



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

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

TO: Interested Parties / Applicant  
DATE: May 6, 2005  
RE: Roadmaster, LLC. / 039-19859-00532  
FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

### Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures  
FNPER.dot 1/10/05



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

---

*Mitchell E. Daniels, Jr.*  
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Indianapolis, Indiana 46204  
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[www.IN.gov/idem](http://www.IN.gov/idem)

**MINOR SOURCE OPERATING PERMIT RENEWAL  
OFFICE OF AIR QUALITY**

**Roadmaster, LLC.  
310 Steury Avenue  
Goshen, Indiana 46526**

(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.: MSOP 039-19859-00532	
Issued by: Original signed by  Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: May 6, 2005  Expiration Date: May 6, 2010

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## 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 and A.2 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 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

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The Permittee owns and operates a stationary cargo/recreational trailer manufacturing source.

Authorized Individual: President  
Source Address: 310 Steury Avenue, Goshen, Indiana, 46526  
Mailing Address: 310 Steury Avenue, Goshen, Indiana, 46526  
General Source Phone: 574.537.0669  
SIC Code: 3799  
County Location: Elkhart  
Source Location Status: Basic Nonattainment area for 8 Hour Ozone  
Attainment area for all other criteria pollutants  
Source Status: Minor Source Operating Permit  
Minor Source, under PSD Rules;  
Minor Source, Section 112 of the Clean Air Act

### A.2 Emissions Units and Pollution Control Equipment Summary

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This stationary source is approved to operate the following emissions units and pollution control devices:

- (a) One (1) paint room, identified as PR for painting metal chassis equipped with one (1) airless spray application system and dry filter as overspray control, exhausting through stacks SV28 and SV32 through SV39, capacity: 7.5 cargo trailers per hour.
- (b) One (1) undercoating operation identified as U1 for painting metal chassis equipped with one (1) airless spray application system, exhausting internally, capacity: 7.5 cargo trailers per hour.
- (c) One (1) plywood department, equipped with three (3) table saws identified as S1, S2 and S3, two (2) miter saws identified as S4 and S5, one (1) chop saw identified as S6, and four (4) shop-vac dust collectors identified as DC1, DC2, DC3 and DC4, capacity: 4,875 pounds of plywood per hour, total.
- (d) One (1) exterior trim department for applying adhesive and sealant to metal and/or wood using aerosol cans and a caulking gun, respectively, capacity: 7.5 cargo trailers per hour.
- (e) One (1) roofing department for applying sealant to metal and/or wood using a caulking gun, capacity: 7.5 cargo trailers per hour.
- (f) One (1) final finish area for applying touch-up paint using aerosol cans, capacity: 7.5 metal chassis per hour.

## **SECTION B GENERAL CONDITIONS**

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

### **B.1 Permit No Defense [IC 13]**

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This permit to operate 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.

### **B.2 Definitions**

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

### **B.3 Effective Date of the Permit [IC13-15-5-3]**

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Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

### **B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]**

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This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

### **B.5 Modification to Permit [326 IAC 2]**

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All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

### **B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

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- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:  
  
Compliance Branch, Office of Air Quality  
Indiana Department of Environmental Management  
100 North Senate Avenue  
Indianapolis, IN 46206-6015
- (d) The notification 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.

**B.7 Preventive Maintenance Plan [326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]**

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- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015
- Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.
- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.

**B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC13-17-3-2][IC 13-30-3-1]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions

related activity is conducted, or where records must be kept under the conditions of this permit;

- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]**

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Pursuant to [326 IAC 2-6.1-6(d)(3)]:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by a notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

**B.11 Annual Fee Payment [326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

**B.12 Credible Evidence [326 IAC 1-1-6]**

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For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

**SECTION C**

**SOURCE OPERATION CONDITIONS**

Entire Source

**C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

**C.2 Permit Revocation [326 IAC 2-1.1-9]**

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

**C.3 Opacity [326 IAC 5-1]**

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.4 Fugitive Dust Emissions [326 IAC 6-4]**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

**C.5 Stack Height [326 IAC 1-7]**

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

**C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at

least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

## Testing Requirements

### C.7 Performance Testing [326 IAC 3-6]

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- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ (and local agency) not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, (and local agency), if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

## Compliance Requirements [326 IAC 2-1.1-11]

### C.8 Compliance Requirements [326 IAC 2-1.1-11]

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

## Compliance Monitoring Requirements

### C.9 Compliance Monitoring [326 IAC 2-1.1-11]

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

### C.10 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

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Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

### C.11 Compliance Response Plan - Preparation and Implementation

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- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

- (1) Reasonable response steps that may be implemented in the event that a

response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and 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 a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

#### C.12 Actions Related to Noncompliance Demonstrated by a Stack Test

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- (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 response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected emissions unit while the response actions are being

implemented.

- (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 re-testing in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the re-testing deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to non-compliant stack tests.

The response action documents submitted pursuant to this condition do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.

### **Record Keeping and Reporting Requirements**

#### **C.13 Malfunctions Report [326 IAC 1-6-2]**

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Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

#### **C.14 General Record Keeping Requirements [326 IAC 2-6.1-5]**

- 
- (a) Records of all required monitoring data, reports and support information required by this permit 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 physically present or electronically accessible at the source location for a minimum of three (3) years. 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 request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
  - (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

#### **C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]**

- 
- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015

- (b) Unless otherwise specified in this permit, any notice, report, or other submission 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) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) paint room, identified as PR for painting metal chassis equipped with one (1) airless spray application system and dry filter as overspray control, exhausting through stacks SV28 and SV32 through SV39, capacity: 7.5 cargo trailers per hour.
- (b) One (1) undercoating operation identified as U1 for painting metal chassis equipped with one (1) airless spray application system, exhausting internally, capacity: 7.5 cargo trailers per hour.

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

### Emission Limitations and Standards [326 IAC 2-6.1-5(1)]

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

- (a) Pursuant to 326 IAC 8-2-9(d), the owner or operator shall not allow the discharge into the atmosphere VOC in excess of 3.5 pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.
- (b) Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of PR and U1 during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

#### D.1.2 Particulate Emissions

- (a) Pursuant to 326 IAC 6-3-2(d),
  - (1) Particulate from the surface coating operations PR shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
  - (2) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
    - (A) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
    - (B) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
  - (3) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.
- (b) The undercoating operation, U1, shall comply with the following:
  - (1) Operate the coating operation inside the building.
  - (2) If accumulation of undercoating is observed on fans, stacks, or on the ground outside the plant, then overspray controls must be installed.
  - (3) Maintain and operate the spray application system according to the manufacturer's recommendations.

**D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these emissions unit and any control devices.

**Compliance Determination Requirements [326 IAC 2-1.1-11]**

**D.1.4 Volatile Organic Compounds (VOC)**

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Compliance with the VOC content 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.

**Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [ 326 IAC 2-6.1-5(a)(2)]**

**D.1.5 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.1.1.
  - (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 VOC content of each coating material and solvent used less water.
- (b) To document compliance with Condition D.1.3, the Permittee shall maintain records of any additional inspection prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (c) One (1) plywood department, equipped with three (3) table saws identified as S1, S2 and S3, two (2) miter saws identified as S4 and S5, one (1) chop saw identified as S6, and four (4) shop-vac dust collectors identified as DC1, DC2, DC3 and DC4, capacity: 4,875 pounds of plywood per hour, total.
- (d) Twenty-eight (28) MIG welders identified as W1 through W28, exhausting internally, maximum capacity: 33.75 pounds of MIG wire per hour, total.

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

### Emission Limitations and Standards [326 IAC 2-6.1-5(1)]

#### D.2.1 Particulate Matter (PM) [326 IAC 6-3]

- (a) Pursuant to 326 IAC 6-3-2(c) (Process Operations), the allowable PM emission rate from the one (1) plywood department, equipped with three (3) table saws identified as S1, S2 and S3, two (2) miter saws identified as S4 and S5, one (1) chop saw identified as S6, and four (4) shop-vac dust collectors identified as DC1, DC2, DC3 and DC4 shall not exceed 7.44 pounds per hour when operating at a process weight rate of 4,875 pounds per hour.

The pounds per hour limitations were calculated with the following equation:

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

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

- (b) Pursuant to 326 IAC 6-3-1, the PM emissions from the twenty-eight (28) MIG welders shall not exceed 0.551 pounds per hour when operating at a process weight rate of less than 100 pounds per hour. Since the potential to emit is 0.39 pounds per hour, the twenty-eight (28) MIG welders will comply with this rule.

## SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (e) One (1) exterior trim department for applying adhesive and sealant to metal and/or wood using aerosol cans and a caulking gun, respectively, capacity: 7.5 cargo trailers per hour.
- (f) One (1) roofing department for applying sealant to metal and/or wood using a caulking gun, capacity: 7.5 cargo trailers per hour.

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

### Emission Limitations and Standards [326 IAC 2-6.1-5(1)]

#### D.3.1 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 coatings delivered to the applicators at the exterior trim department and roofing department when coating metal shall be limited to 3.5 pounds of VOC per gallon of coating less water.
- (b) 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.3.2 Volatile Organic Compound (VOC) [326 IAC 8-1-6]

The VOC usage, including clean-up solvents, at the one (1) exterior trim department and one (1) roofing department shall be limited to less than 25 tons per consecutive twelve (12) month period, rolled on a monthly basis. This will limit VOC emissions from the combination of the exterior trim department and roofing department to less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6, New Facilities; General reduction requirements, are not applicable.

#### D.3.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the one (1) exterior trim department and one (1) roofing department 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:

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

### Compliance Determination Requirements [326 IAC 2-1.1-11]

#### D.3.4 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.3.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

#### D.3.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.3.1 and D.3.2 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.3.6 VOC Emissions

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Compliance with Condition D.3.2 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.

### **Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [ 326 IAC 2-6.1-5(a)(2)]**

#### D.3.7 Record Keeping Requirements

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- (a) To document compliance with Conditions D.3.1 and D.3.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly, and shall be complete and sufficient to establish compliance with the VOC content and VOC usage and emission limits established in Conditions D.3.1 and D.3.2.
- (1) The VOC content of each coating material and solvent used.
  - (2) The amount of coating material and solvent used less water on daily basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
  - (3) The volume weighted VOC content of the coatings used for each month;
  - (4) The cleanup solvent usage for each month;
  - (5) The total VOC usage for each month; and
  - (6) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.3.8 Reporting Requirements

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A quarterly summary of the information to document compliance with Condition D.3.2 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.

## SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (g) One (1) final finish area for applying touch-up paint using aerosol cans, capacity: 7.5 metal chassis per hour.

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

### Emission Limitations and Standards [326 IAC 2-6.1-5(1)]

#### D.4.1 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 coatings delivered to the applicators at the final finish area shall be limited to 3.5 pounds of VOC per gallon of coating less water.
- (b) 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.

### Compliance Determination Requirements [326 IAC 2-1.1-11]

#### D.4.2 Volatile Organic Compounds (VOC)

Compliance with the VOC content limitation contained in Condition D.4.1 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. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

### Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [ 326 IAC 2-6.1-5(a)(2)]

#### D.4.3 Record Keeping Requirements

- (a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1). Records maintained for (1) shall be taken monthly, and shall be complete and sufficient to establish compliance with the VOC content limit established in Condition D.4.1.
- (1) The amount and VOC content of each coating material and solvent used each month. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit

**Indiana Department of Environmental Management  
Office of Air Quality  
Compliance Data Section  
Quarterly Report**

Company Name: ROADMASTER, LLC.  
Location: 310 Steury Avenue, Goshen, Indiana 46526  
Permit No.: 039-19859-00532  
Source: One (1) Exterior Trim Department and  
One (1) Roofing Department  
Pollutant: VOC usage  
Limit: Less than 25 tons per consecutive twelve (12) month period, total

Year: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH**

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

<b>Company Name:</b>	<b>ROADMASTER, LLC.</b>
<b>Address:</b>	<b>310 Steury Avenue</b>
<b>City:</b>	<b>Goshen</b>
<b>Phone #:</b>	<b>(574) 537-0669</b>
<b>MSOP #:</b>	<b>039-19859-00532</b>

I hereby certify that ROADMASTER, LLC. is  still in operation.  
 no longer in operation.

I hereby certify that ROADMASTER, LLC. is  in compliance with the requirements of MSOP 039-19859-00532  
 not in compliance with the requirements of MSOP 039-19859-00532.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

<b>Noncompliance:</b>

**MALFUNCTION REPORT**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
FAX NUMBER - 317 233-5967**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?\_\_\_\_\_, 25 TONS/YEAR SULFUR DIOXIDE ?\_\_\_\_\_, 25 TONS/YEAR NITROGEN OXIDES?\_\_\_\_\_, 25 TONS/YEAR VOC ?\_\_\_\_\_, 25 TONS/YEAR HYDROGEN SULFIDE ?\_\_\_\_\_, 25 TONS/YEAR TOTAL REDUCED SULFUR ?\_\_\_\_\_, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?\_\_\_\_\_, 25 TONS/YEAR FLUORIDES ?\_\_\_\_\_, 100TONS/YEAR CARBON MONOXIDE ?\_\_\_\_\_, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?\_\_\_\_\_, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?\_\_\_\_\_, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?\_\_\_\_\_, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?\_\_\_\_\_. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION \_\_\_\_\_.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC \_\_\_\_\_ OR, PERMIT CONDITION # \_\_\_\_\_ AND/OR PERM LIMIT OF \_\_\_\_\_

THIS INCIDENT MEETS THE DEFINITION OF >MALFUNCTION= AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: \_\_\_\_\_ PHONE NO. ( ) \_\_\_\_\_  
LOCATION: (CITY AND COUNTY) \_\_\_\_\_  
PERMIT NO. \_\_\_\_\_ AFS PLANT ID: \_\_\_\_\_ AFS POINT ID: \_\_\_\_\_ INSP: \_\_\_\_\_  
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: \_\_\_\_\_

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/19\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/19\_\_\_\_ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: \_\_\_\_\_

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_

INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

**Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.**

**326 IAC 1-6-1 Applicability of rule**

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

**326 IAC 1-2-39 "Malfunction" definition**

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

**\*Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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# Indiana Department of Environmental Management Office of Air Quality

## Addendum to the Technical Support Document for a Minor Source Operating Permit (MSOP) Renewal

Source Name: Roadmaster, LLC.  
Source Location: 310 Steury Avenue, Goshen, IN, 46526  
County: Elkhart  
SIC Code: 3799  
Operation Permit No.: M 039-19859-00532  
Permit Reviewer: Amy Moreland

On March 8, 2005, the Office of Air Quality (OAQ) had a notice published in the Goshen News, Goshen, Indiana, stating that Roadmaster, LLC. had applied for a Part 70 Operating Permit to operate a stationary cargo trailer manufacturing source. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit 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.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

**Change 1:** Indiana was required to incorporate credible evidence provisions into state rules consistent with the SIP call published by U.S. EPA in 1997 (62 FR 8314). Indiana has incorporated the credible evidence provision in 326 IAC 1-1-6. This rule is effective March 16, 2005; therefore, the condition reflecting this rule will be incorporated into your permit as follows:

### **B.12 Credible Evidence [326 IAC 1-1-6]**

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**For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.**

**Change 2:** OAQ has determined to revise the particulate control and compliance monitoring conditions because of the low risk of dispersion associated with using heavy, asphalt-based material. Section D.1 (b) and A.2 (b) containing the emission unit description has been revised as follows:

- (b) One (1) undercoating operation identified as U1 for painting metal chassis equipped with one (1) airless spray application system ~~and dry filter as overspray control,~~ exhausting internally, capacity: 7.5 cargo trailers per hour.

Condition D.1.2 has also been revised as follows:

D.1.2 Particulate Emissions ~~[326 IAC 6-3-2(d)]~~

---

(a) Pursuant to 326 IAC 6-3-2(d),

(1) Particulate from the surface coating operations PR and U1 shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

~~(b)~~ (2) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

~~(A)~~ (A) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

~~(B)~~ (B) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

~~(c)~~ (3) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

(b) The undercoating operation, U1, shall comply with the following:

(1) Operate the coating operation inside the building.

(2) If accumulations of undercoating are observed on fans, stacks, or on the ground outside the plant, then overspray controls must be installed.

(3) Maintain and operate the spray application system according to the manufacturer's recommendations.

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

Technical Support Document (TSD) for a  
Minor Source Operating Permit Renewal

**Source Background and Description**

<b>Source Name:</b>	<b>ROADMASTER, LLC.</b>
<b>Source Location:</b>	<b>310 Steury Avenue, Goshen, Indiana 46526</b>
<b>County:</b>	<b>Elkhart</b>
<b>SIC Code:</b>	<b>3799</b>
<b>Operation Permit No.:</b>	<b>039-11527-00532</b>
<b>Operation Permit Issuance Date:</b>	<b>February 25, 2000</b>
<b>Permit Renewal No.:</b>	<b>039-19859-00532</b>
<b>Permit Reviewer:</b>	<b>Amy Moreland (ALM)</b>

The Office of Air Quality (OAQ) has reviewed an application from ROADMASTER, LLC. relating to the operation of a cargo/recreational trailer manufacturing source. The source was issued a MSOP 039-11527-00532 on February 25, 2000.

**Permitted Emission Units and Pollution Control Equipment**

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

- (a) One (1) paint room, identified as PR for painting metal chassis equipped with one (1) airless spray application system and dry filter as overspray control, exhausting through stacks SV28 and SV32 through SV39, capacity: 7.5 cargo trailers per hour.
- (b) One (1) undercoating operation identified as U1 for painting metal chassis equipped with one (1) airless spray application system and dry filter as overspray control, exhausting internally, capacity: 7.5 cargo trailers per hour.
- (c) One (1) plywood department, equipped with three (3) table saws identified as S1, S2 and S3, two (2) miter saws identified as S4 and S5, one (1) chop saw identified as S6, and four (4) shop-vac dust collectors identified as DC1, DC2, DC3 and DC4, capacity: 4,875 pounds of plywood per hour, total.
- (d) Twenty-eight (28) MIG welders identified as W1 through W28, exhausting internally, maximum capacity: 33.75 pounds of MIG wire per hour, total.
- (e) One (1) exterior trim department, exhausting internally, which apply adhesive and sealant to metal and/or wood using aerosol cans and a caulking gun, respectively, capacity: 7.5 cargo trailers per hour.
- (f) One (1) roofing department, exhausting internally, which applies sealant to metal and/or wood using a caulking gun, capacity: 7.5 cargo trailers per hour.
- (g) One (1) final finish area, exhausting internally, which apply touch-up paint using aerosol cans, capacity: 7.5 metal chassis per hour.
- (h) Eleven (11) natural gas-fired space heaters, identified as SV1 through SV11, exhausting through stacks SV1 through SV11, maximum heat input capacity: 0.2 million British thermal units per hour, each.

- (i) Seven (7) natural gas-fired space heaters, identified as SV12 through SV18, exhausting through stacks SV12 through SV18, maximum heat input capacity: 0.175 million British thermal units per hour, each.
- (j) One (1) natural gas-fired space heater, identified as SV19, exhausting through stack SV19, maximum heat input capacity: 0.128 million British thermal units per hour.
- (k) Five (5) natural gas-fired space heaters, identified as SV20 through SV24, exhausting through stacks SV20 through SV24, maximum heat input capacity: 0.150 million British thermal units per hour, each.
- (l) Three (3) natural gas-fired space heaters, identified as SV25 through SV27, exhausting through stacks SV25 through SV27, maximum heat input capacity: 0.94 million British thermal units per hour, each.
- (m) One (1) natural gas-fired air makeup unit, identified as SV28, exhausting through stack SV28, maximum heat input capacity: 4.9 million British thermal units per hour.
- (n) One (1) portable stick welder for maintenance, identified as W29, exhausting internally, maximum capacity: 10 pounds of stick per hour.

### Existing Approvals

The source has been operating under MSOP 039-11527-00532, issued on February 25, 2000, and the following:

- (a) MSOP 039-19952-00532, First Notice – Only Change, issued on October 21, 2004.

Production undercoating of metal chassis has been separated from the metal chassis painting room identified as PR. The undercoating operation is now performed in a separate undercoating station identified as U1. This change is not considered new construction but just a separation of one process into two separate processes. There is no increase in emissions or change in rule applicability.

All conditions from previous approvals were incorporated into this permit, except the following:

- (a) Condition 10(b) of CP 039-9698-00496, issued to Tiara Motor Coach on October 22, 1998, which requires that pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emissions from fiberglass grinding equipment (controlled by baghouse DC-1) are 0.72 lb/hr when operating at the maximum process weight rate of 150 lb/hr, the allowable PM emissions from woodworking equipment (controlled by baghouse DC-2) are 0.39 lb/hr when operating at the maximum process weight rate of 60 lb/hr, the allowable PM emissions from woodworking equipment (controlled by baghouse DC-3) are 0.39 lb/hr when operating at the maximum process weight rate of 60 lb/hr, and the allowable emissions from fiberglass grinding and woodworking operations are calculated using  $E=4.10 * P^{0.67}$  (for process weight rates up to 60,000 pounds per hour), where E is the maximum allowable PM emission rate (lbs/hr) and P is the process weight (tons/hr) is not applicable because the fiberglass and woodworking operations existing at Tiara Motor Coach when that permit was issued are not existing at ROADMASTER, LLC.
- (b) The Best Available Control Technology (BACT) Conditions 13 and 14 of CP 039-9698-00496, issued to Tiara Motor Coach on October 22, 1998, are no longer applicable since BACT is not applicable to this source since the fiberglass operations do not exist at ROADMASTER, LLC.
- (c) Operating Condition 16 of CP 039-9698-00496, issued to Tiara Motor Coach on October 22, 1998, that source shall limit the usage of single HAP and total HAPs to 9.9 and 24.0 tons per twelve (12) month period, respectively, is not applicable because the potentials to

emit any single HAP and total HAPs are less than 10 tons per year and 25 tons per year, respectively. Therefore, no limit is required to make 326 IAC 2-1-3.4 and 326 IAC 2-4.1-1 not applicable.

- (d) Operation Condition 19 of CP 039-9698-00496, issued to Tiara Motor Coach on October 22, 1998, that records of HAP usages shall be kept is not applicable, because HAP limitations do not exist in this permit since the potentials to emit any single HAP and total HAPs are less than 10 tons per year and 25 tons per year, respectively.

**Enforcement Issue**

There are no enforcement actions pending.

**Stack Summary**

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (F)
SV1-SV11	Eleven (11) heaters	27.8, each	0.67, each	200	77
SV12-SV18	Seven (7) heaters	27.8, each	0.5, each	200	77
SV19-SV24	Six (6) heaters	27.8, each	0.67, each	200	77
SV25-SV27	Three (3) heaters	28.3, each	0.67, each	200	77
SV28	Make-up Air Unit	37.5	2.83	12,200	77 to 140
SV32-SV39	Metal Chassis Painting Room – PR	28.5, each	2.0, each	5,400, each	77 to 140

**Recommendation**

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

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

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

**Emission Calculations**

See Appendix A of this document for emission calculations on pages 1 through 11.

**Potential to Emit of the Source Before Controls**

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

Pollutant	Potential to Emit (tons/yr)
PM	25.32
PM-10	25.719
SO <sub>2</sub>	0.032
VOC	42.719
CO	4.42
NO <sub>x</sub>	5.26

HAPs	Potential To Emit (tons/year)
Styrene	0.00
Toluene	7.56
Naphthalene	0.00
Methanol	0.18
Glycol Ethers	6.68
Methylene	0.18
Methylene Chloride	0.00
MEK	0.36
MIBK	0.36
Xylene	0.00
<b>TOTAL</b>	<b>15.32</b>

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of criteria pollutants are less than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (b) 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 particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

**County Attainment Status**

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>x</sub>	attainment
1 - Ozone	attainment
8 - 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 for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

### Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	25.2257
PM-10	25.5247
SO <sub>2</sub>	0.032
VOC	42.719
CO	4.42
NO <sub>x</sub>	5.26
Single HAP	7.56
Combination HAPs	15.32

- (a) This existing source is not a major stationary source because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or greater and it is not in one of the 28 listed source categories.
- (b) These emissions were based on the MSOP Renewal Application submitted by the company.

### Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit 039-19859-00532 is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

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

This status is based on all the air approvals issued to the source. This status has been verified by the OAQ inspector assigned to the source.

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit. There are no steam generating units at this source, therefore the New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) are not applicable.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20) included in this permit.

### State Rule Applicability – Entire Source

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

MSOP 039-11527-00532, was issued on February 25, 2000. The source is not one of the twenty-eight (28) listed source categories, the source is located in Elkhart County, and the potential to emit of each regulated pollutant is less than 250 tons per year, this source is not a major source pursuant to 326 IAC 2-2, PSD, and the requirements of 326 IAC 2-2 are not applicable.

#### 326 IAC 2-1.1-5 (Non-attainment New Source Review)

This source is not subject to 326 IAC 2-1.1-5 because it has the potential to emit less than 100 tons of NOx and less than 100 tons of VOC per year.

#### 326 IAC 2-6 (Emission Reporting)

The source is not required to submit an emission statement because they are not at or above Part 70 emission thresholds. Therefore, 326 IAC 2-6 does not apply.

#### 326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

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

Since the potential to emit each individual hazardous air pollutant (HAP) is less than ten (10) tons per year and the potential to emit total HAPs is less than 25 tons per year, the requirements of 326 IAC 2-4.1-1 are not applicable.

### State Rule Applicability – Individual Facilities

#### 326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating)

Since there are no boilers, and the space heaters are not sources of indirect heating, at this source, the requirements of 326 IAC 6-2 are not applicable.

#### 326 IAC 6-3-2 (c) (Particulate Matter)

Pursuant to 326 IAC 6-3-2(c), the PM from the one (1) exterior trim department and one (1) roofing department 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:

$$E = 55.0 P^{0.11} - 40$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) or (Process Operations)

- (a) Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating operations PR and U1 shall be controlled by a dry particulate filter, and subject to the following, the Permittee shall operate the control device in accordance with manufacturer's specifications
- (1) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
- (A) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (B) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

- (b) Pursuant to 326 IAC 6-3-2(e), the PM emissions from the three (3) table saws identified as S1, S2 and S3, two (2) miter saws identified as S4 and S5, one (1) chop saw identified as S6 combined shall not exceed 7.44 pounds per hour when operating at a process weight rate of 4,875 pounds per hour. Since the potential to emit before controls is 0.400 pounds per hour, these units making up one (1) plywood department will comply with this rule.

This limitation is calculated using the following equation:

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:

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

- (c) 326 IAC 6-3-1(b)(9) exempts the one (1) stick welder because the unit consumes less than six hundred twenty five (625) pounds of rod per day.
- (d) Pursuant to 326 IAC 6-3-1, the PM emissions from the twenty-eight (28) MIG welders shall not exceed 0.551 pounds per hour when operating at a process weight rate of less than 100 pounds per hour. Since the potential to emit is 0.39 pounds per hour, the twenty-eight (28) MIG welders will comply with this rule.
- (e) 326 IAC 6-3-1(b)(12) exempts the final finish area because the area uses aerosol cans to repair minor surface damage and imperfections.

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

- (a) Pursuant to 326 IAC 8-2-9(d)(2), the volatile organic compound (VOC) content of the coating delivered to the applicator at the spray booth shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.
- (b) Pursuant to 326 IAC 8-2-9(d)(3), the volatile organic compound (VOC) content of coatings delivered to the applicators at the exterior trim department and roofing department when

coating metal shall be limited to 3.5 pounds of VOC per gallon of coating less water for extreme performance coatings.

- (c) Pursuant to 326 IAC 8-2-9(d)(3), the volatile organic compound (VOC) content of coatings delivered to the applicators at the final finish area when coating metal shall be limited to 3.5 pounds of VOC per gallon of coating less water for extreme performance coatings.
- (d) Pursuant to 8-2-9(f), 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, the spray booth, exterior trim department and roofing department are in compliance with this requirement.

326 IAC 8-2-12 (Wood furniture and cabinet coating)

This rule does not apply to the wood coating of the cargo/recreational trailer manufacturing operation because the wood trim is not considered a wood furnishing.

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

This rule does not apply because the VOC emissions for wood coating are less than 25 tons per year.

The exterior trim department and the roofing department are determined to be one facility. The VOC usage, including clean-up solvents, at the one (1) exterior trim department and one (1) roofing department shall be limited to less than 25 tons per consecutive twelve (12) month period, rolled on a monthly basis. This will limit VOC emissions from the combination of the exterior trim department and roofing department to less than 25 tons per year. There are no other operations at this source with potential to emit of VOCs greater than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6, New Facilities; General reduction requirements, are not applicable.

## Conclusion

The operation of this cargo trailer manufacturing source shall be subject to the conditions of the Minor Source Operating Permit Renewal 039-19859-00532.

**Appendix A: Emission Calculations**

**Baghouse Operations**

**Company Name:** ROADMASTER, LLC.  
**Address City IN Zip:** 310 Steury Avenue, Goshen, Indiana 46526  
**Permit Number:** 039-19859-00532  
**Pit ID:** 039-00532  
**Permit Reviewer:** Amy Moreland  
**Date:** February 17, 2005

Emission Unit	Stack	Flow Rate (acfm)	Stack Temp. (deg. F)	Outlet Grain Load (gr/acf)	Controlled Emission Rate (lbs/hr)	Controlled Emission Rate (tons/yr)	Control Efficiency	Potential Emissions (lbs/hr)	Potential Emissions (ton/yr)	Process Weight Rate (lbs/yr)	Allowable Emissions (lbs/yr)
<b>Dust Collector</b>											
Shop-Vac	DC 1	105	68	0.0111	0.010	0.044	90.00%	0.100	0.438	4875	7.45
Shop-Vac	DC 2	105	68	0.0111	0.010	0.044	90.00%	0.100	0.438	4875	7.45
Shop-Vac	DC 3	105	68	0.0111	0.010	0.044	90.00%	0.100	0.438	4875	7.45
Shop-Vac	DC 4	105	68	0.0111	0.010	0.044	90.00%	0.100	0.438	4875	7.45

**Totals:**

<b>0.040</b>	<b>0.176</b>	<b>0.400</b>	<b>1.752</b>
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**METHODOLOGY**

scfm = acfm x [(459 + 68) / (459 + stack temperature)]

Controlled Emissions (lbs/hr) = gr/dscf x scfm x 60 minutes/hr / 7000gr/lb

Uncontrolled Emissions (lb/hr) = Controlled Emissions (lbs/hr) / (1 - Control Efficiency)

Emissions (tons/yr) = Emissions (lbs/hr.) \* 8760 hrs/yr / 2000 lbs/ton

Process Weight Rate in lbs/hr the maximum total Process Weight rate

Allowable Emissions (lbs/hr) = 4.10 x (Process Weight (lbs/hr) / 2000 lbs/ton) ^ 0.67 [326 IAC 6-3-2]

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

**(27) Heaters and (1) Air Makeup Unit**

**Company Name: ROADMASTER, LLC.  
Address City IN Zip: 310 Steury Avenue, Goshen, Indiana 46526  
Permit Number: 039-19859-00532  
Pit ID: 039-00532  
Reviewer: ALM  
Date: January 5, 2005**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

12.0

105.1

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.100	0.399	0.032	5.256	0.289	4.415

\*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 3 for HAPs emissions calculations.

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

**Company Name: ROADMASTER, LLC.**  
**Address City IN Zip: 310 Steury Avenue, Goshen, Indiana 46526**  
**Permit Number: 039-19859-00532**  
**Pit ID: 039-00532**  
**Reviewer: ALM**  
**Date: January 5, 2005**

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.104E-04	6.307E-05	3.942E-03	9.461E-02	1.787E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.628E-05	5.782E-05	7.358E-05	1.997E-05	1.104E-04

Methodology is the same as page 2.

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

**Appendix A: Emissions Calculations  
Welding and Thermal Cutting**

**Company Name:** ROADMASTER, LLC.  
**Address City IN Zip:** 310 Steury Avenue, Goshen, Indiana 46526  
**Permit Number:** 039-19859-00532  
**Pit ID:** 039-00532  
**Reviewer:** ALM  
**Date:** January 5, 2005

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)	
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr		
<b>WELDING</b>												
Submerged Arc	0	0	0.036	0			0.000	0.000	0.000	0	0.000	
Metal Inert Gas (MIG)(carbon steel)	28	1.21	0.0052	0.00018	1.00E-06	1.00E-06	0.176	6.10E-03	3.39E-05	3.39E-05	6.20E-03	
Stick (E7018 electrode)	1	10	0.0211	0.0009			0.211	0.000	0.000	0	0.000	
Tungsten Inert Gas (TIG)(carbon steel)			0.0055	0.0005			0.000	0.000	0.000	0	0.000	
Oxyacetylene(carbon steel)	0	0	0.0055	0.0005			0.000	0.000	0.000	0	0.000	
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	0	0	0	0.1622	0.0005	0.0001	0.0003	0.000	0.000	0.000	0.000	0.000
Oxymethane	0	0	0	0.0815	0.0002		0.0002	0.000	0.000	0.000	0.000	0.000
Plasma**	0	0	0					0.000	0.000	0.000	0.000	0.000
<b>EMISSION TOTALS</b>												
Potential Emissions lbs/hr								0.39	6.10E-03	3.39E-05	3.39E-05	6.20E-03
Potential Emissions lbs/day								9.29	1.46E-01	8.13E-04	8.13E-04	1.49E-01
Potential Emissions tons/year								1.70	2.67E-02	1.48E-04	1.48E-04	2.72E-02

**METHODOLOGY**

\*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

\*\*Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

Welding and other flame cutting emission factors are from an internal training session document, "Welding and Flame Cutting". See Rebecca Mason if you need a copy. Refer to AP-42, Chapter 12.19 for additional emission factors for welding.





**Appendix A: Emission Calculations**

**HAP Emission Calculations - Surface Coating Operation - Undercoating**

**Identified as U1**

**Company Name:** ROADMASTER, LLC.

**Address City IN Zip:** 310 Steury Avenue, Goshen, Indiana 46526

**Permit Number:** 039-19859

**Pit ID:** 039-00532

**Permit Reviewer:** ALM

**Date:** December 9, 2004

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Methanol	Weight % Methylene Chloride	Weight % MEK	Weight % MIBK	Weight % Napthalene	Weight % Toluene	Weight % Xylene	Methanol Emissions (ton/yr)	Methylene Chloride Emissions (ton/yr)	MEK Emissions (ton/yr)	MIBK Emissions (ton/yr)	Napthalene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)
ZPG-9902S	1043	0.50000	7.50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Clean Up Solv	7.01	0.008000	7.50	9.50%	0.00%	9.60%	9.50%	0.00%	62.00%	0.00%	0.18	0.00	0.18	0.18	0.00	1.14	0.00

Total State Potential Emissions

**0.18      0.00      0.18      0.18      0.00      1.14      0.00**

**METHODOLOGY**

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

VOC and Particulate  
From Surface Coating Operations - Chassis Painting

Identified as PR

Company Name: ROADMASTER, LLC.

Address City IN Zip: 310 Steury Avenue, Goshen, Indiana 46526

Permit Number: 039-19859

Plt ID: 039-00532

Reviewer: ALM

Date: December 9, 2004

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water & Exempt	Weight % Organics	Volume % Water & Exempt	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
Black WR Enamel	9.01	32.00%	21.7%	10.3%	15.0%	75.00%	0.25000	7.500	1.09	0.93	1.74	41.76	7.62	7.55	1.24	75%
Clean Up Solvent	7.01	100.00%	0.0%	100.0%	0.0%	0.00%	0.00800	7.500	7.01	7.01	0.42	10.09	1.84	0.00	0.00	100%

State Potential Emissions

Add worst case coating to all solvents

2.16

51.85

9.46

7.55

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

**Appendix A: Emission Calculations**  
**Exterior Trim Department, Final Finish Area & Roofing Department**  
**HAP Emission Calculations**

**Company Name:** ROADMASTER, LLC.  
**Address City IN Zip:** 310 Steury Avenue, Goshen, Indiana 4  
**Permit Number:** 039-19859-00532  
**Pit ID:** 039-00532  
**Permit Reviewer:** ALM  
**Date:** January 5, 2005

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Styrene	Weight % Toluene	Weight % Napthalene	Weight % MEK	Weight % Glycol Ethers	Weight % Cobalt C	Styrene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Napthalene Emissions (ton/yr)	MEK Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Cobalt Emissions (ton/yr)
<b>Exterior Trim Department</b>															
Flam. Contact Adhesive Nor	6.3	0.200000	7.50	0.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00	2.07	0.00	0.00	0.00	0.00
SM 5732 Silicone	8.67	0.078130	7.50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
<b>Final Finish Area</b>															
90-907 Black Gloss, QD WR	8.52	0.500000	7.50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.07
<b>Roofing Department</b>															
SM 6104	13.04	0.250000	7.50	0.00%	3.00%	0.00%	0.00%	0.00%	0.00%	0.00	3.21	0.00	0.00	0.00	0.00
				0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00

Total State Potential Emissions **0.00      5.28      0.00      0.00      0.98      0.07**

**METHODOLOGY**

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000

Hapcalc.xls 9/95

**Appendix A: Emission Calculations**

**HAP Emission Calculations - Surface Coating Operation - Undercoating**

Identified as UI

**Company Name:** ROADMASTER, LLC.

**Address City IN Zip:** 310 Steury Avenue, Goshen, Indiana 46526

**Permit Number:** 039-19859-00532

**Plt ID:** 039-00532

**Permit Reviewer:** ALM

**Date:** January 5, 2005

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Methanol	Weight % thylene Chlor	Weight % MEK	Weight % MIBK	Weight % Napthalene	Weight % Toluene	Weight % Xylene	Methylene Emissions (ton/yr)	Methylene Chloride Emissions (ton/yr)	MEK Emissions (ton/yr)	MIBK Emissions (ton/yr)	Napthalene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)
ZPG - 9902S	1043	7.500000	7.50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Clean Up Solv	7.01	0.008000	7.50	9.50%	0.00%	9.60%	9.50%	0.00%	62.00%	0.00%	0.18	0.00	0.18	0.18	0.00	1.14	0.00

Total State Potential Emissions

**0.18      0.00      0.18      0.18      0.00      1.14      0.00**

**METHODOLOGY**

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

Hapcalc.xls 9/95

**Appendix A: Emission Calculations**

**HAP Emission Calculations - Surface Coating Operation - Chassis Painting  
Identified as PR**

**Company Name:** ROADMASTER, LLC.  
**Address City IN Zip:** 310 Steury Avenue, Goshen, Indiana 46526  
**Permit Number:** 039-19859-00532  
**Plt ID:** 039-00532  
**Permit Reviewer:** ALM  
**Date:** December 9, 2004

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Glycol Ether	Weight % Methanol	Weight % Methylene Chlorid	Weight % MEK	Weight % MIBK	Weight % Toluene	Weight % Xylene	Glycol Ether Emissions (ton/yr)	Methanol Emissions (ton/yr)	Methylene Chloride Emissions (ton/yr)	MEK Emissions (ton/yr)	MIBK Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Total HAP Emissions (ton/yr)
Black WR Enamel	9.01	0.25000	7.500	7.70%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	5.70	0.00	0.00	0.00	0.00	0.00	0.00	5.70
Clean Up Solvent	7.01	0.00800	7.500	0.00%	9.50%	9.60%	9.60%	9.50%	62.00%	0.00%	0.00	0.18	0.00	0.18	0.18	1.14	0.00	1.67

Total State Potential Emissions

**5.70      0.18      0.00      0.18      0.18      1.14      0.00      7.37**

**METHODOLOGY**

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lb:



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