



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
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TO: Interested Parties / Applicant
DATE: September 5, 2006
RE: Wabash National Corporation / 157-18078-00046
FROM: Nisha Sizemore
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, 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 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) 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.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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.



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PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Wabash National, L.P. North Plant
1000 Sagamore Parkway South
Lafayette, Indiana 47905**

(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 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T157-18078-00046	
Issued by: Original Signed By: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: September 5, 2006 Expiration Date: September 5, 2011

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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, A.3 and A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary truck trailers manufacturing plant.

Responsible Official:	Vice President, Manufacturing & Continuous Improvement
Source Address:	1000 Sagamore Parkway South, Lafayette, Indiana 47905
Mailing Address:	P.O. BOX 6129, Lafayette, Indiana 47903
General Source Phone Number:	(765) 771-5300
SIC Code:	3715
County Location:	Tippecanoe
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This truck trailer manufacturing company consists of two (2) plants:

- (a) Plant 1 is located at 1000 Sagamore Parkway South, Lafayette IN 47905; and
- (b) Plant 2 is located at 3550 East County Road 350 South, Lafayette, IN 47905

These two plants are located on what IDEM considers adjacent properties, they have the same SIC codes and have common ownership. However there is no support relationship or dependency between the two sources. Therefore, they will be considered as two separate sources per Title V Permit No. 157-6070-00046 issued on June 25, 1999. This is consistent with previous OAQ source determinations.

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

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

- (a) One (1) surface coating spray booth identified as PB1, constructed in 1987, utilizing the airless spray application method with a maximum coating capacity of 3.33 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB1S.
- (b) One (1) surface coating spray booth identified as PB2, constructed in 1987, utilizing the airless spray application method with a maximum coating capacity of 1.67 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB2S.
- (c) One (1) surface coating spray booth identified as PB3, constructed in 1987, utilizing the airless and air atomized spray application method with a maximum coating capacity of 3.33 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB3S.

- (d) One (1) surface coating spray booth identified as PB4, constructed in 1987, utilizing the airless and air atomized spray application method with a maximum coating capacity of 0.50 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB4S.
- (e) One (1) surface coating spray booth identified as PB5, constructed in 1987, utilizing the airless and air atomized spray application method with a maximum coating capacity of 0.21 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB5S.
- (f) One (1) surface coating spray booth identified as PB7, constructed in 1987, utilizing the airless and air atomized spray application method with a maximum coating capacity of 1.67 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB7S.
- (g) One (1) surface coating spray booth identified as PB8, constructed in 1987, utilizing the dip coating application method with a maximum coating capacity of 495 units per hour, equipped with one (1) 2.07 MMBtu/hr natural gas fired regenerative thermal oxidizer for VOC emissions control, and exhausting through stack PB8S.
- (h) One (1) surface coating spray booth identified as PB9, constructed in 1987, utilizing the airless spray application method with a maximum coating capacity of 1.67 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB9S.
- (i) One (1) surface coating spray booth identified as PB10, constructed in 1987, utilizing the airless spray application method with a maximum coating capacity of 0.63 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB10S.
- (j) One (1) surface coating spray booth identified as PB11, constructed in 1987, utilizing the airless spray application method with a maximum coating capacity of 0.83 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB11S.
- (k) One (1) surface coating spray booth identified as PB12, constructed in 1987, utilizing the airless and air atomized spray application method with a maximum coating capacity of 0.63 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB12S.
- (l) One (1) surface coating spray booth identified as PB13, constructed in 1987, utilizing the airless and air atomized spray application method with a maximum coating capacity of 1.67 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB13S.
- (m) One (1) surface coating spray booth identified as PB14, constructed in 1987, utilizing the airless spray application method with a maximum coating capacity of 3.21 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB14S.
- (n) One (1) surface coating spray booth identified as PB15, constructed in 1987, utilizing the airless spray application method with a maximum coating capacity of 0.46 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB15S.
- (o) One (1) surface coating spray booth identified as PB17, constructed in 1987, utilizing the airless spray application method with a maximum coating capacity of 0.71 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB17S.

- (p) One (1) surface coating spray booth identified as PB19, constructed in 2002, utilizing the airless and air atomized spray application method with a maximum coating capacity of 0.71 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB19S.
- (q) One (1) caulking process, identified as CLK, with a maximum capacity of 58 pounds of caulk per hour, using no control, and exhausting to general ventilation.
- (r) One (1) final trailer wash, identified as SC, with a maximum capacity of 4.7 pounds of solvent per hour, using no control, and exhausting to general ventilation.
- (s) One (1) steel shot blasting operation identified as BB1, with a maximum capacity of 3.7 tons of steel shot per hour, equipped with a baghouse (BH1) for particulate control, and exhausting through stack BH1S.
- (t) One (1) steel shot blasting operation identified as BB2, with a maximum capacity of 1.26 tons of steel shot per hour, equipped with a baghouse (BH1) for particulate control, and exhausting through stack BH2S.
- (u) One (1) steel shot blasting operation identified as BB3, with a maximum capacity of 1.26 tons of steel shot per hour, equipped with a baghouse (BH1) for particulate control, and exhausting through stack BH3S.
- (v) One (1) natural gas fired boiler identified as CB1, with a maximum heat input capacity of 5.23 million British thermal units per hour (MMBtu/hr), and exhausting through stack CB1S (installed in 1994).
- (w) One (1) natural gas fired boiler identified as CB4, with a maximum heat input capacity of 10.5 million British thermal units per hour (MMBtu/hr), and exhausting through stack CB4S (installed in 2005)

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

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

- (a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and 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. [326 IAC 6-3-2]
- (b) Other categories with emissions below insignificant thresholds (i.e. less than 5 pounds per hour particulates and less than 3 pounds per hour VOC).
 - (1) One (1) plasma arc metal cutting process, with a maximum capacity of 400 inches per minute, and exhausting to general ventilation. [326 IAC 6-3-2]
 - (2) One (1) incinerator used for burning off paint from metal parts, identified as BO, with a maximum charge capacity of 80 pounds per hour, equipped with a natural gas fired burner with maximum heat input capacity of 1.0 MMBtu/hour, and exhausting through stack BOS. [326 IAC 4-2-2]

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

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

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);

- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B

GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

- (a) This permit, T157-18078-00046, 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 of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7]

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 Severability [326 IAC 2-7-5(5)]

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

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

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(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 "responsible official" as defined by 326 IAC 2-7-1(34). 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.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

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

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The 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 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

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

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall 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) 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 PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) 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.11 Emergency Provisions [326 IAC 2-7-16]

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865
 - (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
Indianapolis, Indiana 46204-2251

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) 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 2-7 and any other applicable rules.
- (g) 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.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T157-18078-00046 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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 not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) 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) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, , takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, , any additional information identified as being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management

Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]

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

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in 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
Indianapolis, Indiana 46204-2251

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, on a rolling five (5) year basis, which

document all such changes and emission trades that are subject to 326 IAC 2-7-20(b), (c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2-2-2]

- (a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.
- (b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2-2.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) 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 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 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 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.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

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

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][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) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 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. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

C.7 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
Indianapolis, Indiana 46204-2251

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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, 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 2-7-6(1)]

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 Permittee 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.9 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 2-7-5(1)] [326 IAC 2-7-6(1)]

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

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

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

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on August 20, 2004.
- (b) Upon direct notification by IDEM, OAQ, , that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as

- through response by a computerized distribution control system); or
- (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
- (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
- (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate 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 "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

- (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 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]
[326 IAC 2-3]

- (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) If there is a reasonable possibility that a "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a "major modification" (as defined in 326 IAC 2-2-1 (ee) and/or 326 IAC 2-3-1 (z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1 (rr) and/or 326 IAC 2-3-1 (mm)), the Permittee shall comply with following:
 - (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1(mm)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.

- (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
- (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]
[326 IAC 2-3]

- (a) The Permittee 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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- (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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ :
 - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).

- (g) The report for a project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
- (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3).
 - (4) Any other information that the Permittee deems fit to include in this report,

Reports required in this part shall be submitted to:

Indiana Department of Environmental Management
Air Compliance Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

- (h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

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 2-7-5(15)]:

- (a) One (1) surface coating spray booth identified as PB1, constructed in 1987, utilizing the airless spray application method with a maximum coating capacity of 3.33 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB1S.
- (b) One (1) surface coating spray booth identified as PB2, constructed in 1987, utilizing the airless spray application method with a maximum coating capacity of 1.67 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB2S.
- (c) One (1) surface coating spray booth identified as PB3, constructed in 1987, utilizing the airless and air atomized spray application method with a maximum coating capacity of 3.33 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB3S.
- (d) One (1) surface coating spray booth identified as PB4, constructed in 1987, utilizing the airless and air atomized spray application method with a maximum coating capacity of 0.50 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB4S.
- (e) One (1) surface coating spray booth identified as PB5, constructed in 1987, utilizing the airless and air atomized spray application method with a maximum coating capacity of 0.21 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB5S.
- (f) One (1) surface coating spray booth identified as PB7, constructed in 1987, utilizing the airless and air atomized spray application method with a maximum coating capacity of 1.67 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB7S.
- (g) One (1) surface coating spray booth identified as PB8, constructed in 1987, utilizing the dip coating application method with a maximum coating capacity of 495 units per hour, equipped with one (1) 2.07 MMBtu/hr natural gas fired regenerative thermal oxidizer for VOC emissions control, and exhausting through stack PB8S.
- (h) One (1) surface coating spray booth identified as PB9, constructed in 1987, utilizing the airless spray application method with a maximum coating capacity of 1.67 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB9S.
- (i) One (1) surface coating spray booth identified as PB10, constructed in 1987, utilizing the airless spray application method with a maximum coating capacity of 0.63 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB10S.
- (j) One (1) surface coating spray booth identified as PB11, constructed in 1987, utilizing the airless spray application method with a maximum coating capacity of 0.83 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB11S.
- (k) One (1) surface coating spray booth identified as PB12, constructed in 1987, utilizing the airless and air atomized spray application method with a maximum coating capacity of 0.63 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB12S.
- (l) One (1) surface coating spray booth identified as PB13, constructed in 1987, utilizing the airless and air atomized spray application method with a maximum coating capacity of 1.67 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB13S.
- (m) One (1) surface coating spray booth identified as PB14, constructed in 1987, utilizing the airless spray application method with a maximum coating capacity of 3.21 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB14S.

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

- (n) One (1) surface coating spray booth identified as PB15, constructed in 1987, utilizing the airless spray application method with a maximum coating capacity of 0.46 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB15S.
- (o) One (1) surface coating spray booth identified as PB17, constructed in 1987, utilizing the airless spray application method with a maximum coating capacity of 0.71 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB17S.
- (p) One (1) surface coating spray booth identified as PB19, constructed in 2002, utilizing the airless and air atomized spray application method with a maximum coating capacity of 0.71 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB19S.
- (q) One (1) caulking process, identified as CLK, with a maximum capacity of 58 pounds of caulk per hour, using no control, and exhausting to general ventilation.
- (r) One (1) final trailer wash, identified as SC, with a maximum capacity of 4.7 pounds of solvent per hour, using no control, and exhausting to general ventilation.

Under NESHAP, Subpart M, Surface coating operations identified as PB1 through PB5, PB7 through PB15, PB17 and PB19 are considered an existing affected source because the construction of each operation commenced prior to August 13, 2002.

The general and specific conditions of 40 CFR 63, Subpart M which are applicable to Surface coating operations identified as PB1 through PB5, PB7 through PB15, PB17 and PB19 are specified in Section E.1 of this permit.

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

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

D.1.1 PSD Major Source and PSD Minor Modification Units Limit [326 IAC 2-2]

- (a) Pursuant to CP 157-4162-00046, issued on June 23, 1995:
 - (1) the total amount of VOC delivered to the applicator of spray operations PB1 through PB5, PB7, and PB9, shall not exceed 257.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
 - (2) the total amount of VOC delivered to the dip coating line PB8, shall not exceed 595.1 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
 - (3) The overall control efficiency of the thermal oxidizer controlling VOC emissions from dip coating line PB8 shall be no less than 95.00%.
- (b) The total amount of organic solvents delivered to the surface coating operations, PB10 through PB15, and PB17, including solvents from coatings, thinners and cleaning solvents, shall be limited to 249.6 tons per consecutive 12 month period with compliance determined at the end of each month.

Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.2 Volatile Organic Compounds (VOC) Limitations [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 VOCs per gallon of coating less water, for air dried coatings, as delivered to the applicator at the surface coating operations (PB1 – PB5, PB7, PB8 – PB15, PB17, and PB19).

D.1.3 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9(f)]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of surface coating operations (PB1 – PB5, PB7, PB8 – PB15, PB17, and PB19) 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.1.4 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating operations (PB1 – PB5, PB7, PB9 – PB15, PB17, and PB19) shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 and 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.

D.1.7 Volatile Organic Compounds (VOC) [326 IAC 2-2]

The Permittee shall operate the thermal oxidizer at all times that the dip coating line PB8 is in operation to achieve compliance with condition D.1.1.

D.1.8 VOC Emissions

Compliance with condition D.1.1 shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound emitted for the previous month, and adding it to previous 11 months total VOC emitted so as to arrive at VOC emissions for the most recent 12 consecutive month period. The VOC emissions for a month can be arrived at using the following equation for VOC usage:

$$\text{VOC emitted} = [(\text{VOC input}) \times (100\% - \% \text{ overall control efficiency})] + [\text{uncontrolled VOC input}]$$

D.1.9 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within one hundred and eighty (180) days after resuming operation of dip coating line PB8, in order to demonstrate compliance with Condition D.1.1, the Permittee shall perform VOC testing for the regenerative thermal oxidizer controlling emissions from PB-8 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every two and a half (2.5) years from the date of the last valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

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

D.1.10 Monitoring [40 CFR 64]

- (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 (PB1S – PB5S, PB7S, PB9S – PB15S, PB17S, and PB19S) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

Compliance with the above monitoring conditions shall satisfy the requirements of 40 CFR 64, Compliance Assurance Monitoring for the surface coating line PB3.

D.1.11 Thermal Oxidizer Temperature [40 CFR 64]

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the three (3) hour average temperature of the thermal oxidizer is below 1500°F. A three (3) hour average temperature that is below 1500°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (b) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limits in conditions D.1.1, as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the three (3) hour average temperature of the thermal oxidizer is below the three (3) hour average temperature as observed during the compliant stack test. A three (3) hour average temperature that is below the three (3) hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

Compliance with the above monitoring conditions shall satisfy the requirements of 40 CFR 64, Compliance Assurance Monitoring for the dip coating line PB-8.

D.1.12 Parametric Monitoring [40 CFR 64]

- (a) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance with limits in conditions D.1.1, as approved by IDEM.

- (b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

Compliance with the above monitoring conditions shall satisfy the requirements of 40 CFR 64, Compliance Assurance Monitoring for the dip coating line PB-8.

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

D.1.13 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each coating material and solvent used on a monthly basis.
 - (2) The amount of coating material and solvent less water used on 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 volume weighted VOC content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with conditions D.1.11 and D.1.12, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken as stated below and shall be complete and sufficient to establish compliance with the monitoring requirements established in conditions D.1.11 and D.1.12.
- (1) The continuous temperature records (on a three (3) hour average basis) for the thermal oxidizer and the three (3) hour average temperature used to demonstrate compliance during the most recent compliant stack test.
 - (2) Daily records of the duct pressure or fan amperage.
- (c) To document compliance with Condition D.1.10, the Permittee shall maintain a log of weekly

overspray observations, and daily and monthly inspections.

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

D.1.14 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (s) One (1) steel shot blasting operation identified as BB1, with a maximum capacity of 3.7 tons of steel shot per hour, equipped with a baghouse (BH1) for particulate control, and exhausting through stack BH1S.
- (t) One (1) steel shot blasting operation identified as BB2, with a maximum capacity of 1.26 tons of steel shot per hour, equipped with a baghouse (BH1) for particulate control, and exhausting through stack BH2S.
- (u) One (1) steel shot blasting operation identified as BB3, with a maximum capacity of 1.26 tons of steel shot per hour, equipped with a baghouse (BH1) for particulate control, and exhausting through stack BH3S.

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

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

D.2.1 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 shot blasters (BB1, BB2, and BB3) shall be limited by the following equation:

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:

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

Emission Unit	Process Weight Rate (tons/hr)	Allowable Particulate Emissions (326 IAC 6-3-2) (lb/hr)
BB1	3.70	9.85
BB2	1.26	4.78
BB3	1.26	4.78

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

Pursuant to CP 157-4162, issued on June 23, 1995, the particulate emissions from the shot blasting units (BB1, BB2, and BB3) shall be limited to the following:

Emission Unit	PM / PM10 Emission Limit (lb/hour)	PM / PM10 Emission Limit (ton/yr)
BB1	0.30	1.31
BB2	0.78	3.43

BB3	0.78	3.42
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Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration, PSD) do not apply.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

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

D.2.4 Particulate Control

Pursuant to CP-157-4162, issued on June 23, 1995, and in order to comply with Conditions D.2.1 and D.2.2, the baghouse for particulate control shall be in operation and control emissions from the shot blasters (BB1, BB2, and BB3) at all times that the units are in operation.

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

D.2.5 Visible Emissions Notations [40 CFR 64]

- (a) Visible emission notations of the shot blasters (BB1, BB2, and BB3) stack exhausts shall be performed once per day 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) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

Compliance with the above monitoring conditions shall satisfy the requirements of 40 CFR 64, Compliance Assurance Monitoring for the shot blaster BB1.

D.2.6 Parametric Monitoring [40 CFR 64]

The Permittee shall record the pressure drop across the baghouse used in conjunction with the shot blaster BB1, BB2, and BB3, at least once per day when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 and 5.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C- Response to Excursions or Exceedances shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

Compliance with the above monitoring conditions shall satisfy the requirements of 40 CFR 64, Compliance Assurance Monitoring for shot blaster BB1.

D.2.7 Broken or Failed Bag Detection [40 CFR 64]

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has 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).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. 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).

Bag failure can be indicated by a significant drop in the baghouse-s pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

Compliance with the above monitoring conditions shall satisfy the requirements of 40 CFR 64, Compliance Assurance Monitoring for the shot blaster BB1.

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

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the stack exhaust (BHS1, BHS2, and BHS3).
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records once per day of the pressure drop during normal operation.
- (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 2-7-5(15)]

- (v) One (1) natural gas fired boiler identified as CB1, with a maximum heat input capacity of 5.23 million British thermal units per hour (MMBtu/hr), and exhausting through stack CB1S (installed in 1994).
- (w) One (1) natural gas fired boiler identified as CB4, with a maximum heat input capacity of 10.5 million British thermal units per hour (MMBtu/hr), and exhausting through stack CB4S (installed in 2005).

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

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

D.3.1 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to boiler CB4 only, as designated by 40 CFR 63.7506(b). The Permittee must comply with these requirements on and after the effective date of 40 CFR 63, Subpart DDDDD.

D.3.2 Particulate [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-4(a) (Particulate Matter Emission Limitations for Sources of Indirect Heating), PM emissions from each of the one (1) 5.23 MMBtu/hr boiler (CB1) shall be limited to 0.70 lb/MMBtu heat input and the one (1) 10.5 MMBtu/hr boiler (CB4) shall be limited to 0.532 lb/MMBtu heat input based on the following formula:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where: Pt = pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input
Q = Total source maximum operating capacity rating in MMBtu/hr heat input.

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

D.3.3 Record Keeping Requirements [40 CFR 60.48]

- (a) To document compliance with 40 CFR 60.48c (g), the Permittee shall maintain records in accordance with (1) through (3) below for boiler CB4.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual natural gas usage since last compliance determination period;
 - (3) To certify compliance when burning natural gas only, the Permittee shall maintain records of fuel used.
- (b) The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

SECTION D.4

FACILITY OPERATION CONDITIONS

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

The following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and 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. [326 IAC 6-3-2]
- (b) Other categories with emissions below insignificant thresholds (i.e. less than 5 pounds per hour particulates and less than 3 pounds per hour VOC).
 - (1) One (1) plasma arc metal cutting process, with a maximum capacity of 400 inches per minute, and exhausting to general ventilation. [326 IAC 6-3-2]
 - (2) One (1) incinerator used for burning off paint from metal parts, identified as BO, with a maximum charge capacity of 80 pounds per hour, equipped with a natural gas fired burner with maximum heat input capacity of 1.0 MMBtu/hour, and exhausting through stack BOS. [326 IAC 4-2-2]

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

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

D.4.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(e), the allowable particulate emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

D.4.2 Incinerators [326 IAC 4-2-2]

Pursuant to 326 IAC 4-2-2 (Incinerators: Requirements), the natural gas fired incinerator model 112B shall comply with the following:

- (a) The incinerator shall comply with the following requirements:
 - (1) Consist of primary and secondary chambers or the equivalent.
 - (2) Be equipped with a primary burner unless burning only wood products.
 - (3) Comply with 326 IAC 5-1 and 326 IAC 2.
 - (4) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in paragraph (c) of this condition.
 - (5) Not emit particulate matter in excess of five-tenths (0.5) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air.

- (6) If any of the requirements of (1) through (5) are not met, then the Permittee shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.
- (b) An incinerator is exempt from paragraph (a)(5) of this condition if subject to a more stringent particulate matter emission limit in 40 CFR 52 Subpart P, State Implementation Plan for Indiana.
- (c) A Permittee developing an operation and maintenance plan pursuant to paragraph (a)(4) of this condition must comply with the following:
 - (1) The operation and maintenance plan must be designed to meet the particulate matter emission limitation specified in paragraph (a)(5) of this condition and include the following:
 - (A) Procedures for receiving, handling, and charging waste.
 - (B) Procedures for incinerator startup and shutdown.
 - (C) Procedures for responding to a malfunction.
 - (D) Procedures for maintaining proper combustion air supply levels.
 - (E) Procedures for operating the incinerator and associated air pollution control systems.
 - (F) Procedures for handling ash.
 - (G) A list of wastes that can be burned in the incinerator.
 - (2) Each incinerator operator shall review the plan before initial implementation of the operation and maintenance plan and annually thereafter.
 - (3) The operation and maintenance plan must be readily accessible to incinerator operators.
 - (4) The Permittee shall notify the department, in writing, thirty (30) days after the operation and maintenance plan is initially developed pursuant to this section.
- (d) The Permittee shall make the manufacturer's specifications or the operation and maintenance plan available to the department upon request.

SECTION E.1 NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP) REQUIREMENTS [326 IAC 2-7-5(1)]

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

- (a) One (1) surface coating spray booth identified as PB1, constructed in 1987, utilizing the airless spray application method with a maximum coating capacity of 3.33 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB1S.
- (b) One (1) surface coating spray booth identified as PB2, constructed in 1987, utilizing the airless spray application method with a maximum coating capacity of 1.67 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB2S.
- (c) One (1) surface coating spray booth identified as PB3, constructed in 1987, utilizing the airless and air atomized spray application method with a maximum coating capacity of 3.33 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB3S.
- (d) One (1) surface coating spray booth identified as PB4, constructed in 1987, utilizing the airless and air atomized spray application method with a maximum coating capacity of 0.50 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB4S.
- (e) One (1) surface coating spray booth identified as PB5, constructed in 1987, utilizing the airless and air atomized spray application method with a maximum coating capacity of 0.21 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB5S.
- (f) One (1) surface coating spray booth identified as PB7, constructed in 1987, utilizing the airless and air atomized spray application method with a maximum coating capacity of 1.67 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB7S.
- (g) One (1) surface coating spray booth identified as PB8, constructed in 1987, utilizing the dip coating application method with a maximum coating capacity of 495 units per hour, equipped with one (1) 2.07 MMBtu/hr natural gas fired regenerative thermal oxidizer for VOC emissions control, and exhausting through stack PB8S.
- (h) One (1) surface coating spray booth identified as PB9, constructed in 1987, utilizing the airless spray application method with a maximum coating capacity of 1.67 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB9S.
- (i) One (1) surface coating spray booth identified as PB10, constructed in 1987, utilizing the airless spray application method with a maximum coating capacity of 0.63 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB10S.
- (j) One (1) surface coating spray booth identified as PB11, constructed in 1987, utilizing the airless spray application method with a maximum coating capacity of 0.83 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB11S.
- (k) One (1) surface coating spray booth identified as PB12, constructed in 1987, utilizing the airless and air atomized spray application method with a maximum coating capacity of 0.63 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB12S.
- (l) One (1) surface coating spray booth identified as PB13, constructed in 1987, utilizing the airless and air atomized spray application method with a maximum coating capacity of 1.67 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB13S.

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

- (m) One (1) surface coating spray booth identified as PB14, constructed in 1987, utilizing the airless spray application method with a maximum coating capacity of 3.21 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB14S.
- (n) One (1) surface coating spray booth identified as PB15, constructed in 1987, utilizing the airless spray application method with a maximum coating capacity of 0.46 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB15S.
- (o) One (1) surface coating spray booth identified as PB17, constructed in 1987, utilizing the airless spray application method with a maximum coating capacity of 0.71 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB17S.
- (p) One (1) surface coating spray booth identified as PB19, constructed in 2002, utilizing the airless and air atomized spray application method with a maximum coating capacity of 0.71 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB19S.
- (q) One (1) caulking process, identified as CLK, with a maximum capacity of 58 pounds of caulk per hour, using no control, and exhausting to general ventilation.
- (r) One (1) final trailer wash, identified as SC, with a maximum capacity of 4.7 pounds of solvent per hour, using no control, and exhausting to general ventilation.

Under NESHAP, Subpart M MMMM, Surface coating operations identified as PB1 through PB5, PB7 through PB15, PB17 and PB19 are considered an existing affected source because the construction of each operation commenced prior to August 13, 2002.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

E.1.1 General Provisions Relating to NESHAP for Surface Coating of Miscellaneous Metal Parts and Products [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.3880, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1 for Paint Line 1 and Paint Line 2, as specified in Appendix A of 40 CFR Part 63, Subpart M MMMM in accordance with the schedule in 40 CFR 63 Subpart M MMMM.
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

E.1.2 NESHAP Surface Coating of Miscellaneous Metal Parts and Products Requirements
[40 CFR Part 63, Subpart Mmmm]

Pursuant to CFR Part 63, Subpart Mmmm the Permittee shall comply with the provisions of 40 CFR Part 63.3880, as specified as follows:

§ 63.3881 Am I subject to this subpart?

(a) Miscellaneous metal parts and products include, but are not limited to, metal components of the following types of products as well as the products themselves: motor vehicle parts and accessories, bicycles and sporting goods, recreational vehicles, extruded aluminum structural components, railroad cars, heavy duty trucks, medical equipment, lawn and garden equipment, electronic equipment, magnet wire, steel drums, industrial machinery, metal pipes, and numerous other industrial, household, and consumer products. Except as provided in paragraph (c) of this section, the source category to which this subpart applies is the surface coating of any miscellaneous metal parts or products, as described in paragraph (a)(1) of this section, and it includes the subcategories listed in paragraphs (a)(2) through (6) of this section.

(1) Surface coating is the application of coating to a substrate using, for example, spray guns or dip tanks. When application of coating to a substrate occurs, then surface coating also includes associated activities, such as surface preparation, cleaning, mixing, and storage. However, these activities do not comprise surface coating if they are not directly related to the application of the coating. Coating application with handheld, non-refillable aerosol containers, touch-up markers, marking pens, or the application of paper film or plastic film which may be pre-coated with an adhesive by the manufacturer are not coating operations for the purposes of this subpart.

(2) The general use coating subcategory includes all surface coating operations that are not high performance, magnet wire, rubber-to-metal, or extreme performance fluoropolymer coating operations.

(3) The high performance coating subcategory includes surface coating operations that are performed using coatings that meet the definition of high performance architectural coating or high temperature coating in §63.3981.

(4) The magnet wire coating subcategory includes surface coating operations that are performed using coatings that meet the definition of magnet wire coatings in §63.3981.

(5) The rubber-to-metal coatings subcategory includes surface coating operations that are performed using coatings that meet the definition of rubber-to-metal coatings in §63.3981.

(6) The extreme performance fluoropolymer coatings subcategory includes surface coating operations that are performed using coatings that meet the definition of extreme performance fluoropolymer coatings in §63.3981.

(b) You are subject to this subpart if you own or operate a new, reconstructed, or existing affected source, as defined in §63.3882, that uses 946 liters (250 gallons (gal)) per year, or more, of coatings that contain hazardous air pollutants (HAP) in the surface coating of miscellaneous metal parts and products defined in paragraph (a) of this section; and that is a major source, is located at a major source, or is part of a major source of emissions of HAP. A major source of HAP emissions is any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit any single HAP at a rate of 9.07 megagrams (Mg) (10 tons) or more per year or any combination of HAP at a rate of 22.68 Mg (25 tons) or more per year. You do not need to include coatings that meet the definition of non-HAP coating contained in §63.3981 in determining whether you use 946 liters (250 gal) per year, or more, of coatings in the surface coating of miscellaneous metal parts and products.

(c) This subpart does not apply to surface coating or a coating operation that meets any of the criteria of paragraphs (c)(1) through (17) of this section.

(1) A coating operation conducted at a facility where the facility uses only coatings, thinners and other additives, and cleaning materials that contain no organic HAP, as determined according to §63.3941(a).

- (2) Surface coating operations that occur at research or laboratory facilities, or is part of janitorial, building, and facility maintenance operations, or that occur at hobby shops that are operated for noncommercial purposes.
- (3) Coatings used in volumes of less than 189 liters (50 gal) per year, provided that the total volume of coatings exempt under this paragraph does not exceed 946 liters (250 gal) per year at the facility.
- (4) The surface coating of metal parts and products performed on-site at installations owned or operated by the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State) or the National Aeronautics and Space Administration, or the surface coating of military munitions manufactured by or for the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State).
- (5) Surface coating where plastic is extruded onto metal wire or cable or metal parts or products to form a coating.
- (6) Surface coating of metal components of wood furniture that meet the applicability criteria for wood furniture manufacturing (subpart JJ of this part).
- (7) Surface coating of metal components of large appliances that meet the applicability criteria for large appliance surface coating (subpart NNNN of this part).
- (8) Surface coating of metal components of metal furniture that meet the applicability criteria for metal furniture surface coating (subpart RRRR of this part).
- (9) Surface coating of metal components of wood building products that meet the applicability criteria for wood building products surface coating (subpart QQQQ of this part).
- (10) Surface coating of metal components of aerospace vehicles that meet the applicability criteria for aerospace manufacturing and rework (40 CFR part 63, subpart GG).
- (11) Surface coating of metal parts intended for use in an aerospace vehicle or component using specialty coatings as defined in appendix A to subpart GG of this part.
- (12) Surface coating of metal components of ships that meet the applicability criteria for shipbuilding and ship repair (subpart II of this part).
- (13) Surface coating of metal using a web coating process that meets the applicability criteria for paper and other web coating (subpart JJJJ of this part).
- (14) Surface coating of metal using a coil coating process that meets the applicability criteria for metal coil coating (subpart SSSS of this part).
- (15) Surface coating of boats or metal parts of boats (including, but not limited to, the use of assembly adhesives) where the facility meets the applicability criteria for boat manufacturing facilities (subpart VVVV of this part), except where the surface coating of the boat is a metal coating operation performed on personal watercraft or parts of personal watercraft. This subpart does apply to metal coating operations performed on personal watercraft and parts of personal watercraft.
- (16) Surface coating of assembled on-road vehicles that meet the applicability criteria for the assembled on-road vehicle subcategory in plastic parts and products surface coating (40 CFR part 63, subpart PPPP).
- (17) Surface coating of metal components of automobiles and light-duty trucks that meets the applicability criteria in §63.3082(b) for the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (40 CFR part 63, subpart IIII) at a facility that meets the applicability criteria in §63.3081(b).
 - (d) If your facility meets the applicability criteria in §63.3081(b) of the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (40 CFR part 63, subpart IIII), and you perform surface coating of metal parts or products that meets both the applicability criteria in §63.3082(c) and the applicability criteria of the Surface Coating of Miscellaneous Metal Parts and Products (40 CFR part 63, subpart MMMM), then for the surface coating of any or all of your metal parts or products that meets the applicability criteria in §63.3082(c), you may choose to comply with the requirements of subpart IIII of this part in lieu of complying with the Surface Coating of Miscellaneous Metal Parts and Products NESHAP. Surface coating operations on metal parts or products not intended for use in automobiles or light-duty trucks (for example, parts for motorcycles or lawn mowers) cannot be made part of your affected source under subpart IIII of this part.
 - (e) If you own or operate an affected source that meets the applicability criteria of this subpart and at the same facility you also perform surface coating that meets the applicability criteria of any other final surface coating NESHAP in this part you may choose to comply as specified in paragraph (e)(1), (2), or (3) of this section.

- (1) You may have each surface coating operation that meets the applicability criteria of a separate NESHAP comply with that NESHAP separately.
- (2) You may comply with the emission limitation representing the predominant surface coating activity at your facility, as determined according to paragraphs (e)(2)(i) and (ii) of this section. However, you may not establish high performance, rubber-to-metal, or extreme performance fluoropolymer coating operations as the predominant activity. You must not consider any surface coating activity that is subject to the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (40 CFR part 63, subpart IIII) in determining the predominant surface coating activity at your facility.

(i) If a surface coating operation accounts for 90 percent or more of the surface coating activity at your facility (that is, the predominant activity), then compliance with the emission limitations of the predominant activity for all surface coating operations constitutes compliance with these and other applicable surface coating NESHAP. In determining predominant activity, you must include coating activities that meet the applicability criteria of other surface coating NESHAP and constitute more than 1 percent of total coating activities at your facility. Coating activities that meet the applicability criteria of other surface coating NESHAP but comprise less than 1 percent of coating activities need not be included in the determination of predominant activity but must be included in the compliance calculation.

(ii) You must use liters (gal) of solids used as a measure of relative surface coating activity over a representative period of operation. You may estimate the relative volume of coating solids used from parameters other than coating consumption and volume solids content (e.g., design specifications for the parts or products coated and the number of items produced). The determination of predominant activity must accurately reflect current and projected coating operations and must be verifiable through appropriate documentation. The use of parameters other than coating consumption and volume solids content must be approved by the Administrator. You may use data for any reasonable time period of at least 1 year in determining the relative amount of coating activity, as long as they represent the way the source will continue to operate in the future and are approved by the Administrator. You must determine the predominant activity at your facility and submit the results of that determination with the initial notification required by §63.3910(b). You must also determine predominant activity annually and include the determination in the next semi-annual compliance report required by §63.3920(a).

(3) You may comply with a facility-specific emission limit calculated from the relative amount of coating activity that is subject to each emission limit. If you elect to comply using the facility-specific emission limit alternative, then compliance with the facility-specific emission limit and the emission limitations in this subpart for all surface coating operations constitutes compliance with this and other applicable surface coating NESHAP. The procedures for calculating the facility-specific emission limit are specified in §63.3890. In calculating a facility-specific emission limit, you must include coating activities that meet the applicability criteria of other surface coating NESHAP and constitute more than 1 percent of total coating activities at your facility. You must not consider any surface coating activity that is subject to the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (40 CFR part 63, subpart IIII) in determining a facility-specific emission limit for your facility. Coating activities that meet the applicability criteria of other surface coating NESHAP but comprise less than 1 percent of total coating activities need not be included in the calculation of the facility-specific emission limit but must be included in the compliance calculations.

§ 63.3882 What parts of my plant does this subpart cover?

(a) This subpart applies to each new, reconstructed, and existing affected source within each of the four subcategories listed in §63.3881(a).

(b) The affected source is the collection of all of the items listed in paragraphs (b)(1) through (4) of this section that are used for surface coating of miscellaneous metal parts and products within each subcategory.

(1) All coating operations as defined in §63.3981;

(2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

(3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and

- (4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
- (c) An affected source is a new affected source if you commenced its construction after August 13, 2002 and the construction is of a completely new miscellaneous metal parts and products surface coating facility where previously no miscellaneous metal parts and products surface coating facility had existed.
- (d) An affected source is reconstructed if it meets the criteria as defined in §63.2.
- (e) An affected source is existing if it is not new or reconstructed.

What This Subpart Covers

§ 63.3883 When do I have to comply with this subpart?

The date by which you must comply with this subpart is called the compliance date. The compliance date for each type of affected source is specified in paragraphs (a) through (c) of this section. The compliance date begins the initial compliance period during which you conduct the initial compliance demonstration described in §§63.3940, 63.3950, and 63.3960.

- (b) For an existing affected source, the compliance date is the date 3 years after January 2, 2004.

Emission Limitations

§ 63.3890 What emission limits must I meet?

(b) For an existing affected source, you must limit organic HAP emissions to the atmosphere from the affected source to the applicable limit specified in paragraphs (b)(1) through (5) of this section, except as specified in paragraph (c) of this section, determined according to the requirements in §63.3941, §63.3951, or §63.3961.

- (1) For each existing general use coating affected source, limit organic HAP emissions to no more than 0.31 kg (2.6 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period.

§ 63.3891 What are my options for meeting the emission limits?

You must include all coatings (as defined in §63.3981), thinners and/or other additives, and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in §63.3890. To make this determination, you must use at least one of the three compliance options listed in paragraphs (a) through (c) of this section. You may apply any of the compliance options to an individual coating operation, or to multiple coating operations as a group, or to the entire affected source. You may use different compliance options for different coating operations, or at different times on the same coating operation. You may employ different compliance options when different coatings are applied to the same part, or when the same coating is applied to different parts. However, you may not use different compliance options at the same time on the same coating operation. If you switch between compliance options for any coating operation or group of coating operations, you must document this switch as required by §63.3930(c), and you must report it in the next semiannual compliance report required in §63.3920.

(a) *Compliant material option.* Demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit in §63.3890, and that each thinner and/or other additive, and cleaning material used contains no organic HAP. You must meet all the requirements of §§63.3940, 63.3941, and 63.3942 to demonstrate compliance with the applicable emission limit using this option.

(b) *Emission rate without add-on controls option.* Demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit in §63.3890, calculated as a rolling 12-month emission rate and determined on a monthly basis. You must meet all the requirements of §§63.3950, 63.3951, and 63.3952 to demonstrate compliance with the emission limit using this option.

§ 63.3892 What operating limits must I meet?

(a) For any coating operation(s) on which you use the compliant material option or the emission rate without add-on controls option, you are not required to meet any operating limits.

§ 63.3893 What work practice standards must I meet?

(a) For any coating operation(s) on which you use the compliant material option or the emission rate without add-on controls option, you are not required to meet any work practice standards.

General Compliance Requirements

§ 63.3900 What are my general requirements for complying with this subpart?

(a) You must be in compliance with the emission limitations in this subpart as specified in paragraphs (a)(1) of this section.

(1) Any coating operation(s) for which you use the compliant material option or the emission rate without add-on controls option, as specified in §63.3891(a) and (b), must be in compliance with the applicable emission limit in §63.3890 at all times.

(b) You must always operate and maintain your affected source, including all air pollution control and monitoring equipment you use for purposes of complying with this subpart, according to the provisions in §63.6(e)(1)(i).

§ 63.3901 What parts of the General Provisions apply to me?

Table 2 to this subpart shows which parts of the General Provisions in §§63.1 through 63.15 apply to you.

Notifications, Reports, and Records

§ 63.3910 What notifications must I submit?

(a) General. You must submit the notifications in §§63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to you by the dates specified in those sections, except as provided in paragraphs (b) and (c) of this section.

(b) Initial Notification. You must submit the initial notification required by §63.9(b) for a new or reconstructed affected source no later than 120 days after initial startup or 120 days after January 2, 2004, whichever is later. The Permittee submitted the initial notification to IDEM, OAQ on December 31, 2004. If you are using compliance with the Surface Coating of Automobiles and Light-Duty Trucks NESHAP (subpart IIII of this part) as provided for under §63.3881(d) to constitute compliance with this subpart for any or all of your metal parts coating operations, then you must include a statement to this effect in your initial notification, and no other notifications are required under this subpart in regard to those metal parts coating operations. If you are complying with another NESHAP that constitutes the predominant activity at your facility under §63.3881(e)(2) to constitute compliance with this subpart for your metal parts coating operations, then you must include a statement to this effect in your initial notification, and no other notifications are required under this subpart in regard to those metal parts coating operations.

(c) Notification of compliance status. You must submit the notification of compliance status required by §63.9(h) no later than 30 calendar days following the end of the initial compliance period described in §§63.3940, 63.3950, or 63.3960 that applies to your affected source. The notification of compliance status must contain the information specified in paragraphs (c)(1) through (11) of this section and in §63.9(h).

(1) Company name and address.

(2) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

(3) Date of the report and beginning and ending dates of the reporting period. The reporting period is the initial compliance period described in §§63.3940, 63.3950, or 63.3960 that applies to your affected source.

(4) Identification of the compliance option or options specified in §63.3891 that you used on each coating operation in the affected source during the initial compliance period.

(5) Statement of whether or not the affected source achieved the emission limitations for the initial

compliance period.

(6) If you had a deviation, include the information in paragraphs (c)(6)(i) and (ii) of this section.

(i) A description and statement of the cause of the deviation.

(ii) If you failed to meet the applicable emission limit in §63.3890, include all the calculations you used to determine the kg (lb) of organic HAP emitted per liter (gal) coating solids used. You do not need to submit information provided by the materials' suppliers or manufacturers, or test reports.

(7) For each of the data items listed in paragraphs (c)(7)(i) through (iv) of this section that is required by the compliance option(s) you used to demonstrate compliance with the emission limit, include an example of how you determined the value, including calculations and supporting data. Supporting data may include a copy of the information provided by the supplier or manufacturer of the example coating or material, or a summary of the results of testing conducted according to §63.3941(a), (b), or (c). You do not need to submit copies of any test reports.

(i) Mass fraction of organic HAP for one coating, for one thinner and/or other additive, and for one cleaning material.

(ii) Volume fraction of coating solids for one coating.

(iii) Density for one coating, one thinner and/or other additive, and one leaning material, except that if you use the compliant material option, only the example coating density is required.

(iv) The amount of waste materials and the mass of organic HAP contained in the waste materials for which you are claiming an allowance in Equation 1 of §63.3951.

(8) The calculation of kg (lb) of organic HAP emitted per liter (gal) coating solids used for the compliance option(s) you used, as specified in paragraphs (c)(8)(i) through (iii) of this section.

(i) For the compliant material option, provide an example calculation of the organic HAP content for one coating, using Equation 2 of §63.3941.

(ii) For the emission rate without add-on controls option, provide the calculation of the total mass of organic HAP emissions for each month; the calculation of the total volume of coating solids used each month; and the calculation of the 12-month organic HAP emission rate using Equations 1 and 1A through 1C, 2, and 3, respectively, of §63.3951.

§ 63.3920 What reports must I submit?

(a) Semiannual compliance reports. You must submit semiannual compliance reports for each affected source according to the requirements of paragraphs (a)(1) through (7) of this section. The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in paragraph (a)(2) of this section.

(1) Dates. Unless the Administrator has approved or agreed to a different schedule for submission of reports under §63.10(a), you must prepare and submit each semiannual compliance report according to the dates specified in paragraphs (a)(1)(i) through (iv) of this section. Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

(i) The first semiannual compliance report must cover the first semiannual reporting period which begins the day after the end of the initial compliance period described in §63.3940, §63.3950, or §63.3960 that applies to your affected source and ends on June 30 or December 31, whichever date is the first date following the end of the initial compliance period.

(ii) Each subsequent semiannual compliance report must cover the subsequent semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

(iii) Each semiannual compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

(iv) For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR part 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), you may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the date specified in paragraph (a)(1)(iii) of this section.

(2) Inclusion with title V report. Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 40 CFR part 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a semiannual compliance report pursuant to this section along with, or as

part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the semiannual compliance report includes all required information concerning deviations from any emission limitation in this subpart, its submission will be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a semiannual compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.

(3) General requirements. The semiannual compliance report must contain the information specified in paragraphs (a)(3)(i) through (vii) of this section, and the information specified in paragraphs (a)(4) through (7) and (c)(1) of this section that is applicable to your affected source.

(i) Company name and address.

(ii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

(iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

(iv) Identification of the compliance option or options specified in §63.3891 that you used on each coating operation during the reporting period. If you switched between compliance options during the reporting period, you must report the beginning and ending dates for each option you used.

(v) If you used the emission rate without add-on controls or the emission rate with add-on controls compliance option (§63.3891(b) or (c)), the calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period.

(vi) If you used the predominant activity alternative (§63.3890(c)(1)), include the annual determination of predominant activity if it was not included in the previous semi-annual compliance report.

(vii) If you used the facility-specific emission limit alternative (§63.3890(c)(2)), include the calculation of the facility-specific emission limit for each 12-month compliance period during the 6-month reporting period.

(4) No deviations. If there were no deviations from the emission limitations in §§63.3890, 63.3892, and 63.3893 that apply to you, the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period. If you used the emission rate with add-on controls option and there were no periods during which the continuous parameter monitoring systems (CPMS) were out-of-control as specified in §63.8(c)(7), the semiannual compliance report must include a statement that there were no periods during which the CPMS were out-of-control during the reporting period.

(5) Deviations: Compliant material option. If you used the compliant material option and there was a deviation from the applicable organic HAP content requirements in §63.3890, the semiannual compliance report must contain the information in paragraphs (a)(5)(i) through (iv) of this section.

(i) Identification of each coating used that deviated from the applicable emission limit, and each thinner and/or other additive, and cleaning material used that contained organic HAP, and the dates and time periods each was used.

(ii) The calculation of the organic HAP content (using Equation 2 of §63.3941) for each coating identified in paragraph (a)(5)(i) of this section. You do not need to submit background data supporting this calculation (e.g., information provided by coating suppliers or manufacturers, or test reports).

(iii) The determination of mass fraction of organic HAP for each thinner and/or other additive, and cleaning material identified in paragraph (a)(5)(i) of this section. You do not need to submit background data supporting this calculation (e.g., information provided by material suppliers or manufacturers, or test reports).

(iv) A statement of the cause of each deviation.

(6) Deviations: Emission rate without add-on controls option. If you used the emission rate without add-on controls option and there was a deviation from the applicable emission limit in §63.3890, the semiannual compliance report must contain the information in paragraphs (a)(6)(i) through (iii) of this section.

(i) The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit in §63.3890.

(ii) The calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred. You must submit the calculations for Equations 1, 1A through

1C, 2, and 3 of §63.3951; and if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.3951(e)(4). You do not need to submit background data supporting these calculations (e.g., information provided by materials suppliers or manufacturers, or test reports).

(iii) A statement of the cause of each deviation.

§ 63.3930 What records must I keep?

You must collect and keep records of the data and information specified in this section. Failure to collect and keep these records is a deviation from the applicable standard.

(a) A copy of each notification and report that you submitted to comply with this subpart, and the documentation supporting each notification and report.

(b) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating. If you conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, you must keep a copy of the complete test report. If you use information provided to you by the manufacturer or supplier of the material that was based on testing, you must keep the summary sheet of results provided to you by the manufacturer or supplier. You are not required to obtain the test report or other supporting documentation from the manufacturer or supplier.

(c) For each compliance period, the records specified in paragraphs (c)(1) through (4) of this section.

(1) A record of the coating operations on which you used each compliance option and the time periods (beginning and ending dates and times) for each option you used.

(2) For the compliant material option, a record of the calculation of the organic HAP content for each coating, using Equation 2 of §63.3941.

(3) For the emission rate without add-on controls option, a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 1, 1A through 1C, and 2 of §63.3951; and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.3951(e)(4); the calculation of the total volume of coating solids used each month using Equation 2 of §63.3951; and the calculation of each 12-month organic HAP emission rate using Equation 3 of §63.3951.

(d) A record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If you are using the compliant material option for all coatings at the source, you may maintain purchase records for each material used rather than a record of the volume used.

(e) A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period unless the material is tracked by weight.

(f) A record of the volume fraction of coating solids for each coating used during each compliance period.

(g) If you use either the emission rate without add-on controls or the emission rate with add-on controls compliance option, the density for each coating, thinner and/or other additive, and cleaning material used during each compliance period.

(h) If you use an allowance in Equation 1 of §63.3951 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to §63.3951(e)(4), you must keep records of the information specified in paragraphs (h)(1) through (3) of this section.

(1) The name and address of each TSDF to which you sent waste materials for which you use an allowance in Equation 1 of §63.3951; a statement of which subparts under 40 CFR parts 262, 264, 265, and 266 apply to the facility; and the date of each shipment.

(2) Identification of the coating operations producing waste materials included in each shipment and the month or months in which you used the allowance for these materials in Equation 1 of §63.3951.

(3) The methodology used in accordance with §63.3951(e)(4) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each month; and the methodology to determine the mass of organic HAP contained in these waste materials. This must include the sources for all data used in the determination, methods used to

generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment.

(i) [Reserved]

(j) You must keep records of the date, time, and duration of each deviation.

§ 63.3931 In what form and for how long must I keep my records?

(a) Your records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database.

(b) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) You must keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to §63.10(b)(1). You may keep the records off-site for the remaining 3 years.

Compliance Requirements for the Compliant Material Option

§ 63.3940 By what date must I conduct the initial compliance demonstration?

You must complete the initial compliance demonstration for the initial compliance period according to the requirements in §63.3941. The initial compliance period begins on the applicable compliance date specified in §63.3883 and ends on the last day of the 12th month following the compliance date. If the compliance date occurs on any day other than the first day of a month, then the initial compliance period extends through that month plus the next 12 months. The initial compliance demonstration includes the calculations according to §63.3941 and supporting documentation showing that during the initial compliance period, you used no coating with an organic HAP content that exceeded the applicable emission limit in §63.3890, and that you used no thinners and/or other additives, or cleaning materials that contained organic HAP as determined according to §63.3941(a).

§ 63.3941 How do I demonstrate initial compliance with the emission limitations?

You may use the compliant material option for any individual coating operation, for any group of coating operations in the affected source, or for all the coating operations in the affected source. You must use either the emission rate without add-on controls option or the emission rate with add-on controls option for any coating operation in the affected source for which you do not use this option. To demonstrate initial compliance using the compliant material option, the coating operation or group of coating operations must use no coating with an organic HAP content that exceeds the applicable emission limits in §63.3890 and must use no thinner and/or other additive, or cleaning material that contains organic HAP as determined according to this section. Any coating operation for which you use the compliant material option is not required to meet the operating limits or work practice standards required in §§63.3892 and 63.3893, respectively. You must meet all the requirements of this section. Use the procedures in this section on each coating, thinner and/or other additive, and cleaning material in the condition it is in when it is received from its manufacturer or supplier and prior to any alteration. You do not need to redetermine the organic HAP content of coatings, thinners and/or other additives, and cleaning materials that are reclaimed on-site (or reclaimed off-site if you have documentation showing that you received back the exact same materials that were sent off-site) and reused in the coating operation for which you use the compliant material option, provided these materials in their condition as received were demonstrated to comply with the compliant material option.

(a) Determine the mass fraction of organic HAP for each material used. You must determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during the compliance period by using one of the options in paragraphs (a)(1) through (5) of this section.

(1) *Method 311 (appendix A to 40 CFR part 63)*. You may use Method 311 for determining the mass fraction of organic HAP. Use the procedures specified in paragraphs (a)(1)(i) and (ii) of this section when performing a Method 311 test.

(i) Count each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA)-defined carcinogens as specified in 29 CFR

1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of the material by mass, you do not have to count it. Express the mass fraction of each organic HAP you count as a value truncated to four places after the decimal point (e.g., 0.3791).

(ii) Calculate the total mass fraction of organic HAP in the test material by adding up the individual organic HAP mass fractions and truncating the result to three places after the decimal point (e.g., 0.763).

(2) *Method 24 (appendix A to 40 CFR part 60)*. For coatings, you may use Method 24 to determine the mass fraction of nonaqueous volatile matter and use that value as a substitute for mass fraction of organic HAP. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, you may use the alternative method contained in appendix A to subpart PPPP of this part, rather than Method 24. You may use the volatile fraction that is emitted, as measured by the alternative method in appendix A to subpart PPPP of this part, as a substitute for the mass fraction of organic HAP.

(3) *Alternative method*. You may use an alternative test method for determining the mass fraction of organic HAP once the Administrator has approved it. You must follow the procedure in §63.7(f) to submit an alternative test method for approval.

(4) *Information from the supplier or manufacturer of the material*. You may rely on information other than that generated by the test methods specified in paragraphs (a)(1) through (3) of this section, such as manufacturer's formulation data, if it represents each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material by mass, you do not have to count it. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, you may rely on manufacturer's data that expressly states the organic HAP or volatile matter mass fraction emitted. If there is a disagreement between such information and results of a test conducted according to paragraphs (a)(1) through (3) of this section, then the test method results will take precedence unless, after consultation, you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

(5) *Solvent blends*. Solvent blends may be listed as single components for some materials in data provided by manufacturers or suppliers. Solvent blends may contain organic HAP which must be counted toward the total organic HAP mass fraction of the materials. When test data and manufacturer's data for solvent blends are not available, you may use the default values for the mass fraction of organic HAP in these solvent blends listed in Table 3 or 4 to this subpart. If you use the tables, you must use the values in Table 3 for all solvent blends that match Table 3 entries according to the instructions for Table 3, and you may use Table 4 only if the solvent blends in the materials you use do not match any of the solvent blends in Table 3 and you know only whether the blend is aliphatic or aromatic. However, if the results of a Method 311 (appendix A to 40 CFR part 63) test indicate higher values than those listed on Table 3 or 4 to this subpart, the Method 311 results will take precedence unless, after consultation, you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

(b) *Determine the volume fraction of coating solids for each coating*. You must determine the volume fraction of coating solids (liters (gal) of coating solids per liter (gal) of coating) for each coating used during the compliance period by a test, by information provided by the supplier or the manufacturer of the material, or by calculation, as specified in paragraphs (b)(1) through (4) of this section. If test results obtained according to paragraph (b)(1) of this section do not agree with the information obtained under paragraph (b)(3) or (4) of this section, the test results will take precedence unless, after consultation, you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

(1) *ASTM Method D2697–86 (Reapproved 1998) or ASTM Method D6093–97 (Reapproved 2003)*. You may use ASTM Method D2697–86 (Reapproved 1998), "Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings" (incorporated by reference, see §63.14), or ASTM Method D6093–97 (Reapproved 2003), "Standard Test Method for Percent Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer" (incorporated by reference, see §63.14), to determine the volume fraction of coating solids for each coating. Divide

the nonvolatile volume percent obtained with the methods by 100 to calculate volume fraction of coating solids.

(2) *Alternative method.* You may use an alternative test method for determining the solids content of each coating once the Administrator has approved it. You must follow the procedure in §63.7(f) to submit an alternative test method for approval.

(3) *Information from the supplier or manufacturer of the material.* You may obtain the volume fraction of coating solids for each coating from the supplier or manufacturer.

(4) *Calculation of volume fraction of coating solids.* You may determine the volume fraction of coating solids using Equation 1 of this section:

$$V_s = 1 - \frac{m_{\text{volatiles}}}{D_{\text{avg}}} \quad (\text{Eq. 1})$$

Where:

V_s = Volume fraction of coating solids, liters (gal) coating solids per liter (gal) coating.

$m_{\text{volatiles}}$ = Total volatile matter content of the coating, including HAP, volatile organic compounds (VOC), water, and exempt compounds, determined according to Method 24 in appendix A of 40 CFR part 60, grams volatile matter per liter coating.

D_{avg} = Average density of volatile matter in the coating, grams volatile matter per liter volatile matter, determined from test results using ASTM Method D1475–98, “Standard Test Method for Density of Liquid Coatings, Inks, and Related Products” (incorporated by reference, see §63.14), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475–98 test results and other information sources, the test results will take precedence unless, after consultation you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

(c) *Determine the density of each coating.* Determine the density of each coating used during the compliance period from test results using ASTM Method D1475–98, “Standard Test Method for Density of Liquid Coatings, Inks, and Related Products” (incorporated by reference, see §63.14), information from the supplier or manufacturer of the material, or specific gravity data for pure chemicals. If there is disagreement between ASTM Method D1475–98 test results and the supplier's or manufacturer's information, the test results will take precedence unless, after consultation you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct.

(d) *Determine the organic HAP content of each coating.* Calculate the organic HAP content, kg (lb) of organic HAP emitted per liter (gal) coating solids used, of each coating used during the compliance period using Equation 2 of this section:

$$H_c = \frac{(D_c)(W_c)}{V_s} \quad (\text{Eq. 2})$$

Where:

H_c = Organic HAP content of the coating, kg organic HAP emitted per liter (gal) coating solids used.

D_c = Density of coating, kg coating per liter (gal) coating, determined according to paragraph (c) of this section.

W_c = Mass fraction of organic HAP in the coating, kg organic HAP per kg coating, determined according to paragraph (a) of this section.

V_s = Volume fraction of coating solids, liter (gal) coating solids per liter (gal) coating, determined according to paragraph (b) of this section.

(e) *Compliance demonstration.* The calculated organic HAP content for each coating used during the initial compliance period must be less than or equal to the applicable emission limit in §63.3890; and each thinner and/or other additive, and cleaning material used during the initial compliance period must contain no organic HAP, determined according to paragraph (a) of this section. You must keep all records required by §§63.3930 and 63.3931. As part of the notification of compliance status required in §63.3910, you must identify the coating operation(s) for which you used the compliant material option and submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the initial compliance period because you used no coatings for which the organic HAP content exceeded the applicable emission limit in §63.3890, and you used no

thinners and/or other additives, or cleaning materials that contained organic HAP, determined according to the procedures in paragraph (a) of this section.

§ 63.3942 How do I demonstrate continuous compliance with the emission limitations?

(a) For each compliance period to demonstrate continuous compliance, you must use no coating for which the organic HAP content (determined using Equation 2 of §63.3941) exceeds the applicable emission limit in §63.3890, and use no thinner and/or other additive, or cleaning material that contains organic HAP, determined according to §63.3941(a). A compliance period consists of 12 months. Each month, after the end of the initial compliance period described in §63.3940, is the end of a compliance period consisting of that month and the preceding 11 months.

(b) If you choose to comply with the emission limitations by using the compliant material option, the use of any coating, thinner and/or other additive, or cleaning material that does not meet the criteria specified in paragraph (a) of this section is a deviation from the emission limitations that must be reported as specified in §§63.3910(c)(6) and 63.3920(a)(5).

(c) As part of each semiannual compliance report required by §63.3920, you must identify the coating operation(s) for which you used the compliant material option. If there were no deviations from the applicable emission limit in §63.3890, submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because you used no coatings for which the organic HAP content exceeded the applicable emission limit in §63.3890, and you used no thinner and/or other additive, or cleaning material that contained organic HAP, determined according to §63.3941(a).

(d) You must maintain records as specified in §§63.3930 and 63.3931.

Compliance Requirements for the Emission Rate Without Add-On Controls Option

§ 63.3950 By what date must I conduct the initial compliance demonstration?

You must complete the initial compliance demonstration for the initial compliance period according to the requirements of §63.3951. The initial compliance period begins on the applicable compliance date specified in §63.3883 and ends on the last day of the 12th month following the compliance date. If the compliance date occurs on any day other than the first day of a month, then the initial compliance period extends through the end of that month plus the next 12 months. You must determine the mass of organic HAP emissions and volume of coating solids used each month and then calculate an organic HAP emission rate at the end of the initial compliance period. The initial compliance demonstration includes the calculations according to §63.3951 and supporting documentation showing that during the initial compliance period the organic HAP emission rate was equal to or less than the applicable emission limit in §63.3890.

§ 63.3951 How do I demonstrate initial compliance with the emission limitations?

You may use the emission rate without add-on controls option for any individual coating operation, for any group of coating operations in the affected source, or for all the coating operations in the affected source. You must use either the compliant material option or the emission rate with add-on controls option for any coating operation in the affected source for which you do not use this option. To demonstrate initial compliance using the emission rate without add-on controls option, the coating operation or group of coating operations must meet the applicable emission limit in §63.3890, but is not required to meet the operating limits or work practice standards in §§63.3892 and 63.3893, respectively. You must conduct a separate initial compliance demonstration for each general use, magnet wire, rubber-to-metal, and extreme performance fluoropolymer coating operation unless you are demonstrating compliance with a predominant activity or facility-specific emission limit as provided in §63.3890(c). If you are demonstrating compliance with a predominant activity or facility-specific emission limit as provided in §63.3890(c), you must demonstrate that all coating operations included in the predominant activity determination or calculation of the facility-specific emission limit comply with that limit. You must meet all the requirements of this section. When calculating the organic HAP emission rate according to this section, do not include any coatings, thinners and/or other additives, or cleaning materials used on coating operations for which you use the compliant material option or the emission rate with add-on controls option. You do not need to redetermine the mass of organic HAP in coatings, thinners and/or other additives, or cleaning materials that have

been reclaimed on-site (or reclaimed off-site if you have documentation showing that you received back the exact same materials that were sent off-site) and reused in the coating operation for which you use the emission rate without add-on controls option. If you use coatings, thinners and/or other additives, or cleaning materials that have been reclaimed on-site, the amount of each used in a month may be reduced by the amount of each that is reclaimed. That is, the amount used may be calculated as the amount consumed to account for materials that are reclaimed.

(a) Determine the mass fraction of organic HAP for each material. Determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each month according to the requirements in §63.3941(a).

(b) Determine the volume fraction of coating solids. Determine the volume fraction of coating solids (liter (gal) of coating solids per liter (gal) of coating) for each coating used during each month according to the requirements in §63.3941(b).

(c) Determine the density of each material. Determine the density of each liquid coating, thinner and/or other additive, and cleaning material used during each month from test results using ASTM Method D1475–98, “Standard Test Method for Density of Liquid Coatings, Inks, and Related Products” (incorporated by reference, see §63.14), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If you are including powder coatings in the compliance determination, determine the density of powder coatings, using ASTM Method D5965–02, “Standard Test Methods for Specific Gravity of Coating Powders” (incorporated by reference, see §63.14), or information from the supplier. If there is disagreement between ASTM Method D1475–98 or ASTM Method D5965–02 test results and other such information sources, the test results will take precedence unless, after consultation you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct. If you purchase materials or monitor consumption by weight instead of volume, you do not need to determine material density. Instead, you may use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, 1C, and 2 of this section.

(d) Determine the volume of each material used. Determine the volume (liters) of each coating, thinner and/or other additive, and cleaning material used during each month by measurement or usage records. If you purchase materials or monitor consumption by weight instead of volume, you do not need to determine the volume of each material used. Instead, you may use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, and 1C of this section.

(e) Calculate the mass of organic HAP emissions. The mass of organic HAP emissions is the combined mass of organic HAP contained in all coatings, thinners and/or other additives, and cleaning materials used during each month minus the organic HAP in certain waste materials. Calculate the mass of organic HAP emissions using Equation 1 of this section.

$$H_e = A + B + C - R_w \quad (\text{Eq. 1})$$

Where:

H_e = Total mass of organic HAP emissions during the month, kg.

A = Total mass of organic HAP in the coatings used during the month, kg, as calculated in Equation 1A of this section.

B = Total mass of organic HAP in the thinners and/or other additives used during the month, kg, as calculated in Equation 1B of this section.

C = Total mass of organic HAP in the cleaning materials used during the month, kg, as calculated in Equation 1C of this section.

R_w = Total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSDF for treatment or disposal during the month, kg, determined according to paragraph (e)(4) of this section. (You may assign a value of zero to R_w if you do not wish to use this allowance.)

(1) Calculate the kg organic HAP in the coatings used during the month using Equation 1A of this section:

$$A = \sum_{i=1}^m (Vol_{c,i}) (D_{c,i}) (W_{c,i}) \quad (\text{Eq. 1A})$$

Where:

A = Total mass of organic HAP in the coatings used during the month, kg.

$Vol_{c,i}$ = Total volume of coating, i, used during the month, liters.

$D_{c,i}$ = Density of coating, i, kg coating per liter coating.

$W_{c,i}$ = Mass fraction of organic HAP in coating, i, kg organic HAP per kg coating. For reactive adhesives as defined in §63.3981, use the mass fraction of organic HAP that is emitted as determined using the method in appendix A to subpart PPPP of this part.

m = Number of different coatings used during the month.

(2) Calculate the kg of organic HAP in the thinners and/or other additives used during the month using Equation 1B of this section:

$$B = \sum_{j=1}^n (Vol_{t,j}) (D_{t,j}) (W_{t,j}) \quad (Eq. 1B)$$

Where:

B = Total mass of organic HAP in the thinners and/or other additives used during the month, kg.

$Vol_{t,j}$ = Total volume of thinner and/or other additive, j, used during the month, liters.

$D_{t,j}$ = Density of thinner and/or other additive, j, kg per liter.

$W_{t,j}$ = Mass fraction of organic HAP in thinner and/or other additive, j, kg organic HAP per kg thinner and/or other additive. For reactive adhesives as defined in §63.3981, use the mass fraction of organic HAP that is emitted as determined using the method in appendix A to subpart PPPP of this part.

n = Number of different thinners and/or other additives used during the month.

(3) Calculate the kg organic HAP in the cleaning materials used during the month using Equation 1C of this section:

$$C = \sum_{k=1}^p (Vol_{s,k}) (D_{s,k}) (W_{s,k}) \quad (Eq. 1C)$$

Where:

C = Total mass of organic HAP in the cleaning materials used during the month, kg.

$Vol_{s,k}$ = Total volume of cleaning material, k, used during the month, liters.

$D_{s,k}$ = Density of cleaning material, k, kg per liter.

$W_{s,k}$ = Mass fraction of organic HAP in cleaning material, k, kg organic HAP per kg material.

p = Number of different cleaning materials used during the month.

(4) If you choose to account for the mass of organic HAP contained in waste materials sent or designated for shipment to a hazardous waste TSDF in Equation 1 of this section, then you must determine the mass according to paragraphs (e)(4)(i) through (iv) of this section.

(i) You may only include waste materials in the determination that are generated by coating operations in the affected source for which you use Equation 1 of this section and that will be treated or disposed of by a facility that is regulated as a TSDF under 40 CFR part 262, 264, 265, or 266. The TSDF may be either off-site or on-site. You may not include organic HAP contained in wastewater.

(ii) You must determine either the amount of the waste materials sent to a TSDF during the month or the amount collected and stored during the month and designated for future transport to a TSDF. Do not include in your determination any waste materials sent to a TSDF during a month if you have already included them in the amount collected and stored during that month or a previous month.

(iii) Determine the total mass of organic HAP contained in the waste materials specified in paragraph (e)(4)(ii) of this section.

(iv) You must document the methodology you use to determine the amount of waste materials and the total mass of organic HAP they contain, as required in §63.3930(h). If waste manifests include this information, they may be used as part of the documentation of the amount of waste materials and mass of organic HAP contained in them.

(f) Calculate the total volume of coating solids used. Determine the total volume of coating solids used, liters, which is the combined volume of coating solids for all the coatings used during each month, using Equation 2 of this section:

$$V_{st} = \sum_{i=1}^m (Vol_{c,i}) (V_{s,i}) \quad (Eq. 2)$$

Where:

V_{st} = Total volume of coating solids used during the month, liters.

$Vol_{c,i}$ = Total volume of coating, i , used during the month, liters.

$V_{s,i}$ = Volume fraction of coating solids for coating, i , liter solids per liter coating, determined according to §63.3941(b).

m = Number of coatings used during the month.

(g) Calculate the organic HAP emission rate. Calculate the organic HAP emission rate for the compliance period, kg (lb) organic HAP emitted per liter (gal) coating solids used, using Equation 3 of this section:

$$H_{yr} = \frac{\sum_{y=1}^n H_e}{\sum_{y=1}^n V_{st}} \quad (Eq. 3)$$

Where:

H_{yr} = Average organic HAP emission rate for the compliance period, kg organic HAP emitted per liter coating solids used.

H_e = Total mass of organic HAP emissions from all materials used during month, y , kg, as calculated by Equation 1 of this section.

V_{st} = Total volume of coating solids used during month, y , liters, as calculated by Equation 2 of this section.

y = Identifier for months.

n = Number of full or partial months in the compliance period (for the initial compliance period, n equals 12 if the compliance date falls on the first day of a month; otherwise n equals 13; for all following compliance periods, n equals 12).

(h) Compliance demonstration. The organic HAP emission rate for the initial compliance period calculated using Equation 3 of this section must be less than or equal to the applicable emission limit for each subcategory in §63.3890 or the predominant activity or facility-specific emission limit allowed in §63.3890(c). You must keep all records as required by §§63.3930 and 63.3931. As part of the notification of compliance status required by §63.3910, you must identify the coating operation(s) for which you used the emission rate without add-on controls option and submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the initial compliance period because the organic HAP emission rate was less than or equal to the applicable emission limit in §63.3890, determined according to the procedures in this section.

§ 63.3952 How do I demonstrate continuous compliance with the emission limitations?

(a) To demonstrate continuous compliance, the organic HAP emission rate for each compliance period, determined according to §63.3951(a) through (g), must be less than or equal to the applicable emission limit in §63.3890. A compliance period consists of 12 months. Each month after the end of the initial compliance period described in §63.3950 is the end of a compliance period consisting of that month and the preceding 11 months. You must perform the calculations in §63.3951(a) through (g) on a monthly basis using data from the previous 12 months of operation. If you are complying with a facility-specific emission limit under §63.3890(c), you must also perform the calculation using Equation 1 in §63.3890(c)(2) on a monthly basis using the data from the previous 12 months of operation.

(b) If the organic HAP emission rate for any 12-month compliance period exceeded the applicable emission limit in §63.3890, this is a deviation from the emission limitation for that compliance period and must be reported as specified in §§63.3910(c)(6) and 63.3920(a)(6).

(c) As part of each semiannual compliance report required by §63.3920, you must identify the coating operation(s) for which you used the emission rate without add-on controls option. If there were no deviations from the emission limitations, you must submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the applicable emission limit in §63.3890, determined according to §63.3951(a) through (g).

(d) You must maintain records as specified in §§63.3930 and 63.3931.

Other Requirements and Information

§ 63.3980 Who implements and enforces this subpart?

(a) This subpart can be implemented and enforced by us, the U.S. Environmental Protection Agency (EPA), or a delegated authority such as your State, local, or tribal agency. If the Administrator has delegated authority to your State, local, or tribal agency, then that agency (as well as the EPA) has the authority to implement and enforce this subpart. You should contact your EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to your State, local, or tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or tribal agency under subpart E of this part, the authorities contained in paragraph (c) of this section are retained by the Administrator and are not transferred to the State, local, or tribal agency.

(c) The authorities that will not be delegated to State, local, or tribal agencies are listed in paragraphs (c)(1) through (4) of this section:

(1) Approval of alternatives to the requirements in §63.3881 through 3883 and §63.3890 through 3893.

(2) Approval of major alternatives to test methods under §63.7(e)(2)(ii) and (f) and as defined in §63.90.

(3) Approval of major alternatives to monitoring under §63.8(f) and as defined in §63.90.

(4) Approval of major alternatives to recordkeeping and reporting under §63.10(f) and as defined in §63.90.

§ 63.3981 What definitions apply to this subpart?

Terms used in this subpart are defined in the CAA, in 40 CFR 63.2, and in this section as follows:

Additive means a material that is added to a coating after purchase from a supplier (e.g., catalysts, activators, accelerators).

Add-on control means an air pollution control device, such as a thermal oxidizer or carbon adsorber, that reduces pollution in an air stream by destruction or removal before discharge to the atmosphere.

Adhesive, adhesive coating means any chemical substance that is applied for the purpose of bonding two surfaces together. Products used on humans and animals, adhesive tape, contact paper, or any other product with an adhesive incorporated onto or in an inert substrate shall not be considered adhesives under this subpart.

Assembled on-road vehicle coating means any coating operation in which coating is applied to the surface of some component or surface of a fully assembled motor vehicle or trailer intended for on-road use including, but not limited to, components or surfaces on automobiles and light-duty trucks that have been repaired after a collision or otherwise repainted, fleet delivery trucks, and motor homes and other recreational vehicles (including camping trailers and fifth wheels). Assembled on-road vehicle coating includes the concurrent coating of parts of the assembled on-road vehicle that are painted off-vehicle to protect systems, equipment, or to allow full coverage. Assembled on-road vehicle coating does not include surface coating operations that meet the applicability criteria of the automobiles and light-duty trucks NESHAP. Assembled on-road vehicle coating also does not include the use of adhesives, sealants, and caulks used in assembling on-road vehicles.

Capture device means a hood, enclosure, room, floor sweep, or other means of containing or collecting emissions and directing those emissions into an add-on air pollution control device.

Capture efficiency or capture system efficiency means the portion (expressed as a percentage) of the pollutants from an emission source that is delivered to an add-on control device.

Capture system means one or more capture devices intended to collect emissions generated by a coating operation in the use of coatings or cleaning materials, both at the point of application and at subsequent points where emissions from the coatings and cleaning materials occur, such as flashoff,

drying, or curing. As used in this subpart, multiple capture devices that collect emissions generated by a coating operation are considered a single capture system.

Cleaning material means a solvent used to remove contaminants and other materials, such as dirt, grease, oil, and dried or wet coating (e.g., depainting or paint stripping), from a substrate before or after coating application or from equipment associated with a coating operation, such as spray booths, spray guns, racks, tanks, and hangers. Thus, it includes any cleaning material used on substrates or equipment or both.

Coating means a material applied to a substrate for decorative, protective, or functional purposes. Such materials include, but are not limited to, paints, sealants, liquid plastic coatings, caulks, inks, adhesives, and maskants. Decorative, protective, or functional materials that consist only of protective oils for metal, acids, bases, or any combination of these substances, or paper film or plastic film which may be pre-coated with an adhesive by the film manufacturer, are not considered coatings for the purposes of this subpart. A liquid plastic coating means a coating made from fine particle-size polyvinyl chloride (PVC) in solution (also referred to as a plastisol).

Coating operation means equipment used to apply cleaning materials to a substrate to prepare it for coating application (surface preparation) or to remove dried coating; to apply coating to a substrate (coating application) and to dry or cure the coating after application; or to clean coating operation equipment (equipment cleaning). A single coating operation may include any combination of these types of equipment, but always includes at least the point at which a given quantity of coating or cleaning material is applied to a given part and all subsequent points in the affected source where organic HAP are emitted from the specific quantity of coating or cleaning material on the specific part. There may be multiple coating operations in an affected source. Coating application with handheld, non-refillable aerosol containers, touch-up markers, or marking pens is not a coating operation for the purposes of this subpart.

Coatings solids means the nonvolatile portion of the coating that makes up the dry film.

Continuous parameter monitoring system (CPMS) means the total equipment that may be required to meet the data acquisition and availability requirements of this subpart, used to sample, condition (if applicable), analyze, and provide a record of coating operation, or capture system, or add-on control device parameters.

Controlled coating operation means a coating operation from which some or all of the organic HAP emissions are routed through an emission capture system and add-on control device.

Deviation means any instance in which an affected source subject to this subpart, or an owner or operator of such a source:

- (1) Fails to meet any requirement or obligation established by this subpart including but not limited to, any emission limit or operating limit or work practice standard;
- (2) Fails to meet any term or condition that is adopted to implement an applicable requirement in this subpart and that is included in the operating permit for any affected source required to obtain such a permit; or
- (3) Fails to meet any emission limit, or operating limit, or work practice standard in this subpart during startup, shutdown, or malfunction, regardless of whether or not such failure is permitted by this subpart.

Emission limitation means the aggregate of all requirements associated with a compliance option including emission limit, operating limit, work practice standard, etc.

Enclosure means a structure that surrounds a source of emissions and captures and directs the emissions to an add-on control device.

Exempt compound means a specific compound that is not considered a VOC due to negligible photochemical reactivity. The exempt compounds are listed in 40 CFR 51.100(s).

Extreme performance fluoropolymer coating means coatings that are formulated systems based on fluoropolymer resins which often contain bonding matrix polymers dissolved in non-aqueous solvents as well as other ingredients. Extreme performance fluoropolymer coatings are typically used when one or more critical performance criteria are required including, but not limited to a nonstick low-energy surface, dry film lubrication, high resistance to chemical attack, extremely wide operating temperature, high electrical insulating properties, or that the surface comply with government (e.g., USDA, FDA) or third party specifications for health, safety, reliability, or performance. Once applied to a substrate, extreme performance fluoropolymer coatings undergo a curing process that typically requires high temperatures, a chemical reaction, or other specialized technology.

Facility maintenance means the routine repair or renovation (including the surface coating) of the tools, equipment, machinery, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity.

General use coating means any material that meets the definition of coating but does not meet the definition of high performance coating, rubber-to-metal coating, magnet wire coating, or extreme performance fluoropolymer coating as defined in this section.

High performance architectural coating means any coating applied to architectural subsections which is required to meet the specifications of Architectural Aluminum Manufacturer's Association's publication number AAMA 605.2-2000.

High performance coating means any coating that meets the definition of high performance architectural coating or high temperature coating in this section.

High temperature coating means any coating applied to a substrate which during normal use must withstand temperatures of at least 538 degrees Celsius (1000 degrees Fahrenheit).

Hobby shop means any surface coating operation, located at an affected source, that is used exclusively for personal, noncommercial purposes by the affected source's employees or assigned personnel.

Magnet wire coatings, commonly referred to as magnet wire enamels, are applied to a continuous strand of wire which will be used to make turns (windings) in electrical devices such as coils, transformers, or motors. Magnet wire coatings provide high dielectric strength and turn-to-turn conductor insulation. This allows the turns of an electrical device to be placed in close proximity to one another which leads to increased coil effectiveness and electrical efficiency.

Magnet wire coating machine means equipment which applies and cures magnet wire coatings.

Manufacturer's formulation data means data on a material (such as a coating) that are supplied by the material manufacturer based on knowledge of the ingredients used to manufacture that material, rather than based on testing of the material with the test methods specified in §63.3941.

Manufacturer's formulation data may include, but are not limited to, information on density, organic HAP content, volatile organic matter content, and coating solids content.

Mass fraction of organic HAP means the ratio of the mass of organic HAP to the mass of a material in which it is contained, expressed as kg of organic HAP per kg of material.

Month means a calendar month or a pre-specified period of 28 days to 35 days to allow for flexibility in recordkeeping when data are based on a business accounting period.

Non-HAP coating means, for the purposes of this subpart, a coating that contains no more than 0.1 percent by mass of any individual organic HAP that is an OSHA-defined carcinogen as specified in 29 CFR 1910.1200(d)(4) and no more than 1.0 percent by mass for any other individual HAP.

Organic HAP content means the mass of organic HAP emitted per volume of coating solids used for a coating calculated using Equation 2 of §63.3941. The organic HAP content is determined for the coating in the condition it is in when received from its manufacturer or supplier and does not account for any alteration after receipt. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, organic HAP content is the mass of organic HAP that is emitted, rather than the organic HAP content of the coating as it is received.

Permanent total enclosure (PTE) means a permanently installed enclosure that meets the criteria of Method 204 of appendix M, 40 CFR part 51, for a PTE and that directs all the exhaust gases from the enclosure to an add-on control device.

Personal watercraft means a vessel (boat) which uses an inboard motor powering a water jet pump as its primary source of motive power and which is designed to be operated by a person or persons sitting, standing, or kneeling on the vessel, rather than in the conventional manner of sitting or standing inside the vessel.

Protective oil means an organic material that is applied to metal for the purpose of providing lubrication or protection from corrosion without forming a solid film. This definition of protective oil includes, but is not limited to, lubricating oils, evaporative oils (including those that evaporate completely), and extrusion oils. Protective oils used on miscellaneous metal parts and products include magnet wire lubricants and soft temporary protective coatings that are removed prior to installation or further assembly of a part or component.

Reactive adhesive means adhesive systems composed, in part, of volatile monomers that react during the adhesive curing reaction, and, as a result, do not evolve from the film during use. These volatile components instead become integral parts of the adhesive through chemical reaction. At least 70 percent of the liquid components of the system, excluding water, react during the process.

Research or laboratory facility means a facility whose primary purpose is for research and development of new processes and products, that is conducted under the close supervision of technically trained personnel, and is not engaged in the manufacture of final or intermediate products for commercial purposes, except in a de minimis manner.

Responsible official means responsible official as defined in 40 CFR 70.2.

Rubber-to-metal coatings are coatings that contain heat-activated polymer systems in either solvent or water that, when applied to metal substrates, dry to a non-tacky surface and react chemically with the rubber and metal during a vulcanization process.

Startup, initial means the first time equipment is brought online in a facility.

Surface preparation means use of a cleaning material on a portion of or all of a substrate. This includes use of a cleaning material to remove dried coating, which is sometimes called depainting.

Temporary total enclosure means an enclosure constructed for the purpose of measuring the capture efficiency of pollutants emitted from a given source as defined in Method 204 of appendix M, 40 CFR part 51.

Thinner means an organic solvent that is added to a coating after the coating is received from the supplier.

Total volatile hydrocarbon (TVH) means the total amount of nonaqueous volatile organic matter determined according to Methods 204 and 204A through 204F of appendix M to 40 CFR part 51 and substituting the term TVH each place in the methods where the term VOC is used. The TVH includes both VOC and non-VOC.

Uncontrolled coating operation means a coating operation from which none of the organic HAP emissions are routed through an emission capture system and add-on control device.

Volatile organic compound (VOC) means any compound defined as VOC in 40 CFR 51.100(s).

Volume fraction of coating solids means the ratio of the volume of coating solids (also known as the volume of nonvolatiles) to the volume of a coating in which it is contained; liters (gal) of coating solids per liter (gal) of coating.

Wastewater means water that is generated in a coating operation and is collected, stored, or treated prior to being discarded or discharged.

Table 2 to Subpart MMMM of Part 63—Applicability of General Provisions to Subpart MMMM of Part 63

You must comply with the applicable General Provisions requirements according to the following table:

Citation	Subject	Applicable to subpart MMMM	Explanation
§ 63.1(a)(1)-(14)	General Applicability.	Yes..	
§ 63.1(b)(1)-(3)	Initial Applicability Determination	Yes.....	Applicability to subpart MMMM is also specified in §63.3881.
§ 63.1(c)(1)	Applicability After Standard Established.	Yes.....	
§ 63.1(c)(2)-(3)	Applicability of Permit Program for Area Sources.	No.....	Area sources are not subject to subpart MMMM.
§ 63.1(c)(4)-(5)	Extensions and Notifications.	Yes.....	
§ 63.1(e)	Applicability of Permit Program Before Relevant Standard is Set	Yes.....	
§ 63.2	Definitions.....	Yes.....	Additional Definitions are specified in § 63.3981
§ 63.1(a)-(c)	Units and Abbreviations.	Yes.....	
§ 63.4(a)(1)-(5)	Prohibited Activities.	Yes.....	
§ 63.4(b)-(c)	Circumvention/Severability.	Yes.....	
§ 63.5(a)	Construction/Reconstruction.	Yes.....	
§ 63.5(b)(1)-(6)	Requirements for Existing Newly Constructed, and Reconstructed Sources.	Yes.....	
§ 63.5(d)	Application for Approval of Construction/Reconstruction.	Yes.....	
§ 63.5(e)	Approval of Construction/Reconstruction.	Yes.....	

§ 63.5(f).....	Approval of Construction/ Reconstruction Based on Prior State Review.	Yes.....	
§ 63.6(a).....	Compliance With Standards and Maintenance Requirements-Applicability.	Yes.....	
§ 63.6(b)(1)-(7)..	Compliance Dates for New and Reconstructed Sources.	Yes.....	Section 63.3883 specifies the compliance dates.
§ 63.6(c)(1)-(5)..	Compliance Dates for Existing Sources.	Yes.....	Section 63.3883 specifies the compliance dates.
§ 63.6(e)(1)-(2)..	Operation and Maintenance.	Yes.....	
§ 63.6(e)(3).....	Startup, Shutdown, and Malfunction Plan.	Yes...	Only sources using an add-on control device to comply with the standard must complete startup, shutdown, and malfunction plans.
§ 63.6(f)(1).....	Compliance Except During Startup, Shutdown, and Malfunction.	Yes....	Applies only to sources using an add-on control device to comply with the standard.
§ 63.6(f)(2)-(3)..	Methods for Determining Compliance..	Yes.....	
§ 63.6(g)(1)-(3)..	Use of an Alternative Standard.	Yes.....	
§ 63.6(h).....	Compliance With Opacity/Visible Emission Standards.	No.....	Subpart Mmmm does not establish opacity standards and does not require continuous opacity monitoring systems (COMS).
§ 63.6(i)(1)-(16).	Extension of Compliance.	Yes.....	
§ 63.6(j).....	Presidential Compliance Exemption.	Yes.....	
§ 63.7(a)(1).....	Performance Test Requirements-Applicability.	Yes.....	Applies to all affected sources. Additional requirements for performance testing are specified in §§ 63.3964, 63.3965, and 63.3966.
§ 63.7(a)(3).....	Performance Tests Required By the Administrator.	Yes.....	
§ 63.7(b)-(e).....	Performance Test Requirements- Notification, Quality Assurance, Facilities Necessary for Safe Testing, Conditions During Test.	Yes.....	Applies only to performance tests for capture system and add-on control device efficiency at sources using these to comply with the standard.

- § 63.7(f).....Performance Test Requirements-Use of Alternative Test Method. Yes.... Applies to all test methods except those used to determine capture system efficiency.
- § 63.7(g)-(h).....Performance Test Requirements-Data Analysis, Recordkeeping, Reporting, Waiver of Test. Yes.....Applies only to performance tests for capture system and add-on control device efficiency at sources using these to comply with the standard.
- § 63.8(a)(1)-(3)..Monitoring Requirements-Applicability. Yes.....Applies only to monitoring of capture system and add-on control device efficiency at sources using these to comply with the standard.
- § 63.8(a)(4)..... Additional Monitoring Requirements. No..... Additional requirements for monitoring are specified in §63.3968. Subpart MMMM does not have monitoring requirements for flares.
- § 63.8(b).....Conduct of Monitoring. Yes....
- § 63.8(c)(4).....CMS..... No.... § 63.3968 specifies the requirements for the operation of CMS for capture systems and add-on control devices at sources using these to comply.
- § 63.8(c)(5)..... COMS..... No..... Subpart MMMM does not have opacity or visible emission standards.
- § 63.8(c)(6).....CMS Requirements..... No..... Section 63.3968 specifies the requirements for monitoring systems for capture systems and add-on control devices at sources using these to comply.
- § 63.8(c)(7).....CMS Out-of-Control Periods. Yes....
- § 63.8(c)(8)..... CMS Out-of-Control Periods and Reporting. No.....§ 63.3920 requires reporting of CMS out-of-
- § 63.8(d)-(e).....Quality Control Program and CMS Performance Evaluation. No.....Subpart MMMM does not require the use of continuous emissions monitoring systems.
- § 63.8(f)(1)-(5)..Use of an Alternative Yes....

Monitoring Method.	
§ 63.8(f)(6).....Alternative to Relative Accuracy Test.	No..... Subpart MMMM does not require the use of continuous emissions monitoring systems.
§ 63.8(g)(1)-(5)..Data Reduction.....	No.....Sections 63.3967 and 63.3968 specify monitoring data reduction.
§ 63.9(a)-(d).....Notification Requirements.	Yes.....
§ 63.9(e).....Notification of Performance Test.	Yes.....Applies only to capture system and add-on control device performance tests at sources using these to comply with the standard.
§ 63.9(f).....Notification of Visible Emissions/ Opacity Test.	No.....Subpart MMMM does not have opacity or visible emissions standards.
§ 63.9(g)(1)-(3)..Additional Notifications When Using CMS.	No..... Subpart MMMM does not require the use of continuous emissions monitoring systems.
§ 63.9(h).....Notification of Compliance Status.	Yes.....Section 63.3910 specifies the dates for submitting the notification of compliance status.
§ 63.9(i).....Adjustment of Submittal Deadlines.	Yes.....
§ 63.9(j).....Change in Previous Information.	Yes.....
§ 63.10(a).....Recordkeeping/ Reporting-Applicability and General Information.	Yes.....
§ 63.10(b)(1).....General Recordkeeping Requirements.	Yes.....Additional requirements are specified in §§ 63.3930 and 63.3931.
§ 63.10(b)(2) (i) - (v)..... Recordkeeping Relevant to Startup, Shutdown, and Malfunction Periods and CMS.	Yes.....Requirements for startup, shutdown, and malfunction records only apply to add-on control devices used to comply with the standard.
§ 63.10(b)(2) (vi) - (xi).....	Yes.....
§ 63.10(b)(2) (xii)Records.....	Yes.....
§ 63.10(b)(2) (xiii).....	No..... Subpart MMMM does not require the use of continuous emissions monitoring systems.
§ 63.10(b)(2) (xiv)	Yes.....
§ 63.10(b)(3).....Recordkeeping Requirements for Applicability	Yes.....

Determinations.

§ 63.10(c)(1)-(6)..Additional Recordkeeping Requirements for Sources with CMS.	Yes....	
§ 63.10(c) (7)-(8)	No....	The same records are required in
§63.3920(a)(7).		
§ 63.10(c) (9)-(15).....	Yes...	
§ 63.10(d)(1).....General Reporting Requirements.	Yes...	Additional Requirements are specified
§ 63.10(d)(2).....Report of Performance Test Results.	Yes.....	Additional requirements are specified in §63.3920(b).
§ 63.10(d)(3).....Reporting Opacity or Visible Emissions Observations.	No.....	Subpart Mmmm does not require opacity or visible emissions observations.
§ 63.10(d)(4).....Progress Reports for Sources With Compliance Extensions.	Yes.....	
§ 63.10(d)(5).....Startup, Shutdown, and Malfunction Reports.	Yes.....	Applies only to add-on control devices at sources using these to comply with the standard.
§ 63.10(e) (1)-(2).Additional CMS Reports	No.....	Subpart Mmmm does not require the use of continuous emissions monitoring systems.
§ 63.10(e) (3).....Excess Emissions/CMS Performance Reports.	No.....	Section 63.3920 (b) specifies the contents of periodic compliance reports.
§ 63.10(e) (4).... COMS Data Reports.....	No.....	Subpart Mmmm does not specify requirements for opacity or COMS.
§ 63.10(f).....Recordkeeping/Reporting Waiver.	Yes.....	
§ 63.11.....Control Device Requirements/Flares.	No.....	Subpart Mmmm does not specify use of flares for compliance.
§ 63.12.....State Authority and Delegations.	Yes.....	
§ 63.13.....Addresses.....	Yes.....	
§ 63.14.....Incorporation by Reference.	Yes.....	
§ 63.15.....Availability of Information/Confidentiality.	Yes.....	

Table 3 to Subpart MMMM of Part 63—Default Organic HAP Mass Fraction for Solvents and Solvent Blends

You may use the mass fraction values in the following table for solvent blends for which you do not have test data or manufacturer's formulation data and which match either the solvent blend name or the chemical abstract series (CAS) number. If a solvent blend matches both the name and CAS number for an entry, that entry's organic HAP mass fraction must be used for that solvent blend. Otherwise, use the organic HAP mass fraction for the entry matching either the solvent blend name or CAS number, or use the organic HAP mass fraction from table 4 to this subpart if neither the name or CAS number match.

Solvent/solvent blend	CAS. No.	Average organic HAP	Typical organic HAP, mass fraction
percent by mass			
1. Toluene.....	108-88-3	1.0	Toluene.
2. Xylene(s).....	1330-20-7	1.0	Xylenes, ethylbenzene.
3. Hexane.....	110-54-3	0.5	n-hexane.
4. n-Hexane.....	110-54-3	1.0	n-hexane.
5. Ethylbenzene.....	100-41-4	1.0	Ethylbenzene.
6. Aliphatic 140.....		0	None.
7. Aromatic 100.....		0.02	1% xylene, 1% cumene.
8. Aromatic 150.....		0.09	Naphthalene.
9. Aromatic naphtha.....	64742-95-6	0.02	1% xylene, 1% cumene.
10. Aromatic solvent.....	64742-94-5	0.1	Naphthalene.
11. Exempt mineral spirits..	8032-32-4	0	None.
12. Ligroines (VM & P).....	8032-32-4	0	None.
13. Lactol spirits.....	64742-89-6	0.15	Toluene.
14. Low aromatic white spirit..	64742-82-1	0	None.
15. Mineral spirits.....	64742-88-7	0.01	Xylenes.
16. Hydrotreated naphtha....	64742-48-9	0	None.
17. Hydrotreated light distillate.....	64742-47-8	0.001	Toluene.
18. Stoddard solvent.....	8052-41-3	0.01	Xylenes.
19. Super high-flash naphtha	64742-95-6	0.05	Xylenes.
20. Varsol ® solvent.....	8052-49-3	0.01	0.5% xylenes, 0.5% ethylbenzene.
21. VM & P naphtha.....	64742-89-8	0.06	3% toluene, 3% xylene.
22. Petroleum distillate mixture.....	68477-31-6	0.08	4% naphthalene, 4% biphenyl.

Table 4 to Subpart MMMM of Part 63—Default Organic HAP Mass Fraction for Petroleum Solvent Groups ^a

You may use the mass fraction values in the following table for solvent blends for which you do not have test data or manufacturer's formulation data.

Solvent type	Average organic HAP mass fraction	Typical organic HAP, percent by mass
Aliphatic ^b	0.03	1% Xylene, 1% Toluene, and 1% Ethylbenzene.
Aromatic ^c	0.06	4% Xylene, 1% Toluene, and 1% Ethylbenzene.

a Use this table only if the solvent blend does not match any of the solvent blends in Table 3 to this subpart by either solvent blend name or CAS number and you only know whether the blend is aliphatic or aromatic.

b Mineral Spirits 135, Mineral Spirits 150 EC, Naphtha, Mixed Hydrocarbon, Aliphatic Hydrocarbon, Aliphatic Naphtha, Naphthol Spirits, Petroleum Spirits, Petroleum Oil, Petroleum Naphtha, Solvent Naphtha, Solvent Blend.

c Medium-flash Naphtha, High-flash Naphtha, Aromatic Naphtha, Light Aromatic Naphtha, Light Aromatic Hydrocarbons, Aromatic Hydrocarbons, Light Aromatic Solvent.

E.1.3 One Time Deadlines Relating to NESHAP Surface Coating of Miscellaneous Metal Parts and Products Requirements [40 CFR Part 63, Subpart MMMM]

The Permittee must conduct the initial performance tests by January 2, 2007. The Permittee must submit a notification of compliance status report for Surface coating operations identified as PB1 through PB5, PB7 through PB15, PB17 and PB19 by February, 2007.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Wabash National, L.P. North Plant
Source Address: 1000 Sagamore Parkway South, Lafayette, Indiana 47905
Mailing Address: P.O. BOX 6129, Lafayette, Indiana 47903
Part 70 Permit No.: T157-18078-00046

**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:

- Annual Compliance Certification Letter
- Test Result (specify)
- Report (specify)
- Notification (specify)
- Affidavit (specify)
- 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:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Wabash National, L.P. North Plant
Source Address: 1000 Sagamore Parkway South, Lafayette, Indiana 47905
Mailing Address: P.O. BOX 6129, Lafayette, Indiana 47903
Part 70 Permit No.: T157-18078-00046

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- C The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - C The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), 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
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

Part 70 Quarterly Report

Source Name: Wabash National, L.P. North Plant
Source Address: 1000 Sagamore Parkway South, Lafayette, Indiana 47905
Mailing Address: P.O. BOX 6129, Lafayette, Indiana 47903
Part 70 Permit No.: T157-18078-00046
Facility: PB1 through PB5, PB7, and PB9
Parameter: VOC usage
Limit: 257.9 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
	VOC Usage This Month	VOC Usage Previous 11 Months	VOC Usage 12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this month.
 Deviation/s occurred in this month.
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

Part 70 Quarterly Report

Source Name: Wabash National, L.P. North Plant
 Source Address: 1000 Sagamore Parkway South, Lafayette, Indiana 47905
 Mailing Address: P.O. BOX 6129, Lafayette, Indiana 47903
 Part 70 Permit No.: T157-18078-00046
 Facility: PB8
 Parameter: VOC emissions
 Limit: The total amount of VOC delivered to the dip coating line PB8, shall not exceed 595.1 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit in combination with the control device will limit the potential to emit of VOC to less than 29.78 tons per twelve (12) consecutive month period. This limit is based upon the use of regenerative thermal oxidizer for VOC control with overall control efficiency of 95.00%.

YEAR: _____

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

- No deviation occurred in this month.
 Deviation/s occurred in this month.
 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**

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

Source Name: Wabash National, L.P. North Plant
Source Address: 1000 Sagamore Parkway South, Lafayette, Indiana 47905
Mailing Address: P.O. BOX 6129, Lafayette, Indiana 47903
Part 70 Permit No.: T157-18078-00046

Months: _____ to _____ Year: _____

Page 1 of 2

<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. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does 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>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
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:	
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 Part 70 Permit**

Source Background and Description

Source Name:	Wabash National L.P. North Plant
Source Location:	1000 Sagamore Parkway South, Lafayette IN 47905
County:	Tippecanoe
SIC Code:	3715
Operation Permit No.:	T157-6070-00046
Operation Permit Issuance Date:	June 25, 1999
Permit Renewal No.:	T157-18078-00046
Permit Reviewer:	Adeel Yousuf/EVP

On May 17, 2006, the Office of Air Quality (OAQ) had a notice published in the Journal and Courier in Lafayette, Indiana, stating that Wabash National L.P. North Plant had applied for a Part 70 permit renewal for the operation of a stationary truck trailers manufacturing plant. The notice also stated that OAQ proposed to issue a Part 70 Permit renewal for this operation and provided information on how the public could review the proposed Part 70 Permit 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 Part 70 Permit should be issued as proposed.

On June 6, 2006, Andrew Frisbie, CHMM, of Wabash National submitted comments on the proposed Part 70 renewal Permit. The summary of the comments and corresponding responses is as follows (bolded language has been added and the language with a line through it has been deleted):

Comment 1

The surface cleaning is not part of surface preparation for painting, so I don't think it would need to be included with the paint and caulking. It is a cosmetic cleaning prior to delivery to the customer. A final trailer wash would be the best description.

Response 1

Based on the information provided by the source, surface cleaning process is not a coating operation but a cosmetic cleaning operation. Therefore, emission unit SC is not subject to the requirements of 40 CFR 63, Subpart M. The following conditions have been revised as a result of this descriptive change:

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

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

(q) One (1) caulking process, identified as CLK, with a maximum capacity of 58 pounds of caulk per hour, using no control, and exhausting to general ventilation.

- (r) One (1) ~~surface cleaning process~~ **final trailer wash**, identified as SC, with a maximum capacity of 4.7 pounds of solvent per hour, using no control, and exhausting to general ventilation.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (q) One (1) caulking process, identified as CLK, with a maximum capacity of 58 pounds of caulk per hour, using no control, and exhausting to general ventilation.
- (r) One (1) ~~surface cleaning process~~ **final trailer wash**, identified as SC, with a maximum capacity of 4.7 pounds of solvent per hour, using no control, and exhausting to general ventilation.

Under NESHAP, Subpart M MMM, Surface coating operations identified as PB1 through PB5, PB7 through PB15, PB17 and PB19, and ~~Surface cleaning operation identified as SC~~, are considered an existing affected source because the construction of each operation commenced prior to August 13, 2002.

The general and specific conditions of 40 CFR 63, Subpart M MMM which are applicable to Surface coating operations identified as PB1 through PB5, PB7 through PB15, PB17 and PB19, and ~~Surface cleaning operation identified as SC~~ are specified in Section E.1 of this permit.

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

SECTION E.1 NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP) REQUIREMENTS [326 IAC 2-7-5(1)]

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

- (q) One (1) caulking process, identified as CLK, with a maximum capacity of 58 pounds of caulk per hour, using no control, and exhausting to general ventilation.
- (r) One (1) ~~surface cleaning process~~ **final trailer wash**, identified as SC, with a maximum capacity of 4.7 pounds of solvent per hour, using no control, and exhausting to general ventilation.

Under NESHAP, Subpart M MMM, Surface coating operations identified as PB1 through PB5, PB7 through PB15, PB17 and PB19, and ~~Surface cleaning operation identified as SC~~, are considered an existing affected source because the construction of each operation commenced prior to August 13, 2002.

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

E.1.3 One Time Deadlines Relating to NESHAP Surface Coating of Miscellaneous Metal Parts and Products Requirements [40 CFR Part 63, Subpart M MMM]

The Permittee must conduct the initial performance tests by January 2, 2007. The Permittee must submit a notification of compliance status report for Surface coating operations identified as PB1 through PB5, PB7 through PB15, PB17 and PB19, and ~~Surface cleaning operation identified as SC~~ by February, 2007.

Upon further review, OAQ has determined the following changes (bolded language has been added and the language with a line through it has been deleted) will be made to the permit:

1. The phone number and the fax number listed in Condition B.11 and Emergency Occurrence Report has been changed.

B.11 Emergency Provisions [326 IAC 2-7-16]

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-~~5674~~ **0178** (ask for Compliance Section)
Facsimile Number: 317-233-~~5967~~ **6865**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-~~5674~~ **0178**
Fax: 317-233-~~5967~~ **6865****

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Wabash National, L.P. North Plant
Source Address: 1000 Sagamore Parkway South, Lafayette, Indiana 47905
Mailing Address: P.O. BOX 6129, Lafayette, Indiana 47903
Part 70 Permit No.: T157-18078-00046

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
 - C The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-56740178, ask for Compliance Section); and
 - C The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-59676865), and follow the other requirements of 326 IAC 2-7-16.

2. IDEM, OAQ has decided to add 326 IAC 2-3 citations to Conditions C.18 and C.19 in case of future change in the source status and/or area re-designation.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] **[326 IAC 2-3]**

- (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) If there is a reasonable possibility that a "project" (as defined in 326 IAC 2-2-1 (qq) **and/or 326 IAC 2-3-1 (II)**) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a "major modification" (as defined in 326 IAC 2-2-1 (ee) **and/or 326 IAC 2-3-1 (z)**) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1 (rr) **and/or 326 IAC 2-3-1 (mm)**), the Permittee shall comply with following:
 - (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1 (qq) **and/or 326 IAC 2-3-1 (II)**) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) **and/or 326 IAC 2-3-1(mm)(2)(A)(iii)**; and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] **[326 IAC 2-3]**

- (a) The Permittee 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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- (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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) **and/or 326 IAC 2-3-1(II)**) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ :
- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) **and/or 326 IAC 2-3-1 (qq)**, for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).

**Indiana Department of Environmental Management
Office of Air Quality**

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	Wabash National L.P. North Plant
Source Location:	1000 Sagamore Parkway South, Lafayette IN 47905
County:	Tippecanoe
SIC Code:	3715
Operation Permit No.:	T157-6070-00046
Operation Permit Issuance Date:	June 25, 1999
Permit Renewal No.:	T157-18078-00046
Permit Reviewer:	Adeel Yousuf/EVP

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Wabash National L.P. North Plant, relating to the operation of a stationary truck trailers manufacturing plant.

Source Definition

This Source Definition from the previous Part 70 Operating Permit, issued on June 25, 1999, was incorporated into this permit as follows:

This truck trailer manufacturing company consists of two (2) plants:

- (a) Plant 1 is located at 1000 Sagamore Parkway South, Lafayette IN 47905; and
- (b) Plant 2 is located at 3550 East County Road 350 South, Lafayette, IN 47905

These two plants are located on what IDEM considers adjacent properties, they have the same SIC codes and have common ownership. However there is no support relationship or dependency between the two sources. Therefore, they will be considered as two separate sources per Title V Permit No. 157-6070-00046 issued on June 25, 1999. This is consistent with previous OAQ source determinations.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) surface coating spray booth identified as PB1, constructed in 1987, utilizing the airless spray application method with a maximum coating capacity of 3.33 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB1S.
- (b) One (1) surface coating spray booth identified as PB2, constructed in 1987, utilizing the airless spray application method with a maximum coating capacity of 1.67 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB2S.
- (c) One (1) surface coating spray booth identified as PB3, constructed in 1987, utilizing the airless and air atomized spray application method with a maximum coating capacity of 3.33 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB3S.

- (d) One (1) surface coating spray booth identified as PB4, constructed in 1987, utilizing the airless and air atomized spray application method with a maximum coating capacity of 0.50 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB4S.
- (e) One (1) surface coating spray booth identified as PB5, constructed in 1987, utilizing the airless and air atomized spray application method with a maximum coating capacity of 0.21 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB5S.
- (f) One (1) surface coating spray booth identified as PB7, constructed in 1987, utilizing the airless and air atomized spray application method with a maximum coating capacity of 1.67 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB7S.
- (g) One (1) surface coating spray booth identified as PB8, constructed in 1987, utilizing the dip coating application method with a maximum coating capacity of 495 units per hour, equipped with one (1) 2.07 MMBtu/hr natural gas fired regenerative thermal oxidizer for VOC emissions control, and exhausting through stack PB8S.
- (h) One (1) surface coating spray booth identified as PB9, constructed in 1987, utilizing the airless spray application method with a maximum coating capacity of 1.67 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB9S.
- (i) One (1) surface coating spray booth identified as PB10, constructed in 1987, utilizing the airless spray application method with a maximum coating capacity of 0.63 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB10S.
- (j) One (1) surface coating spray booth identified as PB11, constructed in 1987, utilizing the airless spray application method with a maximum coating capacity of 0.83 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB11S.
- (k) One (1) surface coating spray booth identified as PB12, constructed in 1987, utilizing the airless and air atomized spray application method with a maximum coating capacity of 0.63 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB12S.
- (l) One (1) surface coating spray booth identified as PB13, constructed in 1987, utilizing the airless and air atomized spray application method with a maximum coating capacity of 1.67 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB13S.
- (m) One (1) surface coating spray booth identified as PB14, constructed in 1987, utilizing the airless spray application method with a maximum coating capacity of 3.21 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB14S.
- (n) One (1) surface coating spray booth identified as PB15, constructed in 1987, utilizing the airless spray application method with a maximum coating capacity of 0.46 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB15S.
- (o) One (1) surface coating spray booth identified as PB17, constructed in 1987, utilizing the airless spray application method with a maximum coating capacity of 0.71 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB17S.
- (p) One (1) surface coating spray booth identified as PB19, constructed in 2002, utilizing the airless and air atomized spray application method with a maximum coating capacity of 0.71 units per hour, equipped with panel filters for particulate control, and exhausting through stack PB19S.

- (q) One (1) caulking process, identified as CLK, with a maximum capacity of 58 pounds of caulk per hour, using no control, and exhausting to general ventilation.
- (r) One (1) surface cleaning process, identified as SC, with a maximum capacity of 4.7 pounds of solvent per hour, using no control, and exhausting to general ventilation.
- (s) One (1) steel shot blasting operation identified as BB1, with a maximum capacity of 3.7 tons of steel shot per hour, equipped with a baghouse (BH1) for particulate control, and exhausting through stack BH1S.
- (t) One (1) steel shot blasting operation identified as BB2, with a maximum capacity of 1.26 tons of steel shot per hour, equipped with a baghouse (BH1) for particulate control, and exhausting through stack BH2S.
- (u) One (1) steel shot blasting operation identified as BB3, with a maximum capacity of 1.26 tons of steel shot per hour, equipped with a baghouse (BH1) for particulate control, and exhausting through stack BH3S.
- (v) One (1) natural gas fired boiler identified as CB1, with a maximum heat input capacity of 5.23 million British thermal units per hour (MMBtu/hr), and exhausting through stack CB1S (installed in 1994).
- (w) One (1) natural gas fired boiler identified as CB4, with a maximum heat input capacity of 10.5 million British thermal units per hour (MMBtu/hr), and exhausting through stack CB4S (installed in 2005)

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units 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 (10) million BTU per hour.
- (b) Propane or liquefied petroleum gas, or butane-fired combustion source with heat input equal to or less than six (6) million BTU per hour.
- (c) 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.
- (d) Combustion source flame safety purging on startup.
- (e) 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.
- (f) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (g) The following VOC and HAP storage containers:
 - (1) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

- (h) Equipment used exclusively for the following:
 - (1) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.
- (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; 15 mm 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°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. [326 IAC 6-3-2]
- (l) Infrared cure equipment.
- (m) Exposure chambers (towers, columns), for curing of ultraviolet inks and ultra-violet coating where heat is the intended discharge.
- (n) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (o) Noncontact cooling towers systems with either of the following:
 - (1) Natural draft cooling towers not regulated under a NESHAP.
 - (2) Forced and induced draft cooling tower system not regulated under a NESHAP.
- (p) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (q) Heat exchanger cleaning and repair.
- (r) Paved and unpaved roads and parking lots with public access.
- (s) Asbestos abatement projects regulated by 326 IAC 14-10.
- (t) Purging of gas lines and vessels that is related 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) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (v) Emergency generators as follows:
 - (1) Gasoline generators not exceeding 110 horsepower
 - (2) Diesel generators not exceeding 1600 horsepower.
- (w) Other emergency equipment as follows:
 - (1) Stationary fire pumps.
- (x) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and 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. [326 IAC 6-3-2]

- (y) Other categories with emissions below insignificant thresholds (i.e. less than 5 pounds per hour particulates and less than 3 pounds per hour VOC).
 - (1) Metal welding and cutting operation, identified as W/C, consisting of:
 - (i) Six (6) submerged arc welding stations, each with a maximum capacity of 3.3 pounds of wire per hour, and exhausting to general ventilation.
 - (ii) One hundred seventy-nine (179) metal inert gas welding stations, each with a maximum capacity of 1.70 pounds of wire per hour, and exhausting to general ventilation.
 - (iii) One hundred seventy-nine (179) stick welding stations, each with a maximum capacity of 6.6 pounds of wire per hour, and exhausting to general ventilation.
 - (iv) One (1) plasma arc metal cutting process, with a maximum capacity of 400 inches per minute, and exhausting to general ventilation. [326 IAC 6-3-2]
 - (2) One (1) decal application process, identified as DA, with a maximum capacity of 1.49 pounds of solvent per hour, using no control, and exhausting to general ventilation.
 - (3) One (1) incinerator used for burning off paint from metal parts, identified as BO, with a maximum charge capacity of 80 pounds per hour, equipped with a natural gas fired burner with maximum heat input capacity of 1.0 MMBtu/hour, and exhausting through stack BOS. [326 IAC 4-2-2]
 - (4) One (1) high density polyethylene extrusion operation, identified as HDPE, exhausting to general ventilation.

Existing Approvals

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

- (a) Part 70 Permit No. 157-6070-00046, issued on June 25, 1999.
- (b) First Significant Permit Modification No. 157-11744-00046, issued on June 28, 2000.
- (c) First Minor Source Modification No. 157-15034-00046, issued on December 20, 2001.
- (d) First Minor Permit Modification No. 157-15068-00046, issued on January 16, 2002.
- (e) First Permit Reopening No. 157-13497-00046, issued on March 14, 2002.
- (f) Second Minor Source Modification No. 157-20457-00046, issued on July 28, 2005.
- (g) Second Minor Permit Modification No. 157-20961-00046, issued on September 22, 2005.

All conditions from previous approvals were incorporated into this Part 70 Permit except the following:

Part 70 Permit No. 157-6070-00046, issued on June 25, 1999.

Wabash National Corporation was issued a Part 70 permit (157-6070-00046) on June 25, 1999. Wabash National Corporation petitioned for review of the Part 70 permit on July 23, 1999. The petition was filed in the Office of Environmental Adjudication under Cause Number 97-A-J-2348. Wabash National Corporation has applied for a Part 70 renewal permit (157-18078-00046) on September 24, 2003. This Part 70 renewal permit shows the changes made to the Part 70 permit in order to settle issues raised by the petition for review.

Appeal Issue #1

The wording in the description in Section A should be changed as follows:
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 and in Conditions D.1 through D.5 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.

Response to Issue #1

The following language has been added to the Section D descriptions:

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

The addition of this language to all permits began after this permit was issued. This language shall be added to the Section D descriptions to answer this issue.

Appeal Issue #2

The maximum capacity language in the descriptions in Section A.2 should be eliminated. Additionally, some maximum capacities should be listed as nominal.

Response to Issue #2

As noted in the response to issue #1 and a statement contained in the beginning of Section A, the information describing the source is descriptive information and does not constitute enforceable conditions. Additionally, the maximum capacity language can not be removed from the description of the paint booths because this information was used to perform emissions calculations. A change or adjustment in that maximum capacity could increase potential emissions.

The change to the wording *Approximately* for some of the unit capacities is not appropriate. Again, the amount of the units were used in the emission calculations. Any change in the amount of units used by the source could change potential emissions. The change in the wording from *Amaximum* to *Anominal* is not appropriate. The use of the term *Anominal* in this descriptive language would serve no purpose because nominal usages or capacities are not used in calculations. Therefore, these changes are not made.

Appeal Issue #3

Section A.3 should be deleted from the permit.

Response to issue #3

As noted, Section A.3 is for those insignificant activities which are specifically regulated. An associated D section is included in the permit. Since there are rules that apply to these operations, this section will remain.

During the review of this renewal permit, IDEM, OAQ has determined that there are additional emission operations at the source which qualify as "specifically regulated insignificant activities" (listed on pages 4 and 5 in TSD), therefore, Condition A.3 is retained in the permit.

Appeal Issues #4 through #32

These issues involve Section B and C conditions including Conditions B.4 (Enforceability), B.8 (Duty to Supplement and Provide Information), B.9 (Compliance with Permit Conditions), B.10 (Certification), B.11 (Annual Compliance Certification), B.12 (Preventive Maintenance Plan), B.14 (Permit Shield), B.16 (Deviations from Permit Requirements and Conditions), B.19 (Permit Amendment or Modification), B.22 (Operational Flexibility), B.23 (Construction Permit Requirement), B.24 (Inspection and Entry), C.1 (Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per hour), C.2 (Opacity), C.4 (Incineration), C.6 (Operation of Equipment), C.7 (Asbestos Abatement Projects), C.8 (Performance Testing), C.9 (Compliance Schedule), C.10 (Compliance Monitoring), C.11 (Maintenance of Monitoring Equipment), C.12 (Monitoring Methods), C.15 (Risk Management Plan), C.16 (Compliance Monitoring Plan – Failure to Take Response Steps), C.17 (Actions Related to Noncompliance Demonstrated by a Stack Test), C.19 (Monitoring Data Availability), C.20 (General Record Keeping Requirements), and C.21 (General Reporting Requirements). Section B and C conditions in the renewal permit reflect the revised conditions based on changes and updates to each condition. These updates will satisfy the source's comments.

Appeal Issue #33

Change section D.1 description to:

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

Eighteen (18) surface coating operations, identified as:

- (a) PB1, ~~with a maximum capacity of 4.15 metal couplers per hour~~, using the airless spray application method, and panel filters for overspray control, and exhausting to stack PB1S,
- (b) PB2, ~~with a maximum capacity of 2.42 metal bogies per hour~~, using the airless spray application method, and panel filters for overspray control, and exhausting to stack PB2S,
- (c) PB3, ~~with a maximum capacity of 1.83 metal trailers per hour~~, using the airless and air atomized spray application method, and panel filters for overspray control, and exhausting to stack PB3S,
- (d) PB4, ~~with a maximum capacity of 1.83 metal trailers per hour~~, using the airless and air atomized spray application method, and panel filters for overspray control, and exhausting to stack PB4S,
- (e) PB5, ~~with a maximum capacity of 0.375 metal trailers per hour~~, using the airless and air atomized spray application method, and panel filters for overspray control, and exhausting to stack PB5S,
- (f) PB7, ~~with a maximum capacity of 4.15 metal couplers per hour~~, using the airless and air atomized spray application method, and panel filters for overspray control, and exhausting to stack PB7S,
- (g) PB8, ~~with a maximum capacity of 554.2 metal crossmembers per hour~~, using dip coating, and a 2.07 MMBtu/hr natural gas regenerative thermal oxidizer, RTOX, for control, and exhausting to stack PB8S,
- (h) PB9, ~~with a maximum capacity of 2.42 metal bogies per hour~~, using the airless spray application method, and panel filters for overspray control, and exhausting to stack PB9S,

- (i) PB10, ~~with a maximum capacity of 2.42 metal bogies per hour~~, using the airless spray application method, and panel filters for overspray control, and exhausting to stack PB10S,
- (j) PB11, ~~with a maximum capacity of 0.25 metal trailers per hour~~, using the airless spray application method, and panel filters for overspray control, and exhausting to stack PB11S,
- (k) PB12, ~~with a maximum capacity of 0.67 metal trailers per hour~~, using the airless and air atomized spray application method, and panel filters for overspray control, and exhausting to stack PB12S,
- (l) PB13, ~~with a maximum capacity of 1.46 metal trailers per hour~~, using the airless and air atomized spray application method, and panel filters for overspray control, and exhausting to stack PB13S,
- (m) PB14, ~~with a maximum capacity of 7.25 metal axles per hour~~, using the airless spray application method, and panel filters for overspray control, and exhausting to stack PB14S,
- (n) PB15, ~~with a maximum capacity of 1.46 metal trailers per hour~~, using the airless spray application method, and panel filters for overspray control, and exhausting to stack PB15S,
- (o) PB16, ~~with a maximum capacity of 1.04 metal trailers per hour~~, using the airless spray application method, and panel filters for overspray control, and exhausting to stack PB16S,
- (p) PB17, ~~with a maximum capacity of 0.21 metal trailers per hour~~, using the airless spray application method, and panel filters for overspray control, and exhausting to stack PB17S,
- (q) PB18, ~~with a maximum capacity of 1.04 metal trailers per hour~~, using the airless and air atomized spray application method, and panel filters for overspray control, and exhausting to stack PB18S,
- (r) RC, ~~with a maximum capacity of 5.66 metal trailer interiors per hour~~, using rollcoating application method, and no control, and exhausting to stack RCS.

Response to issue #33

As noted in the response to issue #2, the maximum capacity language will not be deleted. As noted in the response to issue #1, the following language will be added to all descriptions in each Section D: The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.

Appeal Issue #34

Condition D.1.2 needs to be changed to:

D.1.2 PSD **Major Source** and PSD Minor **Modification Units** Limit [326 IAC 2-2] [40 CFR 52.21]

-
- (a) Pursuant to CP-157-4162, Plant ID 157-00046, issued on June 23, 1995,
 - (1) the total amount of VOC delivered to the applicator of spray operations PB1 - PB5, PB7, and PB9, shall not exceed 257.9 tons per 365 day period rolled on a daily basis.

- (2) The input of VOC to the crossmember dip line, PB8, and the usage of cleanup solvent shall be limited to 595.1 tons per 365 day period rolled on a daily basis. This limitation will prevent the VOC emissions from the crossmember dip line from being greater than 29.78 tons per year. This limitation is based upon the use of a control device on the crossmember dip line with an overall control efficiency of 95%.
- ~~(3) Any change or modification which may increase potential to emit of VOC to 290 tons per year from the equipment listed in (a)(1) and (2) of this condition shall obtain a PSD permit.~~
- (b) Pursuant to OP 4100-0046-0464, issued on October 9, 1990,
- (1) the total amount of organic solvents delivered to the spray painting operations, PB10 - PB18, including solvents from coatings, thinners and cleaning solvents, shall be limited to 249.6 tons per consecutive 12 month period.
- ~~(2) Any change or modification which may increase potential to emit VOC of 250 tons per year from the equipment listed in (b)(1) of this condition shall obtain a PSD permit.~~

Response to issue #34

The additions to the title of the condition can be made. Condition D.1.2 (now renumbered D.1.1) has been revised to remove the soft limits and associated record keeping for such will be deleted as well. Also, the VOC usage limit for surface coating operations (PB10 through PB18) will be removed since the potential usage of organic solvent from the surface coating booths is below the limit listed in D.1.2(b)(1).

D.1.21 PSD Major Source and PSD Minor Modification Units Limit [326 IAC 2-2] [40 CFR 52.21]

-
- (a) Pursuant to CP-157-4162, Plant ID 157-00046, issued on June 23, 1995:
- (1) the total amount of VOC delivered to the applicator of spray operations PB1 - PB5, PB7, and PB9, shall not exceed 257.9 tons per ~~365 day period rolled on a daily basis~~ **twelve (12) consecutive month period with compliance determined at the end of each month.**
- (2) ~~The input of VOC to the cross member dip line, PB8, and the usage of cleanup solvent shall be limited to 595.1 tons per 365 day period rolled on a daily basis. This limitation will prevent the VOC emissions from the crossmember dip line from being greater than 29.78 tons per year. This limitation is based upon the use of a control device on the crossmember dip line with an overall control efficiency of 95%.~~ **the total amount of VOC delivered to the dip coating line PB8, shall not exceed 595.1 tons per twelve (12) consecutive month period with compliance determined at the end of each month.**
- ~~(3) Any change or modification which may increase potential to emit of VOC to 290 tons per year from the equipment listed in (a)(1) and (2) of this condition shall obtain a PSD permit.~~
- (3) **the overall control efficiency of the thermal oxidizer controlling VOC emissions from dip coating line PB8 shall be no less than 95.00%.**

- (b) Pursuant to ~~OP 4100-0046-0464, issued on October 9, 1990,~~
- (4) the total amount of organic solvents delivered to the ~~spray painting~~ **surface coating** operations, PB10 ~~–PB18~~ **through PB15, and PB17**, including solvents from coatings, thinners and cleaning solvents, shall be limited to 249.6 tons per consecutive 12 month period **with compliance determined at the end of each month.**
- (2) ~~Any change or modification which may increase potential to emit VOC of 250 tons per year from the equipment listed in (b)(1) of this condition shall obtain a PSD permit.~~

Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

Appeal Issue #35

Condition D.1.3 needs to be changed to:

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to CP 157-4162, issued on June 23, 1995, the particulate matter from the surface coating operations, PB1 - PB5, PB7, and PB9, shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate **from one hundred (100) pounds per hour** 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 dry filters shall be in operation at all times the spray coating is in operation, in order to comply with this limit.

Response to issue #35

The 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to the spray coating operations at this source. Condition D.1.3 which contained these requirements has been removed and replaced with Condition D.1.4.

D.1.4 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating operations (PB1 – PB5, PB7, PB9 – PB15, PB17, and PB19) shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer’s specifications.

Appeal Issue #36

Condition D.1.5 needs to be changed to:

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

During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform VOC capture and destruction efficiency testing of the thermal oxidizer, RTOX, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every ~~two and one-half (2 1/2)~~ **five (5)** years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

Response to issue #36

The Compliance Department has determined that there are certain units which will need to meet a 2 2 year testing schedule, instead of a 5 year testing schedule. This operation, with potential VOC emissions greater than 100 tons per year, falls under those determined to need a 2 2 year schedule. Therefore, no change is made.

Appeal Issue #37

Condition D.1.7 needs to be deleted:

D.1.7 VOC Emissions

- ~~(a) Compliance with Condition D.1.2(a)(1) and (a)(2) shall be demonstrated at the end of each day based on the total volatile organic compound usage for the most recent 365 day period.~~
- ~~(b) Compliance with Condition D.1.2(b) shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve month period.~~

Response to issue #37

This condition has been replaced with Condition D.1.8 containing the requirements necessary to demonstrate compliance with Condition D.1.2 (now renumbered as D.1.1). A compliance demonstration is now required monthly, instead of daily.

D.1.8 VOC Emissions

Compliance with condition D.1.1 shall be demonstrated within 30 days of the end of each month. This shall be based on the total volatile organic compound emitted for the previous month, and adding it to previous 11 months total VOC emitted so as to arrive at VOC emissions for the most recent 12 consecutive month period . The VOC emissions for a month can be arrived at using the following equation for VOC usage:

VOC emitted = [(VOC input) x (100 - % overall control efficiency)] + [uncontrolled VOC input]

Appeal Issue #38

Condition D.1.9 needs to be changed to:

D.1.9 Monitoring

The compliance monitoring requirements applicable to this equipment are as follows:

The spray coating operations have applicable compliance monitoring conditions as specified below:

- (a) Daily inspections shall be performed **on days of operation** to verify the placement, integrity and particle loading of the filters. ~~To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response~~ **The Preventive Maintenance** Plan shall be followed whenever a condition exists which should result in a response step. ~~Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~

- ~~(b) Weekly 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 an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C – Compliance Monitoring Plan – Failure to Take Response Steps, shall be considered a violation of this permit.~~
- ~~(c) The particulate matter overspray from the surface coating facilities shall be considered in compliance with 326 IAC 6 provided that the overspray is not~~
- ~~(1) visibly detectable at the exhaust,~~
 - ~~(2) accumulated on the rooftops or on the ground.~~
- ~~(d)(b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

The dip line, PB8, VOC emissions are controlled by the regenerative thermal oxidizer, RTOX, and has applicable compliance monitoring conditions as specified below:

- (a) A continuous monitoring system shall be ~~calibrated, maintained, and~~ operated on the capture system for measuring air flow rate when ever the crossmember dip line is operated and cleaned. The output of this system shall be recorded, and that air flow rate shall be that which demonstrates compliance with 100 % capture. **This system shall be calibrated annually.**
- (b) A continuous monitoring system shall be ~~calibrated, maintained, and~~ operated on the regenerative thermal oxidizer burner chamber for measuring operating temperature when ever the crossmember dip line is operated and cleaned. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate 95% overall control efficiency during the most recent compliant stack test. **This system shall be calibrated annually.**

Response to issue #38

Due to the potential for overspray, the OAQ believes performing weekly observation and monthly rooftop inspections is appropriate to ensure compliance with 326 IAC 5-1 and 326 IAC 6-3. Item (c) is not necessary and has been deleted. Two frequency changes have been made. In (a), daily observations shall be changed to weekly observations. In (b), weekly inspections shall be changed to monthly inspections. Condition D.1.9 (now renumbered D.1.10) has been revised to include the compliance monitoring requirements only for the surface coating operations. In addition, Condition C.16 (Compliance Monitoring Plan – Failure to Take Response Steps) has been replaced with Condition C.15 (Response to Excursions or Exceedances). In this new condition, the Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated.

The deletions related to the ~~calibrated, maintained~~ language will not be made since the calibration and maintenance are part of the compliance monitoring requirements. Also, there is no need to insert the frequency for calibration, it should be done as necessary and determined by Permittee. Three new conditions (D.1.10, D.1.11 and D.1.12) containing the compliance monitoring requirements have been added in the permit in lieu of previous Monitoring Condition. Conditions D.1.11 and D.1.12 contain the parametric monitoring requirements for the oxidizer and also satisfy the CAM requirements.

D.1.10 Monitoring [40 CFR 64]

- (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 (PB1S – PB5S, PB7S, PB9S – PB15S, PB17S, and PB19S) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

Compliance with the above monitoring conditions shall satisfy the requirements of 40 CFR 64, Compliance Assurance Monitoring for the surface coating line PB3.

D.1.11 Thermal Oxidizer Temperature [40 CFR 64]

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the three (3) hour average temperature of the thermal oxidizer is below 1500°F. A three (3) hour average temperature that is below 1500°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (b) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limits in conditions D.1.1(b), as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the three (3) hour average temperature of the thermal oxidizer is below the three (3) hour average temperature as observed during the compliant stack test. A three (3) hour average temperature that is below the three (3) hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

Compliance with the above monitoring conditions shall satisfy the requirements of 40 CFR 64, Compliance Assurance Monitoring for the dip coating line PB-8.

D.1.12 Parametric Monitoring [40 CFR 64]

- (a) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance with limits in conditions D.1.1, as approved by IDEM.

- (b) **The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.**

Compliance with the above monitoring conditions shall satisfy the requirements of 40 CFR 64, Compliance Assurance Monitoring for the dip coating line PB-8.

Appeal Issue #39

Condition D.1.10 needs to be changed to:

D.1.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, and D.1.2 (a)(1), and ~~D.1.3~~ **D.1.2(b)**, the Permittee shall maintain records in accordance with (1) through ~~(6)~~**(5)** below. Records maintained for (1) through ~~(6)~~ **(5)** shall be taken daily 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 and D.1.2 (a)(1), and **D.1.2(b)**.
- (1) The amount and VOC content of each coating material and solvent used **each day**. ~~Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~
 - ~~(2) A log of the dates of use;~~
 - ~~(3)~~**(2)** The volume weighted VOC content of the coatings used for each day;
 - ~~(4)~~**(3)** The cleanup solvent usage for each day;
 - ~~(5)~~**(4)** The total VOC usage for each day; and
 - ~~(6)~~**(5)** The weight of VOCs emitted for each compliance period.
- (b) To document compliance with ~~D.1.1 and D.1.2 (b)~~ **D.1.2(a)(2)**, the Permittee shall maintain records **in accordance with (1) through (6) below**. ~~of the materials used that contain any VOCs. The records shall be complete and sufficient to establish compliance with the VOC usage limits and/or VOC emission limits established in this section~~ **D.1.2(a)(2)**. The records shall contain, as a minimum, the following information:
- (1) ~~The weight of VOC containing material used, including purchase orders and invoices necessary to verify the type and amount used.~~ **The amount and VOC content of each coating material and solvent used each day;**
 - (2) ~~The VOC content (weight and volume percent) of each material used.~~ **The volume weighted VOC content of the coatings used for each day;**
 - (3) ~~The weight of VOCs emitted for each compliance period, considering capture and destruction (or removal) efficiency.~~ **The cleanup solvent usage for each day;**

- (4) ~~Operational parameters of the VOC emission control equipment, considering capture and destruction (or removal) efficiency. **The total VOC usage for each day;**~~
- (5) **The weight of VOCs emitted for each compliance period; and**
- (6) The following ~~o~~Operational parameters of the VOC emission control equipment, such as:
 - (a) Capture efficiency (air flow rate);
 - (b) Destruction (or removal) efficiency; **and**
 - (c) ~~Data used to establish the capture and destruction (or removal) efficiencies; and~~
 - (c) Temperature readings.
- (c) To document compliance with Condition D.1.3 ~~and D.1.8~~, the Permittee shall maintain a log of daily **inspections of the filters, whenever the booths are in operation.** ~~overspray observations, daily and weekly 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.

Response to issue #39

The revised condition below will supercede previous D.1.10 condition. This revised condition reflects record keeping requirements in order to demonstrate compliance with the emission limits. The language under condition (a)(1) can not be removed as requested because material usage records including purchase orders, invoices and material safety data sheets are essential to demonstrate compliance with emission limits set forth in Conditions D.1.1 and D.1.2. However, to clarify the requirements, a new sub-condition (a)(2)(A) & (B) have been added. Additionally, the record keeping requirements for the thermal oxidizer's compliance monitoring have been added as well.

Upon further review, IDEM has determined that weekly overspray observations instead of daily is generally sufficient to ensure proper operation of the spray booths. IDEM has also determined that monthly inspection of coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground instead of weekly is sufficient to satisfy the requirements of 326 IAC 2-7-5 and 326 IAC 2-7-6.

D.1.103 Record Keeping Requirements

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- (a) To document compliance with Conditions D.1.1, and D.1.2 ~~(a), and D.1.3~~, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily 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 and D.1.2 ~~(a)~~. **Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.**
 - (1) The amount and VOC content of each coating material and solvent used **on monthly basis.** ~~Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~
 - (2) ~~A log of the dates of use;~~

- (2) The amount of coating material and solvent less water used on 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 volume weighted VOC content of the coatings used for each day month;
 - (4) The cleanup solvent usage for each day month;
 - (5) The total VOC usage for each day month; and
 - (6) The weight of VOCs emitted for each compliance period.
- ~~(c) To document compliance with D.1.1 and D.1.2 (b), the Permittee shall maintain records of the materials used that contain any VOCs. The records shall be complete and sufficient to establish compliance with the VOC usage limits and/or VOC emission limits established in this section. The records shall contain, as a minimum, the following information:~~
- ~~(1) The weight of VOC containing material used, including purchase orders and invoices necessary to verify the type and amount used.~~
 - ~~(2) The VOC content (weight and volume percent) of each material used.~~
 - ~~(3) The weight of VOCs emitted for each compliance period, considering capture and destruction (or removal) efficiency.~~
 - ~~(4) Operational parameters of the VOC emission control equipment, considering capture and destruction (or removal) efficiency.~~
 - ~~(5) The following Operational parameters of the VOC emission control equipment, such as:~~

 - ~~(a) Capture efficiency (air flow rate);~~
 - ~~(b) Destruction (or removal) efficiency;~~
 - ~~(c) Data used to establish the capture and destruction (or removal) efficiencies; and~~
 - ~~(d) Temperature readings.~~
- (b) To document compliance with conditions D.1.11 and D.1.12, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken as stated below and shall be complete and sufficient to establish compliance with the monitoring requirements in conditions D.1.11 and D.1.12.**
- (1) The continuous temperature records (on a three (3) hour average basis) for the thermal oxidizer and the three (3) hour average temperature used to demonstrate compliance during the most recent compliant stack test.**
 - (2) Daily records of the duct pressure or fan amperage.**

- (c) To document compliance with Condition ~~D.1.3 and~~ D.1.8¹⁰, the Permittee shall maintain a log of ~~daily~~ **weekly** overspray observations, **and** daily and ~~weekly~~ **monthly** inspections, ~~and these 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.

Appeal Issue #40

The description in Condition D.2 needs to be changed to:

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

Three (1) shot blasters, identified as:

- (1) BB1, ~~with a maximum capacity of 3.7 tons of steel shot per hour,~~ using a baghouse, identified as BH1 as control, and exhausting to stack BH1S,
- (2) BB2, ~~with a maximum capacity of 1.26 tons of steel shot per hour,~~ using a baghouse, identified as BH2 as control, and exhausting to stack BH2S,
- (3) BB3, ~~with a maximum capacity of 1.26 tons of steel shot per hour,~~ using a baghouse, identified as BH3 as control, and exhausting to stack BH3S.

Response to issue #40

These issues have been addressed in the responses to issues #1 and #2 and there will be no changes as a result.

Appeal Issue #41

Condition D.2.2 needs to be changed to:

~~D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]~~

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

Response to issue #41

IDEM, OAQ has determined that it is not necessary to include this condition in the permit, therefore, this condition will be deleted from the permit.

Appeal Issue #42

Condition D.2.3 needs to be deleted and following conditions renumbered accordingly:

~~D.2.3 Particulate Matter (PM)~~

Pursuant to CP 157-4162, issued on June 23, 1995, the baghouses for PM control shall be in operation at all times when the respective shot blasters are in operation and exhausting to the outside atmosphere.

Response to issue #42

Condition D.2.3 (re-numbered as D.2.4) is a requirement from a prior construction permit. These conditions are carried forward into Title V permits, unless there is some compelling reason why the condition should not be used. In this case, no reason has been presented for why the condition should not continue to be in the Title V Permit. In addition, the control does need to operate at all times the process is in operation to ensure compliance with Condition D.2.1 (326 IAC 6-3-2), Condition D.2.2 (PSD) and CAM.

Appeal Issue #43

The description in Condition D.3 needs to be changed to:

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

Welding and cutting of metal operation, identified as W/C:

- (1) **Approximately s**Six (6) submerged arc welding stations, each with a ~~maximum nominal~~ capacity of 3.3 pounds of wire per hour,
- (2) **Approximately o**One hundred seventy-nine (179) metal inert gas welding stations, each with a ~~maximum nominal~~ capacity of 1.7 pounds of wire per hour,
- (3) **Approximately o**One hundred seventy-nine (179) stick welding stations, each with a ~~maximum nominal~~ capacity of 6.6 pounds of electrodes per hour, and
- (4) **Approximately o**One (1) plasma arc metal cutting process, with a capacity of 400 inches per minute.

Response to issue #43

These issues have been addressed in responses to issues #1 and #2.

Appeal Issue #44

Condition D.3.2 needs to be deleted:

~~D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)]~~

~~The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.~~

Response to issue #44

This condition will be deleted from the permit.

Appeal Issue #45

Condition D.3.3 needs to be deleted:

~~D.3.3 Record Keeping Requirements~~

~~To document compliance with Condition D.3.1, the Permittee shall maintain records on the amount of welding wire, electrode, and steel being cut. Records shall be taken daily and shall be complete and sufficient to establish compliance with the PM emission limits established in Condition D.3.1.~~

Response to issue #45

Condition D.3.3 has been deleted as requested.

Appeal Issue #46

The description in Condition D.4 needs to be changed to:

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

Three (3) ancillary operations, listed as follows:

- (a) One (1) caulking process, identified as CLK, with a ~~maximum~~ **nominal** capacity of 58 pounds of caulk per hour, using no control, and exhausting to general ventilation
- (b) One (1) surface cleaning process, identified as SC, with a ~~maximum~~ **nominal** capacity of 4.7 pounds of solvent per hour, using no control, and exhausting to general ventilation,
- (c) One (1) decal application process, identified as DA, with a ~~maximum~~ **nominal** capacity of 1.49 pounds of solvent per hour, using no control, and exhausting to general ventilation.

Response to issue #46

This issue was addressed in the response to issues #1 and #2. There will be no change as a result.

Appeal Issue #47

Condition D.4.2 needs to be changed to:

D.4.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C- Performance Testing.~~

Response to issue #47

IDEM, OAQ has determined that it is not necessary to include this condition in the permit, therefore, this condition will be deleted from the permit.

Appeal Issue #48

Condition D.4.3 needs to be changed to:

D.4.3 Record Keeping Requirements

- (a) To document compliance with Conditions D.4.1, the Permittee shall maintain records in accordance with (1) through ~~(5)~~ **(4)** below. Records maintained for (1) through ~~(5)~~ **(4)** shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC ~~usage limits and/or the VOC emission~~ limits established in Condition D.4.1.

- (1) The amount and VOC content of the materials and solvent used. ~~Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~
- (2) ~~A log of the dates of use;~~
- (3)(2) The cleanup solvent usage for each month;
- (4)(3) The total VOC usage for each month; and
- (5)(4) The weight of VOCs emitted for each compliance period.

Response to issue #48

Emission limit and Record Keeping requirements for operations CLK and SC have been deleted as requested because these operations have VOC PTE of 22.86 and 20.80 tons per year, respectively. Since the PTE of each operation is less than 25 tons per year, the requirement of 326 IAC 8-1-6 (BACT) does not apply. Therefore, no recordkeeping and reporting is required.

Appeal Issue #49

Condition D.5.2 needs to be changed to:

D.5.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Section C—Performance Testing.~~

Response to issue #49

IDEM, OAQ has determined that it is not necessary to include this condition in the permit, therefore, this condition will be deleted from the permit. Section D.5 in the original Title V permit contained boilers, however, during this permit renewal, the boilers are included in Section D.3 of the permit.

Appeal Issue #50

Condition D.5.3 needs to be changed to:

D.5.3 Record Keeping Requirements

To document compliance with Condition D.5.1, the Permittee shall maintain records on the amount of fuel oil used **when operating with fuel oil**. Records shall be ~~taken monthly and shall be complete and sufficient to establish compliance with the PM emission limits established in Condition D.5.1.~~ **Fuel oil shall be used on an emergency basis.**

Response to issue #50

None of the boilers at the source burn Fuel oil there this Condition has been removed.

Appeal Issue #51

The description in Condition D.6 needs to be deleted:

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

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

Response to issue #51

This issue was addressed in the response to issue #3 and there will be no change as a result.

Appeal Issue #52

Condition D.6.1 needs to be deleted:

~~D.6.1 Particulate Matter (PM) [326 IAC 6-3]~~

~~Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the grinding and machining operations shall not exceed allowable PM emission rate based on the following equation:~~

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

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

Response to issue #52

IDEM, OAQ agrees that Condition D.6.1 is not appropriate since the process weight rate of this operation is less than 100 pounds per hour. Since the grinding and machining operation emits particulate and has process weight rate of less than 100 pounds per hour, it is subject to the requirements of 326 IAC 6-3-2(c). Pursuant to 326 IAC 6-3-2(c), the allowable particulate emissions rate from any process which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour. This includes the grinding and machining operation. Following is a new condition which has been added in Section D.4 of the permit containing the applicable requirement.

D.4.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(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.

Appeal Issue #53

Condition D.6.2 needs to be deleted:

~~D.6.2 Testing Requirements [326 IAC 2-7-6(1),(6)]~~

~~The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter emission limit~~

~~specified in Condition D.6.1 shall be determined by a performance test conducted in accordance with Section C – Performance Testing.~~

Response to issue #53

IDEM, OAQ has determined that it is not necessary to include this condition in the permit, therefore, this condition will be deleted from the permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit 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 Part 70 permit renewal application for the purposes of this review was received on September 24, 2003. Additional information was received on July 27, 2004.

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

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 28 of Appendix A).

Potential to Emit of the Source

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

The source was issued a Part 70 Operating Permit on June 25, 1999. 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 the original Part 70 operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Surface coating booths (PB1 through PB5, PB7, and PB9)	6.19	6.19	0.00	257.29	0.00	0.00	16.17 (single) 48.18 (total)
Surface coating booths (PB10 through PB15, PB17, and PB19)	5.51	5.51	0.00	248.85	0.00	0.00	13.90 (single) 38.94 (total)
Dip coating line (PB8)	0.00	0.00	0.00	29.57 ⁽¹⁾	0.00	0.00	3.61 (single/total)
Shot blasters (BB1, BB2, BB3)	8.17	8.17	0.00	0.00	0.00	0.00	0.00
Welding Stations	236.01	236.01	0.00	0.00	0.00	0.00	17.16 (single/total)
Natural gas fired boilers (CB1) and (CB4)	0.13	0.52	0.04	0.38	5.79	6.89	0.124 (single) 0.13 (total)
Caulking Process (CLK)	0.00	0.00	0.00	22.86	0.00	0.00	0.00
Surface Cleaning Process (SC)	0.00	0.00	0.00	20.80	0.00	0.00	0.00
Insignificant Activities ⁽²⁾	3.13	3.20	0.41	9.89	2.96	1.84	0.1 (single) 0.23 (total)
Total PTE	259.14	259.60	0.45	589.64	8.75	8.73	30.07 (single) 108.25 (total)

Notes:

- (1) VOC emissions reflect controlled emissions by utilizing regenerative thermal oxidizer with overall control efficiency of 95%.
- (2) Insignificant Activities emissions include emissions from natural gas combustion units, High Density Polyethylene Extrusion, Incinerator, and Decal application stripping process.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM10, and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) 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 particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects calendar year 2003 emissions, based upon the Indiana Air Emission Summary Data for criteria pollutants.

Pollutant	Emissions (ton/yr)
PM	Not reported
PM ₁₀	1.0
SO ₂	Not reported
VOC	32.0
CO	Not reported
NO _x	Not reported

County Attainment Status

The source is located in Tippecanoe County.

Pollutant	Status
PM10	Attainment
PM2.5	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Tippecanoe County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Tippecanoe County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions.
- (c) Tippecanoe County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

- (b) Monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) This Part 70 source does include a pollutant-specific emissions unit as defined in 40 CFR 64.1:
 - (1) with the potential to emit before controls equal to or greater than one hundred (100) tons per year;
 - (2) that is subject to an emission standard; and
 - (3) uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

The one (1) dip coating line, coating metal parts, identified as PB8 at this Part 70 source has uncontrolled PTE of VOC of greater than 100 tons per year, and uses a control device (Regenerative thermal oxidizer) as defined in 40 CFR 64.1 to comply with an emission limitation or standard under 326 IAC 2-2. Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are applicable to the dip coating line PB8.

The following CAM plan, which was submitted by the source, shall satisfy the 40 CFR 64 Compliance Assurance Monitoring requirements.

- (i) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the three (3) average temperature of the thermal oxidizer is below 1500°F. A three (3) hour average temperature that is below 1500°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (ii) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limit in condition D.1.1(b), as approved by IDEM.
- (iii) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the three (3) hour average temperature of the thermal oxidizer is below the three (3) hour average temperature as observed during the compliant stack test. A three (3) hour average temperature that is below the three (3) hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (iv) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance with limits in conditions D.1.1(b), as approved by IDEM.

- (v) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

The one (1) surface coating line, coating metal parts, identified as PB3 at this Part 70 source has uncontrolled PTE of PM10 greater than 100 tons per year, and uses a control device (dry filters) as defined in 40 CFR 64.1 to comply with an emission limitation or standard under 326 IAC 6-3-2(d) and 326 IAC 2-2 . Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are applicable to the surface coating line PB3.

The following CAM plan, which was submitted by the source, shall satisfy the 40 CFR 64 Compliance Assurance Monitoring requirements.

- (i) 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 stack (PB3S) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (ii) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

None of the other surface coating booths individually have the potential to emit greater than 100 tons per year of VOC or PM10. Therefore they are not subject to the provisions of 40 CFR 64, Compliance Assurance Monitoring.

The one (1) shot blaster, identified as BB1 at this Part 70 source has uncontrolled PTE of PM and PM10 of greater than 100 tons per year, and uses a control device (baghouse) as defined in 40 CFR 64.1 to comply with an emission limitation or standard under 326 IAC 6-3-2(c). Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are applicable to BB1.

The following CAM plan, which was submitted by the source, shall satisfy the 40 CFR 64 Compliance Assurance Monitoring requirements.

- (i) The Permittee shall record the pressure drop across the baghouse used in conjunction with the BB1, at least once per day when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 and 5.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

- (ii) Broken or Failed Bag Detection:
- (A) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has 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).
- (B) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. 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).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

- (iii) Visible emission notations of the stack exhaust (BH1S, BH2S, and BH3S) shall be performed once per day 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. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances shall be considered a deviation from this permit.

The one (1) surface coating line, coating metal parts, identified as PB3 at this Part 70 source has uncontrolled PTE of PM10 greater than 100 tons per year, and uses a control device (dry filters) as defined in 40 CFR 64.1 to comply with an emission limitation or standard under 326 IAC 6-3-2(d) and 326 IAC 2-2 . Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are applicable to the surface coating line PB3.

The following CAM plan, which was submitted by the source, shall satisfy the 40 CFR 64 Compliance Assurance Monitoring requirements.

- (i) 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 stack (PB3S) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
 - (ii) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) The requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc) are not included in the permit for one (1) boiler, identified as CB1, with a maximum heat input capacity of 5.23 MMBtu per hour because the boiler's capacity is less than the rule applicability threshold of 10 MMBtu per hour.
 - (c) The one (1) 10.5 MMBtu per hour natural gas fired boiler (CB4), constructed in 2005, is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c - 60.48c, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) because it is being constructed after June 9, 1989, and has a maximum design heat input capacity greater than 10 MMBtu per hour and less than 100 MMBtu per hour. However, since this boiler only combusts natural gas, it is subject only to the record keeping and reporting requirements under 40 CFR 60.48c (a) and (g). The applicable record keeping and reporting requirements are as follows:
 - (1) The Permittee shall record and maintain records for a period of two years of the amounts of each fuel combusted during each month.
 - (d) The one (1) boiler, identified as CB1 with a maximum heat input capacity of 5.23 MMBtu per hour is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD. The boiler is part of the affected source for the small gaseous fuel subcategory, as defined by 40 CFR 63.7575, because it has a rated capacity of less than or equal to 10 million British thermal units per hour heat input. However, pursuant to 40 CFR 63.7506(c), there are no applicable requirements from 40 CFR 63, Subpart DDDDD and 40 CFR 63, Subpart A for the affected source for the small gaseous fuel subcategory.

- (e) The one (1) 10.5 MMBtu natural gas fired boiler (CB4) is subject to the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD. The boiler comprises one existing affected source for the large gaseous fuel subcategory, as defined by 40 CFR 63.7506(b), because it meets the criteria in the definition in 40 CFR 63.7575 for the large gaseous fuel subcategory. The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the affected source after the effective date of 40 CFR 63, Subpart DDDDD, except when otherwise specified in 40 CFR 63 Subpart DDDDD. This rule was published in the *Federal Register* on September 13, 2004. A copy of the signed, final rule is available at <http://www.epa.gov/ttn/atw/boiler/boilerpg.html>.

Pursuant to 40 CFR 63.7506(b), the only requirements that apply to the existing affected source for the large gaseous fuel subcategory, are the initial notification requirements in 40 CFR 63.9(b). The Permittee has already fulfilled the requirement of submitting the initial notification on February 25, 2005.

- (f) The requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.50, Subpart E) are not included for the one (1) natural gas fired incinerator (BO) with maximum heat input rate of 1.0 MMBtu/hr and maximum charge capacity of 80 pounds per hour, because the maximum charge capacity of this incinerator is below the rule applicability threshold of 50 tons per day.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR Part 63, Subpart EEE (National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors) (326 IAC 20-28) are not included in the permit for the Incinerator (BO) because this incinerator does not combust any hazardous air pollutants.
- (h) This source is subject to the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63.3880, Subpart MMMM because the source is a major source of HAPs and the painting operation applies surface coating to miscellaneous metal parts and products, as defined in 40 CFR 63.3881(a). Pursuant to 40 CFR 63.3881(a)(1), the surface coating operation also includes storage containers and mixing vessels that are used to store and mix thinners, additives and/or cleaning materials. Therefore, the requirements of National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, (40 CFR 63.3880, Subpart MMMM) are included in the permit.

Under NESHAP, Subpart MMMM, Surface coating operations identified as PB1 through PB5, PB7 through PB15, PB17 and PB19, and Surface cleaning operation identified as SC, are considered an existing affected source because the construction of each operation commenced prior to August 13, 2002.

Pursuant to 40 CFR 63.3883, the Permittee shall comply with the requirements of 40 CFR 63, Subpart MMMM by January 2, 2007.

Non applicable portions of the NESHAP will not be included in the permit. This source is subject to the following portions of Subpart MMMM.

- (a) 40 CFR 63.3881
- (b) 40 CFR 63.3882
- (c) 40 CFR 63.3883 (b);
- (d) 40 CFR 63.3890 (b)(1);

- (e) 40 CFR 63.3891 (a) and (b);
- (f) 40 CFR 63.3892 (a);
- (g) 40 CFR 63.3893 (a);
- (h) 40 CFR 63.3900 (a)(1) and (b);
- (i) 40 CFR 63.3901;
- (j) 40 CFR 63.3910, except 40 CFR 63.3910 (c)(8)(iii), (9), (10) and (11);
- (k) 40 CFR 63.3920, except 40 CFR 63.3920 (a)(7), (b) and (c);
- (l) 40 CFR 63.3930, except 40 CFR 63.3930 (c)(4) and (k);
- (m) 40 CFR 63.3931;
- (n) 40 CFR 63.3940;
- (o) 40 CFR 63.3941;
- (p) 40 CFR 63.3942;
- (q) 40 CFR 63.3950;
- (r) 40 CFR 63.3951;
- (s) 40 CFR 63.3952;
- (t) 40 CFR 63.3980; and
- (u) 40 CFR 63.3981.

The provisions of 40 CFR 63 Subpart A – General Provisions apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart M.

- (i) The requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63.4480, Subpart P (National Emission Standards for Hazardous Air Pollutants for Plastic Parts and Products) (326 IAC 20-28) are not included in the permit since this source does not engage in surface coating of plastic parts.

State Rule Applicability – Entire Source

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

This source is not subject to the requirements of 326 IAC 2-2. This source was constructed in 1988 after the August 7, 1977 rule applicability date, and was a minor source when first built and is not one of the 28 listed source categories. The source is a major source for purposes of determining the applicability of this rule to future modifications, with VOC emissions at greater than 250 tons per year.

This source has made the following modifications since 1988 and VOC emissions from each modification were limited to less than PSD significant levels. Therefore, this source is not subject to the requirements of this rule based on the following:

- (a) The total amount of organic solvents delivered to the surface coating operations, PB10 through PB15, and PB17 including solvent from coatings, thinners and cleaning solvents, shall be limited to 249.6 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

This modification was a minor modification to the existing minor PSD source resulting in total increase of VOC emissions of less than 250 tons per year. However, after this modification, the source became a major PSD source.

- (b) Pursuant to CP 157-4162, issued on June 23, 1995:
- (1) the total amount of VOC delivered to the applicator of spray operations PB1 through PB5, PB7, and PB9, shall not exceed 257.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
 - (2) the total amount of VOC delivered to the dip coating line PB8, shall not exceed 595.1 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit in combination with the control device will limit the potential to emit of VOC to less than 29.78 tons per twelve (12) consecutive month period. This limit is based upon the use of regenerative thermal oxidizer for VOC control with overall control efficiency of 95.00%. This requirement will render the requirements of 326 IAC 2-2 (PSD) not applicable.
 - (3) The overall control efficiency of the thermal oxidizer controlling VOC emissions from dip coating line PB8 shall be no less than 95.00%.

This modification was a minor modification to the existing major PSD source because the net change in emissions was less than 40 tons per year after considering the contemporaneous VOC emission decrease. The decrease in VOC emissions was due to the installation of thermal oxidizer on the dip coating line.

- (c) Pursuant to CP 157-4162, issued on June 23, 1995, the particulate emissions from the shot blasting units (BB1, BB2, and BB3) shall be limited to the following:

Emission Unit	PM / PM10 Emission Limit (lb/hour)	PM / PM10 Emission Limit (ton/yr)
BB1	0.30	1.31
BB2	0.78	3.43
BB3	0.78	3.42

The total PM/PM10 emissions from the three (3) shotblasters are less than 15.0 tons per year (equivalent to 3.42 lb/hr), which is below the PSD significant level for PM/PM10. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration, PSD) do not apply.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). The source also has potential to emit greater than or equal to 250 tons per year of VOC; therefore, an emission statement covering the previous calendar year must be submitted by July 1 annually. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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 the 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.

326 IAC 2-4.1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1 (New Source Toxics Control), any new process or production unit constructed after July 27, 1997, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of any combination of HAPs, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). None of the units constructed after July 27, 1997 at this source have PTE 10 tons per year of any HAP or 25 tons per year of any combination of HAPs, therefore, 326 IAC 2-4.1 does not apply.

326 IAC 6-4 (Fugitive Dust Emissions)

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This rule applies to sources located in a Nonattainment county for Particulate Matter and sources having significant quantity of fugitive emissions. This source is located in a county classified as attainment for Particulate Matter and it emits insignificant quantity of fugitive emissions. Therefore, this rule is not applicable to the source.

State Rule Applicability – Individual Facilities

326 IAC 4-2-2 (Incinerators)

The natural gas fired incinerator BO is subject to the requirements of 326 IAC 4-2-1. Pursuant to 326 IAC 4-2-2 (Incinerators), the natural gas fired incinerator BO shall comply with the following:

- (a) The incinerator shall comply with the following requirements:
 - (1) Consist of primary and secondary chambers or the equivalent.
 - (2) Be equipped with a primary burner unless burning only wood products.
 - (3) Comply with 326 IAC 5-1 and 326 IAC 2.
 - (4) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in paragraph (c) of this condition.
 - (5) Not emit particulate matter in excess of five-tenths (0.5) pound of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air.

- (6) If any of the requirements of (1) through (5) are not met, then the Permittee shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.
- (b) An incinerator is exempt from paragraph (a)(5) of this condition if subject to a more stringent particulate matter emission limit in 40 CFR 52 Subpart P, State Implementation Plan for Indiana.
- (c) A Permittee developing an operation and maintenance plan pursuant to paragraph (a)(4) of this condition must comply with the following:
 - (1) The operation and maintenance plan must be designed to meet the particulate matter emission limitation specified in paragraph (a)(5) of this condition and include the following:
 - (A) Procedures for receiving, handling, and charging waste.
 - (B) Procedures for incinerator startup and shutdown.
 - (C) Procedures for responding to a malfunction.
 - (D) Procedures for maintaining proper combustion air supply levels.
 - (E) Procedures for operating the incinerator and associated air pollution control systems.
 - (F) Procedures for handling ash.
 - (G) A list of wastes that can be burned in the incinerator.
 - (2) Each incinerator operator shall review the plan before initial implementation of the operation and maintenance plan and annually thereafter.
 - (3) The operation and maintenance plan must be readily accessible to incinerator operators.
 - (4) The Permittee shall notify the department, in writing, thirty (30) days after the operation and maintenance plan is initially developed pursuant to this section.
- (d) The Permittee shall make the manufacturer's specifications or the operation and maintenance plan available to the department upon request.

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

- (a) The one (1) natural gas fired boiler CB1, constructed in 1994, with a maximum heat input capacity rating of 5.23 MMBtu per hour is subject to the particulate matter limitations of 326 IAC 6-2-4. Pursuant to this rule, particulate emissions from indirect heating facilities constructed after September 21, 1983, shall be limited by the following equation:

$$Pt = 1.09/Q^{0.26}$$

where: Pt = maximum allowable particulate matter (PM) emitted per MMBtu heat input
Q = total source maximum operation capacity rating = 5.23 MMBtu/hr

$$Pt = 1.09/5.23^{0.26} = 0.70 \text{ lbs PM/MMBtu}$$

Compliance calculation:

$$(0.04 \text{ tons PM/yr}) * (\text{hr}/5.23 \text{ MMBtu}) * (\text{yr}/8,760 \text{ hrs}) * (2,000 \text{ lbs/ton}) = 0.0017 \text{ lbs PM/MMBtu}$$

Actual lbs PM/MMBtu (0.0017) is less than allowable lbs PM/MMBtu (0.7), therefore the boiler will comply with the requirements of 326 IAC 6-2-4.

- (b) The one (1) natural gas fired boiler CB4, constructed in 2005, with a maximum heat input capacity rating of 10.5 MMBtu per hour is subject to the particulate matter limitations of 326 IAC 6-2-4. Pursuant to this rule, particulate emissions from indirect heating facilities constructed after September 21, 1983, shall be limited by the following equation:

$$Pt = 1.09/Q^{0.26}$$

where: Pt = maximum allowable particulate matter (PM) emitted per MMBtu heat input
Q = total source maximum operation capacity rating = 5.23 + 10.5 = 15.73 MMBtu/hr

$$Pt = 1.09/15.73^{0.26} = 0.532 \text{ lbs PM/MMBtu}$$

Compliance calculation:

$$(0.13 \text{ tons PM/yr}) * (\text{hr}/10.5 \text{ MMBtu}) * (\text{yr}/8,760 \text{ hrs}) * (2,000 \text{ lbs/ton}) = 0.0028 \text{ lbs PM/MMBtu}$$

Actual lbs PM/MMBtu (0.0028) is less than allowable lbs PM/MMBtu (0.532), therefore the boiler will comply with the requirements of 326 IAC 6-2-4.

326 IAC 6-3-2(d) (Particulate Emissions Limitations for manufacturing Process)

- (a) Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating operations (PB1 – PB5, PB7, PB9 – PB15, PB17, and PB19) shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) Surface coating operation PB8 is not subject to the requirements of 326 IAC 6-3-2 because this operation applies coatings through a dipping method resulting in 100% transfer efficiency and no particulate emissions.

326 IAC 6-3-2 (e) (Particulate Emissions Limitations for manufacturing Process)

- (a) The particulate emissions from the following shot blasters shall be limited by the following equation:

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

Emission Unit	Process Weight Rate (tons/hr)	Uncontrolled Particulate Emissions (lb/hr)	Control Efficiency %	Controlled Particulate Emissions (lb/hr)	Allowable Particulate Emissions (326 IAC 6-3-2) (lb/hr)
BB1	3.70	60.0	99.5	0.30	9.85
BB2	1.26	2.735	71.4	0.783	4.78
BB3	1.26	2.732	71.4	0.780	4.78

The Baghouses (BH1, BH2, and BH3) shall be in operation at all times the facilities (BB1, BB2, and BB3) are in operation, in order to comply with this limit.

- (b) Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour. This includes the following equipment listed under insignificant activities (each is limited to particulate emissions of 0.551 pounds per hour):
- (1) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and 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. [326 IAC 6-3-2]
 - (2) One (1) plasma arc metal cutting process, with a maximum capacity of 400 inches per minute, and exhausting to general ventilation. [326 IAC 6-3-2]
- (c) The following metal welding operations are exempt from the 326 IAC 6-3-2(c) requirements since each of the welding station consumes less than 625 pounds of rod or wire per day:
- (i) Six (6) submerged arc welding stations, each with a maximum capacity of 3.3 pounds of wire per hour, and exhausting to general ventilation.
 - (ii) One hundred seventy-nine (179) metal inert gas welding stations, each with a maximum capacity of 1.70 pounds of wire per hour, and exhausting to general ventilation.
 - (iii) One hundred seventy-nine (179) stick welding stations, each with a maximum capacity of 6.6 pounds of wire per hour, and exhausting to general ventilation.
- (d) One (1) high density polyethylene extrusion operation, identified as HDPE, is exempt from the requirements of 326 IAC 6-3-2 because the operation has potential emissions less than 0.551 pounds per hour.

326 IAC 8-1-6 (New Facilities)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have potential volatile organic compound (VOC) emissions of 25 tons per year or more and are not subject to other provisions of Article 8.

The surface coating operations, identified as PB1, PB2, PB3, PB9, PB8, PB13, and PB14, each constructed after January 1, 1980, has potential uncontrolled VOC emissions in excess of 25 tons per year. However, these surface coating operations at this source are subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating), therefore, they are not subject to the requirements of 326 IAC 8-1-6.

The surface coating operations, identified as PB4, PB5, PB7, PB10, PB11, PB12, PB15, PB17, and PB19, each constructed after January 1, 1980, have a maximum uncontrolled VOC potential emission rate of less than 25 tons per year. Therefore, this rule does not apply. These surface coating operations (PB4, PB5, PB7, PB10, PB11, PB12, PB15, PB17, and PB19) are subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating) as well.

Operations including caulking process (CLK), surface cleaning (SC), decal application process (DA) and high density polyethylene extrusion operation (HDPE), each has a potential to emit of VOC less than twenty-five (25) tons of per year, therefore, the requirements of 326 IAC 8-1-6 are not applicable to these facilities.

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

Pursuant to 326 IAC 8-2-1 (Applicability) and 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), facilities constructed after July 1, 1990 located in any county, and with actual VOC emissions of greater than fifteen (15) pounds per day before add-on controls shall limit the VOC content of the applied coating to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance coatings.

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 surface coating operations (PB1 – PB5, PB7, PB8 – PB15, PB17, and PB19), each with actual VOC emissions of greater than fifteen (15) pounds per day before add-on controls, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.

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

Based on the MSDS submitted by the source and calculations made, each surface coating operation is in compliance with this requirement.

Testing Requirements

- (a) The Permittee performed VOC testing on the one (1) regenerative thermal oxidizer (RTOX), controlling VOC emissions from the dip coating line PB8 on June 19, 2002. Dip coating line PB8 and associated RTOX is not operating currently, therefore, a repeat compliance stack test shall be performed within one hundred and eighty (180) days after resuming the operation to demonstrate compliance with 326 IAC 2-2. The permittee shall perform compliance stack testing once every 2.5 years since the PTE of VOC before control is greater than 100 tons per year.
- (b) Compliance testing is not required for the surface coating operations since the VOC and volatile organic HAP emissions from the surface coating operations (PB1 – PB5, PB7, PB8 – PB15, PB17, and PB19) are based on the MSDS data provided by the source.
- (c) Compliance testing is not required for the shotblast units (BB1, BB2, and BB3) since each is controlled by baghouse with controlled emissions below the relevant allowable particulate matter emission rates and the compliance will be demonstrated through proper operation and parametric monitoring of the baghouses.

Compliance Requirements

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

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in 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.

The compliance monitoring requirements applicable to this source are as follows:

1. The regenerative thermal oxidizer (RTOX) controlling VOC emissions from surface coating operation PB8 has applicable compliance monitoring conditions as specified below:
 - (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a three (3) hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the three (3) hour average temperature of the thermal oxidizer is below 1500°F. A three (3) hour average temperature that is below 1500°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
 - (b) The Permittee shall determine the three (3) hour average temperature from the most recent valid stack test that demonstrates compliance with limits in conditions D.1.3(b)(2), as approved by IDEM.
 - (c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the three (3) hour average temperature of the thermal oxidizer is below the three (3) average temperature as observed during the compliant stack test. A three (3) hour average temperature that is below the three (3) hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
 - (d) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance with limits in conditions D.1.3(b)(2), as approved by IDEM.

- (e) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

These monitoring conditions are necessary because the catalytic oxidizer must operate properly to ensure compliance with 326 IAC 2-2 (PSD), 326 IAC 8-2-9 (Miscellaneous Metal Coating) and 40 CFR 64 (Compliance Assurance Monitoring) requirements.

- 2. The three (3) shot blasters, identified as BB1, BB2, and BB3, each controlled by a baghouse (BH1S) has applicable compliance monitoring conditions as specified below:

- (a) The Permittee shall record the pressure drop across the baghouse used in conjunction with the BB1, BB2, and BB3, at least once per day when the process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 and 5.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

- (b) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has 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).
- (c) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. 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).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

- (d) Visible emission notations of the stack exhausts (BH1S, BH2S, and BH3S) shall be performed once per day 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. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

These monitoring conditions are necessary because the bahghouse (BH1) must operate properly to ensure compliance with 326 IAC 2-2 (PSD), 326 IAC 2-7 (Part 70), 326 IAC 6-3-2, and 40 CFR 64 (Compliance Assurance Monitoring) requirements.

3. The surface coating operations (PB1 – PB5, PB7, PB9 – PB15, PB17, and PB19) have 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 stack(s) (S1, S2, S3) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
 - (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the spray coating booths equipped with dry filters must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations), 326 IAC 5-1 and 40 CFR 64 (for PB3 only) requirements.

Conclusion

The operation of this truck trailer assembly plant shall be subject to the conditions of this Part 70 permit 157-18078-00046.

Appendix A: Emission Calculations

Company Name: Wabash National, L.P. North Plant
Address City IN Zip: 1000 Sagamore Parkway South, Lafayette, Indiana 47905
Permit No.: T157-18078-00046
Reviewer: Adeel Yousuf / EVP
Date: July 20, 2004

Uncontrolled Potential Emissions (tons/year)									
Emissions Generating Activity									
Pollutant	Surface Coating PB1 through PB5, PB7, and PB9	Surface Coating PB8	Surface Coating PB10 through PB15, PB17, and PB19	Shot Blasting BB1, BB2, and BB3	Oil/gas Combustion Two (2) Boilers	Welding Stations	Miscellaneous Process Operations CLK and SC	Insignificant Activities *	TOTAL
PM	310.11	0.00	275.73	286.76	0.13	236.01	0.00	3.13	1111.87
PM10	310.11	0.00	275.73	286.76	0.52	236.01	0.00	3.20	1112.33
SO2	0.00	0.00	0.00	0.00	0.04	0.00	0.00	0.41	0.45
NOx	0.00	0.00	0.00	0.00	6.89	0.00	0.00	1.84	8.73
VOC	257.29	591.44	248.85	0.00	0.38	0.00	43.66	9.89	1151.51
CO	0.00	0.00	0.00	0.00	5.79	0.00	0.00	2.96	8.75
total HAPs	48.18	72.29	38.94	0.00	0.13	17.16	0.00	0.23	176.93
worst case single HAP	16.17 (Ethyl Benzene)	72.29 (Glycol Ether)	13.90 (Ethyl Benzene)	0.00	(Hexane) 0.124	(Manganese) 17.16	0.00	0.10	72.29 (Glycol Ether)
Total emissions based on rated capacity at 8,760 hours/year.									
* Insignificant activities category include emissions from natural gas combustion units, High Density Polyethylene Extrusion, Incinerator, and Decal application stripping process.									

Controlled Potential Emissions (tons/year)									
Emissions Generating Activity									
Pollutant	Surface Coating PB1 through PB5, PB7, and PB9	Surface Coating PB8	Surface Coating PB10 through PB15, PB17, and PB19	Shot Blasting BB1, BB2, and BB3	Oil/gas Combustion Two (2) Boilers	Welding Stations	Miscellaneous Process Operations CLK and SC	Insignificant Activities *	TOTAL
PM	6.19	0.00	5.51	8.17	0.13	236.01	0.00	3.13	259.14
PM10	6.19	0.00	5.51	8.17	0.52	236.01	0.00	3.20	259.60
SO2	0.00	0.00	0.00	0.00	0.04	0.00	0.00	0.41	0.45
NOx	0.00	0.00	0.00	0.00	6.89	0.00	0.00	1.84	8.73
VOC	257.29	29.57	248.85	0.00	0.38	0.00	43.66	9.89	589.64
CO	0.00	0.00	0.00	0.00	5.79	0.00	0.00	2.96	8.75
total HAPs	48.18	3.61	38.94	0.00	0.13	17.16	0.00	0.23	108.25
worst case single HAP	16.17 (Ethyl Benzene)	3.61 (Glycol Ether)	13.90 (Ethyl Benzene)	0.00	(Hexane) 0.124	(Manganese) 17.16	0.00	0.10	30.07 (Ethyl Benzene)
Total emissions based on rated capacity at 8,760 hours/year.									
* Insignificant activities category include emissions from natural gas combustion units, High Density Polyethylene Extrusion, Incinerator, and Decal application stripping process.									

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Wabash National, L.P. North Plant
Address City IN Zip: 1000 Sagamore Parkway South, Lafayette, Indiana 47905
Permit No.: T157-18078-00046
Reviewer: Adeel Yousuf / EVP
Date: July 20, 2004

Unit ID: PB1

Process/Coating ID	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (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
Valspar AAA0500	11.93	29.17%	0.00%	29.17%	0.00%	51.98%	0.50000	3.330	3.48	3.48	5.794168	139.060041	25.378457	15.41	6.69	75%
Z Tech 1017-F	11.20	19.60%	0.00%	19.60%	0.00%	66.50%	0.25000	3.330	2.20	2.20	1.827504	43.860096	8.004468	8.21	3.30	75%
Xylene	7.30	100.00%	0.00%	100.00%	0.00%	0.00%	0.04000	3.330	7.30	7.30	0.972360	23.336640	4.258937	0.00	#DIV/0!	75%

State Potential Emissions											8.59	206.26	37.64	23.61		
Controlled Potential Emissions																
											Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
											VOC	PM				
Total Controlled Potential Emissions:											0.00%	98.00%	8.59	206.26	37.64	0.47

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 hr/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 = Sum of worst case coatings in each booth

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Wabash National, L.P. North Plant
Address City IN Zip: 1000 Sagamore Parkway South, Lafayette, Indiana 47905
Permit No.: T157-18078-00046
Reviewer: Adeel Yousuf / EVP
Date: July 20, 2004

Unit ID: PB2

Process/Coating ID	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (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
Valspar AAA0500	11.93	29.17%	0.00%	29.17%	0.00%	51.98%	0.50000	1.670	3.48	3.48	2.905784	69.738819	12.727335	7.73	6.69	75%
Z Tech 1017-F	11.20	19.60%	0.00%	19.60%	0.00%	66.50%	2.00000	1.670	2.20	2.20	7.331968	175.967232	32.114020	32.93	3.30	75%
Xylene	7.30	100.00%	0.00%	100.00%	0.00%	0.00%	0.04000	1.670	7.30	7.30	0.487640	11.703360	2.135863	0.00	#DIV/0!	75%

State Potential Emissions	10.73	257.41	46.98	40.66		
Controlled Potential Emissions						
	Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
	VOC	PM				
Total Controlled Potential Emissions:	0.00%	98.00%	10.73	257.41	46.98	0.81

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 hr/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 = Sum of worst case coatings in each booth

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Wabash National, L.P. North Plant
Address City IN Zip: 1000 Sagamore Parkway South, Lafayette, Indiana 47905
Permit No.: T157-18078-00046
Reviewer: Adeel Yousuf / EVP
Date: July 20, 2004

Unit ID: PB3

Process/Coating ID	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (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
Valspar AAA0500	11.93	29.17%	0.00%	29.17%	0.00%	51.98%	0.50000	3.330	3.48	3.48	5.794168	139.060041	25.378457	30.81	6.69	50%
Z Tech 1017-F	11.20	19.60%	0.00%	19.60%	0.00%	66.50%	2.00000	3.330	2.20	2.20	14.620032	350.880768	64.035740	131.34	3.30	50%
Xylene	7.30	100.00%	0.00%	100.00%	0.00%	0.00%	0.04000	3.330	7.30	7.30	0.972360	23.336640	4.258937	0.00	#DIV/0!	50%

State Potential Emissions	21.39	513.28	93.67	162.15		
Controlled Potential Emissions						
	Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
	VOC	PM				
Total Controlled Potential Emissions:	0.00%	98.00%	21.39	513.28	93.67	3.24

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 hr/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 = Sum of worst case coatings in each booth

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Wabash National, L.P. North Plant
Address City IN Zip: 1000 Sagamore Parkway South, Lafayette, Indiana 47905
Permit No.: T157-18078-00046
Reviewer: Adeel Yousuf / EVP
Date: July 20, 2004

Unit ID: PB4

Process/Coating ID	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (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
Valspar AAA0500	11.93	29.17%	0.00%	29.17%	0.00%	51.98%	0.50000	0.500	3.48	3.48	0.869995	20.879886	3.810579	4.63	6.69	50%
Z Tech 1017-F	11.20	19.60%	0.00%	19.60%	0.00%	66.50%	1.00000	0.500	2.20	2.20	1.097600	26.342400	4.807488	9.86	3.30	50%
Xylene	7.30	100.00%	0.00%	100.00%	0.00%	0.00%	0.04000	0.500	7.30	7.30	0.146000	3.504000	0.639480	0.00	#DIV/0!	50%

State Potential Emissions	2.11	50.73	9.26	14.49		
Controlled Potential Emissions						
	Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
	VOC	PM				
Total Controlled Potential Emissions:	0.00%	98.00%	2.11	50.73	9.26	0.29

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 hr/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 = Sum of worst case coatings in each booth

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Wabash National, L.P. North Plant
Address City IN Zip: 1000 Sagamore Parkway South, Lafayette, Indiana 47905
Permit No.: T157-18078-00046
Reviewer: Adeel Yousuf / EVP
Date: July 20, 2004

Unit ID: PB5

Process/Coating ID	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (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
Valspar AAA0500	11.93	29.17%	0.00%	29.17%	0.00%	51.98%	0.50000	0.210	3.48	3.48	0.365398	8.769552	1.600443	1.43	6.69	50%
Z Tech 1017-F	11.20	19.60%	0.00%	19.60%	0.00%	66.50%	1.00000	0.210	2.20	2.20	0.460992	11.063808	2.019145	3.43	3.30	50%
Xylene	7.30	100.00%	0.00%	100.00%	0.00%	0.00%	0.04000	0.210	7.30	7.30	0.061320	1.471680	0.268582	0.00	#DIV/0!	50%

State Potential Emissions											0.89	21.31	3.89	4.85		
Controlled Potential Emissions																
											Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
											VOC	PM				
Total Controlled Potential Emissions:											0.00%	98.00%	0.89	21.31	3.89	0.10

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 hr/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 = Sum of worst case coatings in each booth

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Wabash National, L.P. North Plant
Address City IN Zip: 1000 Sagamore Parkway South, Lafayette, Indiana 47905
Permit No.: T157-18078-00046
Reviewer: Adeel Yousuf / EVP
Date: July 20, 2004

Unit ID: PB7

Process/Coating ID	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (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
Valspar AAA0500	11.93	29.17%	0.00%	29.17%	0.00%	51.98%	0.50000	1.670	3.48	3.48	2.905784	69.738819	12.727335	15.45	6.69	50%
Z Tech 1017-F	11.20	19.60%	0.00%	19.60%	0.00%	66.50%	0.25000	1.670	2.20	2.20	0.916496	21.995904	4.014252	8.23	3.30	50%
Xylene	7.30	100.00%	0.00%	100.00%	0.00%	0.00%	0.04000	1.670	7.30	7.30	0.487640	11.703360	2.135863	0.00	#DIV/0!	50%

State Potential Emissions											4.31	103.44	18.88	23.69		
Controlled Potential Emissions																
											Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
											VOC	PM				
Total Controlled Potential Emissions:											0.00%	98.00%	4.31	103.44	18.88	0.47

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 hr/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 = Sum of worst case coatings in each booth

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Wabash National, L.P. North Plant
Address City IN Zip: 1000 Sagamore Parkway South, Lafayette, Indiana 47905
Permit No.: T157-18078-00046
Reviewer: Adeel Yousuf / EVP
Date: July 20, 2004

Unit ID: PB9

Process/Coating ID	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (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
Valspar AAA0500	11.93	29.17%	0.00%	29.17%	0.00%	51.98%	0.50000	1.670	3.48	3.48	2.905784	69.738819	12.727335	7.73	6.69	75%
Z Tech 1017-F	11.20	19.60%	0.00%	19.60%	0.00%	66.50%	2.00000	1.670	2.20	2.20	7.331968	175.967232	32.114020	32.93	3.30	75%
Xylene	7.30	100.00%	0.00%	100.00%	0.00%	0.00%	0.04000	1.670	7.30	7.30	0.487640	11.703360	2.135863	0.00	#DIV/0!	75%

State Potential Emissions	10.73	257.41	46.98	40.66		
Controlled Potential Emissions						
	Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
	VOC	PM				
Total Controlled Potential Emissions:	0.00%	98.00%	10.73	257.41	46.98	0.81

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 hr/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 = Sum of worst case coatings in each booth

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Wabash National, L.P. North Plant
Address City IN Zip: 1000 Sagamore Parkway South, Lafayette, Indiana 47905
Permit No.: T157-18078-00046
Reviewer: Adeel Yousuf / EVP
Date: July 20, 2004

Unit ID: PB8

Process/Coating ID	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (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
Z-Tech XL5-G	7.256	40.91%	0.00%	40.91%	0.00%	54.98%	0.09190	495.000	2.97	2.97	135.031625	3240.758992	591.438516	0.00	5.40	100%

State Potential Emissions											135.03	3240.76	591.44	0.00		
Controlled Potential Emissions																
VOC/HAP Emissions Controlled by Thermal Regenerative Oxidizer											Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
											VOC	PM				
Total Controlled Potential Emissions:											95.00%	99.00%	6.75	162.04	29.57	0.00

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 hr/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 = Sum of worst case coatings in each booth

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Wabash National, L.P. North Plant
Address City IN Zip: 1000 Sagamore Parkway South, Lafayette, Indiana 47905
Permit No.: T157-18078-00046
Reviewer: Adeel Yousuf / EVP
Date: July 20, 2004

Unit ID: PB10

Process/Coating ID	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (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
Valspar AAA0500	11.93	29.17%	0.00%	29.17%	0.00%	51.98%	0.50000	0.630	3.48	3.48	1.096194	26.308656	4.801330	2.91	6.69	75%
Z Tech 1017-F	11.20	19.60%	0.00%	19.60%	0.00%	66.50%	2.00000	0.630	2.20	2.20	2.765952	66.382848	12.114870	12.42	3.30	75%
Xylene	7.30	100.00%	0.00%	100.00%	0.00%	0.00%	0.04000	0.630	7.30	7.30	0.183960	4.415040	0.805745	0.00	#DIV/0!	75%

State Potential Emissions											4.05	97.11	17.72	15.34		
Controlled Potential Emissions																
											Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
											VOC	PM				
Total Controlled Potential Emissions:											0.00%	98.00%	4.05	97.11	17.72	0.31

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 hr/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 = Sum of worst case coatings in each booth

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Wabash National, L.P. North Plant
Address City IN Zip: 1000 Sagamore Parkway South, Lafayette, Indiana 47905
Permit No.: T157-18078-00046
Reviewer: Adeel Yousuf / EVP
Date: July 20, 2004

Unit ID: PB11

Process/Coating ID	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (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
Valspar AAA0500	11.93	29.17%	0.00%	29.17%	0.00%	51.98%	0.50000	0.830	3.48	3.48	1.444192	34.660611	6.325561	3.84	6.69	75%
Z Tech 1017-F	11.20	19.60%	0.00%	19.60%	0.00%	66.50%	2.00000	0.830	2.20	2.20	3.644032	87.456768	15.960860	16.37	3.30	75%
Xylene	7.30	100.00%	0.00%	100.00%	0.00%	0.00%	0.04000	0.830	7.30	7.30	0.242360	5.816640	1.061537	0.00	#DIV/0!	75%

State Potential Emissions	5.33	127.93	23.35	20.21		
Controlled Potential Emissions						
	Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
	VOC	PM				
Total Controlled Potential Emissions:	0.00%	98.00%	5.33	127.93	23.35	0.40

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 hr/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 = Sum of worst case coatings in each booth

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Wabash National, L.P. North Plant
Address City IN Zip: 1000 Sagamore Parkway South, Lafayette, Indiana 47905
Permit No.: T157-18078-00046
Reviewer: Adeel Yousuf / EVP
Date: July 20, 2004

Unit ID: PB12

Process/Coating ID	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (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
Valspar AAA0500	11.93	29.17%	0.00%	29.17%	0.00%	51.98%	0.50000	0.630	3.48	3.48	1.096194	26.308656	4.801330	5.83	6.69	50%
Z Tech 1017-F	11.20	19.60%	0.00%	19.60%	0.00%	66.50%	2.00000	0.630	2.20	2.20	2.765952	66.382848	12.114870	24.85	3.30	50%
Xylene	7.30	100.00%	0.00%	100.00%	0.00%	0.00%	0.04000	0.630	7.30	7.30	0.183960	4.415040	0.805745	0.00	#DIV/0!	50%

State Potential Emissions	4.05		97.11		17.72		30.68	
Controlled Potential Emissions								
Total Controlled Potential Emissions:	Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr		
	VOC	PM						
	0.00%	98.00%	4.05	97.11	17.72	0.61		

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 hr/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 = Sum of worst case coatings in each booth

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Wabash National, L.P. North Plant
Address City IN Zip: 1000 Sagamore Parkway South, Lafayette, Indiana 47905
Permit No.: T157-18078-00046
Reviewer: Adeel Yousuf / EVP
Date: July 20, 2004

Unit ID: PB13

Process/Coating ID	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (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
Valspar AAA0500	11.93	29.17%	0.00%	29.17%	0.00%	51.98%	0.50000	1.670	3.48	3.48	2.905784	69.738819	12.727335	15.45	6.69	50%
Z Tech 1017-F	11.20	19.60%	0.00%	19.60%	0.00%	66.50%	2.00000	1.670	2.20	2.20	7.331968	175.967232	32.114020	65.87	3.30	50%
Xylene	7.30	100.00%	0.00%	100.00%	0.00%	0.00%	0.04000	1.670	7.30	7.30	0.487640	11.703360	2.135863	0.00	#DIV/0!	50%

State Potential Emissions			10.73	257.41	46.98	81.32
Controlled Potential Emissions						
	Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
	VOC	PM				
Total Controlled Potential Emissions:			10.73	257.41	46.98	1.63

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 hr/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 = Sum of worst case coatings in each booth

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Wabash National, L.P. North Plant
Address City IN Zip: 1000 Sagamore Parkway South, Lafayette, Indiana 47905
Permit No.: T157-18078-00046
Reviewer: Adeel Yousuf / EVP
Date: July 20, 2004

Unit ID: PB14

Process/Coating ID	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (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
Valspar AAA0500	11.93	29.17%	0.00%	29.17%	0.00%	51.98%	0.50000	3.210	3.48	3.48	5.585370	134.048868	24.463918	14.85	6.69	75%
Z Tech 1017-F	11.20	19.60%	0.00%	19.60%	0.00%	66.50%	2.00000	3.210	2.20	2.20	14.093184	338.236416	61.728146	63.30	3.30	75%
Xylene	7.30	100.00%	0.00%	100.00%	0.00%	0.00%	0.04000	3.210	7.30	7.30	0.937320	22.495680	4.105462	0.00	#DIV/0!	75%

State Potential Emissions	20.62	494.78	90.30	78.15		
Controlled Potential Emissions						
	Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
	VOC	PM				
Total Controlled Potential Emissions:	0.00%	98.00%	20.62	494.78	90.30	1.56

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 hr/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 = Sum of worst case coatings in each booth

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Wabash National, L.P. North Plant
Address City IN Zip: 1000 Sagamore Parkway South, Lafayette, Indiana 47905
Permit No.: T157-18078-00046
Reviewer: Adeel Yousuf / EVP
Date: July 20, 2004

Unit ID: PB15

Process/Coating ID	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (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
Valspar AAA0500	11.93	29.17%	0.00%	29.17%	0.00%	51.98%	0.50000	0.460	3.48	3.48	0.800396	19.209495	3.505733	2.13	6.69	75%
Z Tech 1017-F	11.20	19.60%	0.00%	19.60%	0.00%	66.50%	1.00000	0.460	2.20	2.20	1.009792	24.235008	4.422889	4.54	3.30	75%
Xylene	7.30	100.00%	0.00%	100.00%	0.00%	0.00%	0.04000	0.460	7.30	7.30	0.134320	3.223680	0.588322	0.00	#DIV/0!	75%

State Potential Emissions	1.94	46.67	8.52	6.66		
Controlled Potential Emissions						
	Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
	VOC	PM				
Total Controlled Potential Emissions:	0.00%	98.00%	1.94	46.67	8.52	0.13

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 hr/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 = Sum of worst case coatings in each booth

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Wabash National, L.P. North Plant
Address City IN Zip: 1000 Sagamore Parkway South, Lafayette, Indiana 47905
Permit No.: T157-18078-00046
Reviewer: Adeel Yousuf / EVP
Date: July 20, 2004

Unit ID: PB17

Process/Coating ID	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (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
Valspar AAA0500	11.93	29.17%	0.00%	29.17%	0.00%	51.98%	0.50000	0.710	3.48	3.48	1.235393	29.649438	5.411022	3.28	6.69	75%
Z Tech 1017-F	11.20	19.60%	0.00%	19.60%	0.00%	66.50%	2.00000	0.710	2.20	2.20	3.117184	74.812416	13.653266	14.00	3.30	75%
Xylene	7.30	100.00%	0.00%	100.00%	0.00%	0.00%	0.04000	0.710	7.30	7.30	0.207320	4.975680	0.908062	0.00	#DIV/0!	75%

State Potential Emissions	4.56	109.44	19.97	17.29		
Controlled Potential Emissions						
	Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
	VOC	PM				
Total Controlled Potential Emissions:	0.00%	98.00%	4.56	109.44	19.97	0.35

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 hr/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 = Sum of worst case coatings in each booth

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Wabash National, L.P. North Plant
Address City IN Zip: 1000 Sagamore Parkway South, Lafayette, Indiana 47905
Permit No.: T157-18078-00046
Reviewer: Adeel Yousuf / EVP
Date: July 20, 2004

Unit ID: PB19

Process/Coating ID	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (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
Valspar AAA0500	11.93	29.17%	0.00%	29.17%	0.00%	51.98%	0.50000	2.500	3.48	3.48	4.349976	104.399430	19.052896	23.13	6.69	50%
ZPG-9035	7.60	43.40%	0.00%	43.40%	0.00%	55.00%	0.12500	2.500	3.30	3.30	1.030750	24.738000	4.514685	2.94	6.00	50%
Xylene	7.30	100.00%	0.00%	100.00%	0.00%	0.00%	0.00913	2.500	7.30	7.30	0.166623	3.998940	0.729807	0.00	#DIV/0!	50%

State Potential Emissions											5.55	133.14	24.30	26.08		
Controlled Potential Emissions																
											Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
											VOC	PM				
Total Controlled Potential Emissions:											0.00%	98.00%	5.55	133.14	24.30	0.52

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 hr/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 = Sum of worst case coatings in each booth

HAP Emission Calculations

Company Name: Wabash National, L.P. North Plant
Address City IN Zip: 1000 Sagamore Parkway South, Lafayette, Indiana 47905
Permit No.: T157-18078-00046
Reviewer: Adeel Yousuf / EVP
Date: July 20, 2004

Potential Uncontrolled Emissions

Booth ID	Material	Density	Gal of Mat	Maximum	Weight %	Weight %	Weight %	Weight %	Weight %	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Glycol Methyl Ether Emissions (ton/yr)	Ethylene Glycol Monobutyl Emissions (ton/yr)	Total	
		(Lb/Gal)	(gal/unit)	(unit/hour)	Xylene	Toluene	Ethyl Benzene	Glycol Methyl Ether	Ethylene Glycol Monobutyl Ethers Acetate							
PB1	Valspar AAA0500	11.93	0.50000	3.330	0.00%	0.00%	5.00%	0.00%	5.00%	0.00	0.00	4.35	0.00	4.35	8.70	
PB1	Xylene	7.30	0.04000	3.330	100.00%	0.00%	0.00%	0.00%	0.00%	4.26	0.00	0.00	0.00	0.00	4.26	
PB2	Valspar AAA0500	11.93	0.50000	1.670	0.00%	0.00%	5.00%	0.00%	5.00%	0.00	0.00	2.18	0.00	2.18	4.36	
PB2	Xylene	7.30	0.04000	1.670	100.00%	0.00%	0.00%	0.00%	0.00%	2.14	0.00	0.00	0.00	0.00	2.14	
PB3	Valspar AAA0500	11.93	0.50000	3.330	0.00%	0.00%	5.00%	0.00%	5.00%	0.00	0.00	4.35	0.00	4.35	8.70	
PB3	Xylene	7.30	0.04000	3.330	100.00%	0.00%	0.00%	0.00%	0.00%	4.26	0.00	0.00	0.00	0.00	4.26	
PB4	Valspar AAA0500	11.93	0.50000	0.500	0.00%	0.00%	5.00%	0.00%	5.00%	0.00	0.00	0.65	0.00	0.65	1.31	
PB4	Xylene	7.30	0.04000	0.500	100.00%	0.00%	0.00%	0.00%	0.00%	0.64	0.00	0.00	0.00	0.00	0.64	
PB5	Valspar AAA0500	11.93	0.50000	0.210	0.00%	0.00%	5.00%	0.00%	5.00%	0.00	0.00	0.27	0.00	0.27	0.55	
PB5	Xylene	7.30	0.04000	0.210	100.00%	0.00%	0.00%	0.00%	0.00%	0.27	0.00	0.00	0.00	0.00	0.27	
PB7	Valspar AAA0500	11.93	0.50000	1.670	0.00%	0.00%	5.00%	0.00%	5.00%	0.00	0.00	2.18	0.00	2.18	4.36	
PB7	Xylene	7.30	0.04000	1.670	100.00%	0.00%	0.00%	0.00%	0.00%	2.14	0.00	0.00	0.00	0.00	2.14	
PB9	Valspar AAA0500	11.93	0.50000	1.670	0.00%	0.00%	5.00%	0.00%	5.00%	0.00	0.00	2.18	0.00	2.18	4.36	
PB9	Xylene	7.30	0.04000	1.670	100.00%	0.00%	0.00%	0.00%	0.00%	2.14	0.00	0.00	0.00	0.00	2.14	
PB8	Z-Tech XL5-G	7.256	0.09190	495.000	0.00%	0.00%	0.00%	5.00%	0.00%	0.00	0.00	0.00	72.29	0.00	72.29	
PB10	Valspar AAA0500	11.93	0.50000	0.630	0.00%	0.00%	5.00%	0.00%	5.00%	0.00	0.00	0.82	0.00	0.82	1.65	
PB10	Xylene	7.30	0.04000	0.630	100.00%	0.00%	0.00%	0.00%	0.00%	0.81	0.00	0.00	0.00	0.00	0.81	
PB11	Valspar AAA0500	11.93	0.50000	0.830	0.00%	0.00%	5.00%	0.00%	5.00%	0.00	0.00	1.08	0.00	1.08	2.17	
PB11	Xylene	7.30	0.04000	0.830	100.00%	0.00%	0.00%	0.00%	0.00%	1.06	0.00	0.00	0.00	0.00	1.06	
PB12	Valspar AAA0500	11.93	0.50000	0.630	0.00%	0.00%	5.00%	0.00%	5.00%	0.00	0.00	0.82	0.00	0.82	1.65	
PB12	Xylene	7.30	0.04000	0.630	100.00%	0.00%	0.00%	0.00%	0.00%	0.81	0.00	0.00	0.00	0.00	0.81	
PB13	Valspar AAA0500	11.93	0.50000	1.670	0.00%	0.00%	5.00%	0.00%	5.00%	0.00	0.00	2.18	0.00	2.18	4.36	
PB13	Xylene	7.30	0.04000	1.670	100.00%	0.00%	0.00%	0.00%	0.00%	2.14	0.00	0.00	0.00	0.00	2.14	
PB14	Valspar AAA0500	11.93	0.50000	3.210	0.00%	0.00%	5.00%	0.00%	5.00%	0.00	0.00	4.19	0.00	4.19	8.39	
PB14	Xylene	7.30	0.04000	3.210	100.00%	0.00%	0.00%	0.00%	0.00%	4.11	0.00	0.00	0.00	0.00	4.11	
PB15	Valspar AAA0500	11.93	0.50000	0.460	0.00%	0.00%	5.00%	0.00%	5.00%	0.00	0.00	0.60	0.00	0.60	1.20	
PB15	Xylene	7.30	0.04000	0.460	100.00%	0.00%	0.00%	0.00%	0.00%	0.59	0.00	0.00	0.00	0.00	0.59	
PB17	Valspar AAA0500	11.93	0.50000	0.710	0.00%	0.00%	5.00%	0.00%	5.00%	0.00	0.00	0.93	0.00	0.93	1.85	
PB17	Xylene	7.30	0.04000	0.710	100.00%	0.00%	0.00%	0.00%	0.00%	0.91	0.00	0.00	0.00	0.00	0.91	
PB19	Valspar AAA0500	11.93	0.50000	2.500	0.00%	0.00%	5.00%	0.00%	5.00%	0.00	0.00	3.27	0.00	3.27	6.53	
PB19	Xylene	7.30	0.00913	2.500	100.00%	0.00%	0.00%	0.00%	0.00%	0.73	0.00	0.00	0.00	0.00	0.73	
											26.97	0.00	30.07	72.29	30.07	159.40

Total Uncontrolled Potential Emissions

Total HAPS: 159.40 tons per year
 Single HAP: 72.29 tons per year

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

HAP Emission Calculations

Company Name: Wabash National, L.P. North Plant
Address City IN Zip: 1000 Sagamore Parkway South, Lafayette, Indiana 47905
Permit No.: T157-18078-00046
Reviewer: Adeel Yousuf / EVP
Date: July 20, 2004

Potential Controlled Emissions

Booth ID	Material	Density	Gal of Mat	Maximum	Weight %	Weight %	Weight %	Weight %	Weight %	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Glycol Methyl Ether Emissions (ton/yr)	Ethylene Glycol Monobutyl Emissions (ton/yr)	Total	
		(Lb/Gal)	(gal/unit)	(unit/hour)	Xylene	Toluene	Ethyl Benzene	Glycol Methyl Ether	Ethylene Glycol Monobutyl Ethers Acetate							
PB1	Valspar AAA0500	11.93	0.50000	3.330	0.00%	0.00%	5.00%	0.00%	5.00%	0.00	0.00	4.35	0.00	4.35	8.70	
PB1	Xylene	7.30	0.04000	3.330	100.00%	0.00%	0.00%	0.00%	0.00%	4.26	0.00	0.00	0.00	0.00	4.26	
PB2	Valspar AAA0500	11.93	0.50000	1.670	0.00%	0.00%	5.00%	0.00%	5.00%	0.00	0.00	2.18	0.00	2.18	4.36	
PB2	Xylene	7.30	0.04000	1.670	100.00%	0.00%	0.00%	0.00%	0.00%	2.14	0.00	0.00	0.00	0.00	2.14	
PB3	Valspar AAA0500	11.93	0.50000	3.330	0.00%	0.00%	5.00%	0.00%	5.00%	0.00	0.00	4.35	0.00	4.35	8.70	
PB3	Xylene	7.30	0.04000	3.330	100.00%	0.00%	0.00%	0.00%	0.00%	4.26	0.00	0.00	0.00	0.00	4.26	
PB4	Valspar AAA0500	11.93	0.50000	0.500	0.00%	0.00%	5.00%	0.00%	5.00%	0.00	0.00	0.65	0.00	0.65	1.31	
PB4	Xylene	7.30	0.04000	0.500	100.00%	0.00%	0.00%	0.00%	0.00%	0.64	0.00	0.00	0.00	0.00	0.64	
PB5	Valspar AAA0500	11.93	0.50000	0.210	0.00%	0.00%	5.00%	0.00%	5.00%	0.00	0.00	0.27	0.00	0.27	0.55	
PB5	Xylene	7.30	0.04000	0.210	100.00%	0.00%	0.00%	0.00%	0.00%	0.27	0.00	0.00	0.00	0.00	0.27	
PB7	Valspar AAA0500	11.93	0.50000	1.670	0.00%	0.00%	5.00%	0.00%	5.00%	0.00	0.00	2.18	0.00	2.18	4.36	
PB7	Xylene	7.30	0.04000	1.670	100.00%	0.00%	0.00%	0.00%	0.00%	2.14	0.00	0.00	0.00	0.00	2.14	
PB9	Valspar AAA0500	11.93	0.50000	1.670	0.00%	0.00%	5.00%	0.00%	5.00%	0.00	0.00	2.18	0.00	2.18	4.36	
PB9	Xylene	7.30	0.04000	1.670	100.00%	0.00%	0.00%	0.00%	0.00%	2.14	0.00	0.00	0.00	0.00	2.14	
PB8	Z-Tech XL5-G	7.256	0.09190	495.000	0.00%	0.00%	0.00%	5.00%	0.00%	0.00	0.00	0.00	3.61	0.00	3.61	
PB10	Valspar AAA0500	11.93	0.50000	0.630	0.00%	0.00%	5.00%	0.00%	5.00%	0.00	0.00	0.82	0.00	0.82	1.65	
PB10	Xylene	7.30	0.04000	0.630	100.00%	0.00%	0.00%	0.00%	0.00%	0.81	0.00	0.00	0.00	0.00	0.81	
PB11	Valspar AAA0500	11.93	0.50000	0.830	0.00%	0.00%	5.00%	0.00%	5.00%	0.00	0.00	1.08	0.00	1.08	2.17	
PB11	Xylene	7.30	0.04000	0.830	100.00%	0.00%	0.00%	0.00%	0.00%	1.06	0.00	0.00	0.00	0.00	1.06	
PB12	Valspar AAA0500	11.93	0.50000	0.630	0.00%	0.00%	5.00%	0.00%	5.00%	0.00	0.00	0.82	0.00	0.82	1.65	
PB12	Xylene	7.30	0.04000	0.630	100.00%	0.00%	0.00%	0.00%	0.00%	0.81	0.00	0.00	0.00	0.00	0.81	
PB13	Valspar AAA0500	11.93	0.50000	1.670	0.00%	0.00%	5.00%	0.00%	5.00%	0.00	0.00	2.18	0.00	2.18	4.36	
PB13	Xylene	7.30	0.04000	1.670	100.00%	0.00%	0.00%	0.00%	0.00%	2.14	0.00	0.00	0.00	0.00	2.14	
PB14	Valspar AAA0500	11.93	0.50000	3.210	0.00%	0.00%	5.00%	0.00%	5.00%	0.00	0.00	4.19	0.00	4.19	8.39	
PB14	Xylene	7.30	0.04000	3.210	100.00%	0.00%	0.00%	0.00%	0.00%	4.11	0.00	0.00	0.00	0.00	4.11	
PB15	Valspar AAA0500	11.93	0.50000	0.460	0.00%	0.00%	5.00%	0.00%	5.00%	0.00	0.00	0.60	0.00	0.60	1.20	
PB15	Xylene	7.30	0.04000	0.460	100.00%	0.00%	0.00%	0.00%	0.00%	0.59	0.00	0.00	0.00	0.00	0.59	
PB17	Valspar AAA0500	11.93	0.50000	0.710	0.00%	0.00%	5.00%	0.00%	5.00%	0.00	0.00	0.93	0.00	0.93	1.85	
PB17	Xylene	7.30	0.04000	0.710	100.00%	0.00%	0.00%	0.00%	0.00%	0.91	0.00	0.00	0.00	0.00	0.91	
PB19	Valspar AAA0500	11.93	0.50000	2.500	0.00%	0.00%	5.00%	0.00%	5.00%	0.00	0.00	3.27	0.00	3.27	6.53	
PB19	Xylene	7.30	0.00913	2.500	100.00%	0.00%	0.00%	0.00%	0.00%	0.73	0.00	0.00	0.00	0.00	0.73	
											26.97	0.00	30.07	3.61	30.07	90.73

Total Uncontrolled Potential Emissions

Total HAPS: 90.73 tons per year
 Single HAP: 30.07 tons per year

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

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

Company Name: Wabash National, L.P. North Plant
Address City IN Zip: 1000 Sagamore Parkway South, Lafayette, Indiana 47905
Permit No.: T157-18078-00046
Reviewer: Adeel Yousuf / EVP
Date: July 20, 2004

Heat Input Capacity
MMBtu/hr

15.7

Potential Throughput
MMCF/yr

137.8

Facilities

One boiler identified as CB1
 One boiler identified as CB4

MMBtu/hr

5.23
 10.5

Total

15.73

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	0.13	0.52	0.04	6.89	0.38	5.79

*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

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM Btu/hr 0.3 - < 100**

HAPs Emissions

Company Name: Wabash National, L.P. North Plant
Address City IN Zip: 1000 Sagamore Parkway South, Lafayette, Indiana 47905
Permit No.: T157-18078-00046
Reviewer: Adeel Yousuf / EVP
Date: July 20, 2004

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	1.447E-04	8.268E-05	5.167E-03	1.240E-01	2.343E-04

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	3.445E-05	7.579E-05	9.646E-05	2.618E-05	1.447E-04

Methodology is the same as page 16.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

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

Company Name: Wabash National, L.P. North Plant
Address City IN Zip: 1000 Sagamore Parkway South, Lafayette, Indiana 47905
Permit No.: T157-18078-00046
Reviewer: Adeel Yousuf / EVP
Date: July 20, 2004

Heat Input Capacity
MMBtu/hr

3.1

Potential Throughput
MMCF/yr

26.9

Facilities

One Regenerative Thermal Oxidizer (RTOX)
One incinerator burner (BO)

MMBtu/hr

2.07

1.00

Total

3.07

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	0.03	0.10	0.01	1.34	0.07	1.13

*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

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM Btu/hr 0.3 - < 100**

HAPs Emissions

Company Name: Wabash National, L.P. North Plant
Address City IN Zip: 1000 Sagamore Parkway South, Lafayette, Indiana 47905
Permit No.: T157-18078-00046
Reviewer: Adeel Yousuf / EVP
Date: July 20, 2004

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	2.824E-05	1.614E-05	1.008E-03	2.420E-02	4.572E-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	6.723E-06	1.479E-05	1.883E-05	5.110E-06	2.824E-05

Methodology is the same as page 23.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations
Industrial/Commercial Incinerator**

Company Name: Wabash National, L.P. North Plant
Address City IN Zip: 1000 Sagamore Parkway South, Lafayette, Indiana 47905
Permit No.: T157-18078-00046
Reviewer: Adeel Yousuf / EVP
Date: July 20, 2004

POTENTIAL THROUGHPUT	POTENTIAL THROUGHPUT
lbs/hr	ton/yr
80	350.4

Emission Factor in lb/ton	POLLUTANT				
	PM	SO2	CO	VOC	NOX
	7.0	2.5	10.0	3.0	3.0
Potential Emissions in ton/yr	1.2	0.4	1.8	0.5	0.5

Methodology

Emission factors are from AP 42 (5th Edition 1/95) Table 2.1-12, Uncontrolled emission factors for industrial/commercial refuse combustors, multiple chambers
 Throughput (lb/hr) * 8760 hr/yr * ton/2000 lb = throughput (ton/yr)

Waste Incinerator Compliance with 326 IAC 4-2-2

Potential PM emissions	0.28	lb/hr			
Stack gas flow rate	770.00	acfm			
Gas temperature	1400.00	deg F			
Incinerator Throughput	80.00	lb/hr			
Q_{std} =	Volumetric flow rate at Standard Temperature				
Q _{std} =	770	acfm *	$\frac{529}{2328}$	deg R =	174.97 dscfm
Cs =	PM Concentration				
Cs =	$\frac{0.28}{174.97}$	$\frac{\text{lb/hr}}{\text{dscfm}}$	$\frac{7000}{60}$	$\frac{\text{gr/lb}}{\text{min/hr}}$	0.187 gr/dscf
Cs, corrected =	Corrected to 50% excess air				
Cs, corrected =	0.187	gr/dscf *	$\frac{(100+0)\%}{150\%}$		0.124 gr/dscf
Specific Volume =	Ideal Gas Law				
	$\frac{R \times T}{P \times Mw}$	where	R = gas constant = $\frac{21.9(\text{in Hg})(\text{ft}^3)}{(\text{lb mol})(\text{deg R})}$		
			T = standard temp = 529 deg R		
			P = standard pressure = 29.45 in Hg		
			Mw = avg molecular weight of air = 29 lb/lbmol		
Specific Volume =	13.565	cf/lb air			
Cs, corrected =	0.124	gr/dscf *	13.565	cf/lb air =	1.688 gr/lb air
	1.688	gr/lb air *	1/7000	lb pm/gr =	0.00024 lb PM/lb dry gas = 0.241 lb PM/1000 lb dry gas
Maximum allowable particulate emission pursuant to 326 IAC 4-2-2 is 0.3 lb PM/1000 lb dry gas; therefore, this facility complies with the rule. The waste incinerator is in compliance with 326 IAC 4-2-2.					

Appendix A: Emissions Calculations
Welding and Thermal Cutting

Company Name: Wabash National, L.P. North Plant
Address City IN Zip: 1000 Sagamore Parkway South, Lafayette, Indiana 47905
Permit No.: T157-18078-00046
Reviewer: Adeel Yousuf / EVP
Date: July 20, 2004

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Submerged Arc	6	3.3		0.036	0.011			0.713	0.218	0.000	0	0.218
Metal Inert Gas (MIG)(carbon steel)	179	1.7		0.0055	0.0005			1.674	0.152	0.000	0	0.152
Stick Welding	179	6.6		0.037	0.003			43.712	3.544	0.000	0	3.544
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	1	2	400	0.1622	0.0005	0.0001	0.0003	7.786	0.004	0.000	0.000	0.004
EMISSION TOTALS												
Potential Emissions lbs/hr								53.88				3.92
Potential Emissions lbs/day								1293.21				94.03
Potential Emissions tons/year								236.01				17.16

METHODOLOGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" t

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/year x 1 ton/2,000 lb

**Appendix A: Emissions Calculations
Particulate Matter (PM) Emissions**

Company Name: Wabash National, L.P. North Plant
Address City IN Zip: 1000 Sagamore Parkway South, Lafayette, Indiana 47905
Permit No.: T157-18078-00046
Reviewer: Adeel Yousuf / EVP
Date: July 20, 2004

Particulate Emissions from Shotblasting Operation

I. Mechanical Blasting Unit (BB1)

PM/PM10:	0.0025 gr/acf outlet x	14000 acf/min x	60 min/hr /	7000 gr/lb x	4.38 ton/yr / lb/hr ,	0.01 (1- control efficiency) =	262.80 tons/yr (uncontrolled)
	where the total control efficiency is listed at		99.50%				1.31 tons/yr (controlled)

II. Mechanical Blasting Unit (BB2)

PM/PM10:	0.005 gr/acf outlet x	18259 acf/min x	60 min/hr /	7000 gr/lb x	4.38 ton/yr / lb/hr ,	0.01 (1- control efficiency) =	11.98 tons/yr (uncontrolled)
	where the total control efficiency is listed at		71.40%				3.43 tons/yr (controlled)

III. Mechanical Blasting Unit (BB3)

PM/PM10:	0.0114 gr/acf outlet x	8000 acf/min x	60 min/hr /	7000 gr/lb x	4.38 ton/yr / lb/hr ,	0.01 (1- control efficiency) =	11.97 tons/yr (uncontrolled)
	where the total control efficiency is listed at		71.40%				3.42 tons/yr (controlled)

**Total: 286.76 tons/yr (uncontrolled)
8.17 tons/yr (controlled)**

Methodology

Uncontrolled PM/PM10 = grain loading (gr/acf outlet) * Flow rate (acfm) * (60 min/hr) * (1 lb/7000 gr) * 4.38 (tons/yr / lb/hr) / (1- control efficiency %)

**Appendix A: Emissions Calculations
Miscellaneous Emissions**

Company Name: Wabash National, L.P. North Plant
Address City IN Zip: 1000 Sagamore Parkway South, Lafayette, Indiana 47905
Permit No.: T157-18078-00046
Reviewer: Adeel Yousuf / EVP
Date: July 20, 2004

Miscellaneous Process Information

I. Caulking Process (Identified as CLK)

Potential VOC Emissions (ton/yr) = 58 lb/hr (usage) x 9% (VOC content) x 8760 hr/yr x 1 ton / 2000 lb = **22.86 ton/yr**

II. Surface Cleaning Process (identified as SC)

Based on the information provided by the source, VOC emissions equal 16.3 tons per year based on 24 hours per day, 286 days per year, which is a total of 6864 hours each year

Potential VOC Emissions (ton/yr) = (16.3 ton/yr / 6864 hr/yr) x 8760 hr/yr = **20.8 ton/yr**

*** Insignificant Activities ***

III. High Density Polyethylene Extrusion (HDPE)

Based on the information provided by the source, PM/PM10 emissions equal 0.34 lb/hr, VOC emissions equal 0.5 lb/hr, HAP emissions equal 0.0416 based on 24 hours per day, 286 days per year, which is a total of 6864 hours each year

Potential PM/PM10 emissions (ton/yr) = ((0.34 lb/hr x 8760 hr/yr x 1 ton / 2000 lb) / 6864 hr/yr) x 8760 hr/yr = **1.90 ton/yr**

Potential VOC Emissions (ton/yr) = ((0.5 lb/hr x 8760 hr/yr x 1 ton / 2000 lb) / 6864 hr/yr) x 8760 hr/yr = **2.79 ton/yr**

Potential HAP Emissions (ton/yr) = ((0.0416 lb/hr x 8760 hr/yr x 1 ton / 2000 lb) / 6864 hr/yr) x 8760 hr/yr = **0.23 ton/yr**

IV. Decal Application Process (identified as DA)

Based on the information provided by the source, VOC emissions equal 5.12 tons per year based on 24 hours per day, 286 days per year, which is a total of 6864 hour each year.

Potential VOC Emissions (ton/yr) = (5.12 ton/yr / 6864 hr/yr) x 8760 hr/yr = **6.53 ton/yr**