



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

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

TO: Interested Parties / Applicant  
DATE: March 18, 2005  
RE: TN Trailers, Inc / 087-20070-00059  
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



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**NEW SOURCE CONSTRUCTION and  
MINOR SOURCE OPERATING PERMIT  
OFFICE OF AIR QUALITY**

**TN Trailers, Inc.  
0925 N. State Road 5  
Shipshewana, Indiana 46565**

(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 087-20070-00059	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: March 21, 2005 Expiration Date: March 21, 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 trailer manufacturing facility.

Authorized Individual: Operations Manager  
Source Address: 0925 N. State Road 5, Shipshewana, Indiana 46565  
Mailing Address: 0925 N. State Road 5, Shipshewana, Indiana 46565  
General Source Phone: (260) 768-9197  
SIC Code: 3799  
County Location: LaGrange  
Source Location Status: Attainment for all criteria pollutants  
Source Status: Minor Source Operating Permit  
Minor Source, under PSD  
Minor Source, Section 112 of the Clean Air Act  
Not in 1 of 28 Source Categories

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

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

- (a) One (1) plywood department (PD) woodworking facility, having a maximum throughput capacity of 1,320 pounds of plywood per hour, controlled by a portable dust collector with emissions exhausting inside the building. This unit was constructed in 2001.
- (b) Surface coating operations, consisting of:
  - (1) One paint spray booth (PB) using airless guns to coat metal, with a maximum capacity of 3.75 units per hour and a maximum throughput rate of 3.97 gallons per hour and using dry filters for overspray control exhausting to stack PB. The unit was constructed in 2003.
  - (2) One (1) trailer assembly area sealant and adhesive application process (SA) with a maximum rated capacity of 3.75 units per hour and a maximum usage rate of 0.19 gallons per hour of adhesive and 0.22 gallons per hour of sealant. This unit was constructed in 2001. The trailer assembly area sealant and adhesive application process (SA) does not have a control device.
- (c) One (1) metal inert gas (MIG) welding operation, constructed in 2001 and consisting of:
  - (1) Thirteen (13) welding stations each consuming a maximum of 1.0 pounds of carbon steel electrode per hour.
  - (2) One (1) welding station consuming 0.25 pounds of aluminum electrode per hour.
- (d) Cleaners and solvents characterized as the follows:
  - (1) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100F) or;

- (2) Having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20C (68F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (e) These cleaning solvents are used in every small quantities at the facility for general cleanup purposes. They are used to clean up spray paint, adhesives, sealants, or caulks. These cleaning solvents are contained in aerosol cans (22 ounces or less) or small containers (1 gallon or less).

## **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 46204

and

Northern Regional Office  
220 W. Colfax Avenue, Suite 200  
South Bend, Indiana 46601-1634

- (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]

- (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]

- (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 46204

and

Northern Regional Office  
220 W. Colfax Avenue, Suite 200  
South Bend, Indiana 46601-1634

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 an 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 (BLT)), 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 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 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  
Indianapolis, Indiana 46204

and

Northern Regional Office  
220 W. Colfax Avenue, Suite 200  
South Bend, Indiana 46601-1634

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.6 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  
Indianapolis, Indiana 46204

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.7 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.8 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.9 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.

## Record Keeping and Reporting Requirements

### C.10 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.11 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.12 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 46204
- (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 Units Description:

- (a) One (1) plywood department (PD) woodworking facility, having a maximum throughput capacity of 1,320 pounds of plywood per hour, controlled by a portable dust collector with emissions exhausting inside the building. This unit was constructed in 2001.

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

### Emission Limitations and Standards

#### D.1.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the plywood department (PD) woodworking facility shall not exceed 3.10 pounds per hour when operating at a process weight rate of 1,320 pounds per hour.

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

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

$$E = 4.10 P^{0.67}$$

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

#### D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

### Compliance Determination Requirements

#### D.1.3 Particulate Control

In order to comply with Condition D.1.1, the dust collector for particulate control shall be in operation and control emissions from the one (1) woodworking facility at all times that the one (1) woodworking facility is in operation.

#### D.1.4 Visible Emissions Notations

- (a) Daily visible emission notations of the plywood department (PD) woodworking facility stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit.

#### D.1.5 Baghouse Inspections

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An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

#### **Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**

#### D.1.6 Broken or Failed Bag Detection

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In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.

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

#### D.1.7 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.4, the Permittee shall maintain records of daily visible emission notations of the plywood department (PD) woodworking facility stack exhaust.
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain records of the results of the inspections required under Condition D.1.5 and the dates the vents are redirected.
- (c) To document compliance with Condition D.1.2, the Permittee shall maintain records of any 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.

## SECTION D.2

## EMMISSIONS UNITS OPERATION CONDITIONS

### Emissions Unit Description:

- (b) Surface coating operations, consisting of:
- (1) One paint spray booth (PB) using airless guns to coat metal, with a maximum capacity of 3.75 units per hour and a maximum throughput rate of 3.97 gallons per hour and using dry filters for overspray control exhausting to stack PB. The unit was constructed in 2003.
  - (2) One (1) trailer assembly area sealant and adhesive application process (SA) with a maximum rated capacity of 3.75 units per hour and a maximum usage rate of 0.19 gallons per hour of adhesive and 0.22 gallons per hour of sealant. This unit was constructed in 2001. The trailer assembly area sealant and adhesive application process (SA) does not have a control device.

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

### Emission Limitations and Standards

#### D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

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

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

#### D.2.2 Particulate [326 IAC 6-3-2(d)]

- (a) Particulate from the paint spray booth shall be controlled by a dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) 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:
  - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
  - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) 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.

### Compliance Determination Requirements

#### D.2.3 Volatile Organic Compounds (VOC)

Compliance with the VOC content limitations contained in Conditions D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturing the copies of the "as supplied" VOC data sheets. IDEM, OAQ 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.2.4 Record Keeping Requirements**

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- (a) To document compliance with Condition D.2.1, the Permittee shall maintain monthly records of the VOC content of each coating material used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and VOC content of each coating applied. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### SECTION D.3

### EMMISSIONS UNITS OPERATION CONDITIONS

#### Emissions Unit Description:

- (c) One (1) metal inert gas (MIG) welding operation, constructed in 2001 and consisting of:
  - (1) Thirteen (13) welding stations, each consuming a maximum of 1.0 pounds of carbon steel electrode per hour.
  - (2) One (1) welding station consuming a total of 0.833 pounds of electrode per hour.
- (d) Cleaners and solvents characterized as the follows:
  - (1) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100F) or;
  - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20C (68F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (e) These cleaning solvents are used in every small quantities at the facility for general cleanup purposes. They are used to clean up spray paint, adhesives, sealants, or caulks. These cleaning solvents are contained in aerosol cans (22 ounces or less) or small containers (1 gallon or less).

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

#### Emission Limitations and Standards

There are no specifically applicable regulations that apply to these emission units.

**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>TN Trailers, Inc.</b>
<b>Address:</b>	<b>0925 North State Road 5</b>
<b>City:</b>	<b>Shipshewana, Indiana 46565</b>
<b>Phone #</b>	<b>(260) 768-9197</b>
<b>MSOP #:</b>	<b>087-20070-00059</b>

I hereby certify that TN Trailers, Inc. is  still in operation.  
 no longer in operation.

I hereby certify that TN Trailers, Inc. is  in compliance with the requirements of MSOP 087-20070-00059  
 not in compliance with the requirements of MSOP 087-20070-00059

<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: \_\_\_\_/\_\_\_\_/20\_\_\_\_ \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_ \_\_\_\_\_ 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

## Technical Support Document (TSD) for a New Source Construction Permit and Minor Source Operating Permit

### Source Background and Description

Source Name:	TN Trailers, Inc.
Source Location:	0925 N. State Road 5, Shipshewana, Indiana 46565
County:	LaGrange
SIC Code:	3799
Operation Permit No.:	MSOP 087-20070-00059
Permit Reviewer:	ERG/HJ

The Office of Air Quality (OAQ) has reviewed an application from TN Trailers, Inc. relating to the construction and operation of a cargo trailer manufacturing facility.

### Permitted Emission Units and Pollution Control Equipment

There are no permitted emission units operating at this source during this review process.

### Unpermitted Emission Units and Pollution Control Equipment

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

- (a) One (1) plywood department (PD) woodworking facility, having a maximum throughput capacity of 1,320 pounds of plywood per hour, controlled by a portable dust collector with emissions exhausting inside the building. This unit was constructed in 2001.
- (b) Surface coating operations, consisting of:
  - (1) One paint spray booth (PB) using airless guns to coat metal, with a maximum capacity of 3.75 units per hour and a maximum throughput rate of 3.97 gallons per hour and using dry filters for overspray control exhausting to stack PB. The unit was constructed in 2003.
  - (2) One (1) trailer assembly area sealant and adhesive application process (SA) with a maximum rated capacity of 3.75 units per hour and a maximum usage rate of 0.19 gallons per hour of adhesive and 0.22 gallons per hour of sealant. This unit was constructed in 2001. The trailer assembly area sealant and adhesive application process (SA) does not have a control device.
- (c) One (1) metal inert gas (MIG) welding operation, constructed in 2001 and consisting of:
  - (1) Thirteen (13) welding stations, each consuming a maximum of 1.0 pounds of carbon steel electrode per hour.
  - (2) One (1) welding station consuming 0.25 pounds of aluminum electrode per hour.
- (d) Cleaners and solvents characterized as the follows:

- (1) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100F) or;
  - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20C (68F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (e) These cleaning solvents are used in every small quantities at the facility for general cleanup purposes. They are used to clean up spray paint, adhesives, sealants, or caulks. These cleaning solvents are contained in aerosol cans (22 ounces or less) or small containers (1 gallon or less).

### Existing Approvals

The source currently has no existing approvals.

### Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled "Unpermitted Emission Units and Pollution Control Equipment".
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction and operating permit rules.

### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
PB	Paint Booth	18	3.5	25,600	ambient

### 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 completed application for the purposes of this review was received on September 13, 2004.

### Emission Calculations

See Appendix A of this document for detailed emission calculations (Appendix A, pages 1 through 4).

### 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/year)
PM	91.0
PM10	91.0
SO <sub>2</sub>	0
VOC	12.0

Pollutant	Potential to Emit (tons/year)
CO	0
NO <sub>x</sub>	0

HAPs	Potential to Emit (tons/year)
N-Butyl Alcohol	0.76
Toluene	1.41
Hexane	3.53
Glycol Ethers	4.74
<b>Total</b>	<b>10.4</b>

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of all pollutants are less than 100 tons per year and the potential to emit PM and PM10 is greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive 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 LaGrange County.

Pollutant	Status
PM10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
1-hour Ozone	Attainment
8-hour Ozone	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 ozone. LaGrange County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) LaGrange County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

**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/year)
PM	91.0
PM10	91.0
SO <sub>2</sub>	0.00
VOC	12.0
CO	0.00
NO <sub>x</sub>	0.00
Single HAP	4.74
Combination HAPs	10.4

- (a) This existing source is not a major stationary source because no nonattainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one (1) of the twenty-eight (28) listed source categories.
- (b) These emissions were based on the MSOP application submitted by the source.

### Part 70 Permit Determination

#### 326 IAC 2-7 (Part 70 Permit Program)

This existing (previously unpermitted) source is 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 is the first approval issued to this source.

### Federal Rule Applicability

- (a) This source is not subject to the New Source Performance Standard (NSPS), 326 IAC 12 (40 CFR 60.720, Subpart TTT - Standards of Performance for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines) because the source does not coat plastic parts. This source coats metal and wood trailer parts.

There are no other New Source Performance Standards (NSPS), 326 IAC 12, (40 CFR 60) included in this permit for the source.

- (b) This source is not subject to 40 CFR 63, Subpart JJ - National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wood Furniture Manufacturing (326 IAC 14) because this source is not a major source of HAPs as defined in 40 CFR 63, Subpart A and does not manufacture wood furniture or wood furniture components.
- (c) This source is not subject to 40 CFR 63, Subpart MMMM - National Emission Standard for Hazardous Air Pollutant (NESHAPs) for Miscellaneous Metal Parts and Products because this source is not a major source of Hazardous Air Pollutants (HAPs).
- (d) There are no other National Emission Standard for Hazardous Air Pollutant (NESHAPs) (326 IAC 14, 40 CFR 61, 326 IAC 20, and 40 CFR 63) included in this permit for the source.

### State Rule Applicability – Entire Source

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

This source was a minor source when it was built in 2001 and is not in 1 of the 28 listed source categories. At construction, the potential to emit of each criteria pollutant from the entire source was less than 250 tons per year. The potential to emit of each criteria pollutant from the entire

source remained less than 250 tons per year. Therefore, this source is a minor source and the requirements of 326 IAC 2-2 are not applicable.

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

This source is located in LaGrange County and does not have to operate under a Part 70 permit. 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 (Major Sources of Hazardous Air Pollutants (HAP))**

Although constructed after July 27, 1997, the operation of this cargo trailer manufacturing plant has the potential to emit less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

**State Rule Applicability – One (1) Plywood Department (PD) Woodworking Facility**

**326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)**

Pursuant to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the plywood department (PD) woodworking facility shall not exceed 3.10 pounds per hour when operating at a process weight rate equal to 1,320 pounds of plywood per hour.

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

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

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

The dust collector shall be in operation at all times the woodworking facility is in operation, in order to comply with this rule.

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

The compliance monitoring requirements applicable to this source are as follows:

The plywood department (PD) wood working facility has applicable compliance monitoring conditions as specified below:

- (a) Daily visible emission notations of the plywood department (PD) wood working facility stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit.

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.

These monitoring conditions are necessary to demonstrate compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

### **State Rule Applicability – Surface Coating Facilities**

#### **326 IAC 8-1-6 (New Facilities - General Reduction Requirement)**

The paint spray booth and sealant/adhesive application process is not subject to 326 IAC 8-1-6 (General Reduction Requirement) because the potential VOC emissions from the facility is less than twenty-five (25) tons per year. The paint spray booth is not subject to 326 IAC 8-1-6 (General Reduction Requirement) because it is subject to 326 IAC 8-2-9.

#### **326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)**

- (a) The paint spray booth is subject to 326 IAC 6-3-1 (Particulate Emission Limitations for Manufacturing Processes) because this unit uses more than five (5) gallons of coating per day pursuant to 326 IAC 6-3-1(a)(15).

Pursuant to 326 IAC 6-3-2(d), the paint spray booth shall comply with the following requirements:

- (1) Particulate from the paint spray booth shall be controlled by a dry particulate filters, and the control device shall be operated in accordance with the 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.
  - (C) 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 one (1) trailer assembly area sealant and application process is not subject to 326 IAC 6-3-1 (Particulate Emission Limitations for Manufacturing Processes) because it uses less than five (5) gallons of sealant and adhesives per day pursuant to 326 IAC 6-3-1(a)(15).

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

- (a) The paint spray booth is subject to 326 IAC 8-2-9 because this unit paints metal parts and actual emissions are greater than 15 lbs/day. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coating delivered to the applicator at the paint spray booth shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.

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

Based on the MSDS submitted by the source and calculations made, the spray booth is in compliance with this requirement.

- (b) The one (1) trailer assembly area sealant and application process is not subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) because it does not apply coating on metal frames, it applies adhesives and sealants to plywood.

#### 326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations)

This source is not subject to 326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations) because the one (1) paint spray booth and the one (1) trailer assembly area sealant and adhesive application process do not surface coat automobile and light duty truck bodies. These units are used to apply surface coating, sealant, and adhesive to cargo trailers. In addition, the sealant is used to seal the roofs of cargo trailers, it is not applied directly to metal.

#### 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

This source is not subject to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating) because the one (1) paint spray booth and the one (1) trailer assembly area sealant and adhesive application process do not surface coat wood furnishings.

### **State Rule Applicability - Welding Facilities**

#### **326 IAC 6-3 (Particulate Matter Emission Limitations for Manufacturing Processes)**

This source is not subject to 326 IAC 6-3-1 (Particulate Matter Emission Limitations for Manufacturing Processes) because the one (1) metal inert gas (MIG) welding operation consumes less than six hundred and twenty-five (625) pounds of rod or wire per day pursuant to 326 IAC 6-3-1(b)(9).

### **Conclusion**

The operation of this cargo trailer manufacturing plant shall be subject to the conditions of the Minor Source Operating Permit 087-20070-00059.

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

**Addendum to the Technical Support Document  
for a New Source Construction Permit  
and Minor Source Operating Permit**

**Source Background and Description**

Source Name:	TN Trailers, Inc.
Source Location:	0925 N. State Road 5, Shipshewana, Indiana 46565
County:	LaGrange
SIC Code:	3799
Operation Permit No.:	MSOP 087-20070-00059
Permit Reviewer:	ERG/HJ

On February 12, 2005, the Office of Air Quality (OAQ) had a notice published in the LaGrange Standard, LaGrange, Indiana, stating that TN Trailers, Inc. had applied for a New Source Construction Permit and Minor Source Operating Permit relating to the construction and operation of a cargo trailer manufacturing facility. 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, if applicable, to reflect these changes.

1. Based on the new State Rule 326 IAC 1-1-5 the following condition has been added to the permit.

**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.**

2. IDEM's mailing address was corrected throughout the permit:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, ~~P. O. Box 6045~~  
Indianapolis, Indiana 46204-~~6045~~

**Appendix A: Emissions Calculations**

**VOC and Particulate**

**From One (1) Paint Spray Booth and One (1) Adhesive and Sealant Application Process**

**Company Name:** TN Trailers, Inc.  
**Address:** 0925 North State Road 5, Shipshewana, IN 46565  
**Permit Number:** MSOP Renewal 087-20070  
**Pit ID:** 087-20070-00059  
**Reviewer:** ERG/HJ  
**Date:** September 30, 2004

Material	Density (lb/gal)	Weight % Volatile (H <sub>2</sub> O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Max. Usage (gal/unit)	Maximum Throughput (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE VOC (lbs/hour)	PTE VOC (lbs/day)	PTE VOC (tons/year)	PTE of PM/PM10 (tons/yr)	Transfer Efficiency
<b>Paint Booth</b>															
Z Tech Undercoating	10.4	45.0%	41.8%	3.18%	52.1%	45.0%	0.69	3.75	0.69	0.33	0.86	20.5	3.75	38.9	40.0%
Patriot Black Enamel	8.39	75.7%	61.7%	14.0%	62.1%	21.9%	0.37	3.75	3.10	1.17	1.63	39.1	7.14	7.43	40.0%
<b>Total</b>											2.49	59.7	10.9	46.3	
<b>Adhesive and Sealant Application Process</b>															
TACC Adhesive	8.60	10.0%	0.00%	10.0%	0.00%	90.0%	0.05	3.75	0.86	0.86	0.16	3.87	0.71	0.00	NA
Tremco Sealant	12.1	3.22%	0.0%	3.22%	0.00%	97.0%	0.06	3.75	0.39	0.39	0.09	2.10	0.38	0.00	NA
<b>Total</b>											0.25	5.97	1.09	0.00	

**Notes**

The materials used in the paint booth are applied using airless guns. The source indicated a 40% transfer efficiency. The paint booth is controlled by dry filters. The application of sealant and adhesive is done manually with tubes and sausages. Thus, nominal amounts of PM are emitted.

**Methodology**

Pounds of VOC per Gallon Coating less Water = Density (lb/gal) \* Weight % Organics \* 1/(1-Volume % water)  
 Pounds of VOC per Gallon Coating = Density (lb/gal) \* Weight % Organics  
 PTE of VOC (lbs/hr) = Pounds of VOC per Gallon coating (lb/gal) \* Maximum Usage (gal/unit) \* Maximum Throughput (units/hr)  
 PTE of VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) \* Maximum Usage (gal/unit) \* Maximum Throughput (units/hr) \* 24 hr/day  
 PTE of VOC (tons per year) = Pounds of VOC per Gallon coating (lb/gal) \* Maximum Usage (gal/unit) \* Maximum Throughput (units/hr) \* 8760 hr/yr \* 1 ton/2000 lbs  
 PTE of PM/PM10 (tons/yr) = Maximum Throughput (units/hour) \* Maximum Usage (gal/unit) \* Density (lb/gal) \* (1- Weight % Volatiles) \* (1-% Transfer efficiency) \*8760 hrs/yr \*1 ton/2000 lbs

**Appendix A: Emission Calculations  
HAP Emissions  
from the Paint Spray Booth and Adhesive and Sealant Application Process**

**Company Name:** TN Trailers, Inc.  
**Address:** 0925 North State Road 5, Shipshewana, IN 46565  
**Permit Number:** MSOP Renewal 087-20070  
**Plant ID:** 087-20070-00059  
**Reviewer:** ERG/HJ  
**Date:** September 30, 2004

Material	Density of Material (lb/gal)	Max. Usage (gal/unit)	Maximum Throughput (units/hour)	Hazardous Air Pollutants							
				N-Butyl Alcohol		Toluene		Hexane		Glycol Ethers	
				Wt %	PTE (ton/yr)	Wt %	PTE (ton/yr)	Wt %	PTE (ton/yr)	Wt %	PTE (ton/yr)
<b>Paint Booths</b>											
Z Tech. Undercoating	10.4	0.69	3.75	0.00%		0.00%	0.00	0.00%	0.00	0.00%	0.00
Patriot Black Enamel	8.39	0.37	3.75	1.50%	0.76	0.00%	0.00	0.00%	0.00	9.30%	4.74
<b>Sealant and Adhesive</b>											
TACC Adhesive	8.60	0.05	3.75	0.00%	0.00	20.0%	1.41	50.0%	3.53	0.00%	0.00
Tremco Sealant	12.1	0.06	3.75	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00
<b>Total Potential to Emit (tons/year)</b>					<b>0.76</b>		<b>1.41</b>		<b>3.53</b>		<b>4.74</b>
<b>Total Potential to Emit (tons/year)</b>					<b>10.5</b>						

**Notes**

The amount of materials used per unit is as reported by the source.  
The weight percent of HAPs in materials is from Material Safety Data Sheets. Information provided by source.

**Methodology**

PTE for HAPs (tons/yr) = Density (lb/gal) x Max. Usage (gal/unit) x Maximum Throughput (unit/hr) x Weight % HAP x 8760 hrs/yr x 1 ton/2000 lbs

**Appendix A: Emission Calculations  
Particulate Emissions from  
Plywood Department Woodworking**

**Company Name:** TN Trailers, Inc.  
**Address:** 0925 North State Road 5, Shipshewana, IN 46565  
**Permit Number:** 087-20070  
**Plant ID:** 087-20070-00059  
**Reviewer:** ERG/HJ  
**Date:** September 30, 2004

Emissions Unit	Max. Throughput (lbs/hr)	Control Efficiency (%)	Max. Dust Collected (lbs/hr)	PTE for Particulate Before Controls (tons/yr)	PTE for Particulate After Controls (tons/yr)
Plywood Department Woodworking	1320	75.0	7.65	44.7	11.17

**Note:**  
 The plywood woodworking process will be controlled by a portable dry dust collection system. Assume all PM emissions are equal to PM10

**Methodology**  
 Max. Dust Collected (lb/hr) = Dust collected (lbs/hr) x Actual hrs of operation/yr x 1 yr/8760 hrs  
 PTE Before Controls (tons/yr) = (Max. Dust Collected (lbs/hr) x 8760 hrs/yr/2000 lbs/ton)/(Control Efficiency%)  
 PTE After Controls (tons/yr) = PTE Before Controls (ton/yr) x (1-Control Efficiency%)

**Compliance with 326 IAC 6-3-2(e) - Particulate Matter Emissions Limitations**

Maximum Allowable Emissions =  $E = 4.10 * P^{0.67}$

Where: P = Process Rate in tons per hour  
 E = Rate of Emissions in pounds per hour

Maximum Allowable Emissions = **3.10 lbs/hr**

Calculated Emissions (lbs/hr)	
Plywood Woodworking	1.91 lbs/hr

Calculated Emissions (lbs/hr) = Sawdust Collected (lb/hr) x (1 - Control Efficiency (%))

The dust collector must be in operation at all times that the plywood cutting process is in operation in order to ensure compliance with 326 IAC 6-3-2(e).

**Appendix A: Emissions Calculations  
Facility Wide Potential to Emit**

Appendix A: 4 of 4

**Company Name:** TN Trailers, Inc.  
**Address:** 0925 North State Road 5, Shipshewana, IN 46565  
**Permit Number:** 087-20070  
**Pit ID:** 087-20070-00059  
**Reviewer:** ERG/HJ  
**Date:** September 30, 2004

**Facility Wide Potential to Emit of Criteria Pollutants**

<b>Process</b>	<b>VOC</b>	<b>PM</b>	<b>PM10</b>	<b>NOx</b>	<b>SO<sub>2</sub></b>	<b>CO</b>
Paint Booth	10.9	46.3	46.3	0.00	0.00	0.00
Adhesive and Sealant Application Process	1.09	0.00	0.00	0.00	0.00	0.00
Plywood Woodworking	0.00	44.7	44.7	0.00	0.00	0.00
<b>Total</b>	<b>12.0</b>	<b>91.0</b>	<b>91.0</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>