



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

August 30, 2004

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

TO: Interested Parties / Applicant

RE: Hull Lift Trucks, Inc. / 039-18546-00235

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

Notice of Decision: Approval - Registration

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 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

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 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
FN-REGIS.dot 9/16/03



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
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Mr. Brian Hull
Hull Lift Trucks, Inc.
28747 Old US 33 West
Elkhart, Indiana 46516

August 30, 2004

Re: 039-18546-00235
Revised Registered Operation Status,
039-17221-00235

Dear Mr. Hull:

The application from Hull Lift Trucks, Inc., received on February 19, 2004, has been reviewed. The source was issued a Registration no. 039-17221-00235 on November 20, 2003, which specified the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) for the fifteen (15) service bays located at the source. Although the actual VOC emissions from the fifteen (15) service bays are greater than fifteen (15) pounds per day, the surface coating operations account for less than five (5) pounds of actual VOC emissions per day. The remainder of emissions result from materials such as brake-cleaners, truck wash, etc. Therefore, the provisions of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) should not have been included as an applicable requirement and have been removed from the registration.

Based on the data submitted and the provisions in 326 IAC 2-5.5, it has been determined that the following repair and retail of industrial lift trucks plant, located at 28747 Old US 33 West, Elkhart, Indiana 46516, are classified as registered:

- (a) One (1) surface coating facility using one (1) HVLP gun, with a maximum throughput capacity of 1.25 industrial lift trucks per day, exhausting at stack AA and controlled by dry filters. This facility was constructed in 1994.
- (b) Fifteen (15) service bays, with a maximum throughput capacity of 1.25 industrial lift trucks per day, exhausting at vent EX-1. These units were constructed in 1996.
- (c) Five (5) metal inert gas (MIG) welding stations, with a maximum consumption of 1.0 pounds of electrode per hour. This unit was installed in 1996.
- (d) Two (2) stick welding stations, with a maximum consumption of 0.02 pounds of electrode per hour. This unit was installed in 1996.
- (e) One (1) tungsten inert gas (TIG) station, with a maximum consumption of 0.25 pounds of electrode per hour. This unit was installed in 1996.
- (f) Two (2) flame cutting stations using oxyacetylene, with a maximum metal cutting rate of twelve (12) inches per minute. These units were installed in 1996.
- (g) Two (2) flame cutting stations using oxyacetylene, with a maximum metal cutting rate of five (5) inches per minute. These units were installed in 1996.
- (h) One grinding facility, with a maximum throughput capacity of 1.25 industrial lift trucks per day, controlled by dry filters and exhausting to a recirculating ventilation system. This unit was installed in 1996.
- (i) One (1) diesel fuel storage tank (identified as T1), with a maximum storage capacity of 1000 gallons.

- (j) One (1) gasoline storage tank (identified as T2), with a maximum storage capacity of 400 gallons.
- (k) One (1) anti-freeze storage tank (identified as T3), with a maximum storage capacity of 1491 gallons.
- (l) One (1) motor-oil storage tank (identified as T4), with a maximum storage capacity of 7600 gallons.
- (m) One (1) hydraulic oil storage tank (identified as T5), with a maximum storage capacity of 1203 gallons.
- (n) Two (2) heavy duty cleaner storage tanks (Identified as T6 and T9), with a combined maximum storage capacity of 1000 gallons.
- (o) Two (2) degreaser storage tanks (identified as T7 and T8), with a combined maximum storage capacity of 5000 gallons.
- (p) One (1) waste oil storage tank (identified as T10), with a maximum storage capacity of 3500 gallons.
- (q) One (1) waste anti-freeze storage tank (identified as T11), with a maximum storage capacity of 150 gallons.
- (r) One (1) super AFT storage tank (identified as T12), with a maximum storage capacity of 896 gallons.
- (s) Ten (10) natural gas fired combustion units with a total maximum heat input capacity of 1.3 million British thermal unit (MMBtu/hour). These units were installed in 1994.
- (t) One (1) natural gas fired boiler, with a maximum heat input capacity of 0.254 MMBtu per hour. This unit was installed in 1994.

The following conditions shall be applicable:

- (a) 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:
 - (1) 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.
 - (2) 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 non-overlapping integrated averages for a continuous opacity monitor in a six (6) hour period.
- (b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the Permittee shall maintain records of the VOC content and VOC usage in pounds per day of each coating material and solvent used less water at the fifteen (15) service bays and one (1) surface coating facility. Any change or modification which would increase the actual emissions of VOC greater than fifteen (15) pounds per day from the fifteen (15) service bays and one (1) surface coating facility must receive prior approval from IDEM, OAQ.
- (c) Pursuant to 326 IAC 6-3 (Particulate Emission Limitations from Manufacturing Processes), the particulate emission from the grinding facility shall not exceed 6.28 pounds per hour when operating at a process weight rate of 3775 pounds per hour.

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

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

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

The dry filters shall be in operation at all times the grinding facility is in operation, in order to comply with this rule.

- (d) Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Source of Indirect Heating,) the particulate emissions from the 0.254 MMBtu per hour boiler shall be limited to 0.60 pounds per MMBtu heat input.
- (e) Pursuant to 326 IAC 2-6 (Emission Reporting), the Permittee must submit an emission statement for the source. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period identified in 326 IAC 2-6.

This registration is the third air approval issued to this source. The construction permit issued on December 20, 1996 has expired. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Office of Air Quality that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.5-4(a)(3). The annual notice shall be submitted to:

**Compliance Data Section
Office of Air Quality
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015**

no later than March 1 of each year, with the annual notice being submitted in the format attached.

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.

Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Sanober Durrani, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7810 to speak directly to Ms. Durrani. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

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

ERG/SD

cc: File - Elkhart County
Elkhart County Health Department
Air Compliance - Paul Karkiewicz
Northern Regional Office
Permit Tracking
Technical Support and Modeling - Michele Boner
Compliance Data Section

Registration Annual Notification

This form should be used to comply with the notification requirements under 326 IAC 2-5.5-4(a)(3).

Company Name:	Hull Lift Trucks, Inc.
Address:	28747 Old US 33 West
City:	Elkhart, Indiana 46901
Authorized individual:	Mr. Brian Hull
Phone #:	(574) 293-8651
Registration #:	R039-18546-00235

I hereby certify that Hull Lift Truck, Inc. is still in operation and is in compliance with the requirements of Registration 039-18546-00235.

Name (typed):
Title:
Signature:
Date:

Appendix A: Emissions Calculations

To be included in App A for Registration 039-17221-00235

VOC Emissions

From Fifteen (15) Service Bays

Company Name: Hull Lift Truck, Inc.

Address: 28747 US 33 West, Elkhart, Indiana 46516

Revised Registration: 039-18546

Pit ID: 039-00235

Reviewer: ERG/SD

Date: August 5, 2004

Actual Hours of Operation hours/year = 2080

Product Name	Amount Used (lbs)	Amount Used (lbs/hour)	VOC Content %	PTE VOC (lbs/hour)	PTE VOC (tons/year)
High Tack	1.30	0.001	88.0%	0.001	0.002
Toyota N/C Carburetor Cleaner	32.5	0.016	100%	0.02	0.068
Break-A-Way	334	0.161	96.0%	0.15	0.675
* Toyota N/C Brake Cleaner	3601	1.731	100%	1.73	7.58
Gasket Remover	0.86	0.000	91.4%	0.00	0.002
Black Repair	66.8	0.032	61.0%	0.02	0.086
Orange Repair	322	0.155	64.7%	0.10	0.439
Toyota White Grease	210	0.101	6.7%	0.01	0.029
Beige	8.72	0.004	52.2%	0.00	0.010
Waterless Hand Cleaner	232	0.111	80.0%	0.09	0.390
Permatex Thread Sealant	0.5	0.000	37.9%	0.00	0.000
242 Threadlocker	7.75	0.004	13.3%	5.0E-04	0.002
518 Gasket Sealer	0.75	0.000	65.3%	2.4E-04	0.001
Anti-Seize Lubricant	4.10	0.002	10.7%	2.1E-04	0.001
3M Super Weatherstrip	1.55	0.001	63.0%	4.7E-04	0.002
Permatex # 2 Form-A-Gasket	2.75	0.001	14.2%	1.9E-04	0.001
Clear Silicone Sealant	1.25	0.001	4.70%	2.8E-05	0.000
Black Silicone Sealant	8.00	0.004	4.50%	1.7E-04	0.001
The Righ Stuff Gasket Maker	7.68	0.004	4.01%	1.5E-04	0.001
Cyclo Silicone Spray	11.1	0.005	94.7%	5.1E-03	0.022
Anarobc Gasket Eliminator # 518	1.09	0.001	13.0%	6.8E-05	0.000
Eclipse Glass Cleaner	27.5	0.013	11.2%	1.5E-03	0.006
Battery Cleaner w/ Acid Detector	4.58	0.002	14.2%	3.1E-04	0.001
Fast Orange Hand Cleaner	16.0	0.008	9.2%	7.1E-04	0.003
Toyota Grey Paint	176	0.084	90.0%	0.08	0.333
* Crete Clean	5756	2.767	39.0%	1.08	4.73
Kleanstroke	12.4	0.006	25.0%	0.00	0.007
* E-Z Truck Wash	2730	1.312	81.1%	1.06	4.66
Black Low Volatile RTV Silicone	2.01	0.001	5.00%	0.00	0.000
Bar's Leak	0.66	0.000	5.00%	0.00	0.000
Fast Orange Pumice Lotion	85.5	0.041	9.20%	0.00	0.017
Aviation Cement	2.28	0.001	24.9%	0.00	0.001
Ultra Blue Silicone	1.17	0.001	5.50%	0.00	0.000
98H High Tack Sealant	0.91	0.000	55.3%	0.00	0.001
99MA High Tack Spray 9oz	1.09	0.001	45.0%	0.00	0.001
1333K Anti-Seize 8oz	1.22	0.001	13.8%	0.00	0.000
14H Thread Sealant w/ Teflon	0.58	0.000	37.9%	0.00	0.000
Nova	54.8	0.026	85.0%	0.02	0.098
Safety Kleen Green	45.0	0.022	55.0%	0.01	0.052
Wash N Wax	33.5	0.016	39.0%	0.01	0.028
Hi Quat	49.8	0.024	0.00%	0.00	0.000
Window Works	47.3	0.023	0.00%	0.00	0.000
				0.52	2.28

* Materials that are not used for surface coating

PTE VOC lbs/hour = 0.52
 PTE VOC tons/year = 2.28
 Actual (lbs/day) = 4.17

METHODOLOGY

PTE VOC (lbs/hour) = Amount Paint Used (lbs) * 1/Actual Hours of Operation (2080 hours/year) * VOC Content %
 PTE VOC (tons/year) = Amount Paint Used (lbs) * 1/Actual Hours of Operation (2080 hours/year) * VOC Content % * 8760 hours/year * 1ton/2000 lbs
 Actual VOC (lbs/day) = PTE (lbs/hour) * 2080 hours/year * 1year/260 days of operation