%	9.17	0.00%	0.00
Clear Coat	8.36	3.5	0.337	0.31%	0.13	0.00%	0.00	10.30%	4.45	1.66%	0.72	0.02%	0.01
Cleaning Solvent (MEK)	6.76	3.5	0.0037	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	100.00%	0.38
Total					1.21		0.77		4.71		9.89		0.39

Total HAPs

17.0

METHODOLOGY

HAPs emission rate (tons/yr) = Density (lb/gal) x Max. Throughput (unit/hr) * Max. Usage (gal/unit) x Weight % HAP x 8760 hr/yr x 1 ton/2000 lbs

Appendix B

BEST AVAILABLE CONTROL TECHNOLOGY (BACT) DETERMINATION

Source Background and Description

Source Name:	Truck Accessories Group, Inc., dba 20 th Century Fiberglass - Plant 4
Source Location:	28722 Jami Street, Elkhart, Indiana 46514
County:	Elkhart
SIC Code:	3792
Operation Permit No.:	MSOP #039-15858-00109
Operation Permit Issuance Date:	February 5, 2003
Significant Permit Revision No.:	039-16836-00109
Permit Reviewer:	ERG/YC

The Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) has performed the following Best Available Control Technology (BACT) review for a significant permit revision to an existing pickup truck cover coating operation, owned and operated by Truck Accessories Group, Inc., dba 20th Century Fiberglass - Plant 4 (referred to as "the Permittee"), located in 28722 Jami Street, Elkhart, Indiana 46514. This revision includes a VOC usage limit increase for the following emission unit:

- (a) One (1) paint/clear coat booth, identified as PC, constructed in 1993, equipped with two (2) HVLP spray guns and one (1) drying booth, with a total maximum throughput rate of 3.0 pickup truck covers per hour, using dry filters for particulate control, exhausting through stacks PC1 and PC2, and D01.

The potential to emit VOC from this unit was 50.0 tons/yr, but the VOC usage in this paint/clear coat booth was limited to less than 25 tons per twelve (12) consecutive month period in MSOP #039-15858-00109, issued on February 5, 2003. Therefore, the requirements of 326 IAC 8-1-6 (BACT) were not applied for this booth at the issuance of MSOP #039-15858-00109.

On February 24, 2003, the permittee submitted an application to the OAQ requesting to increase the VOC usage limit to 54.1 tons/yr for this unit due to the increase in production rate. No physical change is required for this booth as a result of this modification. The VOC emission from this paint/clear coat booth will be greater than 25 tons/yr, and this coating operation is not regulated by other provisions of 326 IAC 8. Therefore, this booth is subject to 326 IAC 8-1-6 and is required to control the emissions using BACT.

IDEM, OAQ conducts BACT analyses in accordance with the "*Top-Down*" Best Available Control Technology Guidance Document outlined in the 1990 draft USEPA *New Source Review Workshop Manual*, which outlines the steps for conducting a top-down BACT analysis. Those steps are listed below:

- (a) Identify all potentially available control options;
- (b) Eliminate technically infeasible control options;
- (c) Rank remaining control technologies by control effectiveness;
- (d) Evaluate the most effective controls and document the results; and
- (e) Select BACT.

Also, in accordance with the “Top-Down” Best Available Control Technology Guidance Document outlined in the 1990 draft U.S EPA New Source Review Workshop Manual, BACT analyses take into account the energy, environmental, and economic impacts on the source. These reductions may be determined through the application of available control techniques, process design, and/or operational limitations. Such reductions are necessary to demonstrate that the emissions remaining after application of BACT will not cause or contribute to air pollution thereby protecting public health and the environment.

The following BACT determinations are based on the following information:

- (a) The BACT analysis submitted by the Permittee on February 24, 2003;
- (b) Information from vendors/suppliers; and
- (c) The EPA RACT/BACT/LAER (RBLC) Clearinghouse.

VOC BACT

The primary VOC emissions are from the paint/clear coat drying process and the use of clean-up solvents. The source proposed to limit the VOC delivered to the applicator plus any VOC used for the clean-up activities to less than 54.1 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Step 1 - Identify Control Options

The following available technologies were identified and evaluated to control VOC emissions from the plastic parts coating operation:

- (a) IDEM, OAQ and the source searched EPA’s RACT/BACT/LAER Clearinghouse (RBLC) to identify sources with emissions similar to this source. The search identified the following:

<u>Company</u>	<u>PBLD ID</u>	<u>Date Issued and State</u>	<u>Type of Operation</u>	<u>BACT Requirements</u>	<u>Emission Limits</u>
Honda Manufacturing of Alabama, LLC	AL-0192	10/18/02 (AL)	Plastic Parts Coating Line	RTO, Good Work Practice, Low VOC Content Limits: < 4.3 lbs/gal for Basecoat < 4.0 lbs/gal for Clearcoat	NA
Venture Industries, Inc.	MI-0260	01/17/01 (MI)	Plastic Auto Parts Painting	Carbon Concentrators and RTO (95% control)	2,500 lbs/day 223 tons/yr
Orion Paint and Plastic LLC	MI-0333	10/02/96 (MI)	Plastic Parts Painting	Low VOC Content Limits: < 4.8 lbs/gal for Basecoat < 4.0 lbs/gal for Clearcoat	NA
Toyota Motor Corporation	IN-0069	08/19/96 (IN)	Plastic Bumper Coating	Thermal Oxidizer (80% control)	NA

<u>Company</u>	<u>PBLD ID</u>	<u>Date Issued and State</u>	<u>Type of Operation</u>	<u>BACT Requirements</u>	<u>Emission Limits</u>
Environmental Service Products	CA-0757	06/21/96 (CA)	Truck Trailers Painting	HVLP Spray Guns, VOC Content < 3.5 lbs/gal, Enclosed Gun Cleaner	80 lbs/day 10 tons/yr

- (b) The Permittee also evaluated a variety of control technologies, including the following:
- (1) Regenerative Thermal Oxidation with Concentrator;
 - (2) Catalytic Oxidation;
 - (3) Condensation;
 - (4) Waterborne Coatings;
 - (5) HVLP spray equipment (currently used);
 - (6) Low VOC Coatings (VOC < 3.5 lbs/gal less water for clear coats); and
 - (7) Electrostatic Coatings.

Step 2 - Eliminate technically infeasible control options

Based on the results from the RBLC database search, vendor review, and an evaluation of the control technologies, IDEM has determined that the use of condensation, waterborne coatings, and electrostatic coatings are not technically feasible options for the coating booth at this source for the following reasons:

- (a) The condensation method is infeasible due to the low VOC concentration in the waste stream.
- (b) Waterborne coatings for metallic colors (main color used in this source) are not available. In addition, the drying temperature of the coatings exceeds the tolerable temperature of the parts.
- (c) Electrostatic coatings are infeasible because the parts are a non-conductive substrate.

Step 3 - Rank remaining control technologies by control effectiveness

The remaining technically feasible approaches for controlling VOC emissions from facilities that have a similar plastic coating operation at this source are:

Options for VOC Control	Overall VOC Control Efficiency
Regenerative Thermal Oxidizer (RTO) with Concentrator	95%*
Catalytic Oxidizer	95%*

Low VOC Content Coatings	7.1%
HVLP Spray Equipment	NA

Note: (*) The overall control efficiency includes a 100% capture efficiency and a 95% destruction efficiency.

Step 4 - Evaluate the most effective controls and document results

The Permittee provided IDEM with a thorough economic analysis of the technically feasible control options. The analysis estimated the cost of the VOC control equipment, including the initial capital cost of the various components intrinsic to the complete system, and the estimated annual operating costs. The estimated total capital cost was calculated with the use of a factoring method of determining direct and indirect installation costs. The basic equipment costs were obtained from vendor's quoted prices. Annualized costs were developed based on information from the vendors and a literature review. The analysis assumed an interest rate of 5% and an equipment life of 10 years. The basis of cost effectiveness, used to evaluate the control options, is the ratio of the annualized cost to the amount of VOC (tons) removed per year. Note that the cost effectiveness of each option only accounts for the portion of VOC removed by the add-on controls. A summary of the cost figures determined in the analysis is provided in the table below:

Option	Capital Cost (\$)	Total Operating Cost (\$/yr)	Total Annualized Costs (\$/yr)	Potential VOC removal (ton/yr)	Cost Effectiveness (\$/ton VOC removed)
Regenerative Thermal Oxidizer (95% overall reduction)	\$1,248,860	\$617,515	\$946,964	51.3	\$18,459
Catalytic Oxidizer (95% overall reduction)	\$1,492,374	\$800,356	\$1,194,044	51.3	\$23,230
Low VOC (< 3.5 lbs/gal) Clear Coat	\$113,657/yr	NA	\$113,657	3.82	\$29,753

Note: A complete breakdown of the costs associated with the thermal and catalytic oxidizers is included in Appendix C.

Step 5 - Select BACT

IDEM has determined that BACT for the modified paint/clear coat booth (PC) at Truck Accessories Group, Inc., dba 20th Century Fiberglass - Plant 4 will be a VOC usage limit with no add on control. The VOC delivered to the paint/clear coat booth (PC), including the VOC used for the clean-up activities, shall not exceed 54.1 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This determination is based on the following reasons:

- (a) For add-on control options, a cost effectiveness of \$18,459 per ton VOC removed is considered economically infeasible.
- (b) The use lower VOC content clear coat will cost 30% more than the clear coat currently used. However, this operation will only decrease 3.82 tons/yr of VOC emissions. The cost effectiveness for this option is \$29,753 per ton VOC removed, which is considered economically infeasible also.

- (c) This source was a Part 70 minor source and will still maintain minor source status after this Significant Permit Revision.

Appendix C

June 30, 2003

COST ANALYSIS FOR THERMAL AND CATALYTIC OXIDIZERS

VENDOR	Anguil Environmental Regenerative Thermal Oxidation	Anguil Environmental Catalytic Thermal Oxidation
CAPITAL COSTS		
1. Purchased Equipment		
a. Basic Equipment & Auxiliaries (A)	\$600,000	\$725,000
b. Instrumentation & Controls (0.1A)	\$60,000	\$72,500
c. Taxes (0.06A)	\$36,000	\$43,500
d. Freight (0.05A)	\$30,000	\$36,250
<u>Total Purchased Equipment Cost (B)</u>	<u>\$726,000</u>	<u>\$877,250</u>
2. Direct Installation Costs		
a. Foundations & Supports (0.08 B)	\$58,080	\$70,180
b. Auxiliaries (duck work, fittings)	\$40,000	\$40,000
c. Erection & Handling (0.14 B)	\$101,640	\$122,815
d. Electrical (0.04 B)	\$29,040	\$17,545
e. Piping (0.02 B)	\$14,520	\$35,090
g. Site Preparation (As Required)	\$ 150,000	\$15,000
<u>Total Direct Installation Costs</u>	<u>\$272,800</u>	<u>\$318,175</u>
<u>Total Direct Costs (TDC) (Purchased + Installation)</u>	<u>\$998,800</u>	<u>\$1,195,425</u>
Indirect Costs		
3. Engineering & Supervision (0.05 B)	\$36,300	\$43,863
4. Loss of Production Cost (1 Week)	\$25,000	\$25,000
5. Construction & Field Expenses (0.10 B)	\$72,600	\$87,725
6. Contractor Fees (0.10 B)	\$72,600	\$87,725
7. Start Up and Performance Test (0.03 B)	\$21,780	\$26,318
8. Overall Contingency (0.03 B)	\$21,780	\$26,318
<u>Total Indirect Costs</u>	<u>\$250,060</u>	<u>\$296,949</u>
<u>Total Installed Capital Cost</u>	<u>\$1,248,860</u>	<u>\$1,492,374</u>
Capital Cost Recovery Factor (5% INT, 10 Years) = 0.2638	0.2638	0.2638
<u>Capital Recover Cost</u>	<u>\$329,449</u>	<u>\$393,688</u>

ANNUALIZED COSTS

Direct Operating Costs

1. Operating Labor	\$124,800	\$124,800
a. Number of Employees	1	1
b. Cost/Employee/Hour w/Benefits	\$20	\$20
c. Operating Hours/Year	\$6,240	\$6,240
2. Supervisory Labor (0.15%)	\$18,720	\$18,720
3. Maintenance Labor & Materials (5% of TDC)	\$49,940	\$59,771
4. Replacement Parts (5% of Basic Purchase Costs)	\$36,300	\$29,000
5. Utilities		
a. Natural Gas	\$179,275	\$32,695
MMBTU/HR Input	5.00	9.00
Operating Hours/Year	6,240	6,240
Cost/MMBTU - Provided by Facility	\$5.746	\$5.7460
MMBTU/YR	31,200	56,160
b. Electricity	\$159,109	\$78,811
HP Requirements	150	200
KW Requirements/Hr	112.5	150.0
KHH/YR	702,000	936,000
Cost/KWH - Provided by Facility	\$0.0842	\$0.0842
d. Air	\$ --	\$ --
e. Catalyst Replacement (20% Basic Capital Cost/5 Years)	\$ --	\$43,863
<u>Total Direct Operating Costs</u>	<u>\$468,144</u>	<u>\$677,660</u>
Indirect Operating Costs		
6. Overhead (80% of Oper. Labor & Maintenance)	\$154,768	\$162,633
7. Property Tax (0.04 Capital Cost)	\$49,954	\$159,695
<u>Total Indirect Operating Costs</u>	<u>\$204,722</u>	<u>\$222,328</u>
<u>Heat Recovery Credit</u>	<u>\$ (55,351)</u>	<u>\$ (99,632)</u>
a. Heat Input - Annually - MMBTU/Yr	31,200	56,160
b. Unit Heat Efficiency - Heat Output of Control Device	95%	95%
c. Heat Available for Recovery	29,640	53,352
d. Heat Exchanger Efficiency for Heat Recovery	65%	65%
e. Percent Heat Recovery/Year (6 Months)	50%	50%
f. Heat Value Recovered - MMBTU/Yr	9,633	17,399.4
g. Cost/MMBTU - Provided by Facility	\$ 5.746	\$5.746
<u>Total Annual Cost</u>	<u>\$617,515</u>	<u>\$800,356</u>
<u>Capital Recover Cost</u>	<u>\$329,449</u>	<u>\$393,688</u>
<u>Total Annualized Cost</u>	<u>\$946,964</u>	<u>\$1,194,044</u>
Uncontrolled VOC Emissions (PTE - Requested Limit)	54.1	54.1
Control Efficiency	95%	95%
TPY VOC Removed at Control Efficiency	51.3	51.3
<u>Cost Effectiveness, \$/Ton VOC Removed</u>	<u>\$ 18,459</u>	<u>\$ 23,230</u>