



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

October 17, 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: J & L's Cargo Express, Inc. / F 039-17128-000499

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, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar 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 considerations 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.

Enclosures
FNPER.dot 9/16/03



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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) Renewal OFFICE OF AIR QUALITY

**J and L's Cargo Express, Inc.
405 Kesco Drive, Bristol
Bristol, IN 46507**

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F039-17128-00499	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: October 17, 2003 Expiration Date: October 17, 2008

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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 2-8-3(b)]

The Permittee owns and operates a stationary cargo trailer manufacturing and surface coating plant.

Authorized individual:	Operations Manager
Source Address:	405 Kesco Drive, Bristol, IN 46507
Mailing Address:	405 Kesco Drive, Bristol, IN 46507
General Source Phone:	574-848-7441
SIC Code:	3799
Source Location Status:	Elkhart
Source Status:	Attainment for all criteria pollutants Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) paint booth, identified as PB-01, consisting of the following:
 - (1) five (5) air atomized paint guns,
 - (2) dry filters, for overspray control,
 - (3) three (3) paint pumps,
 - (4) two (2) spray pressure pots with capacities of 2.5 gallons, and
 - (5) one (1) natural gas-fired air make up unit with a rated heat input of 2.0 million British thermal units (mmBtu) per hour,with a maximum capacity of coating two (2) metal frames per hour; and exhausting through two (2) stacks, identified as SV-12A and SV-12B.

- (b) One (1) miscellaneous adhesive application operation, identified as MF-01, consisting of the following:
 - (1) one (1) air atomized paint gun, and
 - (2) one (1) spray pressure pot with capacities of 2.5 gallons,with a maximum capacity of coating two (2) cargo trailers per hour.

- (c) One (1) woodworking machining line, identified as WM-01, consisting of the following equipment:
 - (1) seven (7) cutoff saws, two (2) of which use one (1) cyclone dust collector, identified as SV-13 for particulate matter (PM) emissions control, and exhausting through one (1) stack (S/V ID SV-13).
 - (2) one (1) drill press,
 - (3) two (2) band saws,

- (4) ten (10) hand drills,
 - (5) ten (10) hand saws, and
 - (6) five (5) table saws, three (3) of which use one (1) cyclone dust collector, identified as SV-13 for particulate matter (PM) emissions control, and exhausting through one (1) stack (S/V ID SV-13).
- with a maximum capacity of processing 650.0 pounds per hour of plywood.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(l)]

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
 - (1) six (6) natural gas-fired tube heaters with a total rated heat input of 1.5 mmBtu per hour, each exhausting through one (1) stack, identified as SV-6 thru SV-11,
 - (2) one (1) natural gas-fired unit heater with a rated heat input of 0.15 mmBtu per hour, identified as SV-5, and-4.
- (b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.
- (c) Combustion source flame safety purging on startup.
- (d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (e) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (f) The following VOC and HAP storage containers:
 - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
 - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (g) Refractory storage not requiring air pollution control equipment.
- (h) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (i) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (j) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or;
 - (2) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 degrees C (68°F);the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (k) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
 - (1) twenty (20) MIG welders,
 - (2) two (2) stick welders, and
- (l) Any of the following structural steel and bridge fabrication activities:
 - (1) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent.
 - (2) Using 80 tons or less of welding combustibles.
- (m) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (n) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

- (o) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (p) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (q) Heat exchanger cleaning and repair.
- (r) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (s) Paved and unpaved roads and parking lots with public access.
- (t) Purging of gas lines and vessels that is released to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (u) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (v) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (w) On-site fire and emergency response training approved by the department.
- (x) Grinding and machine operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (y) Filter or coalescer media changeout.
- (z) Activities or categories of activities with a combination of HAP emissions not previously identified:
 - (1) any unit emitting greater than 1 pound per day but less than 12.5 pounds per day or 2.5 tons per year of any combination of HAPs.
 - (A) Acrysol - used to clean exterior of trailers after they are finished.
- (aa) Other activities or categories not previously identified with emissions below insignificant thresholds:
 - (1) Touch-up paint;
 - (2) fifteen (15) Hand held grinders;
 - (3) five (5) Belt sanders; and
 - (4) thirty (30) Hand drills.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

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

B.3 Permit Term [326 IAC 2-8-4(2)][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, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

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

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

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

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ may require to determine the compliance status of the source.

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(1).

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
 - (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
 - (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967
- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

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

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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 shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

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

and

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

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
 - (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).
- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2][IC13-30-3-1]

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 FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD));
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 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.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.6 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).

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Stack Height [326 IAC 1-7]

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

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.10 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.11 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance as defined in is present at a source in more than a threshold quantity, the source must comply with the applicable requirements of 40 CFR 68.

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

-
- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.

- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be 10 days or more until the unit or device will be shut down, then the permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall be considered a deviation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and 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.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 **Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]**
[326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.17 **Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]**

- (a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The 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

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit 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 physically present or electronically accessible at the source location for a minimum of three (3) years. 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 request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(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, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) paint booth, identified as PB-01, consisting of the following;
- (1) five (5) air atomized paint guns,
 - (2) dry filters, for overspray control,
 - (3) three (3) paint pumps,
 - (4) two (2) spray pressure pots with capacities of 2.5 gallons, and
 - (5) one (1) natural gas-fired air make up unit with a rated heat input of 2.0 million British thermal units (mmBtu) per hour,
- with a maximum capacity of coating two (2) metal frames per hour; and exhausting through two (2) stacks, identified as SV-12A and SV-12B.

(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 2-8-4(1)]

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

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator at paint booth (PB-01), for air dried or forced warm air dried.

D.1.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of paint booth (PB-01) during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.1.3 HAP Limitation [326 IAC 2-8-4]

- (a) The usage of any single HAP, including clean up solvents in the one (1) paint booth (identified as PB-01) shall be limited such that the source-wide potential to emit of any single HAP is less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 2-7 do not apply.
- (b) Any change or modification to the paint booth (identified as PB-01) that may increase the PTE of any combination of HAPs to more than 25 tons per year, shall obtain prior approval from IDEM, OAQ and shall be subject to the requirements of 326 IAC 2-7.

D.1.4 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the PM from the paint booth (PB-01) shall not exceed the pound per hour emission rate established as E in the following formula:

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.5 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the paint booth (PB-01) shall be controlled by dry filters and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.7 Volatile Organic Compounds (VOC) and HAP [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the usage limitation contained in Conditions D.1.1 and 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 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 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from paint booth (PB-01) while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, 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 Response Plan -Preparation, Implementation, Records, and Reports, 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 2-8-4(3)] [326 IAC 2-8-16]

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC and HAPs 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 HAPs usage for each month; and
 - (5) The weight of HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.3(b), the Permittee shall maintain records of monthly coating usage at the paint booth (identified as PB-01).
 - (c) To document compliance with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
 - (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.3(a) 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 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (b) One (1) miscellaneous adhesive application operation, identified as MF-01, consisting of the following;
- (1) one (1) air atomized paint gun, and
 - (2) one (1) spray pressure pot with capacities of 2.5 gallons, with a maximum capacity of coating two (2) cargo trailers per hour.

(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 2-8-4(1)]

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

Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator at the miscellaneous adhesive application operation (MF-01), for air dried or forced warm air dried.

D.2.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of the miscellaneous adhesive application operation (MF-01) during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.2.3 Particulate [326 IAC 6-3-2(d)]

Any change or modification which may increase the adhesive application rate to greater than five (5) gallons per day from the miscellaneous adhesive application operation (MF-01) shall require a control device, pursuant to 326 IAC 6-3-2(d).

Compliance Determination Requirements

D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Compliance with the VOC content limit in condition D.2.1 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

$$A = [3C \times U] / 3U$$

Where: A is the volume weighted average in pounds VOC per gallon less water as applied;
C is the VOC content of the coating in pounds VOC per gallon less water as applied;
and U is the usage rate of the coating in gallons per day.

As an alternative to performing daily volume weighted averaging, the source has the option of using compliant coatings.

Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.5 Record Keeping Requirements

- (a) To document compliance with condition D.2.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.2.1.
 - (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on daily 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 solvent.
 - (3) The volume weighted average VOC content of the coatings used for each day, unless only compliant coatings are used;
 - (4) The daily cleanup solvent usage; and
 - (5) The total VOC usage for each day.
- (b) To document compliance with Condition D.2.3, the Permittee shall maintain records of daily coating usage at the miscellaneous adhesive application operation (MF-01).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (c) One (1) woodworking machining line, identified as WM-01, consisting of the following equipment:
- (1) seven (7) cutoff saws, two (2) of which use one (1) cyclone dust collector, identified as SV-13 for particulate matter (PM) emissions control, and exhausting through one (1) stack (S/V ID SV-13).
 - (2) one (1) drill press,
 - (3) two (2) band saws,
 - (4) ten (10) hand drills,
 - (5) ten (10) hand saws, and
 - (6) five (5) table saws, three (3) of which use one (1) cyclone dust collector, identified as SV-13 for particulate matter (PM) emissions control, and exhausting through one (1) stack (S/V ID SV-13).
- with a maximum capacity of processing 650.0 pounds per hour of plywood.

(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 2-8-4(1)]

D.3.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the woodworking facilities shall not exceed 1.93 pounds per hour when operating at a process weight rate of 650 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

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

D.3.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.3.3 Particulate Control

In order to comply with condition D.3.1, the cyclone dust collector for particulate control shall be in operation and control emissions from the woodworking machining line at all times that the facilities are in operation.

D.3.4 Visible Emissions Notations

- (a) Daily visible emission notations of the wood machining operation stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) 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.

- (c) 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.
- (d) 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.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.3.5 Cyclone Inspections

An inspection shall be performed each calendar quarter of all cyclones controlling the wood machining operation when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

D.3.6 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. If operations continue after cyclone failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed unit will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.3.7 Record Keeping Requirements

- (a) To document compliance with Condition D.3.4, the Permittee shall maintain records of daily visible emission notations of the wood machining operation stack exhaust.
- (b) To document compliance with Condition D.3.5, the Permittee shall maintain records of the results of the inspections required under Condition D.3.5 and the dates the vents are redirected.
- (c) To document compliance with Condition D.3.2, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

Insignificant Activities:

- (k) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
 - (1) twenty (20) MIG welders,
 - (2) two (2) stick welders.
- (r) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (x) Grinding and machine operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

(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 2-8-4(1)]

D.4.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the trimmers, MIG and stick welders, and grinding and machine operations shall not exceed the allowable particulate emission rate based on the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: J & L's Cargo Express, Inc.
Source Address: 405 Kesco Drive, Bristol, IN 46507
Mailing Address: 405 Kesco Drive, Bristol, IN 46507
FESOP No.: F039-17128-00499

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: J & L's Cargo Express, Inc.
Source Address: 405 Kesco Drive, Bristol, IN 46507
Mailing Address: 405 Kesco Drive, Bristol, IN 46507
FESOP No.: F039-17128-00499

This form consists of 2 pages

Page 1 of 2

9 This is an emergency as defined in 326 IAC 2-7-1(12)
CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
CThe Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

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

Page 2 of 2

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

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

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: J & L's Cargo Express, Inc.
 Source Address: 405 Kesco Drive, Bristol, IN 46507
 Mailing Address: 405 Kesco Drive, Bristol, IN 46507
 FESOP No.: F039-17128-00499
 Facility: Paint Booth (PB-01)
 Parameter: Single HAP
 Limit: The usage of any single HAP, including clean up solvents in the one (1) paint booth (identified as PB-01) shall be limited such that the source-wide potential to emit of any single HAP is less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: J & L's Cargo Express, Inc.
 Source Address: 405 Kesco Drive, Bristol, IN 46507
 Mailing Address: 405 Kesco Drive, Bristol, IN 46507
 FESOP No.: F039-17128-00499

Months: _____ **to** _____ **Year:** _____

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<p><input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Name:	J and L's Cargo Express, Inc.
Source Location:	405 Kesco Drive, Bristol, IN 46507
SIC Code:	3799
County:	Elkhart
Operation Permit No.:	F039-17128-00499
Permit Reviewer:	Alic Bent /EVP

On August 28, 2003, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Indiana, stating that J and L's Cargo Express, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal for the operation of a stationary cargo trailer manufacturing and surface coating operation. The notice also stated that OAQ proposed to issue a Federally Enforceable State Operating Permit Renewal for this operation and provided information on how the public could review the proposed FESOP Renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP Renewal should be issued as proposed.

Upon further review, the OAQ has decided to make the following changes to the FESOP Renewal. Bolded language has been added and the language with a line through it has been deleted.

1. Condition B.10 (Compliance with Permit Conditions) has been removed from the B section and has been added to the FESOP title page instead.

~~B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]~~

~~(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:~~

~~(1) Enforcement action;~~

~~(2) Permit termination, revocation and reissuance, or modification; and~~

~~(3) Denial of a permit renewal application.~~

~~(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.~~

~~(c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B; Emergency Provisions.~~

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

**J and L's Cargo Express, Inc.
405 Kesco Drive, Bristol
Bristol, IN 46507**

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

2. Condition C.15 (b)(3) notification requirement has been modified to apply only to situations where the emissions unit will continue to operate for an extended time while the compliance monitoring parameter is out of range. It is intended to provide the OAQ an opportunity to assess the situation and determine whether any additional actions are necessary to demonstrate compliance with applicable requirements.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, **and it will be 10 days or more until the unit or device will be shut down, then the permittee shall promptly notify** the IDEM, OAQ ~~shall be promptly notified~~ of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

3. Rather than require an emission unit to automatically shutdown when a cyclone failure occurred that caused visible emissions, the Permittee is now required to notify IDEM, OAQ if the cyclone failure will not be fixed within 10 days. The notification should indicate when the problems are expected to be fixed. Once the notification is received, IDEM, OAQ will decide if the source should be ordered to do a stack test.

D.3.6 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. ~~Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~ Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. **If operations continue after cyclone failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed unit will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.**

4. Condition D.1.9(b) has been corrected to require the source to maintain records of monthly coating usage instead of daily coating usage.

D.1.9 Record Keeping Requirements

(b) To document compliance with Condition D.1.3(b), the Permittee shall maintain records of ~~daily~~ **monthly** coating usage at the paint booth (identified as PB-01).

5. Statements have been added to Conditions D.2.4 and D.2.5(a)(3) in order to give the source the option of using compliant coatings as an alternative to performing daily volume averaging.

D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Compliance with the VOC content limit in condition D.2.1 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

$$A = [\sum C \times U] / \sum U$$

Where: A is the volume weighted average in pounds VOC per gallon less water as applied;
C is the VOC content of the coating in pounds VOC per gallon less water as applied;
and U is the usage rate of the coating in gallons per day.

As an alternative to performing daily volume weighted averaging, the source has the option of using compliant coatings.

D.2.5 Record Keeping Requirements

(a) To document compliance with condition D.2.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.2.1.

- (3) The volume weighted average VOC content of the coatings used for each day, **unless only compliant coatings are used;**

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name: J and L's Cargo Express, Inc.
Source Location: 405 Kesco Drive, Bristol, IN 46507
County: Elkhart
SIC Code: 3799
Operation Permit No.: F039-17128-00499
Permit Reviewer: Alic Bent/EVP

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from J and L's Cargo Express, Inc. relating to the operation of a cargo trailer manufacturing and surface coating operation. J and L's Cargo Express, Inc. was issued FESOP 039-9808-00499 on October 29, 1998.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) paint booth, identified as PB-01, consisting of the following:
 - (1) five (5) air atomized paint guns,
 - (2) dry filters, for overspray control,
 - (3) three (3) paint pumps,
 - (4) two (2) spray pressure pots with capacities of 2.5 gallons, and
 - (5) one (1) natural gas-fired air make up unit with a rated heat input of 2.0 million British thermal units (mmBtu) per hour,with a maximum capacity of coating two (2) metal frames per hour; and exhausting through two (2) stacks, identified as SV-12A and SV-12B.
- (b) One (1) miscellaneous adhesive application operation, identified as MF-01, consisting of the following:
 - (1) one (1) air atomized paint gun, and
 - (2) one (1) spray pressure pot with capacities of 2.5 gallons,with a maximum capacity of coating two (2) cargo trailers per hour.
- (c) One (1) woodworking machining line, identified as WM-01, consisting of the following equipment:
 - (1) seven (7) cutoff saws, two (2) of which use one (1) cyclone dust collector, identified as SV-13 for particulate matter (PM) emissions control, and exhausting through one (1) stack (S/V ID SV-13).
 - (2) one (1) drill press,
 - (3) two (2) band saws,
 - (4) ten (10) hand drills,
 - (5) ten (10) hand saws, and

- (6) five (5) table saws, three (3) of which use one (1) cyclone dust collector, identified as SV-13 for particulate matter (PM) emissions control, and exhausting through one (1) stack (S/V ID SV-13).

with a maximum capacity of processing 650.0 pounds per hour of plywood.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
 - (1) six (6) natural gas-fired tube heaters with a total rated heat input of 1.5 mmBtu per hour, each exhausting through one (1) stack, identified as SV-6 thru SV-11,
 - (2) one (1) natural gas-fired unit heater with a rated heat input of 0.15 mmBtu per hour, identified as SV-5, and-4.
- (b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.
- (c) Combustion source flame safety purging on startup.
- (d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (e) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (f) The following VOC and HAP storage containers:
 - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
 - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (g) Refractory storage not requiring air pollution control equipment.
- (h) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (i) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (j) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or;
 - (2) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 degrees C (68°F);the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (k) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
 - (1) twenty (20) MIG welders,
 - (2) two (2) stick welders, and
- (l) Any of the following structural steel and bridge fabrication activities:
 - (1) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent.
 - (2) Using 80 tons or less of welding combustibles.

- (m) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (n) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (o) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (p) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (q) Heat exchanger cleaning and repair.
- (r) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (s) Paved and unpaved roads and parking lots with public access.
- (t) Purging of gas lines and vessels that is released to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (u) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (v) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (w) On-site fire and emergency response training approved by the department.
- (x) Grinding and machine operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (y) Filter or coalescer media changeout.
- (z) Activities or categories of activities with a combination of HAP emissions not previously identified:
 - (1) any unit emitting greater than 1 pound per day but less than 12.5 pounds per day or 2.5 tons per year of any combination of HAPs.
 - (A) Acrysol - used to clean exterior of trailers after they are finished.
- (aa) Other activities or categories not previously identified with emissions below insignificant thresholds:
 - (1) Touch-up paint;
 - (2) fifteen (15) Hand held grinders;
 - (3) five (5) Belt sanders; and
 - (4) thirty (30) Hand drills.

Existing Approvals

The source has constructed or has been operating under the following previous approvals:

- (a) FESOP 039-9808-00499, issued on October 29, 1998; and
- (b) First Reopening R 039-13033-00499, issued on September 21, 2001.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal 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 administratively complete FESOP Renewal application for the purposes of this review was received on April 1, 2003.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A: pages 1 through 7 of this document for detailed emissions calculations.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	less than 100
PM-10	less than 100
SO ₂	less than 100
VOC	less than 100
CO	less than 100
NO _x	less than 100

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

HAP's	Unrestricted Potential Emissions (tons/yr)
Benzene	0.01
Ethyl Benzene	0.42
Hexane	1.99
Manganese	0.03
MIBK	12.85
Toluene	2.54
Xylene	3.55
TOTAL	21.38

- (a) The unrestricted potential emissions of any single HAP is equal to or greater than ten (10) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

- (b) **Fugitive Emissions**
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued a FESOP on October 29, 1998, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP 039-9808-00499, issued on October 29, 1998.

Process/emission unit	Potential to Emit After Issuance (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	Single HAP	Total HAPs
Paint Booth (PB-01)	0.48	0.48	--	22.98	--	--	< 10 ** (MIBK)	10.74
Fugitive Surface Coating (MF-01)	0.21	0.21	--	23.23	--	--	3.55 (xylene)	7.69
Woodworking (WM-01)	2.28	2.28	--	--	--	--	--	--
Insignificant Activities	1.32	1.33	neg.	neg.	0.6	0.7	neg.	neg.
Total PTE After Issuance	4.29	4.39	neg.	46.21	0.6	0.7	< 10	18.44

* Insignificant activities include natural gas combustion and welding.

** Material usage limitation to comply with 326 IAC 2-8 (FESOP)

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	maintenance
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 maintenance for ozone.

Federal Rule Applicability

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

State Rule Applicability - Entire Source

There are no new state rules applicable to the source during this FESOP review process. The applicability determination that follows is based on that conducted for original FESOP 039-9808-00499, issued on October 29, 1998.

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

This source, constructed in 1998, after the applicability date of August 7, 1980, is not considered a major source because it is not one of the 28 listed source categories, and the source wide potential to emit of PM, PM-10, VOC, SO₂, NO_x and CO are less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (PSD) do not apply.

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

The coating operations shall have potential to emit less than 10 tons per year of a single HAP and 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in Elkhart County, a specifically listed county, and has the potential to emit more than ten (10) tons per year of VOC. Pursuant to this rule, the Permittee must submit an emission statement for the source. The statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6 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).

326 IAC 2-8-4 (FESOP)

The usage of any single HAP, including clean up solvents in the one (1) paint booth (identified as PB-01) shall be limited such that the source-wide potential to emit of any single HAP is less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 2-7 do not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary 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.

326 IAC 6-4 (Fugitive Dust Emissions)

Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), the Permittee shall be in violation of 326 IAC 6-4 (Fugitive Dust Emissions) if any of the criteria specified in 326 IAC 6-4-2(1) through (4) are violated. Fugitive dust from the surface coating or welding operations shall not be seen crossing the property line of the source at or near ground level.

State Rule Applicability - Individual Facilities

There are no new state rules applicable to the source during this FESOP review process. The applicability determination that follows is based on that conducted for original FESOP 039-9808-00499, issued on October 29, 1998.

326 IAC 8-1-6 (New Facilities: General Reduction Requirements)

The source is not subject to this rule. This rule applies to all facilities constructed after January 1, 1980, which have potential emissions of 25 tons or more per year, located anywhere in the state, which are not otherwise regulated by other provisions of this article (326 IAC 8). The facilities PB-01 and MF-01 are subject to 326 IAC 8-2-9 (Miscellaneous Metal Coating), therefore, the requirements under 326 IAC 8-1-6 (New Facilities General Reduction Requirements), are not applicable.

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

The paint booth (PB-01) and the miscellaneous adhesive application operation (MF-01) are subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating) because they were both installed in 1998 and have actual VOC emissions of greater than or equal to 15 pounds per day. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the paint booth (PB-01) and the miscellaneous adhesive application operation (MF-01) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

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

- (a) Based on the MSDS submitted by the source and calculations made, paint booth (PB-01) is in compliance with this requirement.
- (b) The operation of the miscellaneous adhesive application (MF-01) shall be in compliance with 326 IAC 8-2-9, using a volume weighted average of coatings on a daily basis pursuant to 326 IAC 8-1-2(a)(7). This volume weighted average shall be determined by the following equation:

$$A = [3C \times U] / 3U$$

Where: A is the volume weighted average in pounds VOC per gallon less water as applied;
C is the VOC content of the coating in pounds VOC per gallon less water as applied;
and U is the usage rate of the coating in gallons per day.

326 IAC 6-3-2 (Process Operations)

- (a) Pursuant to 326 IAC 6-3-2(d), the miscellaneous adhesive application operation (MF-01) is exempt from 326 IAC 6-3-2, because the unit uses less than five (5) gallons of coating per day.
- (b) Pursuant to 40 CFR 52 Subpart P the particulate matter (PM) from the paint booth (PB-01) shall be limited by the following:

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

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

The particulate from the paint booth (PB-01) shall be controlled by dry filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) the particulate from the wood machining operation (WM-01) shall be limited by the following:

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

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

$$E = 4.10 (0.325)^{0.67} = 1.93 \text{ lb PM/hr}$$

Based on the emission calculations, the wood machining operation (WM-01) has a control potential to emit (PTE) PM of 0.52 pounds per hour, therefore the source is in compliance with the requirement.

The cyclone shall be in operation at all times the wood machining operation (WM-01) is in operation, in order to comply with this limit.

- (b) The allowable particulate emission rate from the trimmers, MIG and stick welders, and grinding and machine operations shall not exceed the allowable particulate emission rate based on the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

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

Testing Requirements

Testing of this facility is not required by this permit.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

- (1) The one (1) paint booth (PB-01) has applicable compliance monitoring conditions as specified below:
 - (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 (SV-12A and SV-12B) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, 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 Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
 - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for the paint booth must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

- (2) The wood machining operation (WM-01) has applicable compliance monitoring conditions as specified below:
- (a) Daily visible emission notations of the wood machining operation stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. 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. 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. 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. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
 - (b) An inspection shall be performed each calendar quarter of all cyclones controlling the woodworking operation when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.
 - (c) In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

These monitoring conditions are necessary because the cyclone for the wood machining operation must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-8 (FESOP).

Conclusion

The operation of this cargo trailer manufacturing and surface coating operation shall be subject to the conditions of the attached proposed FESOP No.: F039-17128-00499.

Total Source Emissions
Appendix A: Emission Calculations

Company Name: J and L's Cargo Express, Inc.
Address City IN Zip: 405 Kesco Drive, Bristol, IN 46507
Permit #: F039-17128-00499
Reviewer: Alic Bent/EVP
Date: 5/29/03

Potential Uncontrolled Emissions (tons/year)

Emissions Generating Activity

Pollutant	Adhesive Application Operation (MF-01) (tons per year)	Paint Booth (PB-01) (tons per year)	Woodworking (tons per year)	Welding (tons per year)	Natural Gas (tons per year)	TOTAL (tons per year)
PM	0.21	23.81	28.56	1.32	neg.	53.90
PM10	0.21	23.81	28.56	1.32	0.10	54.00
SO2	0.00	0.00	0.00	0.00	neg.	0.00
NOx	0.00	0.00	0.00	0.00	0.70	0.70
VOC	23.23	22.98	0.00	0.00	neg.	46.21
CO	0.00	0.00	0.00	0.00	0.60	0.60
total HAPs	7.69	13.69	0.00	neg.	neg.	21.38
worst case single HAP	3.55	12.85	0.00	neg.	neg.	12.85

Controlled Emissions (tons/year)

Emissions Generating Activity

Pollutant	Adhesive Application Operation (MF-01) (tons per year)	Paint Booth (PB-01) (tons per year)	Woodworking (tons per year)	Welding (tons per year)	Natural Gas (tons per year)	TOTAL (tons per year)
PM	0.21	0.48	2.28	1.32	neg.	4.29
PM10	0.21	0.48	2.28	1.32	0.10	4.39
SO2	0.00	0.00	0.00	0.00	neg.	0.00
NOx	0.00	0.00	0.00	0.00	0.70	0.70
VOC	23.23	22.98	0.00	0.00	neg.	46.21
CO	0.00	0.00	0.00	0.00	0.60	0.60
total HAPs	7.69	10.74	0.00	neg.	neg.	18.43
worst case single HAP	3.55 (xylene)	9.9 (MIBK)	0.00	neg.	neg.	0.00

Total emissions based on rated capacity at 8,760 hours/year, before control.

Appendix A: Emissions Calculations

**VOC and Particulate
From Surface Coating Operations**

Company Name: J and L's Cargo Express, Inc.
Address City IN Zip: 405 Kesco Drive, Bristol, IN 46507
Permit #: 039-9808-00499
Reviewer: Alic Bent/EVP
Date: 5/29/03

Potential Emissions
 Miscellaneous Fugitive Emissions
 Throughout the source

Material	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
Problem Solver Floor Sealant	9.90	41.00%	0.00%	41.00%	0.00%	59.00%	0.01720	2.000	4.06	4.06	0.14	3.35	0.61	0.00	6.88	100%
7100 Sealant	12.27	3.00%	0.00%	3.00%	0.00%	97.00%	0.02900	2.000	0.37	0.37	0.02	0.51	0.09	0.00	0.38	100%
ABS 30G Solvent	6.56	100.00%	0.00%	100.00%	0.00%	0.00%	0.01720	2.000	6.56	6.56	0.23	5.42	0.99	0.00	#DIV/0!	100%
Parasil Sealant	8.60	5.00%	0.00%	5.00%	0.00%	95.00%	3.57000	2.000	0.43	0.43	3.07	73.68	13.45	0.00	0.45	100%
Silicone Rubber Compound	8.76	0.00%	0.00%	0.00%	0.00%	100.00%	0.01720	2.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%
ACR-LF Touch up paint	9.2	91.00%	0.00%	52.00%	0.00%	52.00%	0.09125	2.000	4.77	4.77	0.87	20.91	3.82	0.00	9.18	100%
Acrysol	6.6	100.00%	0.00%	98.00%	0.00%	98.00%	0.00246	2.000	6.43	6.43	0.03	0.76	0.14	0.00	6.56	100%
Benders Contact Cement	6.63	83.00%	0.00%	83.00%	0.00%	17.00%	0.08570	2.000	5.50	5.50	0.94	22.64	4.13	0.21	32.37	75%

Add worst case coating to all solvents

VOC lbs per Hour	VOC lbs per Day	VOC tons per Year	PM tons/yr
5.30	127.27	23.23	0.21

Miscellaneous Fugitive Emissions:

Control Efficiency VOC	Control Efficiency PM	Control VOC lbs per Hour	Control VOC lbs per Day	Control VOC tons per Year	Paint Booth Controlled PM tons/yr
0.00%	0.00%	5.30	127.27	23.23	0.21

Potential Emissions
 Paint Booth PB-01

Material	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
Black AD Enamel	10.20	32.55%	0.00%	32.55%	0.00%	67.45%	0.79000	2.000	3.32	3.32	5.25	125.89	22.98	23.81	4.92	50%

Add worst case coating to all solvents

VOC lbs per Hour	VOC lbs per Day	VOC tons per Year	Paint Booth PM tons/yr
5.25	125.89	22.98	23.81

Paint Booth Emissions

Control Efficiency PM	Paint Booth Controlled PM tons/yr
98.00%	0.48

*The source will limit the MIBK input into the finishing line to less than 10 tons/yr.

METHODOLOGY

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

Appendix A: HAP Emission Calculations

Company Name: J and L's Cargo Express, Inc.
 Address City IN Zip: 405 Kesco Drive, Bristol, IN 46507
 Permit #: F039-17128-00499
 Reviewer: Alic Bent/EVP
 Date: May 29, 2003

Miscellaneous Fugitive Operations

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MIBK	Weight % Benzene	Weight % Hexane	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	MIBK (ton/yr)	Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Ethyl Benzene (ton/yr)	Manganese (ton/yr)
Problem Solver Floor Sealant	9.9	0.01720	2.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
7100 Sealant	12.3	0.02900	2.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
ABS 30G Solvent	6.6	0.01720	2.000	22.00%	1.00%	0.00%	1.00%	0.00%	5.00%	0.22	0.01	0.00	0.01	0.00	0.05	0.00
Parasil Sealant	8.6	3.57000	2.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Silicone Rubber Compound	8.8	0.01720	2.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Benders Contact Cement	6.6	0.08570	2.000	0.00%	19.00%	0.00%	0.00%	40.00%	0.00%	0.00	0.95	0.00	0.00	1.99	0.00	0.00
ACR-LF Touch up paint	9.2	0.09125	2.000	45.00%	10.00%	0.00%	0.00%	0.00%	0.05	3.30	0.73	0.00	0.00	0.00	0.37	0.00
Acrysol	6.6	0.00246	2.000	22.00%	0.00%	0.00%	0.00%	0.00%	5.00%	0.03	0.00	0.00	0.00	0.00	0.01	0.00
Welding Activity	N/A	N/A	N/A	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.03

Total Potential Emissions 3.55 1.69 0.00 0.01 1.99 0.42 0.03

TOTAL HAPS 7.69

Paint Booth

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MIBK	Weight % Benzene	Weight % Hexane	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	MIBK (ton/yr)	Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Ethyl Benzene (ton/yr)	Manganese (ton/yr)
Black AD Enamel	10.2	0.79000	2.000	0.00%	1.20%	18.20%	0.00%	0.00%	0.00%	0.00	0.85	12.85	0.00	0.00	0.00	0.00

Total Potential Emissions 0.00 0.85 12.85 0.00 0.00 0.00 0.00

Limited Efficiency Single HAP	Limited* Single HAP tons per year
77.04%	9.90

TOTAL HAPS 13.69

Limited Potential Emissions 0.00 0.85 9.90 0.00 0.00 0.00 0.00

LIMITED HAPS 10.74

Total Source Potential Emissions 3.55 2.54 9.90 0.01 1.99 0.42 0.03

Total Source HAPS 18.44

*Limiting the potential MIBK usage to 9.9 tons/year to comply with 326 IAC 2-8 and 326 IAC 2-1-3 this equates to a 77.04% MIBK usage limitation [9.9/12.85 = 0.7704 = 77.04% of potential capacity]

METHODOLOGY

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

Company Name: J and L's Cargo Express, Inc.
Address City IN Zip: 405 Kesco Drive, Bristol, IN 46507
Permit #: F039-17128-00499
Reviewer: Alic Bent/EVP
Date: 5/29/03

Potential Emissions

Woodworking	Rate of Emission lbs/hr	Total Emission per year tons/yr
Uncontrolled	6.52	28.56
Controlled	0.52	2.28

Methodology:

Uncontrolled Emissions: five (5) cutoff saws, one (1) drill press, two (2) band saws, ten (10) hand drills, ten (10) hand saws, two (2) table saws.

Controlled Emissions: two (2) cutoff saws and three (3) table saws. All use one (1) cyclone dust collector.

Amount of particulate matter collected by cyclone per hour = 6 lbs

Collection Efficiency = 92%

$6 \times 1/(1-.92) = \text{Amount before control} = 6.52$

$6.52 - 6 = 0.52$ pounds per hour emitted after control

Appendix A: Welding and Thermal Cutting

Company Name: J and L's Cargo Express, Inc.
 Address City IN Zip: 405 Kesco Drive, Bristol, IN 46507
 Permit No./Plt ID: F039-17128-00499
 Reviewer: Alic Bent/EVP
 Date: 25-Jul-03

PROCESS	Max. total electrode consumption per station (lbs/hr)	EMISSION FACTORS * (lb pollutant / lb electrode)				EMISSIONS (lb/hr)				TOTAL HAPS (lb/hr)
		PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING										
Metal Inert Gas (MIG)	12.5	0.0241	0.000034		0.00001	0.301	0.000425	0.000	0.000125	0.001
Stick	0.1	0.0211								0.000
EMISSION TOTALS						PM = PM10	Mn	Ni	Cr	Total HAPs
Potential Emissions lbs/hr						0.30	0.00	0.00	0.00	0.00
Potential Emissions lbs/day						7.23	0.01	0.00	0.00	0.01
Potential Emissions tons/year						1.32	0.00	0.00	0.00	0.00

METHODOLGY

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

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

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

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

See AP-42, Chapter 12.19 for additional emission factors for welding.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

**Company Name: J and L's Cargo Express, Inc.
Address City IN Zip: 405 Kesco Drive, Bristol, IN 46507
Pit ID: 039-17128-00499
Reviewer: Alic Bent/EVP
Date: July 29, 2003**

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

1.7

14.5

Heat Input Capacity includes:
six (6) tube heaters rated at 1.5 mmBtu/hr
one (1) unit heater rated at 0.15 mmBtu/hr

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.0	0.1	0.0	0.7	0.0	0.6

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

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

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

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Small Industrial Boiler

HAPs Emissions

Company Name: J and L's Cargo Express, Inc.

Address City IN Zip: 405 Kesco Drive, Bristol, IN 46507

Pit ID: 039-17128-00499

Reviewer: Alic Bent/EVP

Date: July 29, 2003

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.518E-05	8.672E-06	5.420E-04	1.301E-02	2.457E-05

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	3.614E-06	7.950E-06	1.012E-05	2.746E-06	1.518E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.