



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: December 17, 2007
RE: United Express Line, Inc / 039-21832-00096
FROM: Matthew Stuckey, Deputy Branch 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, Suite N 501E, 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.dot12/03/07



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100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(317) 232-8603
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Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**United Express Line, Inc.
19986 County Road 8
Bristol, Indiana 46507**

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70, Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 039-21832-00096	
Issued by: Original signed by A.C. Dumauual for:	Issuance Date: December 17, 2007
Matt Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality	Expiration Date: December 17, 2012

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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 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

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

Source Address:	19986 County Road 8, Bristol, Indiana 46507
Mailing Address:	19986 County Road 8, Bristol, Indiana 46507
General Source Phone Number:	(574) 848-7088
SIC Code:	4299
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act

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

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

- (a) One (1) paint shop installed in November 1999, modified in 2006, exhausted to vents V1 and V2, capacity: 9.0 trailers per hour, consisting of the following equipment:
 - (1) One (1) metal surface prep area, identified as Unit 1;
 - (2) One (1) metal surface coating primer area, identified as Unit 2, equipped with dry filters for particulate overspray control;
 - (3) One (1) metal surface coating topcoat area, identified as Unit 2a, equipped with dry filters for particulate overspray control;
 - (4) One (1) metal surface coating primer area, identified as Unit 2b, equipped with dry filters for particulate overspray control;
 - (5) One (1) spray gun cleaning area, identified as Unit 3; and
 - (6) One (1) paint booth, identified as Unit PB1, equipped with filters for particulate overspray control.
- (b) One (1) plywood surface coating area, identified as Unit 4, installed in November 1999, modified in 2006, using rollers to apply coatings and exhausted to the general ventilation, capacity: 9.0 trailers per hour.
- (c) One (1) woodworking area, identified as Plywood, consisting of various woodworking tools, equipped with a cyclone, exhausting through stack DCV-01, installed in November 1999, modified in 2006, capacity: 9.0 trailers per hour.

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour. The total heat input capacity at this source is less than 10 million British thermal units per hour (MMBtu/hr) and there are no boilers.
- (b) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kiloPascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38°C (100°F) or;
 - (2) having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]
- (d) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (e) Any operation using aqueous solutions containing less than 1 percent by weight of VOCs excluding HAPs.
- (f) Water based adhesives that are less than or equal to 5 percent by volume of VOCs excluding HAPs.
- (g) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4] [326 IAC 6-5]
- (h) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (i) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 Permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

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 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]

-
- (a) This permit, F 039-21832-00096, 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, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

-
- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) The annual compliance certification report 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) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (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) 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 PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) 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.12 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865
Northern Regional Office phone: 574-245-4870; fax: 574-245-4877

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
 - (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F 039-21832-00096 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of

the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)]
[326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) 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) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10 (b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-17-3-2] [IC13-30-3-1]

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 FESOP 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 the conditions of this permit;
- (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 facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (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.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10 (b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [62 FR 8314] [326 IAC 1-1-6]

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

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

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 one hundred (100) pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed five hundred fifty-one thousandths (0.551) pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

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 nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.6 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.7 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on September 27, 2007. The plan is included as Attachment A.

C.8 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.9 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 two hundred sixty (260) linear feet on pipes or one hundred sixty (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
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

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 2-1.1-1(1).

- (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 seventy-five hundredths (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.

Testing Requirements [326 IAC 2-8-4(3)]

C.10 Performance Testing [326 IAC 3-6]

- (a) 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ 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.11 Compliance Requirements [326 IAC 2-1.1-11]

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

C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

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

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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.

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

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air

pollution control practices for minimizing emissions.

- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

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

The response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

- (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 within ninety (90) days of permit issuance.

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

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) 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.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) 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.

Stratospheric Ozone Protection

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

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

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Bristol, Indiana
Permit Reviewer: Zach Miller

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- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Surface Coating

- (a) One (1) paint shop installed in November 1999, modified in 2006, exhausted to vents V1 and V2, capacity: 9.0 trailers per hour, consisting of the following equipment:
- (1) One (1) metal surface prep area, identified as Unit 1;
 - (2) One (1) metal surface coating primer area, identified as Unit 2, equipped with dry filters for particulate overspray control;
 - (3) One (1) metal surface coating topcoat area, identified as Unit 2a, equipped with dry filters for particulate overspray control;
 - (4) One (1) metal surface coating primer area, identified as Unit 2b, equipped with dry filters for particulate overspray control;
 - (5) One (1) spray gun cleaning area, identified as Unit 3; and
 - (6) One (1) paint booth, identified as Unit PB1, equipped with filters for particulate overspray control.
- (b) One (1) plywood surface coating area, identified as Unit 4, installed in November 1999, modified in 2006, using rollers to apply coatings and exhausted to the general ventilation, capacity: 9.0 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 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied at the one (1) plywood surface coating area, identified as Unit 4, shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.2 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicators at the one (1) paint shop, including Units 1, 2, 2a, 2b, 3 and PB.
- (b) Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of one (1) paint shop, including Units 1, 2, 2a, 2b, 3 and PB, 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.1.3 Volatile Organic Compounds (VOC) [326 IAC 2-8-4] [326 IAC 2-2]

The usage of VOC by the the one (1) paint shop, including Units 1, 2, 2a, 2b, 3 and PB, and the one (1) plywood surface coating area, identified as Unit 4, shall be limited to less than 98.0 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month. This will limit the potential to emit VOC to less than 98.0 tons per year from the one (1) paint shop, including Units 1, 2, 2a, 2b, 3 and PB, and the one (1) plywood surface coating area, identified as Unit 4, and less than 100 tons per year from the entire source, rendering 326 IAC 2-7, Part 70, and 326 IAC 2-2, PSD, not applicable with respect to VOC emissions.

D.1.4 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

- (b) The usage of any combination of HAPs by the one (1) paint shop, including Units 1, 2, 2a, 2b, 3 and PB, and the one (1) plywood surface coating area, identified as Unit 4, shall be less than a total of 24.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit the potential to emit any combination of HAPs to less than 24.0 tons per year from the one (1) paint shop, including Units 1, 2, 2a, 2b, 3 and PB, and the one (1) plywood surface coating area, identified as Unit 4, and less than 25 tons per year from the entire source, rendering 326 IAC 2-7, Part 70, not applicable with respect to total HAP emissions.
- (c) The usage of each individual HAP by the one (1) paint shop, including Units 1, 2, 2a, 2b, 3 and PB, and the one (1) plywood surface coating area, identified as Unit 4, shall be less than a total of 10.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit the potential to emit each individual HAP to less than 10.0 tons per year from the one (1) paint shop, including Units 1, 2, 2a, 2b, 3 and PB, and the one (1) plywood surface coating area, identified as Unit 4, and less than 10 tons per year from the entire source, rendering 326 IAC 2-7, Part 70, not applicable with respect to individual HAP emissions.

D.1.5 Particulate [326 IAC 6-3-2(d)] [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating processes at Units 2, 2a, 2b and PB in the paint shop shall be controlled by dry particulate filters, and the Permittee shall operate the filters in accordance with manufacturer's specifications. In combination with Conditions D.2.1 and D.2.2, this shall render 326 IAC 2-7, Part 70, not applicable with respect to PM₁₀ emissions and 326 IAC 2-2, PSD, not applicable with respect to PM and PM₁₀ emissions.

D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.7 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC content and usage limitations and HAP usage limitations contained in Conditions D.1.2, D.1.3 and D.1.4 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 manufacturer the copies of the "as supplied" and "as applied" 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.

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

D.1.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (V1 and V2) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2, D.1.3 and D.1.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.2, D.1.3 and D.1.4. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.
 - (1) The VOC and HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on a monthly 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 cleanup solvent usage for each month;
 - (4) The total VOC, individual HAP and total HAP usage for each month; and
 - (5) The weight of VOCs, each individual HAP and total HAPs emitted for each compliance period.

- (b) To document compliance with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) Quarterly summaries of the information to document compliance with Condition D.1.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The reports submitted by the Permittee do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Woodworking

- (c) One (1) woodworking area, identified as Plywood, consisting of various woodworking tools, equipped with a cyclone, exhausting through stack DCV-01, installed in November 1999, modified in 2006, capacity: 9.0 trailers per hour.

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

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

D.2.1 Particulate [326 IAC 6-3-2] [326 IAC 2-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the one (1) woodworking area, identified as Plywood, shall be limited to 3.19 pounds per hour when operating at a process weight rate of 1,376 pounds of wood per hour.

The pounds per hour limitation was calculated with 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:

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

In combination with Condition D.1.5, this shall also limit the potential to emit PM to less than two hundred fifty (250) tons per year, rendering 326 IAC 2-2, PSD, not applicable with respect to PM emissions.

D.2.2 Particulate Matter - 10 microns (PM₁₀) [326 IAC 2-8-4] [326 IAC 2-2]

The PM₁₀ emissions from the one (1) woodworking area, identified as Plywood, shall be limited to less than 18.04 pounds per hour. In combination with Condition D.1.5, this shall limit the potential to emit PM₁₀ to less than one hundred (100) tons per year, rendering 326 IAC 2-7, Part 70, and 326 IAC 2-2, PSD, not applicable with respect to PM₁₀ emissions.

D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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.2.4 Particulate Control

In order to comply with Conditions D.2.1 and D.2.2, the cyclone for particulate control shall be in operation and control emissions from the one (1) woodworking area, identified as Plywood, at all times that the woodworking area is in operation.

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

D.2.5 Visible Emissions Notations

- (a) Visible emission notations of the one (1) woodworking area, identified as Plywood, stack exhaust shall be performed once per day during normal daylight operations. 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) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.2.6 Cyclone Inspections

An inspection shall be performed each calendar quarter of all cyclones controlling the woodworking operation. A cyclone inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors.

D.2.7 Cyclone Failure Detection

- (a) For a cyclone controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a cyclone controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain a daily record of visible emission notations of the one (1) woodworking area, identified as Plywood, stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the woodworking did not operate that day).
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Insignificant Activities

- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]

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

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

D.3.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the insignificant brazing, cutting, soldering and welding shall be limited by 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:

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

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

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: United Express Line, Inc.
Source Address: 19986 County Road 8, Bristol, Indiana 46507
Mailing Address: 19986 County Road 8, Bristol, Indiana 46507
FESOP No.: F 039-21832-00096

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify) _____
- Report (specify) _____
- Notification (specify) _____
- Affidavit (specify) _____
- Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: United Express Line, Inc.
Source Address: 19986 County Road 8, Bristol, Indiana 46507
Mailing Address: 19986 County Road 8, Bristol, Indiana 46507
FESOP No.: F 039-21832-00096

This form consists of 2 pages

Page 1 of 2

- | |
|---|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16 |
|---|

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: United Express Line, Inc.
Source Address: 19986 County Road 8, Bristol, Indiana 46507
Mailing Address: 19986 County Road 8, Bristol, Indiana 46507
FESOP No.: F 039-21832-00096
Facilities: One (1) paint shop, including Units 1, 2, 2a, 2b, 3 and PB, and the one (1) plywood surface coating area, identified as Unit 4
Parameter: Total VOC Usage
Limit: Less than 98.0 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month

QUARTER: _____ YEAR: _____

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

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

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: United Express Line, Inc.
 Source Address: 19986 County Road 8, Bristol, Indiana 46507
 Mailing Address: 19986 County Road 8, Bristol, Indiana 46507
 FESOP No.: F 039-21832-00096
 Facilities: One (1) paint shop, including Units 1, 2, 2a, 2b, 3 and PB, and the one (1) plywood surface coating area, identified as Unit 4
 Parameter: Individual HAP Usage
 Limit: Less than 10.0 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month

QUARTER: _____ YEAR: _____

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

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

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: United Express Line, Inc.
Source Address: 19986 County Road 8, Bristol, Indiana 46507
Mailing Address: 19986 County Road 8, Bristol, Indiana 46507
FESOP No.: F 039-21832-00096
Facilities: One (1) paint shop, including Units 1, 2, 2a, 2b, 3 and PB, and the one (1) plywood surface coating area, identified as Unit 4
Parameter: Total HAPs Usage
Limit: Less than 24.0 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month

QUARTER: _____ YEAR: _____

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

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

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: United Express Line, Inc.
Source Address: 19986 County Road 8, Bristol, Indiana 46507
Mailing Address: 19986 County Road 8, Bristol, Indiana 46507
FESOP No.: F 039-21832-00096

Months: _____ to _____ Year: _____

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked ^No deviations occurred this reporting period^.</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

ATTACHMENT A
F 039-21832-00096
FUGITIVE PARTICULATE MATTER EMISSION CONTROL PLAN

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions will be controlled according to the following plan for United Express Line, Inc., a covered cargo trailer manufacturing source.

1) Current Source Address:

19986 County Road 8, Bristol, Indiana 46507

2) Name of Operator Responsible:

Director of Human Resources and EH&S for United Express Line, Inc.

3) Points that have a potential to emit:

Unpaved Roads and Storage Areas

Unpaved roads and storage areas at the source shall be coated with water, as necessary, for dust control to prevent fugitive dust generated from vehicle travel from crossing off United Express Line, Inc. property.

Records shall be kept which will identify the atmospheric conditions, general maintenance activities, and visible observation made in accordance with this fugitive dust control plan. A log of this information shall be kept and made available to regulatory officials upon request. The following information shall be included with each log entry:

Unpaved Roads and Storage Areas

- (1) Name of employee conducting visible observations
- (2) Dates and times when water is applied
- (3) Dates and times of visible observations

In the event that adverse meteorological conditions arise, appropriate control measures shall be implemented. The unpaved road usage activities will be discontinued if conditions exist that will not allow for the comprehensive control of visible particulate matter generated from these activities. These instances shall be noted in the monitoring log.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a
Federally Enforceable State Operating Permit Renewal

Source Background and Description

Source Name:	United Express Line, Inc.
Source Location:	19986 County Road 8, Bristol, Indiana 46507
County:	Elkhart
SIC Code:	4299
Permit Renewal No.:	F 039-21832-00096
Permit Reviewer:	Zach Miller

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from United Express Line, Inc. relating to the operation of a covered cargo trailer manufacturing source.

History

On September 23, 2005, United Express Line, Inc. submitted applications to the OAQ requesting to renew its operating permit. United Express Line, Inc. was issued a FESOP (F 039-11645-00096) on June 25, 2001.

Permitted Emission Units and Pollution Control Equipment

- (a) One (1) paint shop installed in November 1999, modified in 2006*, exhausted to vents V1 and V2, capacity: 9.0 trailers per hour, consisting of the following equipment:
 - (1) One (1) metal surface prep area, identified as Unit 1;
 - (2) One (1) metal surface coating primer area, identified as Unit 2, equipped with dry filters for particulate overspray control;
 - (3) One (1) metal surface coating topcoat area, identified as Unit 2a, equipped with dry filters for particulate overspray control;
 - (4) One (1) metal surface coating primer area, identified as Unit 2b, equipped with dry filters for particulate overspray control;
 - (5) One (1) spray gun cleaning area, identified as Unit 3; and
 - (6) One (1) paint booth, identified as Unit PB1, equipped with filters for particulate overspray control.
- (b) One (1) plywood surface coating area, identified as Unit 4, installed in November 1999, modified in 2006*, using rollers to apply coatings and exhausted to the general ventilation, capacity: 9.0 trailers per hour.
- (c) One (1) woodworking area, identified as Plywood, consisting of various woodworking tools, equipped with a cyclone, exhausting through stack DCV-01, installed in November 1999, modified in 2006*, capacity: 9.0 trailers per hour.

*The 2006 modifications were approved by Significant Permit Revision No. 039-22535-00096, issued on April 5, 2007.

Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit

There are no emission units and pollution control equipment that were constructed or operated without a permit.

Emission Units and Pollution Control Equipment Removed From the Source

No emission units have been removed since the last approval was issued.

Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour. The total heat input capacity at this source is less than 10 million British thermal units per hour (MMBtu/hr) and there are no boilers.
- (b) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kiloPascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38°C (100°F) or;
 - (2) having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]
- (d) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (e) Any operation using aqueous solutions containing less than 1 percent by weight of VOCs excluding HAPs.
- (f) Water based adhesives that are less than or equal to 5 percent by volume of VOCs excluding HAPs.
- (g) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4] [326 IAC 6-5]
- (h) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (i) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

Existing Approvals

Since the issuance of the FESOP 039-11645-00096 on June 25, 2001, the source has constructed or has been operating under the following approvals as well:

- (a) Administrative Amendment No. 039-15095-00096, issued on January 14, 2002;
- (b) Administrative Amendment No. 039-17235-00096, issued on June 2, 2003;

- (c) Administrative Amendment No. 039-20261-00096, issued on March 7, 2005;
 - (d) Significant Permit Revision No. 039-22535-00096, issued on April 5, 2007; and
 - (e) Administrative Amendment No. 039-24589-00096, issued on June 4, 2007.
- All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into this FESOP Renewal:

Condition D.1.3(b): Pursuant to 326 IAC 6-3-2(d), particulate matter emissions from Unit 4 shall follow the following Work Practices Plan:

- (1) Operate the plywood coating operation inside the facility.
- (2) Spray coat only wood and wood derived materials.
- (3) Employ proper work practices as follows: Maintain and operate the HVLP Spray Application equipment in according with the manufacturer's recommendations.
- (4) If accumulations of overspray are observed on the building or grounds outside the facility in the area of the plywood coating area; then overspray controls shall be installed.

Reason not incorporated: The coatings are applied with roll coaters at Unit 4. Therefore, pursuant to 326 IAC 6-3-1(b)(6), Unit 4 is exempt from the requirements of 326 IAC 6-3-2.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations (6 pages).

County Attainment Status

The source is located in Elkhart County

Pollutant	Status
PM ₁₀	attainment
PM _{2.5}	attainment
SO ₂	attainment
NO _x	attainment
8-hour Ozone	attainment
CO	attainment
Lead	attainment

Note: On September 6, 2007 the Indiana Air Pollution Control Board finalized a temporary emergency rule to redesignate Allen, Clark, Elkhart, Floyd, LaPorte, St. Joseph as attainment for the 8-hour ozone standard.

- (a) Elkhart County has been classified as unclassifiable or attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration

(PSD), 326 IAC 2-2 for PM_{2.5} emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions. See the State Rule Applicability – Entire Source section.

- (b) Volatile organic compounds (VOC) and nitrogen oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) Elkhart County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (e) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD or Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	988
PM ₁₀	988
SO ₂	0.026
VOC	283
CO	3.68
NO _x	4.38

HAPs	tons/year
Xylene	45.4
MIBK	21.5
Ethyl benzene	10.8
Toluene	22.9
Formaldehyde	0.003
Hexane	0.079
Manganese	0.219
Total	101

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM₁₀ and VOC is equal to or greater than one hundred (100) tons per year. The source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to limit their PM₁₀ and VOC emissions to less than Title V levels. Therefore the source will be issued a FESOP.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than one hundred (<100) tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. However, the source has agreed to limit their single HAP emissions and total HAP emissions below Title V limits. Therefore, the source will be issued a FESOP.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
V1	Paint Shop	26.0	4.0	13,000	Ambient
V2	Paint Shop	26.0	4.0	13,000	Ambient
DCV-01	Woodworking	15.0	3.0	1,960	70

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2003 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	not reported
PM ₁₀	1
SO ₂	0
VOC	42
CO	1
NO _x	3
HAP	not reported

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/Emission Unit	Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Surface Coating (Units 1, 2, 2a, 2b, 3, PB and 4)	10.7	10.7	0.00	< 98.0	0.00	0.00	< 10 individual (xylene, MIBK, Ethyl benzene & toluene) < 24.0 total
Woodworking (Plywood)	14.0	79.0	0.00	0.00	0.00	0.00	0.00
Combustion	0.083	0.333	0.026	0.241	3.68	4.38	0.079 hexane; 0.083 total
Welding and Cutting	4.97	4.97	0.00	0.00	0.00	0.00	0.219 manganese; 0.219 total
Total	29.7	95.0	0.026	98.2	3.68	4.38	< 10 individual; < 25 total
Major Source Threshold	250	250	250	250	250	250	10 individual; 25 total

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (b) The covered cargo trailers manufactured at this source are not automobiles or light duty trucks pursuant to 40 CFR 60.391. Therefore, the requirements of 40 CFR 60, Subpart MM, Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations, and 40 CFR 63, Subpart IIII, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks, are not included in the permit for this source.
- (c) This source is not a major source of HAPs. Therefore, the requirements of 40 CFR 63, Subpart MMMM, the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, are not included in the permit for this source.

State Rule Applicability – Entire Source

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

- (a) The potential to emit PM₁₀ and VOC is limited by 326 IAC 2-8-4 in order to render 326 IAC 2-7, Part 70, not applicable. Those limits also render 326 IAC 2-2, PSD, not applicable with respect to PM₁₀ and VOC emissions.

- (b) Pursuant to 326 IAC 6-3-2, the PM emissions from the one (1) woodworking area, identified as Plywood, shall be limited to 3.19 pounds per hour, which is equivalent to less than 14.0 tons per year. Also pursuant to 326 IAC 6-3-2, particulate from the surface coating processes at Units 2, 2a, 2b and PB in the paint shop shall be controlled by dry particulate filters and the Permittee shall operate the filters in accordance with manufacturer's specifications. These requirements limit the potential to emit PM from the entire source to less than 250 tons per year (14.0 tons/yr + 10.7 tons per year from coating after control + 0.083 tons/yr from combustion + 4.97 from welding and cutting < 250 tons/yr) and render 326 IAC 2-2 not applicable with respect to PM emissions.
- (c) The only modification occurred in 2006. That modification was approved by Significant Permit Revision No. 039-22535-00096, issued on April 5, 2007. The 2006 modification was not subject to 326 IAC 2-2, PSD, because the emissions increase was less than PSD significance levels for PM, PM₁₀ and VOC emissions of two-hundred fifty (250) tons per year.

326 IAC 2-4.1 (New Source Toxics Control)

The operation of each facility at this source will 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, the requirements of 326 IAC 2-4.1 are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is not located in Lake, Porter or LaPorte County, does not emit five (5) tons per year or more of lead and does not require a Part 70 Operating Permit. Therefore, the requirements of 326 IAC 2-6 do not apply.

326 IAC 2-8-4 (FESOP)

- (a) The usage of VOC by the one (1) paint shop, including Units 1, 2, 2a, 2b, 3 and PB, and the one (1) plywood surface coating area, identified as Unit 4, shall be limited to less than 98.0 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month. This will limit the potential to emit VOC to less than 98.0 tons per year from the one (1) paint shop, including Units 1, 2, 2a, 2b, 3 and PB, and the one (1) plywood surface coating area, identified as Unit 4, and less than 100 tons per year from the entire source (98.0 tons/yr + 0.241 tons/yr from combustion < 100 tons/yr), rendering 326 IAC 2-7, Part 70, not applicable based on VOC emissions.
- (b) The usage of any combination of HAPs by the one (1) paint shop, including Units 1, 2, 2a, 2b, 3 and PB, and the one (1) plywood surface coating area, identified as Unit 4, shall be less than a total of 24.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit the potential to emit any combination of HAPs to less than 24.0 tons per year from the one (1) paint shop, including Units 1, 2, 2a, 2b, 3 and PB, and the one (1) plywood surface coating area, identified as Unit 4, and less than 25 tons per year from the entire source (24.0 tons/yr + 0.083 tons/yr from combustion + 0.219 tons/yr from combustion < 25 tons/yr), rendering 326 IAC 2-7, Part 70, not applicable based on total HAP emissions.
- (c) The usage of each individual HAP by the one (1) paint shop, including Units 1, 2, 2a, 2b, 3 and PB, and the one (1) plywood surface coating area, identified as Unit 4, shall be less than a total of 10.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit the potential to emit each individual HAP to less than 10.0 tons per year from the one (1) paint shop, including Units 1, 2, 2a, 2b, 3 and PB, and the one (1) plywood surface coating area, identified as Unit 4, and less than 10 tons per year from the entire source (combustion emissions do not include the same HAPs emitted from the surface coating and there are no other volatile HAPs (VHAPs)

emitted from this source), rendering 326 IAC 2-7, Part 70, not applicable based on individual HAP emissions.

- (d) Pursuant to FESOP 039-11645-00096 on June 25, 2001, the PM₁₀ emissions from the one (1) woodworking area, identified as Plywood, shall be limited to less than 18.04 pounds per hour. This shall limit the PM₁₀ emissions from the one (1) woodworking area, identified as Plywood, to 79.0 tons per year. Pursuant to 326 IAC 6-3-2, particulate from the surface coating processes at Units 2, 2a, 2b and PB in the paint shop shall be controlled by dry particulate filters and the Permittee shall operate the filters in accordance with manufacturer's specifications. These requirements limit the potential to emit PM₁₀ from the entire source to less than 100 tons per year (79.0 tons/yr + 10.7 tons per year from coating after control + 0.333 tons/yr from combustion + 4.97 from welding and cutting < 100 tons/yr) and render 326 IAC 2-7 not applicable based on PM₁₀ emissions.

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 6-4 (Fugitive Dust Emissions)

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).

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source has unpaved roads and it did not receive all necessary preconstruction approvals by December 13, 1985. Therefore, the requirements of 326 IAC 6-5 are applicable. This rule requires submission of a fugitive particulate matter control plan. The plan was submitted on September 27, 2007. The plan consists of coating unpaved roads and storage areas with water, as necessary, for dust control to prevent fugitive dust from crossing the property line.

State Rule Applicability – Individual Facilities

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

- (a) Unit 1 at the paint shop is a prep area with no particulate emissions. Unit 3 is a cleanup area, also with no particulate emissions. Therefore, the requirements of 326 IAC 6-3 are not applicable to Units 1 and 3 in the paint shop.
- (b) The coatings are applied with roll coaters at Unit 4. Therefore, pursuant to 326 IAC 6-3-1 (b)(6), Unit 4 is exempt from the requirements of 326 IAC 6-3-2.
- (c) Pursuant to 326 IAC 6-3-2(d)(1), particulate from the surface coating processes at Units 2, 2a, 2b and PB in the paint shop shall be controlled by dry particulate filters, and the Permittee shall operate the filters in accordance with manufacturer's specifications. This source has a valid permit under 326 IAC 2-8. Therefore, the requirements of 326 IAC 6-3-2(d)(2) are not applicable.

- (d) Pursuant to 326 IAC 6-3-2, the particulate from the insignificant welding and torch cutting operations at this source shall be limited by the following:

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

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

- (e) Pursuant to 326 IAC 6-3-2, the particulate from the one (1) woodworking area, identified as Plywood, shall be limited to 3.19 pounds per hour when operating at a process weight rate of 1,376 pounds of wood per hour.

The limited emission rate is based upon the following:

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

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

The potential to emit PM after control by the cyclone is 1.75 pounds per hour. Therefore, the cyclone shall be in operation at all times that the woodworking is in operation, in order to comply with this limit.

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

The coating operations at this source are regulated by 326 IAC 8-2. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

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

The covered cargo trailers manufactured at this source are not passenger cars or passenger car derivatives. Therefore, the requirements of 326 IAC 8-2-2 are not applicable.

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

The one (1) paint shop, including Units 1, 2, 2a, 2b, 3 and PB, performs miscellaneous metal coating. The one (1) paint shop was constructed after July 1, 1990, and has actual VOC emissions greater than fifteen (15) pounds per day. Therefore, the one (1) paint shop, including Units 1, 2, 2a, 2b, 3 and PB, is subject to the requirements of 326 IAC 8-2-9, when applying coating or adhesives to metal. Pursuant to 326 IAC 8-2-9, the volatile organic compound (VOC) content of the coating delivered to the applicators when coating metal at each production line shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried or forced warm air dried coatings.

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

Based on the MSDS submitted by the source and calculations made, the spray booth can comply with this requirement.

326 IAC 8-2-10 (Flat Wood Panels; Manufacturing Operations)

This source does not coat any flat wood panels that are considered printed panels, natural finish hardwood plywood panels, or hardboard paneling with Class II finishes. Therefore, the requirements of 326 IAC 8-2-10 are not applicable.

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

The surface coating operations at the one (1) plywood surface coating area, identified as Unit 4, applies coatings to solid wood or wood composition. The one (1) plywood surface coating area, identified as Unit 4, was constructed after July 1, 1990, and has actual VOC emissions greater than fifteen (15) pounds per day. Therefore, the one (1) plywood surface coating area, identified as Unit 4, is subject to the requirements of 326 IAC 8-2-12. Pursuant to 326 IAC 8-2-12, the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This source was constructed after January 1, 1980. Therefore, the requirements of 326 IAC 8-6 are not applicable.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

- (a) The surface coating facilities have applicable compliance determination conditions as specified below:

Compliance with the VOC content and usage and the HAPs usage limitations contained in the permit 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 manufacturer the copies of the "as supplied" and "as

applied" 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.

- (b) The woodworking area has applicable compliance determination conditions as specified below:

In order to comply with the PM and PM₁₀ limitations in the permit, the cyclone for particulate control shall be in operation and control emissions from the one (1) woodworking area, identified as Plywood, at all times that the woodworking area is in operation.

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

- (a) The surface coating facilities have applicable compliance monitoring conditions as specified below:
- (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (V1 and V2) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
 - (2) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the dry filters for the surface coating processes at Units 2, 2a, 2b and PB in the paint shop must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-8 (FESOP) and to render 326 IAC 2-2 (PSD) not applicable.

- (b) The woodworking area has applicable compliance determination conditions as specified below:
- (1) Visible emission notations of the one (1) woodworking area, identified as Plywood, stack exhaust shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. 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. 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. 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. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in

accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

- (2) An inspection shall be performed each calendar quarter of all cyclones controlling the woodworking operation. A cyclone inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors.
- (3) For a cyclone controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (4) For a cyclone controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the cyclone for the woodworking area must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-8 (FESOP) and to render 326 IAC 2-2 (PSD) not applicable.

Recommendation

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

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

An application for the purposes of this review was received on September 23, 2005. Additional information was received on September 27, October 9, and October 19, 2007.

Conclusion

The operation of this covered cargo trailer manufacturing source shall be subject to the conditions of the attached **FESOP Renewal No. F 039-21832-00096**.

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

**Company Name: United Express Line, Inc.
Address City IN Zip: 19986 CR 8, Bristol, Indiana 46507
FESOP Renewal No.: F 039-21832-00096
Reviewer: Zach Miller
Date: September 28, 2007**

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/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 (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
Paint Shop																
Unit 1																
Toluene	7.25	100.00%	0.0%	100.0%	0.0%	0.00%	0.08000	9.00	7.25	7.25	5.22	125.28	22.86	0.00	n/a	100%
Units 2, 2a, 2b and PB																
Alkyl FD Gray Primer	13.69	20.11%	0.0%	20.1%	0.0%	58.46%	0.15000	9.00	2.75	2.75	3.72	89.20	16.28	16.17	4.71	75%
FD 35 Black Enamel	9.16	37.54%	0.0%	37.5%	0.0%	50.54%	0.89000	9.00	3.44	3.44	27.54	661.05	120.64	50.18	6.80	75%
Undercoat	11.52	18.02%	5.0%	13.0%	4.6%	92.00%	1.59000	9.00	1.57	1.50	21.46	515.13	94.01	147.98	1.63	75%
Unit 3																
Mineral Spirits	6.43	100.00%	0.0%	100.0%	0.0%	0.00%	0.08000	9.00	6.43	6.43	4.63	111.11	20.28	0.00	n/a	100%
Plywood Coating																
Unit 4																
Roof Adhesive/Sealer	9.76	3.0%	0.0%	3.0%	0.0%	97.0%	0.20500	9.00	0.29	0.29	0.53	12.84	2.34	0.00	0.30	100%
Silicone Sealer	8.68	4.0%	0.0%	4.0%	0.0%	95.0%	0.20500	9.00	0.35	0.35	0.65	15.49	2.83	0.00	0.37	100%
Russel Spray Adhesive	6.6	80.00%	0.0%	80.0%	0.0%	0.0%	0.01500	9.00	5.28	5.28	0.71	17.11	3.12	0.00	n/a	100%
PM Control Efficiency										95.00%						
Uncontrolled											62.6	1502	274	214		
Controlled														10.7		
LIMIT													<98.0			

Methodology

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lbs/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/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)

**Appendix A: Emission Calculations
HAP Emission Calculations**

**Company Name: United Express Line, Inc.
Address City IN Zip: 19986 CR 8, Bristol, Indiana 46507
FESOP Renewal No.: F 039-21832-00096
Reviewer: Zach Miller
Date: September 28, 2007**

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % MIBK	Weight % Ethyl benzene	Weight % Toluene	Xylene Emissions (tons/yr)	MIBK Emissions (tons/yr)	Ethyl Benzene (tons/yr)	Toluene Emissions (tons/yr)
Paint Shop											
Unit 1											
Toluene	7.25	0.08000	9.000	0.00%	0.00%	0.00%	100.00%	0.00	0.00	0.00	22.86
Units 2, 2a, 2b and PB											
Alkyl FD Gray Primer	13.69	0.15000	9.00	6.08%	0.00%	1.11%	0.00%	4.92	0.00	0.90	0.00
FD 35 Black Enamel	9.16	0.89000	9.00	12.61%	6.70%	3.09%	0.00%	40.52	21.53	9.93	0.00
Undercoat	11.52	1.59000	9.00	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Unit 3											
Mineral Spirits	6.43	0.08000	9.00	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Plywood Coating											
Unit 4											
Roof Adhesive/Sealer	9.76	0.20500	9.00	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Silicone Sealer	8.68	0.20500	9.00	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
Russel Spray Adhesive	6.6	0.01500	9.00	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00

Individual Total	45.4	21.5	10.8	22.9
Overall Total	101			
Overall Limit	<24.0			

METHODOLOGY

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

**Appendix A: Emission Calculations
Woodworking Operations**

**Company Name: United Express Line, Inc.
Address City IN Zip: 19986 CR 8, Bristol, Indiana 46507
FESOP Renewal No.: F 039-21832-00096
Reviewer: Zach Miller
Date: September 28, 2007**

PM and PM10 Emissions

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	Emission Rate before Controls (lb/hr)	Emission Rate before Controls (tons/yr)	Emission Rate after Controls (lb/hr)	Emission Rate after Controls (tons/yr)
Plywood	99.0%	0.1044	1960	175	768	1.75	7.68

Methodology

Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (sq. ft.) ((cub. ft./min.)/sq. ft.) (60 min/hr) (lb/7000 grains)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

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

**Company Name: United Express Line, Inc.
Address City IN Zip: 19986 CR 8, Bristol, Indiana 46507
FESOP Renewal No.: F 039-21832-00096
Reviewer: Zach Miller
Date: September 28, 2007**

Insignificant Combustion

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

10.0

87.6

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100 **see below	5.50	84.0
Potential Emission in tons/yr	0.083	0.333	0.026	4.38	0.241	3.68

*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

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	0.00210	0.00120	0.07500	1.80000	0.00340
Potential Emission in tons/yr	0.00009	0.00005	0.00329	0.07884	0.00015

Emission Factor in lb/MMcf	HAPs - Metals					Total
	Lead	Cadmium	Chromium	Manganese	Nickel	
	0.0005	0.0011	0.0014	0.0004	0.0021	
Potential Emission in tons/yr	0.00002	0.00005	0.00006	0.00002	0.00009	0.083

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

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: United Express Line, Inc.
Address City IN Zip: 19986 CR 8, Bristol, Indiana 46507
FESOP Renewal No.: F 039-21832-00096
Reviewer: Zach Miller
Date: September 28, 2007**

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	
WELDING												
Metal Inert Gas (MIG)(carbon steel)	10	5		0.0055	0.0005			0.275	0.025	0.000	0.000	0.025
Metal Inert Gas (MIG)(carbon steel)	10	5		0.0055	0.0005			0.275	0.025	0.000	0.000	0.025
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	5	1	12	0.162	0.0005	0.0001	0.0003	0.584	0.000	0.000	0.000	0.000
EMISSION TOTALS												
Potential Emissions lbs/hr								1.13	0.050	0.00	0.00	0.050
Potential Emissions lbs/day								27.2	1.20	0.00	0.00	1.20
Potential Emissions tons/year								4.97	0.219	0.00	0.00	0.219

METHODOLOGY

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

**Appendix A: Emissions Calculations
Totals**

Company Name: **United Express Line, Inc.**
 Address City IN Zip: **19986 CR 8, Bristol, Indiana 46507**
 FESOP Renewal No.: **F 039-21832-00096**
 Reviewer: **Zach Miller**
 Date: **September 28, 2007**

Unrestricted Potential Emissions (tons/yr)

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Surface Coating (Units 1, 2, 2a, 2b, 3, PB and 4)	214	214	0.000	0.000	274	0.000
Woodworking (Plywood)	768	768	0.000	0.000	0.000	0.000
Combustion	0.083	0.333	0.026	4.38	0.241	3.68
Welding and Cutting	4.97	4.97	0.000	0.000	0.000	0.000
Total	988	988	0.026	4.38	274	3.68

	HAPs							
	Xylene	MIBK	Ethyl benzene	Toluene	Formaldehyde	Hexane	Manganese	Total
Surface Coating (Units 1, 2, 2a, 2b, 3, PB and 4)	45.4	21.5	10.8	22.9	0.000	0.000	0.000	101
Woodworking (Plywood)	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Combustion	0.000	0.000	0.000	0.000	0.003	0.079	0.000	0.083
Welding and Cutting	0.000	0.000	0.000	0.000	0.000	0.000	0.219	0.219
Total	45.4	21.5	10.8	22.9	0.003	0.079	0.219	101

Controlled Potential Emissions (tons/yr)

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Surface Coating (Units 1, 2, 2a, 2b, 3, PB and 4)	10.7	10.7	0.000	0.000	274	0.000
Woodworking (Plywood)	7.68	7.68	0.000	0.000	0.000	0.000
Combustion	0.083	0.333	0.026	4.38	0.241	3.679
Welding and Cutting	4.97	4.97	0.000	0.000	0.000	0.000
Total	23.4	23.7	0.026	4.38	274	3.68

	HAPs							
	Xylene	MIBK	Ethyl benzene	Toluene	Formaldehyde	Hexane	Manganese	Total
Surface Coating (Units 1, 2, 2a, 2b, 3, PB and 4)	45.4	21.5	10.8	22.9	0.000	0.000	0.000	100.7
Woodworking (Plywood)	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Combustion	0.000	0.000	0.000	0.000	0.003	0.079	0.000	0.083
Welding and Cutting	0.000	0.000	0.000	0.000	0.000	0.000	0.219	0.219
Total	45.4	21.5	10.8	22.9	0.003	0.079	0.219	101.0

Limited Potential to Emit (tons/yr)

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Surface Coating (Units 1, 2, 2a, 2b, 3, PB and 4)	10.7	10.7	0.000	0.000	98.0	0.000
Woodworking (Plywood)	14.0	79.0	0.000	0.000	0.000	0.000
Combustion	0.083	0.333	0.026	4.380	0.241	3.679
Welding and Cutting	4.97	4.97	0.000	0.000	0.000	0.000
Total	29.7	95.0	0.026	4.38	98.2	3.68

	HAPs							
	Xylene	MIBK	Ethyl benzene	Toluene	Formaldehyde	Hexane	Manganese	Total
Surface Coating (Units 1, 2, 2a, 2b, 3, PB and 4)	9.99	9.99	9.99	9.99	0.000	0.000	0.000	24.0
Woodworking (Plywood)	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Combustion	0.000	0.000	0.000	0.000	0.003	0.079	0.000	0.083
Welding and Cutting	0.000	0.000	0.000	0.000	0.000	0.000	0.219	0.219
Total	9.99	9.99	9.99	9.99	0.003	0.079	0.219	24.3