



Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

November 16, 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: Utilimaster Corporation / SPM 039-19269-00530  
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 13-17-3-4 and 326 IAC 2, this permit modification 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 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) 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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit 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.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

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Mr. James A. Orbik  
Utilimaster Corporation  
P.O. Box 585  
Wakarusa, IN 46573

November 16, 2004

Re: 039-19269  
Second Significant Permit Modification to  
Part 70 Permit No.: 039-7087-00530

Dear Mr. Orbik:

Utilimaster Corporation was issued a Part 70 permit on June 12, 2000, for a stationary walk-in vans and truck bodies manufacturing operation. An application to modify the source was received by the Office of Air Quality (OAQ) on June 09, 2004. Pursuant to the provisions of 326 IAC 2-7-12, a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of addition of one (1) undercoating application using a solvent-based undercoat material. The location of the operation has not yet been determined, but it will either be located in Plant 5 or Plant 6. Although the operation of the undercoating process will generate unrestricted PTE VOC of 41.56 tons per year, this modification will be limited to 24.9 tons per year.

All other conditions of the permit shall remain unchanged and in effect. A complete copy of the modified permit is attached.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Femi Ogunsola, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or at 973-575-2555, extension 3241, or dial 1-800-451-6027, and ask for extension 3-6878.

Sincerely,

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

Attachments  
FO / EVP

cc: File – Elkhart County  
U.S. EPA, Region V  
Elkhart County Health Department  
Air Compliance Section Inspector – Tony Pelath  
Compliance Data Section  
Administrative and Development  
Technical Support and Modeling - Michele Boner





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## PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Utilimaster Corporation  
65906 State Road 19  
Wakarusa, Indiana 46573**

(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.: T039-7087-00530	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 12, 2000  Expiration Date: June 12, 2005

First Significant Permit Modification, 039-12572-00530, issued on April 19, 2001

Significant Permit Modification: SPM 039-19269-00530	Pages Affected: 5, 6, 7, 18, 24, 25, 28, 29, 30, 31, 32, 32a and 43a.
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:

## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

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The Permittee owns and operates a commercial vehicle assembly plant.

Responsible Official: Jim Orbik

Source Address: Plants EU3, EU4, EU5, EU6, EU7, EU8, EU10, EU11, EU12 & 32, EU14, EU16, EU17, EU18:

65266 State Road 19, Wakarusa, Indiana 46573

Plants EU57, EU59, EU60:

21 Ward Street, Wakarusa, Indiana 46573

recreational vehicle assembly plant

65906 State Road 19, Wakarusa, Indiana 46573

Mailing Address: P.O. Box 585, Wakarusa, Indiana 46573

Phone Number: (574) 862-3440

SIC Code: 3713

County Location: Elkhart

County Status: Maintenance for Ozone under the 1-hour standard  
Nonattainment for Ozone under the 8-hour standard

Attainment for all other criteria pollutants

Source Status: Part 70 Permit Program

Major Source, under PSD Rules and Nonattainment NSR

Major Source, Section 112 of the Clean Air Act

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

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

- (a) Plant 3, identified as EU3, consisting of:
  - (1) One (1) final inspection area, with a maximum capacity of six and one half (6.5) truck bodies per hour, using no control, and exhausting to general ventilation GV9-1.
  
- (b) Plant 5, identified as EU5, consisting of:
  - (1) One (1) painting operation, with a maximum capacity of three and three fourths (3.75) chassis per hour, using dry filters as control, and exhausting to general ventilation, SV8-1 to 2.
  
  - (2) One (1) undercoating booth, with maximum capacity of two (2) trucks per hour, using dry filters or work practices as equivalent control for particulate overspray control and exhausting to general ventilation.
  
- (c) Plant 6, identified as EU6, consisting of:
  - (1) One (1) final inspection operation with an maximum capacity of (7.5) trucks per hour, using no control, and exhausting to general ventilation, GV1-1 to 5.

- (d) Plant 8, identified as EU8, consisting of:
  - (1) One (1) general assembly operation, with a maximum capacity of three (3) chassis per hour, using no control, and exhausting to general ventilation, GV2-1 to 3.
  
- (e) Plant 10, identified as EU10, consisting of:
  - (1) One (1) general assembly operation, with a maximum capacity of two and one half (2.5) chassis per hour, using no control, and exhausting to general ventilation GV17-1 to 2.
  
- (f) Plant 11, identified as EU11, consisting of:
  - (1) One (1) general assembly operation, with a maximum capacity of nine and one half (9.5) truck bodies per hour, using no control, and exhausting to general ventilation, GV3-1 to 2.
  - (2) One (1) final inspection area, with a maximum capacity of nine and one half (9.5) truck bodies per hour, using no control, and exhausting to general ventilation, GV7-1.
  
- (g) Plants 12 & 32, identified as EU12 and EU32, consisting of:
  - (1) One (1) service and repair operation, with a maximum capacity of one half (0.5) trucks per hour, using no control, and exhausting to general ventilation, GV18-1,
  - (2) One (1) painting operation, with a maximum capacity of one half (0.5) trucks per hour, using dry filters as control, and exhausting to general ventilation, GV18-2.
  
- (h) Plant 14, identified as EU14, consisting of:
  - (1) Two (2) surface coating operations, with booths designated as B11-1 through B11-8, one with a maximum capacity of six and one half (6.5) truck bodies per hour and the other with a maximum capacity of five (5) steel racks per hour, using dry filters as control, and exhausting to general ventilation PB11-1 to 7 and SB11-8, respectively.
  
- (i) Plant 16, identified as EU16, consisting of:
  - (1) One (1) general assembly operation, with a maximum capacity of two and one half (2.5) chassis per hour, using no control, and exhausting to general ventilation GV14-1 to 2, and
  - (2) One (1) general assembly operation, with a maximum capacity of five and one fourth (5.25) truck bodies and PDV per hour, using no control, and exhausting to general ventilation GV14-1 to 4.
  
- (j) Plant 18, identified as EU18, consisting of:
  - (1) One (1) general assembly operation, with a maximum capacity of four (4) truck bodies per hour, using no control, and exhausting to general ventilation, GV16-1 to 7,
  - (2) One (1) undercoating booth, with a maximum capacity of thirteen and one half (13.5) chassis per hour, using dry filters as control, and exhausting to general ventilation, GV16-1 to 7.

- (k) Plant 57, identified as EU57, consisting of one (1) general assembly operation, producing 3.75 truck bodies per hour, using 2.07 gallons of adhesives per unit, 0.485 gallons of caulks or sealants per unit, using no control, and exhausting to general ventilation, GV57-1 to 3.
- (l) Plant 59, identified as EU59, consisting of one (1) general assembly operation, producing 3.75 truck bodies per hour, using no control, and exhausting to general ventilation, GV59-1.
- (m) Plant 60, identified as EU60, consisting of one (1) general assembly operation, producing 3.75 truck bodies per hour, using no control, and exhausting to general ventilation, GV60-1.
- (n) Plant 14 Paint Line #3, consisting of:
  - (1) one (1) paint booth, identified as PB003, using an air atomization spray system, coating a maximum of four (4.0) aluminum truck bodies per hour, using dry filters for particulate matter control and exhausting to stacks 1 and 2,
  - (2) one (1) touch-up paint booth, identified as TB004, using an air atomization spray system, coating a maximum of four (4.0) aluminum truck bodies per hour, using dry filters for particulate matter control and exhausting to stack 4,
  - (3) one (1) natural gas fired curing oven, identified as C003, with a maximum heat input rate of 1.5 million Btu per hour, exhausting to stack 3, and
  - (4) two (2) natural gas fired paint booth air make-up units, identified as 001 and 002, each with a maximum heat input rate of 1.5 MM Btu per hour, exhausting to stacks 1 and 2.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

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

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, degreasing in Plant 8, Plant 10, Plants 12 & 32, Plant 16, Plant 18, Plant 15.
- (b) Plant 4, identified as EU4, consisting of one (1) welding operation.
- (c) Plant 7, identified as EU7, consisting of one (1) steel welding operation and one (1) aluminum welding operation.
- (d) Plant 17, identified as EU17, consisting of one (1) steel welding operation and one (1) aluminum welding operation.
- (e) Plant 18, identified as EU18, consisting of three (3) storage tanks, EU16-D (diesel fuel), EU16-G (gasoline), EU17-G (gasoline), each with storage capacities less than 10,500 gallons.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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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).

- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]

**B.24 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

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- (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, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
The application 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).
- (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.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. 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 317-233-0425 (ask for OAQ, Billing, Licensing and Training Section), to determine the appropriate permit fee.

**B.26 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314]**

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Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within Anormal@ parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

**C.17 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 corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (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. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not 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.18 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, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

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.19 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information 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 kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. 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 written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

**SECTION D.1**

**FACILITY OPERATION CONDITIONS**

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

- (a) Plant 3, identified as EU3, consisting of:
  - (1) One (1) final inspection area, with a maximum capacity of six and one half (6.5) truck bodies per hour, using no control, and exhausting to general ventilation GV9-1.
  
- (b) Plant 5, identified as EU5, consisting of:
  - (1) One (1) painting operation, with a maximum capacity of three and three fourths (3.75) chassis per hour, using dry filters as control, and exhausting to general ventilation, SV8-1 to
  
  - (2) One (1) undercoating booth, with maximum capacity of two (2) trucks per hour, using dry filters or work practices as equivalent control for particulate overspray control and exhausting to general ventilation.
  
- (c) Plant 6, identified as EU6, consisting of:
  - (1) One (1) final inspection operation with an maximum capacity of (7.5) trucks per hour, using no control, and exhausting to general ventilation, GV1-1 to 5.
  
- (d) Plant 8, identified as EU8, consisting of:
  - (1) One (1) general assembly operation, with a maximum capacity of three (3) chassis per hour, using no control, and exhausting to general ventilation, GV2-1 to 3.
  
- (e) Plant 10, identified as EU10, consisting of:
  - (1) One (1) general assembly operation, with a maximum capacity of two and one half (2.5) chassis per hour, using no control, and exhausting to general ventilation GV17-1 to 2.
  
- (f) Plant 11, identified as EU11, consisting of:
  - (1) One (1) general assembly operation, with a maximum capacity of nine and one half (9.5) truck bodies per hour, using no control, and exhausting to general ventilation, GV3-1 to 2.
  
  - (2) One (1) final inspection area, with a maximum capacity of nine and one half (9.5) truck bodies per hour, using no control, and exhausting to general ventilation, GV7-1.
  
- (g) Plants 12 & 32, identified as EU18, consisting of:
  - (1) One (1) service and repair operation, with a maximum capacity of one half (0.5) trucks per hour, using no control, and exhausting to general ventilation, GV18-1,
  
  - (2) One (1) painting operation, with a maximum capacity of one half (0.5) trucks per hour, using dry filters as control, and exhausting to general ventilation, GV18-2.
  
- (h) Plant 14, identified as EU14, consisting of:
  - (1) Two (2) surface coating operations, with booths designated as B11-1 through B11-8, one with a maximum capacity of six and one half (6.5) truck bodies per hour and the other with a maximum capacity of five (5) steel racks per hour, using dry filters as control, and exhausting to general ventilation PB11-1 to 7 and SB11-8, respectively.
  
- (i) Plant 16, identified as EU16, consisting of:
  - (1) One (1) general assembly operation, with a maximum capacity of two and one half (2.5) chassis per hour, using no control, and exhausting to general ventilation GV14-1 to 2, and

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

- (2) One (1) general assembly operation, with a maximum capacity of five and one fourth (5.25) truck bodies and PDV per hour, using no control, and exhausting to general ventilation GV14-1 to 4.
- (j) Plant 18, identified as EU18, consisting of:
  - (1) One (1) general assembly operation, with a maximum capacity of four (4) truck bodies per hour, using no control, and exhausting to general ventilation, GV16-1 to 7,
  - (2) One (1) undercoating booth, with a maximum capacity of thirteen and one half (13.5) chassis per hour, using dry filters as control, and exhausting to general ventilation, GV16-1 to 7.

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

**Emissions Limitations and Standards**

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

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator:
  - (1) at the State Road 19 site, vehicle body prime paint booth designated as EU-18, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.
  - (2) at the State Road 19 site, the eight (8) paint booths designated as EU-14 (B11-1, B11-2, B11-3, B11-5, B11-6, B11-7, and B11-8), shall be limited to 3.5 pounds of VOC per gallon of coating less water, for air dried coatings.
  - (3) at the State Road 19 site, the vehicle body non-customized top coat paint booth EU 14, B11-4, shall be limited to 4.3 pounds of VOCs per gallon of coating less water.
- (b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the undercoating delivered to the applicator at the one (1) undercoating booth shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

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

**D.1.2 PSD Minor Limit [326 IAC 2-2]**

- (a) Pursuant to 326 IAC 2-2, these facilities located at the State Road 19 site, Plants EU3, EU6, EU8, EU10, EU12 & 32, EU14, EU16, EU17, EU18, shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive months. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.
- (b) Pursuant to 326 IAC 2-2, the facilities identified as Plants EU4, EU5, EU7, and EU11 located at the State Road 19 site shall use less than 40 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive months. This usage limit is required to limit the potential to emit of VOC to less than 40 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

- (c) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), the VOC usage from the undercoating operation shall be limited to 24.9 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), not applicable.

#### D.1.3 Vehicle Weight Limit [326 IAC 8-2-2]

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Vehicles coated at the State Road 19 site shall:

- (a) be either rated at greater than 8500 pounds per vehicle; or
- (b) be manufactured truck bodies for sale separately or on purchased chassis rated at less than 8500 pounds per vehicle, so the requirements of 326 IAC 8-2-2 do not apply.

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

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Pursuant to 40 CFR 52, Subpart P, the particulate matter (PM) from the surface coating and the undercoating operations and shall be limited by the following:

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

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

The control equipment shall be in operation at all times the surface coating booths are in operation, in order to comply with this limit.

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

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Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating and undercoating operations shall be controlled by a dry particulate filter or equivalent control device for undercoating operation in Plant 5 and the Permittee shall operate the control device in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.

The Permittee shall implement the work practice as stated in condition D.1.12 (Monitoring) as equivalent control device for the undercoating operations in Plant 5.

#### D.1.6 Best Available Control Technology [326 IAC 8-1-6]

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Pursuant to Construction Permit PC (20) 1830, 326 IAC 8-1-6 (Best Available Control Technology (BACT)) has been determined to be:

- (a) the use of high-solids top coat for the State Road 19 vehicle body top coat paint booth when engaged in customized top coating.
- (b) the State Road 19 vehicle body customized top coating shall be limited to less than 35 vehicles per day.

#### D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

## Compliance Determination Requirements

### D.1.8 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

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The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC and PM limits specified in Conditions D.1.1, D.1.2, and D.1.4 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

### D.1.9 Volatile Organic Compounds (VOC)

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Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. 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.1.10 VOC Emissions

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Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

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

### D.1.11 Particulate Matter (PM)

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- (a) Pursuant to 326 IAC 6-3-2, the dry filters for PM control shall be in operation at all times when the surface coating booth is in operation.
- (b) The Permittee shall implement work practices specified in D.1.12 (b) as an alternative equivalent control device to dry filters if so desire for undercoating operation in Plant 5 to comply with 326 IAC 6-3-2.

### D.1.12 Monitoring

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- (a) The surface coating booths and one (1) undercoating booth in Plant 5 have applicable compliance monitoring conditions as specified below:
  - (1) The dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the paint booths are in operation
  - (2) The Permittee shall implement an operator training program with the following requirements:
    - (A) All operators that perform painting operations or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within sixty (60) days of permit issuance. All new operators shall be trained upon hiring.
    - (B) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be in writing and retained on site. Copies of the training program, the list of trained operators, and training records shall be maintained on site or available within one (1) hour for inspection by IDEM.
    - (C) All operators shall be given refresher training annually.
  - (3) Records shall be maintained of any non-routine maintenance activities performed on the particulate emission control devices which have air flow greater than four thousand cubic feet per minute (4000 cfm).

- (4) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

- (b) Pursuant to 326 IAC 6-3-2, the Permittee shall comply with the following work practices for PM emissions control when the undercoating booth is in operation:
  - (1) Operate the undercoating operation inside the building
  - (2) Spray coat only the interior of the homes being manufactured
  - (3) If accumulations of undercoating are observed on fans, stacks or on the ground outside the plant; then overspray controls must be installed.
  - (4) Use the current spray application system or an application method with equivalent or superior transfer efficiency.
  - (5) Proper work practices as follows:
    - (A) Spray no farther than 18" from the coating surface.
    - (B) Spray gun pressure shall be maintained at 40 pounds per square inch (psi) or less.
    - (C) The source shall use guns with nozzle size no greater than 0.017"
    - (D) Maintain and operate the undercoating application according to the manufacturer's recommendations.

IDEM has decided that conducting the surface coating operation inside the building and spray coating only the interior of the homes being manufactured can be considered as operating with two layers of enclosures and therefore, satisfy the requirements of 326 IAC 6-3-2 (d).

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

#### **D.1.12 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2.
  - (1) The amount and VOC content of each coating material 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) The cleanup solvent usage for each month;
  - (3) The total VOC usage for each month; and
  - (4) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with D.1.6(b), the Permittee shall maintain records of the number of vehicles painted with customized top coating.

- (c) To document compliance with Condition D.1.12(a), the Permittee shall maintain the following:
  - (1) Copies of the training program, the list of trained operators, and training records shall be maintained on site or available within one (1) hour for inspection by IDEM.
  - (2) Records any non-routine maintenance activities performed on the particulate emission control devices which have air flow greater than four thousand cubic feet per minute (4000 cfm).
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.13 Reporting Requirements

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A quarterly summary of the information to document compliance with Condition D.1.2 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.

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

## Part 70 Quarterly Report

Source Name: Utilimaster Corporation  
Source Address: 65266 State Road 19, Wakarusa, Indiana 46573  
Mailing Address: P.O. Box 585, Wakarusa, Indiana 46573  
Part 70 Permit No.: T039-7087-00530  
Facility: Undercoating Booth (Plant 5 )  
Parameter: VOC  
Limit: 25 tons per 12 consecutive months

YEAR:

Month	VOC	VOC	VOC
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.  
Deviation has been reported on:

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

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Minor Source Modification and Significant Permit Modification to a Part 70 Operating Permit

#### Source Background and Description

<b>Source Name:</b>	<b>Utilimaster Corporation</b>
<b>Source Location:</b>	<b>65906 State Road 19 Wakarusa IN 46573</b>
<b>County:</b>	<b>Elkhart</b>
<b>SIC Code:</b>	<b>3713</b>
<b>Operation Permit No.:</b>	<b>T039-7087-00530</b>
<b>Operation Permit Issuance Date:</b>	<b>June 12, 2000</b>
<b>Minor Source Modification No.:</b>	<b>MSM 039-19251-00530</b>
<b>Significant Permit Modification No.:</b>	<b>SPM 039-19269-00530</b>
<b>Permit Reviewer:</b>	<b>FO/EVP</b>

The Office of Air Quality (OAQ) has reviewed a modification application from Utilimaster Corporation, relating to the operation of a stationary truck bodies manufacturing plant that produces walk-in vans and truck bodies.

#### History

Utilimaster Corporation was issued Part 70 operating permit T039-7087-00530 on June 12, 2000. On June 9, 2004, Utilimaster Corporation submitted an application to OAQ to add one (1) undercoating application using a solvent-based undercoat material.

#### Explanation of Modification Requested

On June 9, 2004, Utilimaster Corporation submitted a request to:

- (a) Add one (1) undercoating application using a solvent-based undercoating material that will be located Plant 5.

This addition will be a minor source modification and significant modification to Utilimaster Corporation's current Title V permit. Utilimaster Corporation is originally permitted to operate the stationary truck bodies manufacturing plant. The net effect of the addition of one (1) undercoating application using solvent-based undercoat materials is an increase of potential to emit VOC by 41.06 tons per year. However, the source will limit the VOC emission increase to 24.9 tons per year in order to render PSD and NSR requirements not applicable.

### Existing Approvals

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

- (a) Part 70 permit T039-7087-00530, issued on June 12, 2000;
- (b) First Source Significant Source Modification No. 039-11906-00530, issued on May 22, 2000; and
- (c) First Significant Permit Modification No. 039-12572-00530, issued on April 19, 2001.

### Enforcement Issue

There is no enforcement action with the equipment proposed in the modification.

### Recommendation

The staff recommends to the Commissioner that the Minor Source Modification and Significant Permit Modification 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 application for the purposes of this review was received on May 10, 2004.

### Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 of 1).

### Potential to Emit Before Controls for the Modification

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.”

This table reflects the PTE before controls due to the modification. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	36.83
PM <sub>10</sub>	36.83
SO <sub>2</sub>	0.00
VOC	41.56
CO	0.00
NO <sub>x</sub>	0.00

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

### Justification for Modification

The Part 70 operating permit is being modified through both Part 70 Minor Source Modification and Significant Permit Modification. The source is increasing the painting capacity of Booth 15 that will result in an increase of 39.66 tons VOC per year. However, since the source is limiting the potential emissions due to this modification to less than 25 tons per year of VOC, this modification is reviewed as minor source modification, pursuant to 2-7-10.5 (d)(5). The source is a major source under PSD rule. The net effect of the modification will be to increase the permitted emission capacity of this major PSD source while keeping the modification below the PSD modification level of 40 tons VOC per year. Therefore, pursuant to 326 IAC 2-7-12(d), this modification request is reviewed as significant permit modification.

### County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
1-hour Ozone	Maintenance
8-hour Ozone	Basic Non 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 the ozone standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.
- (b) Elkhart County has been classified as attainment or unclassifiable in Indiana for 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.
- (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 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 2001 emissions, based upon the Indiana Air Emission Summary Data for criteria pollutants.

Pollutant	Emissions (ton/yr)
PM	n.d.
PM <sub>10</sub>	0.27
SO <sub>2</sub>	0.01
VOC	93.34
CO	0.39
NO <sub>x</sub>	1.93

Note: n.d. means no data available.

**Existing Source Status**

Existing Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/or as otherwise limited):

	PM (tons/yr)	PM <sub>10</sub> (tons/yr)	SO <sub>2</sub> (tons/yr)	NO <sub>x</sub> (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Worst Case Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Source	<100.0	<100.0	<100.0	<100.0	>250.0	<100	>10.0	>25.0

- (a) This existing source is a major PSD stationary source because the source VOC emissions exceed the applicable PSD level of 250 tons per year.
- (b) The existing source is a Title V major stationary source because the VOC, worst case single HAP, and total combined HAP emissions exceed their respective applicable 100, 10 and 25 tons per year thresholds.

**Potential to Emit After Controls for the Modification**

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units for the modification.

Process/facility	Potential to Emit (tons/year)							
	PM	PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	HAPs	
							Single Worst Case	Total
One (1) undercoating application modification	1.84	1.84	0.00	0.00	24.9	0.00	0.00	0.00

**Source Emissions After the Modification**

	PM (tons/yr)	PM <sub>10</sub> (tons/yr)	SO <sub>2</sub> (tons/yr)	NO <sub>x</sub> (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Worst Case Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Source	<100.0	<100.0	<100.0	<100.0	>250.00	<100.0	>10.0	>25.0
Modification	1.84	1.84	0.00	0.00	24.9	0.00	0.00	0.00
Source, After Modification	<100.0	<100.0	<100.0	<100.0	>250.0	<100.0	>10.0	>25.0

PSD Major Source Levels	250	250	250	250	250	250	-	-
PSD Significant Levels	25	-	40	40	40	100	-	-
Part 70 Major Levels	-	100	100	100	100	100	10	25

- (a) The source after the modification is still considered a major PSD stationary source because the VOC emissions exceed the applicable PSD level of 250 tons per year.
- (b) The proposed modification is not a major PSD modification to an existing PSD major source because the PM emissions are less than the applicable level of 25 tons per year and the VOC emissions are limited to less than 25 tons per year.
- (c) The source after the modification is still a Title V major stationary source because the VOC emissions are greater than 100 tons per year, the worst case single HAP emissions exceed ten (10) tons per year, and the combined HAP emissions exceed 25 tons per year.

**Federal Rule Applicability**

- (a) This minor source modification does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 for VOC and PM<sub>10</sub>:
  - (1) with the potential to emit before controls equal to or greater than the major source threshold for VOC and PM<sub>10</sub>,
  - (2) that is subject to an emission limitation or standard for VOC and PM<sub>10</sub>, and
  - (3) uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to this modification.

- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source because of this modification.

### State Rule Applicability - Entire Source

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

This modification to an existing major stationary source is not major. The source, which is not one of the 28 listed source categories, has the potential to emit VOC of greater than 250 tons per year. The source will limit VOC emissions from the proposed one (1) undercoating booth to less than 25 tons per year. Therefore, the requirements of 326 IAC 2-2 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 2500 tons per year of sulfur dioxide; 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.

### State Rule Applicability - Individual Facilities

#### 326 IAC 2-4.1-1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any process or production unit, which in and of itself emits or has the potential to emit (PTE) ten (10) tons per year of any HAP or twenty five (25) tons per year of the combination of HAPs, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). This rule does not apply to this modification because the addition of one (1) undercoating application using a solvent-based material that contains no HAP. Therefore, the undercoating application is not subject to the requirements of this rule.

#### 326 IAC 6-3-2 (Process Operations)

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3(Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirement(s) from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirement(s) until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Pursuant to [40 CFR 52 Subpart P], the particulate matter (PM) from the undercoating application operation shall be limited by the following:

Interpolation and extrapolation 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:

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

Under the rule revision, particulate from the undercoating application operations shall be controlled by a panel of filters and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the undercoating delivered to the applicator at the spray booths shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste

solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made (see page 1 of 1 of Appendix A), the spray booth is in compliance with this requirement.

## 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 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.

- (a) The **one (1) undercoating booth** has applicable compliance monitoring conditions as specified below:
- (1) The dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the paint booths are in operation
  - (2) The Permittee shall implement an operator training program with the following requirements:
    - (A) All operators that perform painting operations or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within sixty (60) days of permit issuance. All new operators shall be trained upon hiring.
    - (B) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be in writing and retained on site. Copies of the training program, the list of trained operators, and training records shall be maintained on site or available within one (1) hour for inspection by IDEM.
    - (C) All operators shall be given refresher training annually.
  - (3) Records shall be maintained of any non-routine maintenance activities performed on the particulate emission control devices which have air flow greater than four thousand cubic feet per minute (4000 cfm).
  - (4) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

## Changes Proposed

### 1. Section A.1

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

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The Permittee owns and operates a commercial vehicle assembly plant.

Responsible Official: Jim Orbik

Source Address: Plants EU3, EU4, EU5, EU6, EU7, EU8, EU10, EU11, EU12 & 32, EU14, EU16, EU17, EU18:

65266 State Road 19, Wakarusa, Indiana 46573

Plants EU57, EU59, EU60:

21 Ward Street, Wakarusa, Indiana 46573

recreational vehicle assembly plant

65906 State Road 19, Wakarusa, Indiana 46573

Mailing Address:

P.O. Box 585, Wakarusa, Indiana 46573

Phone Number:

~~Dan Murray, 219-862-4564~~ **(574) 862-3440**

SIC Code:

3713

County Location:

Elkhart

County Status:

~~Attainment for all criteria pollutants~~

Maintenance for Ozone under the 1-hour standard

Nonattainment for Ozone under the 8-hour standard

Attainment for all other criteria pollutants

Source Status:

Part 70 Permit Program

Major Source, under PSD Rules **and Nonattainment NSR**

Major Source, Section 112 of the Clean Air Act

### 2. A.2 (b)

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

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

(a) Plant 3, identified as EU3, consisting of:

- (1) One (1) final inspection area, with a maximum capacity of six and one half (6.5) truck bodies per hour, using no control, and exhausting to general ventilation GV9-1.

(b) Plant 5, identified as EU5, consisting of:

- (1) One (1) painting operation, with a maximum capacity of three and three fourths (3.75) chassis per hour, using dry filters as control, and exhausting to general ventilation, SV8-1 to 2.

- (2) One (1) undercoating booth, with maximum capacity of two (2) trucks per hour, using dry filters for particulate overspray control, and exhausting to general ventilation.**

### **3. Section B**

#### **B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]**

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant 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, ~~Technical Support and Modeling~~ **Billing, Licensing and Training** Section), to determine the appropriate permit fee.

In accordance with the credible evidence rule (62 Fed. Reg. 8314, Feb 24, 1997); Section 113 (a) of the Clean Air Act, 42 U.S. C. § 7413 (a); and a letter from the United States Environmental Protection Agency (USEPA) to IDEM, OAQ dated May 18, 2004, all permits must address the use of credible evidence; otherwise, USEPA will object to the permits. The following language will be incorporated into the permit to address credible evidence:

#### **B.26 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314]**

**Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.**

### **4. Section C**

The emission statement rule has been revised and effective on March 27, 2004. Therefore the Emission Statement condition in this permit has been revised as follows:

#### **C.18 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) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:~~
  - ~~(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);~~
  - ~~(2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.~~
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

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

- ~~(c) The annual 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.

- (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, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

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.

## 5. Section D

### SECTION D.1

### FACILITY OPERATION CONDITIONS

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

- (a) Plant 3, identified as EU3, consisting of:
  - (1) One (1) final inspection area, with a maximum capacity of six and one half (6.5) truck bodies per hour, using no control, and exhausting to general ventilation GV9-1.
- (b) Plant 5, identified as EU5, consisting of:
  - (1) One (1) painting operation, with a maximum capacity of three and three fourths (3.75) chassis per hour, using dry filters as control, and exhausting to general ventilation, SV8-1 to
  - (2) **One (1) undercoating booth, with maximum capacity of two (2) trucks per hour, using dry filters for particulate overspray control and exhausting to general ventilation.**
- (c) Plant 6, identified as EU6, consisting of:
  - (1) One (1) final inspection operation with an maximum capacity of (7.5) trucks per hour, using no control, and exhausting to general ventilation, GV1-1 to 5.
- (d) Plant 8, identified as EU8, consisting of:
  - (1) One (1) general assembly operation, with a maximum capacity of three (3) chassis per hour, using no control, and exhausting to general ventilation, GV2-1 to 3.

- (e) Plant 10, identified as EU10, consisting of:
  - (1) One (1) general assembly operation, with a maximum capacity of two and one half (2.5) chassis per hour, using no control, and exhausting to general ventilation GV17-1 to 2.
- (f) Plant 11, identified as EU11, consisting of:
  - (1) One (1) general assembly operation, with a maximum capacity of nine and one half (9.5) truck bodies per hour, using no control, and exhausting to general ventilation, GV3-1 to 2.
  - (2) One (1) final inspection area, with a maximum capacity of nine and one half (9.5) truck bodies per hour, using no control, and exhausting to general ventilation, GV7-1.
- (g) Plants 12 & 32, identified as EU18, consisting of:
  - (1) One (1) service and repair operation, with a maximum capacity of one half (0.5) trucks per hour, using no control, and exhausting to general ventilation, GV18-1,
  - (2) One (1) painting operation, with a maximum capacity of one half (0.5) trucks per hour, using dry filters as control, and exhausting to general ventilation, GV18-2.
- (h) Plant 14, identified as EU14, consisting of:
  - (1) Two (2) surface coating operations, with booths designated as B11-1 through B11-8, one with a maximum capacity of six and one half (6.5) truck bodies per hour and the other with a maximum capacity of five (5) steel racks per hour, using dry filters as control, and exhausting to general ventilation PB11-1 to 7 and SB11-8, respectively.
- (i) Plant 16, identified as EU16, consisting of:
  - (1) One (1) general assembly operation, with a maximum capacity of two and one half (2.5) chassis per hour, using no control, and exhausting to general ventilation GV14-1 to 2, and
  - (2) One (1) general assembly operation, with a maximum capacity of five and one fourth (5.25) truck bodies and PDV per hour, using no control, and exhausting to general ventilation GV14-1 to 4.
- (j) Plant 18, identified as EU18, consisting of:
  - (1) One (1) general assembly operation, with a maximum capacity of four (4) truck bodies per hour, using no control, and exhausting to general ventilation, GV16-1 to 7,
  - (2) One (1) undercoating booth, with a maximum capacity of thirteen and one half (13.5) chassis per hour, using dry filters as control, and exhausting to general ventilation, GV16-1 to 7.

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

## Emissions Limitations and Standards

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

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator:
  - (a1) at the State Road 19 site, vehicle body prime paint booth designated as EU-18, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

- (b2) at the State Road 19 site, the eight (8) paint booths designated as EU-14 (B11-1, B11-2, B11-3, B11-5, B11-6, B11-7, and B11-8), shall be limited to 3.5 pounds of VOC per gallon of coating less water, for air dried coatings.
- (e3) at the State Road 19 site, the vehicle body non-customized top coat paint booth EU 14, B11-4, shall be limited to 4.3 pounds of VOCs per gallon of coating less water.

- (b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the undercoating delivered to the applicator at the one (1) undercoating booth shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.**

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

D.1.2 PSD Minor Limit [326 IAC 2-2] [~~40 CFR 52.24~~]

- (a) Pursuant to 326 IAC 2-2 and ~~40 CFR 52.24~~ these facilities located at the State Road 19 site, Plants EU3, EU6, EU8, EU10, EU12 & 32, EU14, EU16, EU17, EU18, shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive months. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and ~~40 CFR 52.24~~ not applicable.
- (b) Pursuant to 326 IAC 2-2 and ~~40 CFR 52.24~~, the facilities identified as Plants EU4, EU5, EU7, and EU11 located at the State Road 19 site shall use less than 40 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive months. This usage limit is required to limit the potential to emit of VOC to less than 40 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and ~~40 CFR 52.24~~ not applicable.
- (c) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), the VOC usage from the undercoating operation shall be limited to 24.9 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.**

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

Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) from the surface coating **and the undercoating** operations shall be limited by the following:

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

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

The control equipment shall be in operation at all times the surface coating booths are in operation, in order to comply with this limit.

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

### D.1.10 Particulate Matter (PM)

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Pursuant to 326 IAC 6-3-2, the dry filters for PM control shall be in operation at all times when the surface coating and **the undercoating** booth are in operation.

### D.1.11 Monitoring

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- (a) The surface coating booths and **one (1) undercoating booth** have applicable compliance monitoring conditions as specified below:
- (1) The dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the paint booths are in operation
  - (2) The Permittee shall implement an operator training program with the following requirements:
    - (A) All operators that perform painting operations or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within sixty (60) days of permit issuance. All new operators shall be trained upon hiring.
    - (B) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be in writing and retained on site. Copies of the training program, the list of trained operators, and training records shall be maintained on site or available within one (1) hour for inspection by IDEM.
    - (C) All operators shall be given refresher training annually.
  - (3) Records shall be maintained of any non-routine maintenance activities performed on the particulate emission control devices which have air flow greater than four thousand cubic feet per minute (4000 cfm).
  - (4) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

**6. Part 70 Quarterly Report Form for this modification**

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

**Part 70 Quarterly Report**

**Source Name:** Utilimaster Corporation  
**Source Address:** 65266 State Road 19, Wakarusa, Indiana 46573  
**Mailing Address:** P.O. Box 585, Wakarusa, Indiana 46573  
**Part 70 Permit No.:** T039-7087-00530  
**Facility:** Undercoating Booth (Plant 5)  
**Parameter:** VOC  
**Limit:** 25 tons per 12 consecutive months

**YEAR:**

Month	VOC	VOC	VOC
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

**No deviation occurred in this quarter.**

**Deviation/s occurred in this quarter.  
Deviation has been reported on:**

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

**Conclusion**

The modification to the operation of stationary truck trailers manufacturing plant shall be subject to the conditions of the attached proposed Minor Source Modification No. 039-19251-00530 and Significant Permit Modification No. 039-19269-00530.

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

**Addendum to the  
Technical Support Document for a Part 70 Operating Permit  
Second Significant Permit Modification**

<b>Source Name:</b>	<b>Utilimaster Corporation</b>
<b>Source Location:</b>	<b>65906 State Road 19, Wakarusa IN 46573</b>
<b>County:</b>	<b>Elkhart</b>
<b>SIC Code:</b>	<b>3713</b>
<b>Operation Permit No.:</b>	<b>T039-7087-00530</b>
<b>Operation Permit Issuance Date:</b>	<b>June 12, 2000</b>
<b>Minor Source Modification No.:</b>	<b>039-19251-00530</b>
<b>Significant Permit Modification No.:</b>	<b>039-19269-00530</b>
<b>Permit Reviewer:</b>	<b>Femi Ogunsola/EVP</b>

On July 31, 2004, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth in Elkhart, Indiana stating that Utilimaster Corporation had applied for a Significant Permit Modification of Part 70 Operating Permit relating to the installation and operation of one (1) undercoating application. The notice also stated that OAQ proposed to issue a Significant Permit Modification for this operation and provided information on how the public could review the proposed Significant Permit Modification 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 permit should be issued as proposed.

The public notice ended on August 30, 2004. The source has not submitted any comments and has confirmed they have no post public notice comments. However, upon further review, OAQ has determined the following changes will be made to the permit (where language deleted is shown with strikeout and that which is added is shown in bold):

1. Section A.2 (b)
  - (b) Plant 5, identified as EU5, consisting of:
    - (1) One (1) painting operation, with a maximum capacity of three and three fourths (3.75) chassis per hour, using dry filters as control, and exhausting to general ventilation, SV8-1 to 2.
    - (2) One (1) undercoating booth, with maximum capacity of two (2) trucks per hour, using dry filters or **work practices as equivalent control** for particulate overspray control and exhausting to general ventilation.
2. Condition D.1.5 has been included to clarify the compliance with rule 326 IAC 6-3-2 since work practices have been included as an equivalent alternative control device for undercoating booth in Plant 5. Subsequent condition numbers have been revised such as previous D.1.5 becomes D.1.6 and so on.

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

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**Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating and undercoating operations shall be controlled by a dry particulate filter or equivalent control device for undercoating operation in Plant 5 and the Permittee shall operate the control device in accordance with manufacturer's specifications. This requirement to operate the control is not federally enforceable.**

**The Permittee shall implement the work practice as stated in condition D.1.12 (Monitoring) as equivalent control device for the undercoating operations in Plant 5.**

3. The compliance monitoring requirements specified in D.1.10 and D.1.11 have been revised to remove the requirements to use dry filters for particulate controls of the undercoating application operations. Instead, work practice shall be used as control for particulate overspray.

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

#### **D.1.10 Particulate Matter (PM)**

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- (a) Pursuant to 326 IAC 6-3-2, the dry filters for PM control shall be in operation at all times when the surface coating and the undercoating booth are in operation
- (b) **The Permittee shall implement work practices specified in D.1.12 (b) as an alternative equivalent control device to dry filters if so desire for undercoating operation in Plant 5 to comply with 326 IAC 6-3-2.**

#### **D.1.11 Monitoring**

---

- (a) The surface coating booths and one (1) undercoating booth **in Plant 5** have applicable compliance monitoring conditions as specified below:
- (1) The dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the paint booths are in operation.
- (2) The Permittee shall implement an operator training program with the following requirements:
- (A) All operators that perform painting operations or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within sixty (60) days of permit issuance. All new operators shall be trained upon hiring.
- (B) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be in writing and retained on site. Copies of the training program, the list of trained operators, and training records shall be maintained on site or available within one (1) hour for inspection by IDEM.
- (C) All operators shall be given refresher training annually.
- (3) Records shall be maintained of any non-routine maintenance activities performed on the particulate emission control devices which have air flow greater than four thousand cubic feet per minute (4000 cfm).
- (4) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

- (b) **Pursuant to 326 IAC 6-3-2, the Permittee shall comply with the following work practices for PM emissions control when the undercoating booth is in operation:**
- (1) **Operate the undercoating operation inside the building**
- (2) **Spray coat only the interior of the homes being manufactured**
- (3) **If accumulations of undercoating are observed on fans, stacks or on the ground outside the plant; then overspray controls must be installed.**
- (4) **Use the current spray application system or an application method with equivalent or superior transfer efficiency.**
- (5) **Proper work practices as follows:**

- (A) Spray no farther than 18" from the coating surface.**
- (B) Spray gun pressure shall be maintained at 40 pounds per square inch (psi) or less.**
- (C) The source shall use guns with nozzle size no greater than 0.017"**
- (D) Maintain and operate the undercoating application according to the manufacturer's recommendations.**

**IDEM has decided that conducting the surface coating operation inside the building and spray coating only the interior of the homes being manufactured can be considered as operating with two layers of enclosures and therefore, satisfy the requirements of 326 IAC 6-3-2 (d).**

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

**Company Name:** Utilimaster Corporation  
**Address City IN Zip:** 65906 State Road 19, Wakarusa IN 46573  
**Permit Number:** 039-19269-00530  
**Reviewer:** Femi Ogunsola/EVP  
**Date:** 06/28/2004

Material	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 Guard 8000	11.5	22.00%	0.0%	22.0%	0.0%	62.00%	1.25000	3.000	2.53	2.53	9.49	227.70	41.56	36.83	4.08	75%

<b>Potential Emissions</b>	<b>9.49</b>	<b>227.70</b>	<b>41.56</b>	<b>36.83</b>	
<b>PM Potential Emissions after control ( control efficiency = 95%)</b>				<b>1.84</b>	

**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 = Worst Coating + Sum of all solvents used