



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: March 29, 2005
RE: Good Roads, Inc / 171-18487-00011
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot 1/10/05



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

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Mr. R.D. Manning
Good Roads, Inc.
P.O. Box 67
Williamsport, Indiana 47993

March 29, 2005

Re: Source Specific Operation Status
S 171-18487-00011

Dear Mr. Manning:

Your application for Source Specific Operation Status was received on January 27, 2005 and has been reviewed. Based on the data submitted and the provisions in 326 IAC 2, it has been determined that your emission source, a snow plow manufacturing operation, located at 537 State Road 28, East Williamsport, Indiana 47993, has met the criteria required to obtain a Source Specific Operating Agreement.

Pursuant to IC 4-21.5-3-5(a) and (b), approval of this Source Specific Operating Agreement shall not be effective until fifteen (15) days from the date of this letter.

The facilities and processes of this source are hereby granted the Source Specific Operating Agreement provided that the following requirements of 326 IAC 2-9 are satisfied:

Section A: Surface Coating or Graphic Arts Operation: [326 IAC 2-9-3]

1. The combined total amount of volatile organic compounds (VOC) and hazardous air pollutants (HAP) delivered to the surface coating operation at the source shall not exceed fifteen (15) pounds per day.
2. The source shall keep the following records of the surface coating operation:
 - (a) the number of gallons of each solvent containing material used,
 - (b) the VOC and HAP content (pounds per gallon as supplied) of each solvent containing material used,
 - (c) material safety data sheets (MSDS) for all VOC and HAP containing material used,
 - (d) a monthly summation of VOC and HAP usage, and
 - (e) purchase orders and invoices for each solvent containing material used.

These records shall be kept for a minimum period of five (5) years, and made available upon request of the Office of Air Quality (OAQ).

3. Particulate matter emissions shall be controlled by a dry filter system or an equivalent control device. The source shall operate the particulate control device at all times the graphic arts operation is in operation in accordance with the manufacturer's specifications. A source shall be

considered in compliance with this requirement provided the overspray is not visibly detectable at the exhaust or accumulated on the rooftops or on the ground.

4. Include with the annual notice required in Condition 1 of the General Requirements Section, an inventory listing of the monthly volatile organic compound (VOC) and hazardous air pollutant (HAP) totals, and the total VOC and HAP emissions for the previous twelve (12) months.

Section B: External Combustion Operation: [326 IAC 2-9-13]

1. The visible emissions from the external combustion unit shall not exceed twenty percent (20%) opacity in twenty-four (24) consecutive readings in a six (6) minute period. The opacity shall be determined using 40 CFR 60, Appendix A, Method 9.
2. The fuel usage for the units listed in this Source Specific Operating Agreement (SSOA) shall be limited to less than one thousand six hundred million cubic feet (1600 MMcf) of natural gas per year, based on a straight twelve (12) month total.
3. The source shall keep the following records from the external combustion unit:
 - (a) the hours operated for each external combustion unit approved under this Source Specific Operating Agreement (SSOA),
 - (b) records of the annual fuel usage for each external combustion unit approved under this SSOA, and
 - (c) records of all routine maintenance conducted on the external combustion units approved under this SSOA.

These records shall be kept for a minimum period of five (5) years, and made available upon request of the Office of Air Quality (OAQ).

Section C: General Requirements: [326 IAC 2-9-1]

1. The source shall provide an annual notice to the commissioner, stating that the source is in operation, and certifying that its operations are in compliance with the requirements of this Source Specific Operating Agreement. The above annual notice shall be submitted to:

**Compliance Data Section
Office of Air Quality
100 North Senate Avenue
Indianapolis, IN 46204**

no later than January 30 of each year, with the annual notice being submitted in the format attached.

2. Any exceedance of any requirement contained in this operating agreement shall be reported, in writing, within one (1) week of its occurrence. Said report shall include information on the actions taken to correct the exceedance, including measures to reduce emissions, in order to comply with the established limits. If an exceedance is the result of a malfunction, then the provisions of 326 IAC 1-6 apply.
3. Pursuant to 326 IAC 2-9-1(i), the Permittee is hereby notified that this operating agreement does not relieve the permittee of the responsibility to comply with the provisions of any applicable federal, state, or local rules, or any New Source Performance Standards (NSPS), 40 CFR Part 60, or National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 61.

Any change or modification which will alter operations in such a way that it will no longer comply with the applicable restrictions and conditions of this operating agreement, must obtain the appropriate approval from the Office of Air Quality (OAQ) under 326 IAC 2-5.1, 326 IAC 2-5.5, 326 IAC 2-6.1, 326 IAC 2-2, 326 IAC 2-3, 326 IAC 2-7, and 326 IAC 2-8, before such change may occur.

Sincerely,
Original signed by

Paul Dubenetzky, Chief
Permit Branch
Office of Air Quality

ERG/TDP

cc: File - Warren County
Warren County Health Department
Air Compliance Section - Wanda Stanfield
Permit Tracking
Compliance Data Section

Source Specific Operating Agreement Annual Notification
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This form should be used to comply with the notification requirements under 326 IAC 2-9.

Company Name:	Good Roads, Inc.
Address:	537 State Road 28 East
City:	Williamsport, Indiana 47993
Contact Person:	R.D. Manning, Owner
Phone #:	765-762-1111
SSOA #:	S 171-18487-00011

I hereby certify that Good Roads, Inc. is still in operation and is in compliance with the requirements of Source Specific Operating Agreement (SSOA) S 171-18487-00011.

Name (typed):
Title:
Signature:
Date:

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
Six (6) 0.20 MMBtu/hr Space Heaters**

Company Name: Good Roads, Inc.
Address : 537 State Road 28 East, Williamsport, Indiana 47993
Permit Number: 18487-00011
Plt ID: 171-00011
Reviewer: ERG/TDP
Date: December 16, 2004

Heat Input Capacity
MMBtu/hr
1.20 (6 units only)

Potential Throughput
MMCF/yr
10.5

	Pollutant					
	PM*	PM10*	SO ₂	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100	5.5	84
Potential Emission in tons/yr	0.04	0.04	0.003	0.53	0.03	0.44

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

**Emission factor for NOx: Uncontrolled = 100 lb/MMCF.

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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)

Methodology

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

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

See page 2 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
Six (6) 0.20 MMBtu/hr Space Heaters**

Company Name: Good Roads, Inc.
Address: 537 State Road 28 East, Williamsport, Indiana 47993
Permit Number: 18487-00011
Plt ID: 171-00011
Reviewer: ERG/TDP
Date: December 16, 2004

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential to Emit in tons/yr	1.10E-05	6.31E-06	3.94E-04	9.46E-03	1.79E-05

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emit in tons/yr	2.63E-06	5.78E-06	7.36E-06	2.00E-06	1.10E-05

Methodology is the same as page 1.

Total HAP: 9.92E-03

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
Welding Operations

Company Name: Good Roads, Inc.
Address : 537 State Road 28 East, Williamsport, Indiana 47993
Permit Number: 18487-00011
Pit ID: 171-00011
Reviewer: ERG/TDP
Date: December 16, 2004

Process	Number of Stations	Max. Electrode Consumption (lbs/hr)	*EMISSION FACTORS (lb pollutant/lb electrode)				POTENTIAL TO EMIT (lbs/hr)			
			PM/PM10	Mn	Ni	Cr	PM/PM10	Mn	Ni	Cr
Metal Inert Gas (MIG) Welding ER70S	5	4	0.0052	0.00318	0.00001	0.00001	1.04E-01	6.36E-02	2.00E-04	2.00E-04

PM/PM10 (tons/yr) = 0.46
HAPs (tons/yr) = 0.28

*Emission factors are from AP-42, Chapter 12.19, SCC 3-09-050 (January 1995).

Methodology

Potential to Emit (lbs/hr) = Number of Stations * (Max. Electrode Consumption (lbs/hr) * Emission Factor (lbs pollutant/lb electrode))

**Appendix A: Emissions Calculations
VOC and Particulate Emissions
From Surface Coating Operations**

Company Name: **Good Roads, Inc.**
Address : **537 State Road 28 East, Williamsport, Indiana 47993**
Permit Number: **18487-00011**
Plt ID: **171-00011**
Reviewer: **ERG/TDP**
Date: **December 16, 2004**

SB1

Material	Density (Lb/Gal)	Pounds VOC per gallon of coating less water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	PTE of VOC (lb/hr)	PTE of VOC (lb/day)	PTE of VOC (tons/year)	PTE of PM/PM10 (ton/yr)	Transfer Efficiency (%)	Controlled Particulate (ton/yr)	Control Efficiency (%)
Enamel, Omaha Orange	8.33	4.30	40.0%	0.25	4.00	4.30	103	18.8	8.76	40%	0.18	98%
Water Reducible Enamel, Yellow	8.42	3.51	28.0%	0.25	4.00	3.51	84.2	15.4	6.20	40%	0.12	98%
Water Reducible Enamel, Low Gloss Black	9.82	2.74	35.0%	0.25	4.00	2.74	65.8	12.0	9.03	40%	0.18	98%
Water Reducible Enamel, Orange	8.47	2.77	30.0%	0.25	4.00	2.77	66.5	12.1	6.68	40%	0.13	98%
Water Reducible Metal Primer, Gray	10.7	2.49	35.0%	0.25	4.00	2.49	59.8	10.9	9.81	40%	0.20	98%
SB2 F78 W530, Low Gloss White	10.9	2.71	37.0%	0.25	4.00	2.71	65.0	11.9	10.6	40%	0.21	98%
*Worst case potential to emit:								18.8	10.6	0.21		

SB2

Material	Density (Lb/Gal)	Pounds VOC per gallon of coating less water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	PTE of VOC (lb/hr)	PTE of VOC (lb/day)	PTE of VOC (tons/year)	PTE of PM/PM10 (ton/yr)	Transfer Efficiency (%)	Controlled Particulate (ton/yr)	Control Efficiency (%)
Enamel, Omaha Orange	8.33	4.30	40.0%	0.05	20.00	4.30	103	18.8	8.76	40%	0.18	98%
Water Reducible Enamel, Yellow	8.42	3.51	28.0%	0.05	20.00	3.51	84.2	15.4	6.20	40%	0.12	98%
Water Reducible Enamel, Low Gloss Black	9.82	2.74	35.0%	0.05	20.00	2.74	65.8	12.0	9.03	40%	0.18	98%
Water Reducible Enamel, Orange	8.47	2.77	30.0%	0.05	20.00	2.77	66.5	12.1	6.68	40%	0.13	98%
Water Reducible Metal Primer, Gray	10.7	2.49	35.0%	0.05	20.00	2.49	59.8	10.9	9.81	40%	0.20	98%
SB2 F78 W530, Low Gloss White	10.9	2.71	37.0%	0.05	20.00	2.71	65.0	11.9	10.6	40%	0.21	98%
*Worst case potential to emit:								18.8	10.6	0.21		

Control = Fabric filters.

*Only one spray gun and one paint can be used at a time at each spray booth.

Pounds of VOC per Gallon Coating Less Water is from the MSDS sheets as provided by the source.

PTE from SB1 and SB2: 37.7 21.1 0.42

METHODOLOGY

PTE of VOC (lb/hr) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

PTE of VOC (lb/day) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * 24 hr/day

PTE of VOC (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * 8760 hr/yr * 1 ton/2000 lbs

PTE of PM/PM10 (tons/yr) = Maximum (units/hour) * Gallons of Material (gal/unit) * Density (lbs/gal) * Volume % Non-Volatiles * (1-Transfer efficiency %) * 8760 hrs/yr * 1 ton/2000 lbs

Controlled Particulate Potential to Emit (tons/yr) = Maximum (units/hour) * Gallons of Material (gal/unit) * Density (lbs/gal) * (1-Weight % Volatiles) * (1-Transfer efficiency%) * (1-Control Efficiency%) * 8760 hrs/yr * 1 ton/2000 lbs

**Appendix A: Emission Calculations
HAP Emission Calculations
Surface Coating Operations**

Company Name: Good Roads, Inc.
Address : 537 State Road 28 East, Williamsport, Indiana 47993
Permit Number: 18487-00011
Plt ID: 171-00011
Permit Reviewer: ERG/TDP
Date: December 16, 2004

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hr)	Weight % Ethylbenzene	Weight % Cobalt Compounds	Weight % Glycol Ethers	Weight % Xylene	Weight % Triethylamine	Potential to Emit				
									Ethylbenzene (ton/yr)	Cobalt Compound (ton/yr)	Glycol Ethers (ton/yr)	Xylene (ton/yr)	Triethylamine (ton/yr)
Enamel, Omaha Orange	8.33	0.05	20.0	5.00%	0.10%	0.00%	31.00%	0.00%	1.82	0.04	0.00	11.3	0.00
Water Reducible Enamel, Yellow	8.42	0.05	20.0	0.00%	0.20%	11.00%	0.00%	2.00%	0.00	0.07	4.06	0.00	0.74
Water Reducible Enamel, Low Gloss Black	9.82	0.05	20.0	0.00%	0.20%	13.00%	0.00%	1.00%	0.00	0.09	5.59	0.00	0.43
Water Reducible Enamel, Orange	8.47	0.05	20.0	0.00%	0.20%	12.00%	0.00%	2.00%	0.00	0.07	4.45	0.00	0.74
Water Reducible Enamel Primer, Gray	10.7	0.05	20.0	0.00%	0.00%	11.00%	0.00%	0.00%	0.00	0.00	5.14	0.00	0.00
SB2 F78 W530, Low Gloss White	10.9	0.05	20.0	0.00%	0.10%	12.00%	0.00%	1.00%	0.00	0.05	5.70	0.00	0.48

*Worst case potential to emit: 11.3 tons/yr

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hr)	Weight % Ethylbenzene	Weight % Cobalt Compounds	Weight % Glycol Ethers	Weight % Xylene	Weight % Triethylamine	Potential to Emit				
									Ethylbenzene (ton/yr)	Cobalt Compound (ton/yr)	Glycol Ethers (ton/yr)	Xylene (ton/yr)	Triethylamine (ton/yr)
Enamel, Omaha Orange	8.33	0.25	4.00	5.00%	0.10%	0.00%	31.00%	0.00%	1.82	0.04	0.00	11.3	0.00
Water Reducible Enamel, Yellow	8.42	0.25	4.00	0.00%	0.20%	11.00%	0.00%	2.00%	0.00	0.07	4.06	0.00	0.74
Water Reducible Enamel, Low Gloss Black	9.82	0.25	4.00	0.00%	0.20%	13.00%	0.00%	1.00%	0.00	0.09	5.59	0.00	0.43
Water Reducible Enamel, Orange	8.47	0.25	4.00	0.00%	0.20%	12.00%	0.00%	2.00%	0.00	0.07	4.45	0.00	0.74
Water Reducible Enamel Primer, Gray	10.7	0.25	4.00	0.00%	0.00%	11.00%	0.00%	0.00%	0.00	0.00	5.14	0.00	0.00
SB2 F78 W530, Low Gloss White	10.9	0.25	4.00	0.00%	0.10%	12.00%	0.00%	1.00%	0.00	0.05	5.70	0.00	0.48

*Only one spray gun and one paint can be used at a time at each booth.

*Worst case potential to emit: 11.3 tons/yr

METHODOLOGY

Potential to Emit from SB1 and SB2: 22.6 tons/yr

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

**Appendix A: Emission Calculations
Summary of Emissions**

Company Name: Good Roads, Inc.
Address : 537 State Road 28 East, Williamsport, Indiana 47993
Permit Number: 18487-00011
Plt ID: 171-00011
Permit Reviewer: ERG/TDP
Date: December 16, 2004

Emission Units	PM*	PM10*	SO₂	NO_x	VOC	CO	HAP
Six (6) Space Heaters	0.04	0.04	3.15E-03	0.53	0.03	0.44	9.92E-03
Welding Operations	0.46	0.46					0.28
Surface Coating Operations	21	21			38		22.6
Totals:	22	22	3.15E-03	0.53	38	0.44	22.9