



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

November 10, 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: North American Van Lines / 003-19659-00208

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

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot 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

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November 10, 2004

Mr. Frank Ianucilli
North American Van Lines
P.O. Box 988
Fort Wayne, Indiana 46801-0988

Re: **003-19659**
Second Minor Permit Revision to
FESOP 003-13899-00208

Dear Mr. Ianucilli:

North American Van Lines was issued a permit on August 19, 2002 for a motor freight and warehousing source. A letter requesting changes to this permit was received on February 7, 2003. Pursuant to the provisions of 326 IAC 2-8-11.1 a Minor Permit Revision to this permit is hereby approved as described in the attached Technical Support Document.

The revision consists of the addition of one (1) spray booth (E5) which will be incorporated as part of the VOC and HAP limits in the reporting requirements as well as the inclusion of one (1) insignificant natural gas-fired air make-up unit rated at 1.325 million British thermal units per hour.

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the minor permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. For your convenience, the revised pages of the FESOP Renewal is being provided.

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 Michael S. Schaffer, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 ext. 23 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,
Original signed by

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
MSS/MES

cc: File - Allen County
U.S. EPA, Region V
Allen County Health Department
Air Compliance Section Inspector - Patrick Burton
Compliance Branch
Administrative and Development
Technical Support and Modeling - Michele Boner



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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

**North American Van Lines
5001 U.S. Highway 30 West
Fort Wayne, Indiana 46818**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: F 003-13899-00208	
Original signed by Paul Dubenetzky Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: August 19, 2002 Expiration Date: August 19, 2007

First Minor Permit Revision 003-16790-00208, issued on April 9, 2003
First Administrative Amendment 003-16621-00208, issued on June 15, 2004

Second Minor Permit Revision 003-19659-00208	Changed Pages: 3, 5, 6, 24 - 30, 32, and 34 - 36
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: November 10, 2004

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]
- C.12 Monitoring Methods [326 IAC 3] [40 CFR 60][40 CFR 63]

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]
- C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4, 5]
- C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4, 5]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

- C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]
- C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

- C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS: Five (5) spray paint booths 24

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]
- D.1.2 Hazardous Air Pollutants (HAPs) Limitations [326 IAC 2-8-4]
- D.1.3 Particulate Matter (PM) [40 CFR 52 Subpart P]
- D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-6] [326 IAC 2-8-11.1(f)]
- D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.1.6 Volatile Organic Compounds (VOC)
- D.1.7 VOC Emissions
- D.1.8 Hazardous Air Pollutants (HAPs)
- D.1.9 Hazardous Air Pollutants (HAPs) Emissions
- D.1.10 Particulate [326 IAC 6-3-2(d)]

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- D.1.11 Monitoring
- D.1.12 Nonapplicability of Daily Visible Emissions Notations

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

- D.1.13 Record Keeping Requirements
- D.1.14 Reporting Requirements

SECTION D.2 FACILITY OPERATION CONDITIONS: Two (2) fuel oil storage tanks 28

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

- D.2.1 Record Keeping Requirements [326 IAC 12] [40 CFR 60.116b Subpart Kb]

SECTION D.3 FACILITY OPERATION CONDITIONS: Insignificant Activities 29

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.3.1 Particulate Matter Limitation (PM) [326 IAC 6-2-3]
- D.3.2 Particulate Matter Limitation (PM) [326 IAC 6-2-4]
- D.3.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]
- D.3.4 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]

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 2-8-3(b)]

The Permittee owns and operates a stationary motor freight and warehousing source.

Authorized Individual:	Vice President of Fleet Services
Source Address:	5001 U.S. Highway 30 West, Fort Wayne, Indiana 46818
Mailing Address:	P.O. Box 988, Fort Wayne, Indiana 46801-0988
General Source Phone Number:	260 - 429 - 1390
SIC Code:	4213
County Location:	Allen County
Source Location Status:	Nonattainment for ozone under the 8-hour standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules and Nonattainment NSR; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) Three (3) spray paint booths, known as E1 (Paint Rooms A and D), E2 (Paint Room B) and E3 (Paint Room C), constructed prior to 1975, equipped with three (3) low pressure air atomized spray guns that operate one (1) at a time, and dry filters for overspray control, exhausting to stacks E1, E2, and E3, respectively, capacity: 0.38 trailers per hour, each.
- (b) One (1) spray paint booth, known as E4 (Paint Room E), consisting of undercoat, topcoat, or washdown operations that operate one (1) at a time, equipped with low pressure air atomized spray guns and dry filters to control particulate overspray, exhausting to Stacks E4a, E4b, E4c, and E4d, capacity: 0.25 trailers per hour.
- (c) One (1) spray paint booth, known as E5 (Paint Room F), equipped with one (1) low pressure air atomized spray gun and dry filters to control particulate overspray, exhausting to Stacks E5a and E5b, capacity: 0.25 trailer parts of various substrates (metal, fiberglass, etc.) per hour.
- (d) Two (2) fuel oil storage tanks, known as Tanks 1 and 2, constructed in 1990, capacity: 15,000 gallons, each.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour. including the following.
 - (1) Two (2) natural gas fired air make up units, heat input capacity: 3.85 million British thermal units per hour, each;

- (2) One (1) natural gas fired air make up unit, heat input capacity: 2.79 million British thermal units per hour;
 - (3) Thirty-seven (37) natural gas fired tube heaters, heat input capacity: 0.10 million British thermal units per hour, each;
 - (4) Forty-two (42) natural gas fired space heaters, heat input capacity: 0.16 million British thermal units per hour, each;
 - (5) One (1) natural gas fired boiler, constructed in 1994, heat input capacity: 0.63 million British thermal units per hour; (326 IAC 6-2-4)
 - (6) Two (2) natural gas fired boilers, constructed 1977, heat input capacity: 3.00 million British thermal units per hour, each; (326 IAC 6-2-3)
 - (7) One (1) natural gas fired boiler, constructed 1977, heat input capacity: 1.56 million British thermal units per hour; and (326 IAC 6-2-3)
 - (8) One (1) air make-up unit, heat input capacity: 1.325 million British thermal units per hour.
- (b) Seven (7) waste oil heat exchangers, heat input capacity: 0.5 million British thermal units per hour, each.
 - (c) Combustion source flame safety purging on startup.
 - (d) A gasoline fuel (diesel fuel only) transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
 - (e) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
 - (f) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.
 - (g) Closed loop heating and cooling systems.
 - (h) Paved and unpaved roads and parking lots with public access.
 - (i) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
 - (j) Two (2) diesel powered emergency generators, power output capacity: 4,600 horsepower, total.
 - (k) Stationary fire pumps.
 - (l) Maintenance cold cleaning degreasers, including Crystal Clean units with capacities less than 15 gallons each, constructed in 2000, equipped with remote solvent reservoirs, using only non-HAP materials and having a VOC usage rate less than 15 pounds per day, total. (326 IAC 8-3-2)

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Five (5) spray paint booths

- (a) Three (3) spray paint booths, known as E1 (Paint Rooms A and D), E2 (Paint Room B) and E3 (Paint Room C), constructed prior to 1975, equipped with three (3) low pressure air atomized spray guns that operate one (1) at a time, and dry filters for overspray control, exhausting to stacks E1, E2, and E3, respectively, capacity: 0.38 trailers per hour, each.
- (b) One (1) spray paint booth, known as E4 (Paint Room E), consisting of undercoat, topcoat, or washdown operations that operate one (1) at a time, equipped with low pressure air atomized spray guns and dry filters to control particulate overspray, exhausting to Stacks E4a, E4b, E4c, and E4d, capacity: 0.25 trailers per hour.
- (c) One (1) spray paint booth, known as E5 (Paint Room F), equipped with one (1) low pressure air atomized spray gun and dry filters to control particulate overspray, exhausting to Stacks E5a and E5b, capacity: 0.25 trailer parts of various substrates (metal, fiberglass, etc.) per hour.

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]

- (a) The total amount of VOC delivered to the applicators at the five (5) spray paint booths (E1, E2, E3, E4, and E5) shall not exceed 95.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This will limit the potential to emit VOC from the entire source, including insignificant activities to less than one hundred (100) tons per year. Compliance with this limit shall make the requirements of 326 IAC 2-7 and 326 IAC 2-1.1-5 not applicable.
- (b) The requirements from FESOP 003-5768-00208, issued on December 9, 1996, Condition D.1.1, that the volatile organic compound (VOC) emissions from the three (3) paint booths (E1, E2, and E3) shall not exceed 8.25 tons per month has not been included in the renewal because the limit in Condition D.1.1(a) shall limit the potential to emit VOC from the entire source to less than one hundred (100) tons of VOC per year. Thus, the requirements of 326 IAC 2-7 are still not applicable and Condition D.1.1 of FESOP 003-5768-00208 is hereby rescinded.

D.1.2 Hazardous Air Pollutants (HAPs) Limitations [326 IAC 2-8-4]

- (a) The total worst case single HAP delivered to the coating applicators at the five (5) spray paint booths (E1, E2, E3, E4, and E5) shall not exceed 9.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This will limit the potential to emit of a single HAP for the entire source, including insignificant activities, to less than ten (10) tons per year. Compliance with this limit shall make the requirements of 326 IAC 2-7 not applicable.
- (b) The total combination of HAPs delivered to the coating applicators at the five (5) spray paint booths (E1, E2, E3, E4, and E5) shall not exceed 24.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This will limit the potential to emit of the combination of HAPs from the entire source, including insignificant activities, to less than twenty-five (25) tons per year. Compliance with this limit shall make the requirements of 326 IAC 2-7 not applicable.

North American Van Lines
Fort Wayne, Indiana
Permit Reviewer: MSS/MES

Second Minor Permit Revision 003-19659-00208
Revised By: MSS/MES

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- (c) The requirements from FESOP 003-5768-00208, issued on December 9, 1996, Condition D.1.2 that the amount of any single hazardous air pollutant (HAP) delivered to the applicators shall not exceed 0.75 tons per month and the amount of any combination of HAPs delivered to the applicators shall not exceed 2.00 tons per month has not been included in the renewal because the limit in Condition D.1.2(a) and (b) shall make the requirements of 326 IAC 2-7 still not applicable. Thus, Condition D.1.2 of FESOP 003-5768-00208 is hereby rescinded.

D.1.3 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to FESOP 003-5768-00208, issued on December 9, 1996 and 40 CFR 52 Subpart P, the PM from the five (5) spray paint booths (E1, E2, E3, E4, and E5) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

or

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-6] [326 IAC 2-8-11.1(f)]

Any change or modification that increases the potential to emit from spray paint booth (E5) to greater than twenty-five (25) tons per year may render the requirements of 326 IAC 8-1-6 and 326 IAC 2-8-11.1(f) applicable to spray paint booth (E5) and shall require prior IDEM, OAQ approval.

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B.13 - Preventive Maintenance Plan, of this permit, is required for the five (5) spray paint booths and the dry filters.

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitation contained in Condition D.1.1 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.

D.1.7 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

D.1.8 Hazardous Air Pollutants (HAPs)

Compliance with the HAPs usage limitations contained in Condition 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.

D.1.9 Hazardous Air Pollutants (HAPs) Emissions

Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the total single and total combination HAPs usage for the twelve (12) month period.

D.1.10 Particulate [326 IAC 6-3-2(d)]

Pursuant to FESOP 003-5768-00208, issued on December 9, 1996, 326 IAC 6-3-2(d) and in order to comply with Condition D.1.3, the dry filters for particulate control shall be in operation at all times in accordance with manufacturer's specifications when the five (5) spray paint booths (E1, E2, E3, E4, and E5) are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.11 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (E1, E2, E3, E4a, E4b, E4c, E4d, E5a, and E5b) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.12 Nonapplicability of Daily Visible Emissions Notations

The requirement from FESOP 003-5768-00208, issued on December 9, 1996, Condition D.1.7 to perform daily visible emissions notations has not been included in the renewal. This requirement is no longer applicable because the daily inspections of the filter, weekly observations of the overspray from the stacks and monthly inspections of emissions required by Condition D.1.10 are sufficient compliance monitoring requirements to ensure compliance with the applicable rules. Thus, Condition D.1.7 of FESOP 003-5768-00208 is hereby rescinded.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.13 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.1.1 and the HAPs usage limits and the HAPs emission limits established in Condition D.1.2.
 - (1) The amount and VOC and HAP 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 and degreasing solvents;
 - (2) The cleanup solvent usage for each month;

- (3) The total VOC, as well as total individual HAP and total combination of HAPs usage for each month; and
 - (4) The weight of VOCs, as well as total individual and total HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain records of the total VOC usage at spray paint booth (E5).
 - (c) To document compliance with Conditions D.1.10 and D.1.11, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
 - (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.14 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and 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. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Two (2) fuel oil storage tanks

- (d) Two (2) fuel oil storage tanks, known as Tanks 1 and 2, constructed in 1990, capacity: 15,000 gallons, each.

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

There are no emission limitations and standards, compliance determination requirements, and compliance monitoring requirements for these storage tanks.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.1 Record Keeping Requirements [326 IAC 12] [40 CFR 60.116b Subpart Kb]

The Permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel for the life of the source.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour. including the following.
 - (1) Two (2) natural gas fired air make up units, heat input capacity: 3.85 million British thermal units per hour, each;
 - (2) one (1) natural gas fired air make up unit, heat input capacity: 2.79 million British thermal units per hour;
 - (3) Thirty-seven (37) natural gas fired tube heaters, heat input capacity: 0.10 million British thermal units per hour, each;
 - (4) Forty-two (42) natural gas fired space heaters, heat input capacity: 0.16 million British thermal units per hour, each;
 - (5) One (1) natural gas fired boiler, constructed in 1994, heat input capacity: 0.63 million British thermal units per hour; (326 IAC 6-2-4)
 - (6) Two (2) natural gas fired boilers, constructed 1977, heat input capacity: 3.00 million British thermal units per hour, each; (326 IAC 6-2-3)
 - (7) One (1) natural gas fired boiler, constructed 1977, heat input capacity: 1.56 million British thermal units per hour; and (326 IAC 6-2-3)
 - (8) One (1) air make-up unit, heat input capacity: 1.325 million British thermal units per hour.
- (b) Seven (7) waste oil heat exchangers, heat input capacity: 0.5 million British thermal units per hour, each.
- (c) Combustion source flame safety purging on startup.
- (d) A gasoline fuel (diesel fuel only) transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (e) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
- (f) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.
- (g) Closed loop heating and cooling systems.
- (h) Paved and unpaved roads and parking lots with public access.
- (i) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (j) Two (2) diesel powered emergency generators, power output capacity: 4,600 horsepower, total.
- (k) Stationary fire pumps.
- (l) Maintenance cold cleaning degreasers, including Crystal Clean units with capacities less than 15 gallons each, constructed in 2000, equipped with remote solvent reservoirs, using only non-HAP materials and having a VOC usage rate less than 15 pounds per day, total. (326 IAC 8-3-2)

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Particulate Matter Limitation (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3(e), the PM emissions from the three (3) insignificant boilers constructed in 1977, rated at 3.00, 3.00, and 1.56 million British thermal units per hour respectively, shall not exceed 0.6 pound per million British thermal units.

D.3.2 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a), the PM emissions from the one (1) insignificant boiler constructed in 1994, rated at 0.63 million British thermal units per hour, shall not exceed 0.6 pound per million British thermal units.

D.3.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2, The following requirements shall apply to the operation of the insignificant cold cleaning degreasers, constructed in 2000:

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

D.3.4 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]

Any change or modification that increases the potential to emit VOC to more than 2.63 tons per year from the insignificant maintenance degreasers, may cause the potential to emit VOC for the entire source to be greater than one hundred (100) tons per year and make the requirements of 326 IAC 2-7 applicable and shall require prior IDEM, OAQ, approval.

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

FESOP Quarterly Report

Source Name: North American Van Lines
 Source Address: 5001 U.S. Highway 30 West, Fort Wayne, Indiana 46818
 Mailing Address: P.O. Box 988, Fort Wayne, Indiana 46801-0988
 FESOP No.: F 003-13899-00208
 Facilities: Five (5) spray paint booths, known as E1, E2, E3, E4, and E5
 Parameter: VOC delivered to the applicators
 Limit: Total not to exceed 95.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Total VOC usage (tons)	Total VOC usage (tons)	Total VOC usage (tons)
	This Month	Previous 11 Months	12 Month Total

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: North American Van Lines
Source Address: 5001 U.S. Highway 30 West, Fort Wayne, Indiana 46818
Mailing Address: P.O. Box 988, Fort Wayne, Indiana 46801-0988
FESOP No.: F 003-13899-00208
Facilities: Five (5) spray paint booths, known as E1, E2, E3, E4, and E5
Parameter: Individual HAP delivered to the applicators
Limit: Total not to exceed 9.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Individual HAP Usage (tons)	Individual HAP Usage (tons)	Individual HAP Usage (tons)
	This Month	Previous 11 Months	12 Month Total

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: North American Van Lines
 Source Address: 5001 U.S. Highway 30 West, Fort Wayne, Indiana 46818
 Mailing Address: P.O. Box 988, Fort Wayne, Indiana 46801-0988
 FESOP No.: F 003-13899-00208
 Facilities: Five (5) spray paint booths, known as E1, E2, E3, E4, and E5
 Parameter: Combination of HAPs delivered to the applicators
 Limit: Total not to exceed 24.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Combination of HAPs Usage (tons)	Combination of HAPs Usage (tons)	Combination of HAPs Usage (tons)
	This Month	Previous 11 Months	12 Month Total

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Minor Permit Revision to a Federally Enforceable State Operating Permit

Source Background and Description

Source Name:	North American Van Lines
Source Location:	5001 U.S. Highway 30 West, Fort Wayne, Indiana 46818
County:	Allen
SIC Code:	4213
Operation Permit No.:	F 003-13899-00208
Operation Permit Issuance Date:	August 19, 2002
Minor Permit Revision No.:	MPR 003-19659-00208
Permit Reviewer:	Michael S. Schaffer

The Office of Air Quality (OAQ) has reviewed a minor permit revision application from North American Van Lines relating to the construction and operation of the following significant and insignificant emission units and pollution control devices:

Significant Emission Unit:

- (c) One (1) spray paint booth, known as E5 (Paint Room F), equipped with one (1) low pressure air atomized spray gun and dry filters to control particulate overspray, exhausting to Stacks E5a and E5b, capacity: 0.25 trailer parts of various substrates (metal, fiberglass, etc.) per hour.

Insignificant Emission Unit:

- (a) (8) One (1) air make-up unit, heat input capacity: 1.325 million British thermal units per hour.

History

On October 1, 2004, North American Van Lines submitted an application to the OAQ requesting to add an additional surface coating booth to their existing plant. North American Van Lines was issued a Federally Enforceable State Operating Permit (FESOP) Renewal on August 19 2002.

North American Van Lines was also issued a First Minor Permit Revision 003-16790-00208 on April 9, 2003 to add spray paint booth (E4) and a First Administrative Amendment 003-16621-00208 on June 15, 2004 to add five (5) insignificant waste oil heat exchangers.

North American Van Lines has requested to incorporate spray paint booth (E5) in each existing surface coating emission limitation that is currently in Section D.1 of F 003-16790-00208, issued on April 9, 2003

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
E5a	Paint Room F	15.0	2.00	9,000	80.0
E5b	Paint Room F	15.0	2.00	9,000	80.0

Recommendation

The staff recommends to the Commissioner that the FESOP Minor Permit Revision 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 October 1, 2004. Additional information was received on October 12, 2004.

Emission Calculations

See Pages 1 through 4 of 4 in Appendix A of this document for detailed emissions calculations.

Potential To Emit of Revision

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 for this revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	1.73
PM ₁₀	1.76
SO ₂	0.003
VOC	18.4
CO	0.487
NO _x	0.580

HAPs	Potential To Emit (tons/year)
Benzene	1.01
Dichlorobenzene	0.000007
Formaldehyde	0.420
Hexane	0.010
Toluene	3.52
Lead	0.000003
Cadmium	0.00001
Chromium	0.00001
Manganese	0.000002
Nickel	0.00001
Xylene	2.41
Total	7.38

Justification for Revision

The FESOP is being revised through a FESOP Minor Permit Revision. This revision is being performed pursuant to 326 IAC 2-8-11.1(d)(4)(A) and (D), since the potential to emit the potential to emit VOC from this revision is greater than ten (10) tons per year, but less than twenty-five (25) tons per year.

County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
1-Hour Ozone	attainment
8-Hour Ozone	nonattainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO_x) 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 NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for nonattainment new source review.

- (b) Allen County has been classified as attainment or unclassifiable in Indiana for PM₁₀, SO₂, NO₂, and Lead. 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.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	49.7
PM ₁₀	49.5
SO ₂	0.079
VOC	Less Than 100
CO	17.2
NO _x	40.9

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based on a combination of the information on Page 6 of the TSD from F 003-13899-00208, issued on August 19, 2002, and Page 4 of the TSD from MPR 003-16790-00208, issued on April 9, 2003.

Potential to Emit of Revision After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units. The control equipment is considered federally enforceable only after issuance of this FESOP revision.

Process/facility	Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Five (5) spray paint booths (E1,E2, E3 E4, and E5)	50.2	50.3	-	95.5	-	-	Single 9.0 Total 24.0
Two (2) fuel oil storage tanks, (Tanks 1 and 2)	-	-	-	0.07	-	-	Negligible
Insignificant Activities	1.06	1.03	0.114	4.32	17.8	42.4	Total Less Than 1

Process/facility	Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Total PTE After Issuance	51.3	51.3	0.114	Less Than 100	17.8	42.4	Single less than 10 Total less than 25

This revision to the existing FESOP will **not** change the status of the stationary source because the emissions from the entire source will still be limited to less than the Part 70 major source thresholds.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this revision.
- (b) This revision is not subject to the requirements of National Emission Standards for Hazardous Air Pollutants (NESHAPs) (40 CFR Part 63, Subparts Mmmm and Pppp) because pursuant to 326 IAC 2-8-4, the entire source is limited to area source levels.

State Rule Applicability - Individual Facilities

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))
 326 IAC 2-1.1-5 (Nonattainment New Source Review)

This motor freight and warehousing source is not 1 of the 28 major PSD source categories pursuant to 326 IAC 2-2. The three (3) spray paint booths, identified as E1, E2, and E3 were each constructed prior to 1975, which is prior to the August 7, 1977 applicability date of this rule.

The one (1) spray paint booth, identified as E4, constructed in 2003, was considered to be a minor modification to an existing minor PSD source because the potential to emit of each criteria pollutant from the entire source continued to be less than 250 tons per year.

The potential to emit PM₁₀, SO₂, and CO from the entire source, including the spray paint booth (E5) and insignificant air make-up unit in this revision, is less than 250 tons per year, each. In addition, the potential to emit VOC and NO_x from the entire source, including the spray paint booth (E5) and insignificant air make-up unit in this revision, is less than 100 tons per year, each. Therefore, this source will continue to operate as a minor PSD and minor nonattainment new source review source.

326 IAC 2-8-4 (FESOP)

The spray paint booth (E5) has been incorporated into the existing FESOP limitations as follows:

- (a) The total amount of VOC delivered to the applicators at the five (5) spray paint booths (E1, E2, E3, E4, and E5) shall not exceed 95.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This will limit the potential to emit VOC from the entire source, including insignificant activities to less than one hundred (100) tons per year. Compliance with this limit shall make the requirements of 326 IAC 2-7 and 326 IAC 2-1.1-5 not applicable.
- (b) The total combination of HAPs delivered to the coating applicators at the five (5) spray paint

booths (E1, E2, E3, E4, and E5), shall not exceed 24.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This will limit the potential to emit of the combination of HAPs from the entire source, including insignificant activities, to less than twenty-five (25) tons per year. Compliance with this limit shall make the requirements of 326 IAC 2-7 not applicable.

- (c) The total combination of HAPs delivered to the coating applicators the five (5) spray paint booths (E1, E2, E3, E4, and E5), shall not exceed 24.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This will limit the potential to emit of the combination of HAPs from the entire source, including insignificant activities, to less than twenty-five (25) tons per year. Compliance with this limit shall make the requirements of 326 IAC 2-7 not applicable.

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 requirements from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirements 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 one (1) spray paint booth (E5) shall be limited by the following:

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

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

or

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Under the rule revision, particulate from the one (1) spray paint booth (E5) shall be controlled by a dry particulate filter and the Permittee shall operate the dry particulate filter in accordance with manufacturer's specifications.

326 IAC 8-1-6 (New facilities, general reduction requirements)

The one (1) spray paint booth (E5), is not subject to the requirements of 326 IAC 8-1-6 because its potential to emit is less than twenty-five (25) tons per year.

However, since the one (1) spray paint booth (E5) is not subject any other provision of 326 IAC 8, any change or modification that increases the potential to emit from spray paint booth (E5) to greater than twenty-five (25) tons per year may render the requirements of 326 IAC 8-1-6 applicable to the spray paint booth (E5) and shall require prior IDEM, OAQ approval.

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

This source does not surface coat large farm machinery, small household appliances, office equipment, or industrial machinery. Furthermore, this source coats metal parts or products under the Standard Industrial Classification (SIC) Code #42 which is not one the SIC codes listed in 326 IAC 8-2-9(a)(5). Therefore, the requirements of 326 IAC 8-2-9 do not apply to the one (1) spray paint booth (E5).

Compliance Requirements

Permits issued under 326 IAC 2-8 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 2-8-4. 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.

The one (1) spray paint booth has the following compliance monitoring requirements:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (E5a and E5b) while one or more of the booths exhausting to that stack are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for overspray control must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

Testing Requirements

There will be no testing requirements for the one (1) spray paint booth (E5) because VOC emissions are uncontrolled and particulate emissions will be controlled by dry filters which must be operated in accordance with manufacturer's specifications as well as be inspected daily.

Changes To Existing Approvals

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in bold):

Change 1:

Since Allen County has been designated as nonattainment for ozone under the 8-hour standard, Condition A.1 has been revised as follows:

A.1 General Information [326 IAC 2-8-3(b)]

Source Location Status: **Nonattainment for ozone under the 8-hour standard**
Attainment for all **other** criteria pollutants
Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD Rules **and Nonattainment NSR**;
Minor Source, Section 112 of the Clean Air Act

Change 2:

Spray paint booth (E5) has been added as paragraph (c) to Condition A.2 and the equipment description box in Section D.1 as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

(c) **One (1) spray paint booth, known as E5 (Paint Room F), equipped with one (1) low pressure air atomized spray gun and dry filters to control particulate overspray, exhausting to Stacks E5a and E5b, capacity: 0.25 trailer parts of various substrates (metal, fiberglass, etc.) per hour.**

~~(c)~~(d) Two (2) fuel oil storage tanks, known as Tanks 1 and 2, constructed in 1990, capacity: 15,000 gallons, each.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: ~~Four (4)~~ **Five (5)** spray paint booths

(c) **One (1) spray paint booth, known as E5 (Paint Room F), equipped with one (1) low pressure air atomized spray gun and dry filters to control particulate overspray, exhausting to Stacks E5a and E5b, capacity: 0.25 trailer parts of various substrates (metal, fiberglass, etc.) per hour.**

Change 3:

Spray paint booth (E5) has been incorporated into the existing FESOP limits in Conditions D.1.1(a) and D.1.2 as follows:

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]

- (a) The total amount of VOC delivered to the applicators at the ~~four (4)~~ **five (5)** spray paint booths (E1, E2, E3, ~~and E4, and E5~~) shall not exceed 95.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This will limit the potential to emit VOC from the entire source, including insignificant activities to less than one hundred (100) tons per year. Compliance with this limit shall make the requirements of 326 IAC 2-7 **and 326 IAC 2-1.1-5** not applicable.

D.1.2 Hazardous Air Pollutants (HAPs) Limitations [326 IAC 2-8-4]

- (a) The total worst case single HAP delivered to the coating applicators ~~consisting of at the four (4)~~ **five (5)** spray paint booths (E1, E2, E3, ~~and E4, and E5~~) shall not exceed 9.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This will limit the potential to emit of a single HAP for the entire source, including insignificant activities, to less than ten (10) tons per year. Compliance with this limit shall make the requirements of 326 IAC 2-7 not applicable.
- (b) The total combination of HAPs delivered to the coating applicators ~~consisting of at the four (4)~~ **five (5)** spray paint booths (E1, E2, E3, ~~and E4, and E5~~), shall not exceed 24.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This will limit the potential to emit of the combination of HAPs from the entire source, including insignificant activities, to less than twenty-five (25) tons per year. Compliance with this limit shall make the requirements of 326 IAC 2-7 not applicable.

Change 4:

Since spray paint booth (E5) is subject to the requirements of 40 CFR 52, Subpart P, spray paint booth (E5) has been included in Condition D.1.3 as follows:

D.1.3 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to FESOP 003-5768-00208, issued on December 9, 1996 and 40 CFR 52 Subpart P, the PM from the ~~four (4)~~ **five (5)** spray paint booths (E1, E2, E3, ~~and E4, and E5~~) shall not exceed the pound per hour emission rate established as E in the following formula:

Change 5:

The following VOC requirement for spray paint booth (E5) has been added as Condition D.1.4:

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-6] [326 IAC 2-8-11.1(f)]

Any change or modification that increases the potential to emit from spray paint booth (E5) to greater than twenty-five (25) tons per year may render the requirements of 326 IAC 8-1-6 and 326 IAC 2-8-11.1(f) applicable to spray paint booth (E5) and shall require prior IDEM, OAQ approval.

Change 6:

The Preventive Maintenance Plan requirement for the four (4) spray paint booth in Condition D.1.5 (formerly Condition D.1.4) must now include spray paint booth (E5). Therefore, Condition D.1.5 has

been revised as follows:

D.1.4 5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B.13 - Preventive Maintenance Plan, of this permit, is required for the ~~four (4)~~ **five (5)** spray paint booths and the dry filters.

Change 7:

As a result of Change 4, the spray paint booth (E5) and Stacks E5a and E5b have been incorporated into Conditions D.1.10 and D.1.11(a) (formerly Conditions D.1.9 and D.1.10(a)), as follows:

D.1.9 10 Particulate [326 IAC 6-3-2(d)]

Pursuant to FESOP 003-5768-00208, issued on December 9, 1996, 326 IAC 6-3-2(d) and in order to comply with Condition D.1.3, the dry filters for particulate control shall be in operation at all times in accordance with manufacturer's specifications when the ~~four (4)~~ **five (5)** spray paint booths (E1, E2, E3, ~~and E4, and E5~~) are in operation.

D.1.40 11 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (E1, E2, E3, E4a, E4b, E4c ~~and E4d, E5a and E5b~~) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Change 8:

As a result of Change 5, paragraph (b) has been added to Condition D.1.13 (formerly Condition D.1.12) as follows:

D.1.42 13 Record Keeping Requirements

- (b) **To document compliance with Condition D.1.4, the Permittee shall maintain records of the total VOC usage at spray paint booth (E5).**
- (b) (c) To document compliance with Conditions D.1.9 10 and D.1.40 11, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Change 9:

As a result of Change 3, the VOC, individual HAP, and combination of HAPs quarterly report forms at the end of the permit have been revised as follows:

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

FESOP Quarterly Report

Source Name: North American Van Lines
Source Address: 5001 U.S. Highway 30 West, Fort Wayne, Indiana 46818
Mailing Address: P.O. Box 988, Fort Wayne, Indiana 46801-0988
FESOP No.: F 003-13899-00208
Facilities: ~~Four (4)~~ **Five (5)** spray paint booths, known as E1, E2, E3, ~~and E4,~~ and E5
Parameter: VOC delivered to the applicators
Limit: Total not to exceed 95.5 tons per twelve (12) consecutive month period with compliance determined at the end

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

FESOP Quarterly Report

Source Name: North American Van Lines
Source Address: 5001 U.S. Highway 30 West, Fort Wayne, Indiana 46818
Mailing Address: P.O. Box 988, Fort Wayne, Indiana 46801-0988
FESOP No.: F 003-13899-00208
Facilities: ~~Four (4)~~ **Five (5)** spray paint booths, known as E1, E2, E3, ~~and E4,~~ and E5
Parameter: Individual HAP delivered to the applicators
Limit: Total not to exceed 9.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

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

FESOP Quarterly Report

Source Name: North American Van Lines
Source Address: 5001 U.S. Highway 30 West, Fort Wayne, Indiana 46818
Mailing Address: P.O. Box 988, Fort Wayne, Indiana 46801-0988
FESOP No.: F 003-13899-00208
Facilities: ~~Four (4)~~ **Five (5)** spray paint booths, known as E1, E2, E3, ~~and E4,~~ and E5
Parameter: Combination of HAPs delivered to the applicators
Limit: Total not to exceed 24.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Change 10:

The one (1) insignificant natural gas-fired air makeup unit has been added to Condition A.3 and the equipment description box for Section D.3 as follows:

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

- (a) (7) One (1) natural gas fired boiler, constructed 1977, heat input capacity: 1.56 million British thermal units per hour; **and** (326 IAC 6-2-3)
- (8) **One (1) air make-up unit, heat input capacity: 1.325 million British thermal units per hour.**

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

- (a) (7) One (1) natural gas fired boiler, constructed 1977, heat input capacity: 1.56 million British thermal units per hour; **and** (326 IAC 6-2-3)
- (8) **One (1) air make-up unit, heat input capacity: 1.325 million British thermal units per hour.**

Change 11:

As a result of Change 10 and AAF 003-16621-00208, issued on June 15, 2004, the potential VOC emissions from insignificant activities have been increased by 0.110 tons from that in F 003-13899-00208, issued on August 19, 2002. Therefore, Condition D.3.4 has been revised as follows:

D.3.4 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]

Any change or modification that increases the potential to emit VOC to more than ~~2.74~~ **2.63** tons per year from the insignificant maintenance degreasers, may cause the potential to emit VOC for the entire source to be greater than one hundred (100) tons per year and make the requirements of 326 IAC 2-7 applicable and shall require prior IDEM, OAQ, approval.

Conclusion

The construction and operation of this revision shall be subject to the conditions of the attached FESOP Minor Permit Revision No. MPR 003-19659-00208.

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

**Company Name: North American Van Lines
Address City IN Zip: 5001 U.S. Highway 30 West, Fort Wayne, Indiana 46818
Permit Number: MPR 003-19659
Plt ID: 003-00208
Reviewer: Michael S. Schaffer
Application Date: October 1, 2004**

Material	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Material (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (lbs/hr)	Potential VOC (lbs/day)	Potential VOC (tons/yr)	Particulate Potential (tons/yr)	VOC solids (lbs/gal)	Transfer Efficiency						
One(1) spray paint booth (E5)																							
Room F																							
Navl Blue	7.67	67.2%	0.00%	67.2%	0.00%	20.8%	1.25	0.25	1.0	5.15	5.15	1.61	39	7.1	1.72	24.78	50%						
Reducer	6.74	100%	0.00%	100%	0.00%	0.00%	1.25	0.25	1.0	6.74	6.74	2.11	51	9.2	0.00	N/A	50%						
R-T-S	7.21	82.5%	0.00%	82.5%	0.00%	10.4%	2.50	0.25	1.0	5.95	5.95	3.7	89	16.3	1.72	57.18	50%						
Room F																							
Navl White	9.30	46.00%	0.00%	46.0%	0.00%	14.2%	1.25	0.25	1.0	4.28	4.28	1.34	32.1	5.9	3.44	30.13	50%						
Reducer	6.74	100%	0.00%	100%	0.00%	0.00%	1.25	0.25	1.0	6.74	6.74	2.11	50.6	9.2	0.00	N/A	50%						
R-T-S	8.02	68.7%	0.00%	68.7%	0.00%	7.10%	2.50	0.25	1.0	5.51	5.51	3.4	82.6	15.1	3.44	77.59	50%						
Room F																							
Wipedown	6.71	100%	0.00%	100%	0.00%	0.00%	0.25	0.25	1.0	6.71	6.71	0.419	10.1	1.84	0.00	N/A	50%						
State Potential Emissions												Add worst case coating to all solvents		PM Control Efficiency		95.00%		Total Before Controls:		4.14	99.3	18.1	1.72
																		4.14	99.3	18.1	0.086		

METHODOLOGY

RTS Density (lbs/gal) = ((Da*Va)+(Db*Vb))/(Va+Vb)

RTS Weight % H2O + Organics = ((Wa*Da*Va)+(Wb*Db*Vb))/((Da*Va)+(Db*Vb))

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) * Flash-off

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day) * Flash-off

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) * Flash-off

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) * Flash-off

Total = RTS

TSD App A

Material Substrate
<i>Various</i>
<i>Various</i>
<i>Various</i>
<i>Various</i>
<i>Various</i>
<i>Various</i>
<i>Various</i>

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

Company Name: North American Van Lines
Address City IN Zip: 5001 U.S. Highway 30 West, Fort Wayne, Indiana 46818
Permit Number: MPR 003-19659
Plt ID: 003-00208
Reviewer: Michael S. Schaffer
Application Date: October 1, 2004

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

One (1) insignificant air make-up unit rated at 1.325 MMBtu/hr

1.325

11.6

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100	5.50	84.0
				**see below		
Potential Emission in tons/yr	0.011	0.044	0.003	0.580	0.032	0.487

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

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

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

See page 4 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR <100
 HAPs Emissions**

Company Name: North American Van Lines
Address City IN Zip: 5001 U.S. Highway 30 West, Fort Wayne, Indiana 46818
Permit Number: MPR 003-19659
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HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 0.0021	Dichlorobenzene 0.0012	Formaldehyde 0.0750	Hexane 1.80	Toluene 0.0034
Potential Emission in tons/yr	0.00001	0.000007	0.0004	0.010	0.00002

HAPs - Metals						
Emission Factor in lb/MMcf	Lead 0.0005	Cadmium 0.0011	Chromium 0.0014	Manganese 0.0004	Nickel 0.0021	Total
Potential Emission in tons/yr	0.000003	0.00001	0.00001	0.000002	0.00001	0.011

Methodology is the same as page 3.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.