INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

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

February 18, 2004

TO: Interested Parties / Applicant

RE: Truck City of Gary, Inc. / 089-18376-00116

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

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-AM.dot 9/16/03

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February 18, 2004

Ms. Gerri Davis
Truck City of Gary, Inc.
P. O. Box 6177
Gary, IN 46406

Dear Ms. Davis:

Re: Exemption No.
089-18376-00116

The application from Truck City of Gary, Inc., received on January 12, 2004, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following emission units, to be located at 7360 W. Chicago Avenue, Gary, Indiana, are classified as exempt from air pollution permit requirements:

(a) One (1) cold solvent cleaning operation for cleaning truck parts, including cold solvent cleaning tanks.

(b) One (1) crystal clean paint gun cleaning operation.

(c) One (1) truck cleaning and preparation operation using Pre Sol 3939S and MOPP0001 surface conditioner.

(d) One (1) surface coating operation for painting cleaned and repaired trucks, using Imron Polyurethane Enamel, with a maximum capacity of 1 truck per day.

The following conditions shall be applicable:

(1) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:

(a) Opacity shall not exceed an average of twenty percent (20%) 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 15 minutes (60 readings) in a 6-hour period 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.

(2) Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operation), the owner or operator of a cold cleaning facility shall:

(a) equip the cleaner with a cover;
(b) equip the cleaner with a facility for draining cleaned parts;
(c) close the degreaser cover whenever parts are not being handled in the cleaner;
(d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
(e) provide a permanent, conspicuous label summarizing the operating requirements;
(f) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

(3) Pursuant to 326 IAC 8-10-4(a) (Means to Limit VOC Emissions), the owner or operator of the truck refinishing operation shall limit emissions of volatile organic compounds (VOCs) from refinishing operations by using coating or surface preparation products that meet the VOC content limit established in 326 IAC 8-10-4(b).

(a) On and after May 1, 1996, the owner or operator of a refinishing facility shall limit emissions of volatile organic compounds (VOCs) from refinishing operations by one (1) of the following means:

(i) By using coatings or surface preparation products that meet the VOC content limits established in subsection (b).
(ii) By employing a control system meeting the requirements of subsection (c).
(iii) By employing a combination of coatings as specified in subsection (b) and control system measures identified in subsection (c).

(b) Compliance with the VOC limits shall be based on the VOC content on an as-applied basis. The VOC content shall not exceed the following limits:

Coating Category	VOC limit (lb/gal)
Topcoat	
Single and two-stage	5.0

For surface preparation products:

Type of substrate	VOC limit (lb/gal)
Plastic	6.5
Other	1.4

(c) A control system used to comply with the VOC emission requirements of this rule shall achieve an overall control efficiency of at least eighty-one percent (81%). An owner or operator complying with the VOC emission reduction requirements of this rule by means of a control system shall do the following:

(i) On or before May 1, 1996, demonstrate initial compliance with the emission limit by performing an emission test that demonstrates compliance according to procedures in section 7 of this rule.
(ii) On or before June 31, 1996, submit to the department the results of the initial compliance test according to procedures in section 7 of this rule.
(iii) Depending on type of control device installed, choose an appropriate operating parameter according to procedures in section 8(b) of this rule.

(iv) Calculate the site-specific operating parameter value, as an arithmetic average of the minimum or maximum values of the operating parameter as appropriate, that demonstartes initial compliance with the emission limit.

(v) On and after May 1, 1996, demonstrate continuous compliance with the emission limits in this section by ensuring that during the refinishing operation, the value of the operating parameter, as determined during the initial compliance test or subsequent compliance test, id within the range specified in the applicable subdivision of section 9(b) of this rule.

(d) Application of all specialty coatings except anti-glare/safety coatings shall not exceed five percent (5%) by volume of all coatings applied on a monthly basis.

(4) Pursuant to 326 IAC 8-10-5 (Work Practices Standards):

(a) The owner or operator of a refinishing facility shall ensure that spray guns are cleaned in an enclosed device that:

(i) is closed during spray gun equipment cleaning operations except when depositing and removing objects to be cleaned;
(ii) is closed during noncleaning operations with the exception of the maintenance and repair of the cleaning device itself; and
(iii) recirculates cleaning solvent during the cleaning operation so that the solvent is available for reuse onsite or for disposal offsite.

The cleaning device shall be operated and maintained according to the manufacturer's recommendations. The owner or operator of the refinishing facility shall have the cleaning device manufacturer's recommendations available for inspection upon request by the department or the U. S. EPA.

(b) On and after May 1, 1996, the owner or operator of a refinishing facility shall use one (1) or a combination of the following equipment for coating application:

(i) Electrostatic equipment.
(ii) High volume low pressure (HVLP) spray equipment.
(iii) Any other coating application equipment that has been demonstrated, by the owner or operator, to the satisfaction of the department to be capable of achieving at least sixty-five percent (65%) transfer efficiency. The owner or operator must submit sufficient data for the department to be able to determine the accuracy of the transfer efficiency claims.

Coating application equipment shall be operated and maintained according to the manufacturer's recommendations. The owner or operator shall have the manufacturer's recommendations available for inspection upon request by the department or the U. S. EPA.

(c) On or after May 1, 1996, the owner or operator of a refinishing facility shall implement housekeeping practices which include the following:

(i) All paper or cloth used for activities such as surface preparation and surface cleanup shall be stored in closed containers until disposed of offsite. The containers shall remain closed unless being filled or emptied.
(ii) All fresh or used solvent shall be stored in closed containers.
(iii) Storage containers and equipment shall be free from cracks, holes, and leaks.
(iv) Waste coatings, spray booth filters, and used automotive fluids shall be stored in closed containers.
(v) Equipment cleanup shall be performed with methods that minimize the use of solvents. Reasonable efforts shall be made to reclaim the bulk of used solvents.

No cleaning shall be performed by direct spraying of solvents into the atmosphere.

(vi) Effort shall be made to schedule operations of a similar nature to significantly reduce total volatile organic compound material consumption.

(vii) Coatings or surface preparation products shall be applied in a manner that minimizes overspray.

(d) The owner or operator of a refinishing facility shall comply with the training requirements of this rule as follows:

(i) On or before May 1, 1996, develop a written training program. The training program may include training provided by the manufacturer or supplier and shall include written procedures and hands on demonstration, as appropriate, on the following topics:

(A) Identification of appropriate coatings or surface preparation products.
(B) Preparation of coatings or surface preparation products according to coating manufacturer, distributor, or owner or operator's recommendations.
(C) Application of coatings or surface preparation products, or organic solvents using techniques that minimize their usage.
(D) Operation and maintenance of spray gun cleaning equipment to minimize evaporation of organic solvents to the atmosphere.
(E) Work practices standards established in subsection (c).
(F) Procedures to gather, record, monitor, and report data in accordance with section 9 of this rule.

(ii) Beginning in 1997, provide annual refresher training prior to May 1, to any employee performing one (1) or more of the activities listed in subdivision (1). Such training shall be appropriate to the job responsibilities of the employee.

(iii) Any person may form one (1) or more activity addressed in subdivision (1), for not more than one hundred eighty (180) days, notwithstanding the requirement of subdivision (2), provided each of the following:

(A) Such untrained person works under the supervision of a person who meets the training requirements of subdivision (2).
(B) The owner or operator keeps the following records:

(a) The date the person was assigned to the activity.
(b) The date training was completed.
(c) The name of the person providing the supervision.

(iv) The owner or operator of the refinishing operation shall keep records of the training program. The records shall consist of the following:
(A) The date training was completed.
(B) A list of persons, by name and activity and the topics in which they have been trained.
(C) A statement signed by the trainer certifying each trainee who satisfactorily has completed training in the topics and is proficient in the procedures specified in subdivision (1).

(5) Pursuant to 326 IAC 8-10-6 (Compliance Procedures), on or before May 1, 1996, the owner or operator of a refinishing facility shall submit to the department a statement signed by a responsible official of the facility, certifying that the facility has acquired and will continuously employ coating or surface preparation products meeting the VOC limits of section 4(b) of this rule or that an add-on control system meeting the requirements of section 4(c) of this rule has been installed, including a description of the controlling system.

(6) Pursuant to 326 IAC 8-10-7 (Test Procedures):

(a) Owners or operators of refinishing facilities shall be subject to the applicable test method and requirements of 326 IAC 8-1-4 and 40 CFR 60, Appendix A.

(b) Owners or operators may use data provided with coatings or surface preparation products formulation information such as the container label, the product data sheet, and the MSDS sheet in order to comply with sections 4 and 9(a) of this rule. The department and U.S. EPA may require VOC content determination and verification of any coating or surface preparation product using EPA Method 24. In the event of any inconsistency between Method 24 and formulation data, Method 24 shall govern.

(c) An owner or operator of a refinishing facility electing to meet the emission limit requirements of section 4(c) of this rule using a control device or devices shall test the control system according to the following schedule and under the following situations:

(i) An initial compliance test shall be conducted on or before May 1, 1996, and every two (2) years after the date of the initial compliance test.

(ii) A compliance test shall be conducted whenever the owner or operator operates the control system under conditions different from those which were in place at the time of the previous compliance test.

(iii) A compliance test shall be performed within ninety (90) days of the startup of a new facility or within thirty (30) days of a written request by the department or the U. S. EPA.

(iv) All compliance tests shall be conducted according to a protocol developed by the owner or operator of a facility according to procedures in 326 IAC 3-2.1-2. The results of the tests shall be submitted to the department according to procedures in 326 IAC 3-2.1-4.

(7) Pursuant to 326 IAC 8-10-8 (Control System Operation, Maintenance, and Monitoring):

(a) The following requirements apply to sources that meet the emission limit requirements of section 4 of this rule at a facility by using a control device or devices as provided in section 4(a)(2) and 4(a)(3) of this rule:

(i) The control system shall be operated and maintained according to the manufacturer's specifications and instructions.

(ii) The operation of the control system may be modified upon the written request of the department or the U. S. EPA based on the results of the initial or subsequent compliance test.

(iii) The operating and maintenance procedures applicable to the control system shall be followed beginning no later than May 1, 1996.

(iv) A copy of the operating and maintenance procedures shall be maintained at the source property and as close to the control system as possible for the reference of plant personnel and department inspectors.

(b) Owners or operators choosing to meet the emission limit requirements of section 4 of this rule with the use of a control device or devices shall install, calibrate, maintain, and operate the monitoring equipment as follows:

(i) If a thermal incinerator is used for VOC reduction, combustion temperature shall be the operating parameter. A temperature monitoring device capable of continuously recording the temperature of the gas stream in the combustion zone of the incinerator shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade or plus or minus five-tenths (0.5) degree Centigrade, whichever is greater.

(ii) If a catalytic incinerator with a fixed catalyst bed is used for VOC reduction, gas temperature both upstream and downstream of the catalyst bed shall be the operating parameter. A temperature device capable of continuously recording the temperature in the gas stream immediately before and after catalyst bed of the incinerator shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade or plus or minus five-tenths (0.5) degree Centigrade, whichever is greater.

(iii) If a carbon adsorber is used to remove and recover VOC from the gas stream, concentration level of VOC at the outlet of the carbon bed shall be the operating parameter. A VOC monitoring device capable of continuously recording the concentration level of VOC at the outlet of the carbon bed shall be used. The monitoring device shall be based on a detection principle such as infrared, photoionization, or thermal conductivity.

(iv) When a VOC recovery device other than a carbon adsorber is used, the source shall provide to the department information describing the operation of the device and the process parameters which would indicate proper operation and maintenance of the control device. The department may request further information and may specify appropriate monitoring procedures and reporting requirements.

(8) Pursuant to 326 IAC 8-10-9(Record Keeping and Reporting):

(a) Owners or operators of refinishing facilities subject to the provisions of section 4(b) of this rule shall keep records of the following:

(i) For each batch of coating mixed or refinishing job performed, the following information:
- (A) Batch or job identification number or name.
- (B) Date batch made or job performed.
- (C) Coating category, consistent with the coating categories in section 4(b) of this rule.
- (D) Coating manufacturer's name and identification number.
- (E) Either the quantity used in making the mix or the mix ratio used.
- (F) VOC content as supplied or packaged.
- (G) Manufacturer's name and identification number of added components, such as catalysts, reducers, and hardeners.
- (H) Either the quantity of components added or the mix ratio used.

(ii) For each surface preparation product used, the following information:
- (A) Manufacturer's name and identification number.
- (B) Substrate to which the product is applied.
- (C) VOC content as supplied per calendar month for:
  - (1) number of containers used; and
  - (2) volume of each container in suitable units, such as quarts, gallons, pints, other similar units, and the ratio of components added.

(iii) Owners or operators shall maintain documents such as MSDS, or product or other data sheets for a period of three (3) years, following use of the product. MSDS or product or other data sheetsmay be used by the U. S. EPA or the department to verify the VOC content, as supplied, provided by the coating manufacturer, distributor, or supplier, of the coatings or surface preparation products.

(iv) Except when complying with section 4(a)(ii) or 4(a)(iii) of this rule, owners or operators shall report within thirty (30) days to the department any incidence in which non-compliant coating was used, the reason for use of the noncompliant coating, and corrective actions taken.

(b) Owners or operators choosing to meet the emission limit requirements of section4 of this rule with the use of a control device or devices shall maintain the following records:

(i) A log of the operating time of the facility and the facility's capture system, control device, and monitoring equipment.

(ii) A maintenance log for the control system and the monitoring equipment detailing all routine and nonroutine maintenance performed. The log shall include the dates and duration of any outages of the capture system, the control device, or the monitoring system.

(iii) The following additional records shall be maintained for facilities using thermal incinerators:

(A) Continuous records of the temperature in the gas stream in the combustion zone of the incinerator.

(B) Records of all three (3) hour periods of operation for which the average combustion temperature of the gas stream in the combustion zone was more than fifty (50) degrees Fahrenheit below the combustion zone temperature which existed during the most recent compliance test that demonstrated that the facility was in compliance.

(iv) The following additional records shall be maintained for facilities using catalytic incinerators:

(A) Continuous records of the temperature of the gas stream both upstream and downstream of thecatalyst bed of the incinerator.

(B) Records of all three (3) hour periods of operation for which the average temperature measured at the process vent stream immediately before the catalyst bed is more than fifty (5)) degrees Fahrenheit below the average temperature of the process vent stream which existed during the most recent compliance test that demonstrated that the facility was in compliance.

(C) Records of all three (3) hour periods of operation for which the average temperature difference across the catalyst bed is less than eighty percent (80%) of the temperature difference measured during the most recent compliance test that demonstrated that the facility was in compliance.

(v) The following additional records shall be maintained for facilities using carbon adsorbers:

(A) Continuous records of the VOC concentration level or reading in the exhaust stream of the carbon adsorber.

(B) Records of all three (3) hour periods of operation during which the average VOC concentration level or reading in the exhaust gas is more than twenty percent (20%) greater than the average exhaust gas concentration level or reading measured by the organic monitoring device during the most recent determination of the recovery efficiency of the carbon adsorber that demonstrated that the facility was in compliance.

(vi) Facilities using VOC recovery devices other than carbon adsorbers shall maintain the monitoring records and meet the reporting requirements specified by section 8(b)(iv) of this rule.

(vii) Information requirements in subdivisions (ii), iii(B), iv(B), iv(C), and v(B) shall be submitted to the department within thirty (3)) days of occurrence. The following information shall accompany the submittal:

(A) The name and location of the facility.
(B) Identification of the control system where the excess emission occurred and the facility it served.
(C) The time, date, and duration of the exceedence.
(D) Corrective action taken.

(c) Owners or operators of refinishing facilities affected by this rule shall maintain the following records:

(1) Records of training programs as required in section 5(d) of this rule.
(2) Initial compliance statements as required in section 6(c) of this rule.
(3) Records as required in this section.

(d) Owners or operators of refinishing facilities affected by this rule shall maintain all records for a minimum of three (3) years and shall make records available to the department and the U.S. EPA upon request.

(e) Failure to maintain records required by subsections (a) through (c) shall constitute a violation of this rule for each day records are not maintained.

(9) Pursuant to 326 IAC 8-3-8(c)(2)(B) (Organic Solvent Degreasing Operations: Material Requirements for Cold Cleaning Degreasers), on and after May 1, 2001, no person shall do the following:

Operate a cold cleaning degreaser with a solvent vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousands (0.019) pound per square inch) measured at twenty (20) degrees Celcius (sixty-eight degrees Fahrenheit).

Pursuant to 326 IAC 8-3-8(d)(2), all persons subject to the requirements of 326 IAC 8-3-8(c)(2)(B) shall maintain each of the following records for each purchase:

(A) The name and address of the solvent supplier.
(B) The date of purchase.
(C) The type of solvent.
(D) The volume of each unit of solvent.
(E) The total volume of the solvent.
(F) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celcius (sixty-eight (68) degrees Fahrenheit).

All records shall be retained on-site for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

(10) Any change or modification that may increase the potential to emit of a single hazardous air pollutant (HAP) to 10 tons per year or greater, or that of Volatile Organic Compounds (VOC) or any combination of HAPs to 25 tons per year or greater, shall require prior approval of the Office of Air Quality (OAQ).

This exemption is the first air approval issued to this source.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,
Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

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cc: File – Lake County
Lake County Health Department
Northwest Regional Office
Air Compliance – Rick Massoels/Ramesh Tejuja
Northwest Regional Office
Permit Tracking
Compliance Data Section

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name:	**Truck City of Gary, Inc.**
Source Location:	**7300 W. Chicago Avenue, Gary, Indiana 46406**
County:	**Lake**
SIC Code:	**7532**
Exemption No.:	**089-18376-00116**
Permit Reviewer:	**Madhurima D. Moulik**

The Office of Air Quality (OAQ) has reviewed an application from Truck City of Gary, Inc., relating to the construction and operation of a truck repair, cleaning, and surface coating operation.

Emission Units and Pollution Control Equipment

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

(a) One (1) cold solvent cleaning operation for cleaning truck parts, including cold solvent cleaning tanks.

(b) One (1) crystal clean paint gun cleaning operation.

(c) One (1) truck cleaning and preparation operation using Pre Sol 3939S and MOPP0001 surface conditioner.

(d) One (1) surface coating operation for painting cleaned and repaired trucks, using Imron Polyurethane Enamel, with a maximum capacity of 1 truck per day.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

A complete application for the purposes of this review was received on January 12, 2004.

Emission Calculations

Emissions calculations are based on usage of materials as supplied by source.

MOP0001 surface conditioner:

This contains deionized water only.
VOC content = HAP content = 0%
Therefore, there are no emissions of regulated pollutants.

V-192S Activator:
VOC = HAP = 0 %

Therefore, there are no emissions of regulated pollutants from V-192S activator usage.

Preparation Solvent 3939S:

Monthly usage = 1 gallon
Time period of usage = 173.33 hours/month.
Therefore, over 8760 hr/yr, usage = 1 x (8760/173.33) gal/yr = 50.5 gal/yr
Density = 6.63 lb/gal
VOC content = HAP percentage = 13% (Toluene);

Therefore, potential to emit of **VOC = HAP** = 50.5 gal/yr x 6.63 lb/gal x 0.13 = 43.52 lb = **0.0217 tons/yr**

Crystal Clean Super 16:

Monthly usage = 1209 gal/yr.
Density = 6.98 lb/gal
VOC content = 37% (29% toluene, 4 % MEK, 0.9% methanol, 4% methyl isobutyl ketone)

PTE of VOC = 1209 gal/yr x 6.98 lb/gal x 0.37 = 3122 lb/yr = **1.56 tons/yr**

Crystal Clean Paint Gun Cleaner:

Monthly usage = 378 gal/yr.
Density = 7.06 lb/gal
VOC content = 100% (65% toluene, 35 % MEK)

PTE of VOC = 378 gal/yr x 7.06 lb/gal = 2668.7 lb/yr = **1.33 tons/yr**

Imron 5000 Polyurethane Enamel:

Monthly usage = 1095 gal/yr.
Density =9.55 lb/gal
VOC content = 41.2% (2.9% toluene, 0.6 % ethyl benzene, 9.10 % MEK, 3.10 % xylene, 2.5 % tri-methyl-benzebne, 21% ether acetate, 2% butyl alcohol)

PTE of VOC = 1095 gal/yr x 9.55 lb/gal x 0.412 = 4308.4 lb/yr = **2.15 tons/yr**

Potential to emit of **PM/PM-10** = 9.55 lb/gal x 1095 gal/yr x (1-0.412) x (1-0.75(transfer efficiency)) x 1 ton/2000 lb

= **0.77 tons per year**

Potential to Emit of the Source Before Controls

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

Pollutant	Potential to Emit (tons/yr)
PM	0.77
PM-10	0.77
SO_2	Negligible
VOC	5.1
CO	Negligible
NO_x	Negligible

HAPs	Potential to Emit (tons/yr)
Single HAP	<10
Total	<25

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of pollutants are less than the levels listed in 326 IAC 2-1.1-3(d)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3. An exemption will be issued.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3. An exemption will be issued.

County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM-10	moderate non-attainment
SO_2	attainment
NO_2	attainment
Ozone	severe non-attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Lake County has been designated as severe non-attainment for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.

(a) Lake County (City of Gary) has been classified as attainment for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration PSD) 326 IAC 2-2. See the State Rule Applicability for the source section.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

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

This is the first air approval issued to this source.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) This source is not subject to the requirements of the proposed National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart IIII (Standards for Auto and Light Duty Trucks) because this source is not a major source for HAPs.

(c) The degreasing operation at this facility does not use any halogenated solvents and is not a major source for HAPs. Therefore, this source is not subject to the requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart T (Standards for Halogenated Solvent Degreasing).

State Rule Applicability – Entire Source

326 IAC 2-3 (Emission Offset)

This source, located in Gary (severe non-attainment for ozone), has potential to emit of VOCs less than 25 tons per year. Therefore, 326 IAC 2-3 does not apply.

326 IAC 2-2 (Prevention of Significant Deterioration)

The source, located in Gary has been classified as attainment as attainment for all criteria pollutants other than ozone, and has potential to emit of these pollutants less than 250 tons per year, and is not one of the twenty-eight (28) listed source categories. This source is not one of the twenty-five (25) listed source categories. Therefore, 326 IAC 2-2 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is located in Lake County and the potential to emit of VOC is less than ten (10) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Visible Emissions Limitations)

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

(a) Opacity shall not exceed an average of twenty percent (20%) 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 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of this truck repair, cleaning, and surface coating operation will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

State Rule Applicability – Individual Facilities

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

This source is not subject to the requirements of 326 IAC 8-2-9, since this source performs automobile refinishing, and pursuant to 326 IAC 8-2-9(b)(3), is exempt from the requirements of this rule.

326 IAC 8-3-2 (Cold Cleaner Degreasers)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operation), the owner or operator of a cold cleaning facility shall:

(a) equip the cleaner with a cover;
(b) equip the cleaner with a facility for draining cleaned parts;
(c) close the degreaser cover whenever parts are not being handled in the cleaner;
(d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
(e) provide a permanent, conspicuous label summarizing the operating requirements;

(f) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-10 (Automobile Refinishing)

This source refinishes trucks in Lake county, and applies paint as necessary using spray gun application method. Therefore, this source is subject to the requirements of 326 IAC 8-10. Pursuant to 326 IAC 326 IAC 8-10-3(c), the source is subject to the following:

(1) Pursuant to 326 IAC 8-10-4(a) (Means to Limit VOC Emissions), the owner or operator of the truck refinishing operation shall limit emissions of volatile organic compounds (VOCs) from refinishing operations by using coating or surface preparation products that meet the VOC content limit established in 326 IAC 8-10-4(b).

(a) On and after May 1, 1996, the owner or operator of a refinishing facility shall limit emissions of volatile organic compounds (VOCs) from refinishing operations by one (1) of the following means:

(i) By using coatings or surface preparation products that meet the VOC content limits established in subsection (b).
(ii) By employing a control system meeting the requirements of subsection (c).
(iii) By employing a combination of coatings as specified in subsection (b) and control system measures identified in subsection (c).

(b) Compliance with the VOC limits shall be based on the VOC content on an as-applied basis. The VOC content shall not exceed the following limits:

Coating Category	VOC limit (lb/gal)
Topcoat	
Single and two-stage	5.0

For surface preparation products:

Type of substrate	VOC limit (lb/gal)
Plastic	6.5
Other	1.4

(c) A control system used to comply with the VOC emission requirements of this rule shall achieve an overall control efficiency of at least eighty-one percent (81%). An owner or operator complying with the VOC emission reduction requirements of this rule by means of a control system shall do the following:

(i) On or before May 1, 1996, demonstrate initial compliance with the emission limit by performing an emission test that demonstrates compliance according to procedures in section 7 of this rule.
(ii) On or before June 31, 1996, submit to the department the results of the initial compliance test according to procedures in section 7 of this rule.
(iii) Depending on type of control device installed, choose an appropriate operating parameter according to procedures in section 8(b) of this rule.
(iv) Calculate the site-specific operating parameter value, as an arithmetic average of the minimum or maximum values of the operating parameter as appropriate, that demonstartes initial compliance with the emission limit.
(v) On and after May 1, 1996, demonstrate continuous compliance with the emission limits in this section by ensuring that during the refinishing operation, the value of the operating parameter, as determined during the initial compliance test or subsequent compliance test, id within the range specified in the applicable subdivision of section 9(b) of this rule.

(d) Application of all specialty coatings except anti-glare/safety coatings shall not exceed five percent (5%) by volume of all coatings applied on a monthly basis.

Based on MSDS submitted by source, the source is in compliance with the VOC limits required by section 4(b) of this rule.

(2) Pursuant to 326 IAC 8-10-5 (Work Practices Standards):

(a) The owner or operator of a refinishing facility shall ensure that spray guns are cleaned in an enclosed device that:

(i) is closed during spray gun equipment cleaning operations except when depositing and removing objects to be cleaned;
(ii) is closed during noncleaning operations with the exception of the maintenance and repair of the cleaning device itself; and
(iii) recirculates cleaning solvent during the cleaning operation so that the solvent is available for reuse onsite or for disposal offsite.

The cleaning device shall be operated and maintained according to the manufacturer's recommendations. The owner or operator of the refinishing facility shall have the cleaning device manufacturer's recommendations available for inspection upon request by the department or the U. S. EPA.

(b) On and after May 1, 1996, the owner or operator of a refinishing facility shall use one (1) or a combination of the following equipment for coating application:

(i) Electrostatic equipment.
(ii) High volume low pressure (HVLP) spray equipment.
(iii) Any other coating application equipment that has been demonstrated, by the owner or operator, to the satisfaction of the department to be capable of achieving at least sixty-five percent (65%) transfer efficiency. The owner or operator must submit sufficient data for the department to be able to determine the accuracy of the transfer efficiency claims.

Coating application equipment shall be operated and maintained according to the manufacturer's recommendations. The owner or operator shall have the manufacturer's recommendations available for inspection upon request by the department or the U. S. EPA.

(c) On or after May 1, 1996, the owner or operator of a refinishing facility shall implement housekeeping practices which include the following:

(i) All paper or cloth used for activities such as surface preparation and surface cleanup shall be stored in closed containers until disposed of offsite. The containers shall remain closed unless being filled or emptied.
(ii) All fresh or used solvent shall be stored in closed containers.
(iii) Storage containers and equipment shall be free from cracks, holes, and leaks.
(iv) Waste coatings, spray booth filters, and used automotive fluids shall be stored in closed containers.
(v) Equipment cleanup shall be performed with methods that minimize the use of solvents. Reasonable efforts shall be made to reclaim the bulk of used solvents. No cleaning shall be performed by direct spraying of solvents into the atmosphere.
(vi) Effort shall be made to schedule operations of a similar nature to significantly reduce total volatile organic compound material consumption.
(vii) Coatings or surface preparation products shall be applied in a manner that minimizes overspray.

(d) The owner or operator of a refinishing facility shall comply with the training requirements of this rule as follows:

(i) On or before May 1, 1996, develop a written training program. The training program may include training provided by the manufacturer or supplier and shall include written procedures and hands on demonstration, as appropriate, on the following topics:

(A) Identification of appropriate coatings or surface preparation products.

(B) Preparation of coatings or surface preparation products according to coating manufacturer, distributor, or owner or operator's recommendations.
(C) Application of coatings or surface preparation products, or organic solvents using techniques that minimize their usage.
(D) Operation and maintenance of spray gun cleaning equipment to minimize evaporation of organic solvents to the atmosphere.
(E) Work practices standards established in subsection (c).
(F) Procedures to gather, record, monitor, and report data in accordance with section 9 of this rule.

(ii) Beginning in 1997, provide annual refresher training prior to May 1, to any employee performing one (1) or more of the activities listed in subdivision (1). Such training shall be appropriate to the job responsibilities of the employee.
(iii) Any person may form one (1) or more activity addressed in subdivision (1), for not more than one hundred eighty (180) days, notwithstanding the requirement of subdivision (2), provided each of the following:
(A) Such untrained person works under the supervision of a person who meets the training requirements of subdivision (2).
(B) The owner or operator keeps the following records:
(a) The date the person was assigned to the activity.
(b) The date training was completed.
(c) The name of the person providing the supervision.

(iv) The owner or operator of the refinishing operation shall keep records of the training program. The records shall consist of the following:
(A) The date training was completed.
(B) A list of persons, by name and activity and the topics in which they have been trained.
(C) A statement signed by the trainer certifying each trainee who satisfactorily has completed training in the topics and is proficient in the procedures specified in subdivision (1).

(3) Pursuant to 326 IAC 8-10-6 (Compliance Procedures), on or before May 1, 1996, the owner or operator of a refinishing facility shall submit to the department a statement signed by a responsible official of the facility, certifying that the facility has acquired and will continuously employ coating or surface preparation products meeting the VOC limits of section 4(b) of this rule or that an add-on control system meeting the requirements of section 4(c) of this rule has been installed, including a description of the controlling system.

(4) Pursuant to 326 IAC 8-10-7 (Test Procedures):

(a) Owners or operators of refinishing facilities shall be subject to the applicable test method and requirements of 326 IAC 8-1-4 and 40 CFR 60, Appendix A.
(b) Owners or operators may use data provided with coatings or surface preparation products formulation information such as the container label, the product data sheet, and the MSDS sheet in order to comply with sections 4 and 9(a) of this rule. The department and U.S. EPA may require VOC content determination and verification of any coating or surface preparation product using EPA Method 24. In the event of any inconsistency between Method 24 and formulation data, Method 24 shall govern.
(c) An owner or operator of a refinishing facility electing to meet the emission limit requirements of section 4(c) of this rule using a control device or devices shall test the control system according to the following schedule and under the following situations:
(i) An initial compliance test shall be conducted on or before May 1, 1996, and every two (2) years after the date of the initial compliance test.
(ii) A compliance test shall be conducted whenever the owner or operator operates the control system under conditions different from those which were in place at the time of the previous compliance test.
(iii) A compliance test shall be performed within ninety (90) days of the startup of a new facility or within thirty (30) days of a written request by the department or the U. S. EPA.
(iv) All compliance tests shall be conducted according to a protocol developed by the owner or operator of a facility according to procedures in 326 IAC 3-2.1-2. The results of the tests shall be submitted to the department according to procedures in 326 IAC 3-2.1-4.

(5) Pursuant to 326 IAC 8-10-8 (Control System Operation, Maintenance, and Monitoring):

(a) The following requirements apply to sources that meet the emission limit requirements of section 4 of this rule at a facility by using a control device or devices as provided in section 4(a)(2) and 4(a)(3) of this rule:

(i) The control system shall be operated and maintained according to the manufacturer's specifications and instructions.

(ii) The operation of the control system may be modified upon the written request of the department or the U. S. EPA based on the results of the initial or subsequent compliance test.

(iii) The operating and maintenance procedures applicable to the control system shall be followed beginning no later than May 1, 1996.

(iv) A copy of the operating and maintenance procedures shall be maintained at the source property and as close to the control system as possible for the reference of plant personnel and department inspectors.

(b) Owners or operators choosing to meet the emission limit requirements of section 4 of this rule with the use of a control device or devices shall install, calibrate, maintain, and operate the monitoring equipment as follows:

(i) If a thermal incinerator is used for VOC reduction, combustion temperature shall be the operating parameter. A temperature monitoring device capable of continuously recording the temperature of the gas stream in the combustion zone of the incinerator shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade or plus or minus five-tenths (0.5) degree Centigrade, whichever is greater.

(ii) If a catalytic incinerator with a fixed catalyst bed is used for VOC reduction, gas temperature both upstream and downstream of the catalyst bed shall be the operating parameter. A temperature device capable of continuously recording the temperature in the gas stream immediately before and after catalyst bed of the incinerator shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade or plus or minus five-tenths (0.5) degree Centigrade, whichever is greater.

(iii) If a carbon adsorber is used to remove and recover VOC from the gas stream, concentration level of VOC at the outlet of the carbon bed shall be the operating parameter. A VOC monitoring device capable of continuously recording the concentration level of VOC at the outlet of the carbon bed shall be used. The monitoring device shall be based on a detection principle such as infrared, photoionization, or thermal conductivity.

(iv) When a VOC recovery device other than a carbon adsorber is used, the source shall provide to the department information describing the operation of the device and the process parameters which would indicate proper operation and maintenance of the control device. The department may request further information and may specify appropriate monitoring procedures and reporting requirements.

(6) Pursuant to 326 IAC 8-10-9(Record Keeping and Reporting):

(a) Owners or operators of refinishing facilities subject to the provisions of section 4(b) of this rule shall keep records of the following:

(i) For each batch of coating mixed or refinishing job performed, the following information:
(A) Batch or job identification number or name.
(B) Date batch made or job performed.
(C) Coating category, consistent with the coating categories in section 4(b) of this rule.
(D) Coating manufacturer's name and identification number.
(E) Either the quantity used in making the mix or the mix ratio used.
(F) VOC content as supplied or packaged.
(G) Manufacturer's name and identification number of added components, such as catalysts, reducers, and hardeners.
(H) Either the quantity of components added or the mix ratio used.

(ii) For each surface preparation product used, the following information:

(A) Manufacturer's name and identification number.
(B) Substrate to which the product is applied.
(C) VOC content as supplied per calendar month for:

(1) number of containers used; and
(2) volume of each container in suitable units, such as quarts, gallons, pints, other similar units, and the ratio of components added.

(iii) Owners or operators shall maintain documents such as MSDS, or product or other data sheets for a period of three (3) years, following use of the product. MSDS or product or other data sheetsmay be used by the U. S. EPA or the department to verify the VOC content, as supplied, provided by the coating manufacturer, distributor, or supplier, of the coatings or surface preparation products.

(iv) Except when complying with section 4(a)(ii) or 4(a)(iii) of this rule, owners or operators shall report within thirty (30) days to the department any incidence in which non-compliant coating was used, the reason for use of the noncompliant coating, and corrective actions taken.

(b) Owners or operators choosing to meet the emission limit requirements of section4 of this rule with the use of a control device or devices shall maintain the following records:

(i) A log of the operating time of the facility and the facility's capture system, control device, and monitoring equipment.

(ii) A maintenance log for the control system and the monitoring equipment detailing all routine and nonroutine maintenance performed. The log shall include the dates and duration of any outages of the capture system, the control device, or the monitoring system.

(iii) The following additional records shall be maintained for facilities using thermal incinerators:

(A) Continuous records of the temperature in the gas stream in the combustion zone of the incinerator.
(B) Records of all three (3) hour periods of operation for which the average combustion temperature of the gas stream in the combustion zone was more than fifty (50) degrees Fahrenheit below the combustion zone temperature which existed during the most recent compliance test that demonstrated that the facility was in compliance.

(iv) The following additional records shall be maintained for facilities using catalytic incinerators:
(A) Continuous records of the temperature of the gas stream both upstream and downstream of thecatalyst bed of the incinerator.
(B) Records of all three (3) hour periods of operation for which the average temperature measured at the process vent stream immediately before the catalyst bed is more than fifty (5)) degrees Fahrenheit below the average temperature of the process vent stream which existed during the most recent compliance test that demonstrated that the facility was in compliance.
(C) Records of all three (3) hour periods of operation for which the average temperature difference across the catalyst bed is less than eighty percent (80%) of the temperature difference measured during the most recent compliance test that demonstrated that the facility was in compliance.

(v) The following additional records shall be maintained for facilities using carbon adsorbers:
(A) Continuous records of the VOC concentration level or reading in the exhaust stream of the carbon adsorber.
(B) Records of all three (3) hour periods of operation during which the average VOC concentration level or reading in the exhaust gas is more than twenty percent (20%) greater than the average exhaust gas concentration level or reading measured by the organic monitoring device during the most recent determination of the recovery efficiency of the carbon adsorber that demonstrated that the facility was in compliance.

(vi) Facilities using VOC recovery devices other than carbon adsorbers shall maintain the monitoring records and meet the reporting requirements specified by section 8(b)(iv) of this rule.

(vii) Information requirements in subdivisions (ii), iii(B), iv(B), iv(C), and v(B) shall be submitted to the department within thirty (3)) days of occurrence. The following information shall accompany the submittal:
(A) The name and location of the facility.
(B) Identification of the control system where the excess emission occurred and the facility it served.
(C) The time, date, and duration of the exceedence.
(D) Corrective action taken.

(c) Owners or operators of refinishing facilities affected by this rule shall maintain the following records:

(1) Records of training programs as required in section 5(d) of this rule.
(2) Initial compliance statements as required in section 6(c) of this rule.
(3) Records as required in this section.

(d) Owners or operators of refinishing facilities affected by this rule shall maintain all records for a minimum of three (3) years and shall make records available to the department and the U.S. EPA upon request.
(e) Failure to maintain records required by subsections (a) through (c) shall constitute a violation of this rule for each day records are not maintained.

326 IAC 8-3-8 (Organic Solvent Degreasing Operations: Material Requirements for Cold Cleaning Degreasers)

According to 326 IAC 8-3-1, section 8 of this rule is applicable to "any person who sells, offers for sale, uses, or manufactures solvent for use in cold cleaning degreasers in the following counties: (1) Clark. (2) Floyd. (3) Lake. (4) Porter." This source is in Lake county and uses solvents for organic degreasing, therefore, 326 IAC 8-3-8 applies.

Pursuant to 326 IAC 8-3-8(c)(2)(B), on and after May 1, 2001, no person shall do the following:

Operate a cold cleaning degreaser with a solvent vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousands (0.019) pound per square inch) measured at twenty (20) degrees Celcius (sixty-eight degrees Fahrenheit).

Pursuant to 326 IAC 8-3-8(d)(2), all persons subject to the requirements of 326 IAC 8-3-8(c)(2)(B) shall maintain each of the following records for each purchase:

(A) The name and address of the solvent supplier.
(B) The date of purchase.
(C) The type of solvent.
(D) The volume of each unit of solvent.
(E) The total volume of the solvent.
(F) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celcius (sixty-eight (68) degrees Fahrenheit).

All records shall be retained on-site for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements)

The potential to emit of VOCs of all emissions units are less than 25 tons per year. Therefore, 326 IAC 8-1-6 does not apply.

Conclusion

The operation of this truck repair, cleaning, and surface coating operation shall be subject to the conditions of the Exemption No. 089-18376-00116.