



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: January 24 2006
RE: Aluminum Trailer Co., and TN Trailers, Inc. / 039-21926-00639
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot 1/10/05



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

**Aluminum Trailer Company & TN Trailers, Inc.
306 South Nappanee Street
Nappanee, Indiana 46550**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 039-21926-00639	
Issued by: Origin signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: January 24, 2006 Expiration Date: January 24, 2011

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SECTION A

SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates stationary motorized bus manufacturing plant.

Authorized Individual:	Daniel Peck, Director of Engineering and Operations
Source Address:	306 South Nappanee Street, Nappanee, Indiana 46550
Mailing Address:	306 South Nappanee Street, Nappanee, Indiana 46550
General Source Phone:	(574) 773-2240
SIC Code:	3715 (Manufacturing of Truck Trailers) 3799 (Manufacturing of Transportation Equipment Not Elsewhere Classified)
County Location:	Elkhart
Source Location Status:	Nonattainment area for ozone under the 8-hour standard Attainment area for all other criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD and Emission Offset Minor Source, Section 112 of the Clean Air Act Not in 1 of 28 Source Categories

A.2 Source Definition [326 IAC 1-2-73]

This stationary towable cargo trailer manufacturing source consists of operations from the following two (2) companies located at the same address:

- (a) Aluminum Trailer Company; and
- (b) TN Trailers, Inc.

Since the two (2) companies operate at the same location, are owned or operated by the same person (or by persons under common control), and belong to the same major industrial grouping, they will be considered one (1) source, effective from the date of issuance of this MSOP.

A.3 Emissions Units and Pollution Control Equipment Summary

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

Aluminum Trailer Company

- (a) one (1) welding and metal cutting operation, to be constructed in 1999, which fabricates metal frames for non-motorized trailers at a maximum capacity of 0.5 trailer frames per hour, venting to the indoors, and consisting of the following emission units:
 - (1) six (6) metal inert gas (MIG) welding stations, to be constructed in 1999, each with a maximum wire usage rate of 0.25 pounds per hour of an aluminum-based welding wire (4043 wire) and 1.0 pounds per hour of a carbon steel wire (GMAW Wire Type ER70S-3);

- (2) four (4) metal inert gas (MIG) welding stations, to be constructed in 1999, each with a maximum wire usage rate of 0.25 pounds per hour of an aluminum-based welding wire (4043 wire); and
- (3) two (2) compressed air metal cutting stations, to be constructed in 1999, each with a maximum metal thickness cut of 0.1875 inches and a maximum metal cutting rate of 4.0 inches per minute;
- (b) one (1) wood and aluminum metal cutting and grinding operation, to be constructed in 1999, with a total maximum throughput of 0.45 tons of wood and aluminum per hour, consisting of the table saws, chop saws, and band saws, with no particulate control, and venting to the indoors;
- (c) one (1) assembly operation, designated as ATC-SA, to be constructed in 1999, maximum capacity of 0.5 trailers per hour, consisting of manual application of sealants and adhesives to wood and metal surfaces, with cleanup operations utilizing hand or soak application of a non-halogenated organic solvent, and venting to the indoors; and
- (d) Insignificant activities consisting of the following:
 - (1) operation of hand-held metal grinders and saws;
 - (2) application of waxes and touch-up paints; and
 - (3) operation of propane-fueled forklifts;

TN Trailers, Inc.

- (a) one (1) welding and metal cutting operation, constructed in 2005, which fabricates metal frames for non-motorized trailers at a maximum capacity of 3.75 trailer frames per hour, venting to the indoors, and consisting of the following emission units:
 - (1) thirteen (13) metal inert gas (MIG) welding stations, constructed in 2005, each with a maximum wire usage rate of 1.0 pounds per hour of a carbon steel wire (GMAW Wire Type ER70S-3);
 - (2) one (1) metal inert gas (MIG) welding station, constructed in 2005, with a maximum wire usage rate of 0.25 pounds per hour of an aluminum-based welding wire (4043 wire); and
 - (3) three (3) compressed air metal cutting stations, constructed in 2005, each with a maximum metal thickness cut of 0.1875 inches and a maximum metal cutting rate of 4.0 inches per minute;
- (b) one (1) plywood cutting operation, designated as TNT-PD, constructed in 2005, with a total maximum throughput of 0.66 tons of plywood per hour, consisting of the table saws, with particulate emissions controlled by one (1) portable dust collector with a control efficiency of 75%, and venting to the indoors;
- (c) one (1) paint booth, designated as TNT-PB, constructed in 2005, consisting of two (2) airless spray guns for application of paint and a rust preventative sealant undercoating to metal trailer frames at a maximum capacity of 3.75 trailer frames per hour, controlled by dry filters, and exhausting through stack PB;

- (d) one (1) assembly operation, designated as TNT-SA, constructed in 2005, maximum capacity of 3.75 trailers per hour, consisting of manual or low pressure, non-atomizing flow coating application of sealants and adhesives to wood and metal surfaces, and venting to the indoors; and
- (e) Insignificant activities consisting of the following:
 - (1) operation of hand-held metal grinders and saws;
 - (2) application of waxes and touch-up paints; and
 - (3) operation of propane-fueled forklifts;

SECTION B GENERAL CONDITIONS

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

B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

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

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

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

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]

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

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

B.6 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.7 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section.
 - (1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
 - (2) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2-6.1-6 and 326 IAC 2-2 or 326 IAC 2-3 and an Operation Permit Validation Letter is issued.

- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).

B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

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

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, IN 46204
- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each emissions unit:
 - (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.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

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

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.

**B.11 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2]
[IC13-17-3-2][IC 13-30-3-1]**

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

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

B.12 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

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

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

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

B.13 Annual Fee Payment [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.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.14 Credible Evidence [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

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

C.5 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

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

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

Testing Requirements

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by the 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.7 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

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

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

C.9 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

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

C.10 Instrument Specifications [326 IAC 2-1.1-11]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

C.11 Response to Excursions or Exceedances

- (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.

Record Keeping and Reporting Requirements

C.12 Malfunctions Report [326 IAC 1-6-2]

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.13 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNITS OPERATION CONDITIONS

Facility Description: Cutting and Grinding Equipment

Aluminum Trailer Company

- (b) one (1) wood and aluminum metal cutting and grinding operation, to be constructed in 1999, with a total maximum throughput of 0.45 tons of wood and aluminum per hour, consisting of the table saws, chop saws, and band saws, with no particulate control, and venting to the indoors;
- (d) Insignificant activities consisting of the following:
 - (1) operation of hand-held metal grinders and saws;

TN Trailers, Inc.

- (b) one (1) plywood cutting operation, designated as TNT-PD, constructed in 2005, with a total maximum throughput of 0.66 tons of plywood per hour, consisting of the table saws, with particulate emissions controlled by one (1) portable dust collector with a control efficiency of 75%, and venting to the indoors;
- (e) Insignificant activities consisting of the following:
 - (1) operation of hand-held metal grinders and saws;

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

Emission Limitations and Standards

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the Aluminum Trailer Company wood and metal cutting operations shall not exceed 2.40 pounds per hour based on a process weight rate equal to 0.45 tons of wood and metal per hour, and the particulate emissions from the TN Trailers, Inc. plywood cutting operation (TNT-PD) shall not exceed 3.10 pounds per hour based on a process weight rate equal to 0.66 tons of plywood per hour.

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

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

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

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

Compliance Determination Requirements

D.1.2 Particulate Control

In order to comply with Condition D.1.1:

- (a) the portable dust collector shall be in operation and control emissions from the TNT-PD operation at all times that TNT-PD is in operation, and the permittee shall operate the control device in accordance with the manufacturer's specifications; and

- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

SECTION D.2 EMISSIONS UNITS OPERATION CONDITIONS

Facility Description: Surface Coating Operations

Aluminum Trailer Company

- (c) one (1) assembly operation, designated as ATC-SA, to be constructed in 1999, maximum capacity of 0.5 trailers per hour, consisting of manual application of sealants and adhesives to wood and metal surfaces, with cleanup operations utilizing hand or soak application of a non-halogenated organic solvent, and venting to the indoors; and
- (d) Insignificant activities consisting of the following:
 - (2) application of waxes and touch-up paints;

TN Trailers, Inc.

- (c) one (1) paint booth, designated as TNT-PB, constructed in 2005, consisting of two (2) airless spray guns for application of paint and a rust preventative sealant undercoating to metal trailer frames at a maximum capacity of 3.75 trailer frames per hour, controlled by dry filters, and exhausting through stack PB;
- (d) one (1) assembly operation, designated as TNT-SA, constructed in 2005, maximum capacity of 3.75 trailers per hour, consisting of manual or low pressure, non-atomizing flow coating application of sealants and adhesives to wood and metal surfaces, and venting to the indoors; and
- (e) Insignificant activities consisting of the following:
 - (2) application of waxes and touch-up paints;

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

Emission Limitations and Standards

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

Pursuant to 326 IAC 8-2-9, for the metal surface coating operations in ATC-SA, TNT-PB, and TNT-SA, the owner or operator shall not allow the discharge into the atmosphere VOC in excess of:

- (a) Three and five-tenths (3.5) pounds per gallon of coating, excluding water, delivered to a coating applicator, in a coating application system that is air dried.
- (b) Three and five-tenths (3.5) pounds per gallon of coating, excluding water, delivered to a coating applicator that applies extreme performance coatings.

D.2.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from equipment used in ATC-SA, TNT-PB, and TNT-SA 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.2.3 Particulate [326 IAC 6-3-2(d)]

- (a) Particulate from paint booth TNT-PB shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.2.4 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.2.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the 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.

D.2.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Compliance with the VOC content limits in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

$$A = \frac{\sum_{i=1}^n (C_i \times U_i)}{\sum_{i=1}^n U_i}$$

where: A is the volume weighted average in pounds VOC per gallon less water and exempt solvents as applied;
C is the VOC content of the coating *i* in pounds VOC per gallon less water and exempt solvents as applied;
U is the usage rate of the coating *i* in gallons per day less water and exempt solvents as applied; and
n is the number of coatings being averaged

If for a given day, all coating materials used in a metal surface coating operation are in compliance with the VOC content limits contained in Condition D.2.1, then the Permittee shall not be required to perform the daily averaging calculation for that operation on that day.

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

D.2.7 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.2.1.
 - (1) The VOC content of each coating material and solvent used;
 - (2) The amount of coating material and solvent less water used on daily basis;
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used; and
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvent.
 - (3) The volume weighted average VOC content of the coatings used for each day. If for a given day, all coating materials used in a metal surface coating operation are in compliance with the VOC content limits contained in Condition D.2.1, then the Permittee shall not be required to maintain records of the volume weighted average VOC content of the coatings used in that operation on that day;
 - (4) The cleanup solvent usage for each day; and
 - (5) The total VOC usage for each day.
- (b) To document compliance with Condition D.2.3 the Permittee shall maintain a record of any actions taken if overspray is visibly detected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	Aluminum Trailer Company & TN Trailers, Inc.
Address:	306 South Nappanee Street
City:	Nappanee, Indiana 46550
Phone #:	(574) 773-2240
MSOP #:	039-21926-00639

I hereby certify that Aluminum Trailer Company & TN Trailers, Inc. is:

- still in operation.
- no longer in operation.

I hereby certify that Aluminum Trailer Company & TN Trailers, Inc. is:

- in compliance with the requirements of MSOP 039-21926-00639.
- not in compliance with the requirements of MSOP 039-21926-00639.

Authorized Individual (typed):
Title:
Signature:
Date:

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

Mail to: Permit Administration & Development Section
Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

Aluminum Trailer Company & TN Trailers, Inc.
306 South Nappanee Street
Nappanee, Indiana 46550

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)
4. I hereby certify that Aluminum Trailer Company & TN Trailers, Inc., located at 306 South Nappanee Street, Nappanee, Indiana 46550, completed construction of the stationary towable cargo trailer manufacturing plant on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on October 27, 2005 and as permitted pursuant to the Minor Source Operating Permit (MSOP) No. 039-21926-00639 issued on _____.
5. Additional _____ were constructed/substituted as described in the attachment to this document
(operations/facilities)
and were not made in accordance with the construction permit. (Delete this statement if it does not apply.)

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature

Date

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of
Indiana on this _____ day of _____, 20 _____.

My Commission expires: _____.

Signature

Name (typed or printed)

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

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

Source Background and Description

Source Name:	Aluminum Trailer Company & TN Trailers, Inc.
Source Location:	306 South Nappanee Street, Nappanee, IN 46550
County:	Elkhart
SIC Code:	3715 (Manufacturing of Truck Trailers) 3799 (Manufacturing of Transportation Equipment Not Elsewhere Classified)
Application No.:	039-21926-00639
Reviewer:	Nathan C. Bell

On October 27, 2005, the Office of Air Quality (OAQ) received an application from Aluminum Trailer Company & TN Trailers, Inc. relating to the construction and operation of the stationary towable cargo trailer manufacturing plant located at 306 South Nappanee Street, Nappanee, IN 46550.

History

TN Trailers, Inc. was issued a Minor Source Operating Permit (MSOP) No. 087-20070-00059 on March 21, 2005 for a stationary towable cargo trailer manufacturing plant located at 0925 N. State Road 5, Shipshewana, Indiana 46565. On October 27, 2005, the Office of Air Quality (OAQ) received notification that TN Trailers Inc. is planning to relocate and merge its operations with the previously exempt operations of the Aluminum Trailer Company. TN Trailers, Inc. will relocate its existing source to the Aluminum Trailer Company site located at 306 South Nappanee Street, Nappanee, IN 46550. The two companies have common ownership and the source name is now Aluminum Trailer Company & TN Trailers, Inc.

Source Definition

This stationary towable cargo trailer manufacturing source consists of operations from the following two (2) companies located at the same address:

- (a) Aluminum Trailer Company; and
- (b) TN Trailers, Inc.

Since the two (2) companies operate at the same location, are owned or operated by the same person (or by persons under common control), and belong to the same major industrial grouping, they will be considered one (1) source, effective from the date of issuance of this MSOP.

Permitted Emission Units and Pollution Control Equipment

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

Unpermitted Emission Units and Pollution Control Equipment

Aluminum Trailer Company

- (a) one (1) welding and metal cutting operation, constructed in 1999, which fabricates metal frames for non-motorized trailers at a maximum capacity of 0.5 trailer frames per hour, venting to the indoors, and consisting of the following emission units:
 - (1) six (6) metal inert gas (MIG) welding stations, constructed in 1999, each with a maximum wire usage rate of 0.25 pounds per hour of an aluminum-based welding wire (4043 wire) and 1.0 pounds per hour of a carbon steel wire (GMAW Wire Type ER70S-3);
 - (2) four (4) metal inert gas (MIG) welding stations, constructed in 1999, each with a maximum wire usage rate of 0.25 pounds per hour of an aluminum-based welding wire (4043 wire); and
 - (3) two (2) compressed air metal cutting stations, constructed in 1999, each with a maximum metal thickness cut of 0.1875 inches and a maximum metal cutting rate of 4.0 inches per minute;
- (b) one (1) wood and aluminum metal cutting and grinding operation, constructed in 1999, with a total maximum throughput of 0.45 tons of wood and aluminum per hour, consisting of the table saws, chop saws, and band saws, with no particulate control, and venting to the indoors;
- (c) one (1) assembly operation, designated as ATC-SA, constructed in 1999, maximum capacity of 0.5 trailers per hour, consisting of manual application of sealants and adhesives to wood and metal surfaces, with cleanup operations utilizing hand or soak application of a non-halogenated organic solvent, and venting to the indoors; and
- (d) Insignificant activities consisting of the following:
 - (1) operation of hand-held metal grinders and saws;
 - (2) application of waxes and touch-up paints; and
 - (3) operation of propane-fueled forklifts;

New Emission Units and Pollution Control Equipment

The application includes information relating to the construction and operation of the following:

TN Trailers, Inc.

- (a) one (1) welding and metal cutting operation, to be constructed in 2005, which fabricates metal frames for non-motorized trailers at a maximum capacity of 3.75 trailer frames per hour, venting to the indoors, and consisting of the following emission units:
 - (1) thirteen (13) metal inert gas (MIG) welding stations, to be constructed in 2005, each with a maximum wire usage rate of 1.0 pounds per hour of a carbon steel wire (GMAW Wire Type ER70S-3);
 - (2) one (1) metal inert gas (MIG) welding station, to be constructed in 2005, with a maximum wire usage rate of 0.25 pounds per hour of an aluminum-based welding wire (4043 wire); and

- (3) three (3) compressed air metal cutting stations, to be constructed in 2005, each with a maximum metal thickness cut of 0.1875 inches and a maximum metal cutting rate of 4.0 inches per minute;
- (b) one (1) plywood cutting operation, designated as TNT-PD, to be constructed in 2005, with a total maximum throughput of 0.66 tons of plywood per hour, consisting of the table saws, with particulate emissions controlled by one (1) portable dust collector with a control efficiency of 75%, and venting to the indoors;
- (c) one (1) paint booth, designated as TNT-PB, to be constructed in 2005, consisting of two (2) airless spray guns for application of paint and a rust preventative sealant undercoating to metal trailer frames at a maximum capacity of 3.75 trailer frames per hour, controlled by dry filters, and exhausting through stack PB;
- (d) one (1) assembly operation, designated as TNT-SA, to be constructed in 2005, maximum capacity of 3.75 trailers per hour, consisting of manual or low pressure, non-atomizing flow coating application of sealants and adhesives to wood and metal surfaces, and venting to the indoors; and
- (e) Insignificant activities consisting of the following:
 - (1) operation of hand-held metal grinders and saws;
 - (2) application of waxes and touch-up paints; and
 - (3) operation of propane-fueled forklifts;

Existing Approvals

TN Trailers, Inc. was issued an MSOP No. 087-20070-00059 on March 21, 2005.

Enforcement Issue

There are no enforcement actions pending. The source indicated that Aluminum Trailer Company's previous operations at this location were exempt from air pollution permit requirements.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
PB	TN Trailers, Inc. Paint Booth (TNT-PB)	18.0	3.5	25,600	77

Recommendation

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

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

An application for the purposes of this review was received on October 27, 2005. Additional information was submitted by the source by email on November 16, 2005.

Emission Calculations

- (a) The source will generate PM and PM10 emissions due to the cutting of wood and metal. The following calculations determine the unrestricted potential emissions and the estimated emissions after controls.

Aluminum Trailer Company

- (1) Potential Emissions Before Controls:

For Aluminum Trailer Company, there are no controls for particulate (PM/PM10) emissions from cutting of wood and aluminum. The source estimates the amount of saw dust and aluminum shavings from cutting of wood and aluminum is 1.06 pounds per hour. Assuming worst case, the uncontrolled PTE of particulate matter (PM/PM10) from cutting of wood and aluminum would be 1.06 pounds of PM per hour. Assuming 8760 hours of operation per year, the uncontrolled PTE of PM/PM10 is as follows:

$$\text{Uncontrolled PTE PM/PM10} = (1.06 \text{ lb/hr}) * (8760 \text{ hr/yr}) * (\text{ton}/2000 \text{ lb}) = 4.66 \text{ tons/yr PM/PM10}$$

TN Trailers, Inc.

- (1) Potential Emissions Before Controls:

For TN Trailers, Inc., the particulate (PM/PM10) emissions from cutting of plywood will be controlled by one portable dust collector with a control efficiency of 75%. The source estimates the amount of saw dust from cutting of plywood is 7.33 pounds per hour. Assuming worst case, the uncontrolled PTE of particulate matter (PM/PM10) from cutting of plywood would be 7.33 pounds of PM/PM10 per hour. Assuming 8760 hours of operation per year, the uncontrolled PTE of PM/PM10 is as follows:

$$\text{Uncontrolled PTE PM/PM10} = (7.33 \text{ lb/hr}) * (8760 \text{ hr/yr}) * (\text{ton}/2000 \text{ lb}) = 32.1 \text{ tons/yr PM/PM10}$$

- (2) Potential Emissions After Controls:

Using a dust collector control efficiency of 75%, the PTE PM/PM10 after controls is calculated to be:

$$\text{Controlled PTE PM/PM10} = 32.1 \text{ tons/yr} * (1 - 0.75) = 8.03 \text{ tons/yr PM/PM10}$$

- (b) Based on information provided by the source, there are negligible emissions of regulated criteria pollutants and hazardous air pollutants from the compressed air metal cutting stations and the insignificant activities (i.e., operation of hand-held metal grinders and saws; application of waxes and touch-up paints; and operation of propane-fueled forklifts)
- (c) For all other emission sources, see Appendix A of this TSD for detailed emissions calculations (Appendix A, pp. 1-8).

Potential To Emit

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

Pollutant	Potential To Emit (tons/year)
PM	83.92
PM10	83.92
SO ₂	0
NO _x	0
VOC	54.39
CO	0

HAPs	Potential To Emit (tons/year)
Xylenes	7.83
Toluene	2.51
n-Hexane	4.14
Ethylene Glycol	0.16
Methanol	0.97
Chromium	negligible
Cobalt	negligible
Manganese	0.03
Nickel	negligible
TOTAL HAPs	15.63

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of particulate matter (PM/PM10) and volatile organic compounds (VOCs) is each less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated criteria pollutants are less than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.
- (b) The PTE (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM10	Attainment or Unclassifiable
PM2.5	Attainment or Unclassifiable
SO ₂	Attainment
NO ₂	Attainment or Unclassifiable
1-Hour Ozone	Maintenance Attainment
8-Hour Ozone	Basic Nonattainment
CO	Attainment or Unclassifiable
Lead	Attainment or Unclassifiable

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when

evaluating the rule applicability relating to the ozone standard. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

- (b) Elkhart County has been classified as attainment for PM2.5. 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 PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability – Entire Source section.
- (c) Elkhart County has been classified as attainment or unclassifiable for all the other regulated criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (d) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

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

Pollutant	Emissions (tons/yr)
PM	16.22
PM10	16.22
SO ₂	0
NO _x	0
VOC	54.39
CO	0
Worst Single HAP	7.83
Combination HAPs	15.63

- (a) This new source is not a major PSD stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (b) This new source is not a Emission Offset major stationary source because no regulated nonattainment pollutant is emitted at a rate of 100 tons per year or greater. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the PTE of:

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

This status is based on the potential to emit calculations of the source (see Appendix A).

Federal Rule Applicability

- (a) This source is not subject to the requirements of the New Source Performance Standards (NSPS), 40 CFR 60, Subpart MM, Automobile and Light Duty Truck Surface Coating Operations (40 CFR Parts 60.390 - 60.398) (326 IAC 12), because this source is not a major source for HAPs as defined in 40 CFR 63.2 and is not involved in the surface coating of automobiles or light duty trucks. This source assembles motorized buses.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (c) This source is not subject to the requirements of the 40 CFR Subpart T (63.460 through 63.470), NESHAP for for Halogenated Solvent Cleaning, because this operation does not use a degreasing solvent that contains any of the halogenated compounds listed in 40 CFR 63.460(a).
- (d) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart JJ, Wood Furniture Manufacturing (40 CFR Part 63.800 - 63.808) (326 IAC 20-14-1), because this source is not a major source of HAPs as defined in 40 CFR 63.2 and does not manufacture wood furniture or wood furniture components.
- (e) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart IIII, Surface Coating of Automobiles and Light-Duty Trucks (40 CFR Part 63.3080 - 63.3176), because this source is not a major source of HAPs as defined in 40 CFR 63.2 and does not surface coat automobiles or light duty trucks as defined by 63.3176. This source assembles non-motorized towable cargo trailers.
- (f) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart MMMM, Surface Coating of Miscellaneous Metal Parts and Products (40 CFR Part 63.3880 - 63.3981), because this source is not a major source of HAPs as defined in 40 CFR 63.2.
- (g) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in the permit for this source.

State Rule Applicability - Entire Source

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

The emission units at this source were constructed after the applicability date of August 7, 1977. However, this source is not one of the 28 listed source categories defined in 326 IAC 2-2-1(y)(1), no major modifications were done to this source, and the uncontrolled potential to emit of all attainment regulated pollutants is less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

326 IAC 2-3 (Emission Offset)

The requirements of 326 IAC 2-3 (Emission Offset) apply to major sources or major modifications constructed in an area designated as non-attainment. The uncontrolled potential to emit of VOC and NOx are each less than 100 tons per year. Therefore, the requirements of 326 IAC 2-3 (Emission Offset) are not applicable.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The requirements of 326 IAC 2-4.1 are not applicable to this source, since the potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it is located in Elkhart County, it is not required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, and it does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year.

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 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.

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.

State Rule Applicability - Individual Facilities

326 IAC 8-1-6 (VOC rules: General Reduction Requirements for New Facilities)

- (a) The requirements of 326 IAC 8-1-6 are not applicable to each of the following operations, since they each have do not have the potential to emit greater than twenty-five (25) tons of VOCs per year.
 - (1) Aluminum Trailer Co.: Assembly Operation, Acrysol Cleanup Solvent
 - (2) TN Trailers, Inc.: Paint Booth (TNT-PB)
 - (3) TN Trailers, Inc.: Assembly Operation, Sealant/Adhesive Application (TNT-SA)
- (b) The requirements of 326 IAC 8-1-6 are not applicable to the ATC-SA metal surface coating operation, since this operation is specifically regulated by 326 IAC 8-2-9 (See below for 326 IAC 8-2-9 applicability).

State Rule Applicability - Welding Equipment

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

- (a) Pursuant to 326 IAC 6-3-1(b)(9), each of the welding stations are exempt from the requirements of 326 IAC 6-3, since they each have a potential to consume welding wire of less than six hundred twenty-five (625) pounds per day.

State Rule Applicability - Cutting and Grinding Equipment

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

- (a) The requirements of 326 IAC 6-3 are applicable to the Aluminum Trailer Company wood and metal cutting operations. Pursuant to 326 IAC 6-3-2(e)(2), the particulate emissions from the wood and metal cutting operations shall not exceed 2.40 pounds per hour based on a process weight rate equal to 0.45 tons of wood and metal per hour (900 pounds of wood and metal per hour). The allowable rate of emission was calculated as follows:

Interpolation of the data in the table in 326 IAC 6-3-2(e)(2) for the process weight rates 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 hourly potential particulate matter emissions from the Aluminum Trailer Company wood and metal cutting operations are estimated to be 1.06 pounds per hour, which is less than the 326 IAC 6-3-2 allowable hourly rate of 2.40 pounds per hour. Therefore, compliance with 326 IAC 6-3 is expected.

- (b) The requirements of 326 IAC 6-3 are applicable to the TNT-PD plywood cutting operation. Pursuant to 326 IAC 6-3-2(e)(2), the particulate emissions from TNT-PD shall not exceed 3.10 pounds per hour based on a process weight rate equal to 0.66 tons of plywood per hour (1,320 pounds of plywood per hour).

In order to comply with the allowable rate of emission, portable dust collector shall be in operation and control emissions from TNT-PD at all times that TNT-PD is in operation, and the permittee shall operate the control device in accordance with the manufacturer's specifications. The allowable rate of emission was calculated as follows:

Interpolation of the data in the table in 326 IAC 6-3-2(e)(2) for the process weight rates up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

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

- (c) Pursuant to 326 IAC 6-3-1(b)(14), the hand-held metal grinders and saws at this source are each exempt from the requirements of 326 IAC 6-3, because they each have a potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

State Rule Applicability - Surface Coating Operations

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

- (a) Aluminum Trailer Company Assembly Operation, Sealant/Adhesive Application (ATC-SA)

Pursuant to 326 IAC 6-3-1(b)(14), the ATC-SA operation is exempt from the requirements of 326 IAC 6-3, because the potential particulate emissions are less than five hundred fifty-one thousandths (0.551) pound per hour.

- (b) TN Trailers, Inc. Paint Booth (TNT-PB)

Application of surface coatings in paint booth TNT-PB using in the two (2) airless spray guns has potential particulate emissions that are greater than five hundred fifty-one thousandths

(0.551) pound per hour and has the potential to use greater than five (5) gallons per day of surface coatings. Therefore, the requirements of 326 IAC 6-3-2 are applicable to TNT-PB. Pursuant to 326 IAC 6-3-2(d), particulate from TNT-PB shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

- (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

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

(c) TN Trailers, Inc. Assembly Operation, Sealant/Adhesive Application (TNT-SA)

Pursuant to 326 IAC 6-3-1(b)(14), the TNT-SA operation is exempt from the requirements of 326 IAC 6-3, because the potential particulate emissions are less than five hundred fifty-one thousandths (0.551) pound per hour.

- (d) Pursuant to 326 IAC 6-3-1(b)(14), the application of waxes and touch-up paints are each exempt from the requirements of 326 IAC 6-3, because the potential particulate emissions are each less than five hundred fifty-one thousandths (0.551) pound per hour.

326 IAC 8-2-2 (Volatile Organic Compounds, Automobile and Light Duty Truck Coating Operations)

The requirements of 326 IAC 8-2-2 are not applicable to this source, since this source does not perform surface coating of automobiles or light duty trucks as defined in 326 IAC 8-2-2(a). This source assembles motorized buses.

326 IAC 8-2-9 (Volatile Organic Compounds, Miscellaneous Metal Coating Operations)

Pursuant to 326 IAC 8-2-1 (Applicability), this rule applies to facilities constructed after July 1, 1990 located in any county, and with actual VOC emissions of greater than fifteen (15) pounds per day before add-on controls.

(a) Aluminum Trailer Company Assembly Operation, Acrysol Cleanup Solvent

The requirements of 326 IAC 8-2-9 are not applicable to the Aluminum Trailer Company Assembly Operation degreasing and cleanup solvent activities, since usage of degreasing and cleanup solvents are not considered application of surface coatings, which are defined as protective, functional, or decorative films (326 IAC 8-1-0.5(c)).

(b) Aluminum Trailer Company Assembly Operation, Sealant/Adhesive Application (ATC-SA)

Pursuant to 8-2-1(a)(4) and 8-2-9(a)(5), the requirements of 326 IAC 8-2-9 are applicable to metal surface coating in the ATC-SA operation, since this operation was constructed after July 1, 1990 and has actual VOC emissions greater than fifteen (15) pounds per day before add-on controls, and since this operation includes surface coating of metal parts or products under the Standard Industrial Classification Code of major group #37.

Pursuant to 326 IAC 8-2-9(d), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts and products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of the following:

- (1) Three and five-tenths (3.5) pounds per gallon of coating, excluding water, delivered to a coating applicator, in a coating application system that is air dried.
- (2) Three and five-tenths (3.5) pounds per gallon of coating, excluding water, delivered to a coating applicator that applies extreme performance 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.

Each of the coatings used in the ATC-SA operation has a VOC content less than 3.5 pounds per gallon, excluding water. Therefore, the source is currently in compliance with 326 IAC 8-2-9.

(c) TN Trailers, Inc. Paint Booth (TNT-PB)

Pursuant to 8-2-1(a)(4) and 8-2-9(a)(5), the requirements of 326 IAC 8-2-9 are applicable to the metal surface coating operations in paint booth TNT-PB, since TNT-PB will be constructed after July 1, 1990 and will have actual VOC emissions greater than fifteen (15) pounds per day before add-on controls, and since this operation includes surface coating of metal parts or products under the Standard Industrial Classification Code of major group #37.

Pursuant to 326 IAC 8-2-9(d), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts and products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of the following:

- (1) Three and five-tenths (3.5) pounds per gallon of coating, excluding water, delivered to a coating applicator, in a coating application system that is air dried.
- (2) Three and five-tenths (3.5) pounds per gallon of coating, excluding water, delivered to a coating applicator that applies extreme performance 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.

Each of the coatings used in paint booth TNT-PB has a VOC content less than 3.5 pounds per gallon, excluding water. Therefore, the source is currently in compliance with 326 IAC 8-2-9.

(c) TN Trailers, Inc. Assembly Operation, Sealant/Adhesive Application (TNT-SA)

Pursuant to 8-2-1(a)(4) and 8-2-9(a)(5), the requirements of 326 IAC 8-2-9 are applicable to metal surface coating in the TNT-SA operation, since this operation will be constructed after July 1, 1990 and will have actual VOC emissions greater than fifteen (15) pounds per day before add-on controls, and since this operation includes surface coating of metal parts or products under the Standard Industrial Classification Code of major group #37.

Pursuant to 326 IAC 8-2-9(d), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts and products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of the following:

- (1) Three and five-tenths (3.5) pounds per gallon of coating, excluding water, delivered to a coating applicator, in a coating application system that is air dried.
- (2) Three and five-tenths (3.5) pounds per gallon of coating, excluding water, delivered to a coating applicator that applies extreme performance 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.

The table below summarizes metal surface coating in the TNT-SA operation. Based on the maximum usage information provided by the source, the volume-weighted VOC content of the coatings is less than 3.5 pounds per gallon, excluding water. Therefore, compliance with 326 IAC 8-2-9 is expected.

Facility/ Process	Metal Surface Coating Material	Volume % of water and non- VOCs	Maximum Usage (gal/day)	Maximum Usage (gal/day) (less water & non-VOCs)	VOC Content of Coatings (lb/gal) (less water & non-VOCs)	Volume-Weighted VOC Content of Coatings for Operation (lb/gal) (less water and non-VOCs)
TNT-SA	TACC T2832-05 Adhesive	25.0%	4.50	3.38	5.32	2.29
	Tremco 638 GD Self-Leveling Sealant	0.0%	5.40	5.40	0.39	

326 IAC 8-2-10 (Volatile Organic Compounds, Flat Wood Panels Manufacturing Operations)

The requirements of 326 IAC 8-2-10 are not applicable to this source, since this source does not perform manufacturing of flat wood panels.

326 IAC 8-2-11 (Volatile Organic Compounds, Fabric and Vinyl Coating)

The requirements of 326 IAC 8-2-11 are not applicable to this source, since this source does not perform surface coating of fabric or vinyl as defined by 326 IAC 8-2-11(a).

326 IAC 8-2-12 (Volatile Organic Compounds, Wood Furniture and Cabinet Coating)

The requirements of 326 IAC 8-2-12 are not applicable to this source, since this source does not perform surface coating of wood furniture or cabinets.

326 IAC 8-11-3 (Volatile Organic Compounds, Wood Furniture Coatings)

The requirements of 326 IAC 8-11-3 are not applicable to this source, since this source does not perform manufacturing of wood furniture.

State Rule Applicability – Degreasing Operations

326 IAC 8-3-1 (Organic Solvent Degreasing Operations)

The requirements of 326 IAC 8-3-1 are not applicable to degreasing operations at this source, since degreasing is performed using hand application of solvents.

326 IAC 20-6-1 (Halogenated Solvent Cleaning)

This source is not subject to the requirements of the 326 IAC 20-6-1, since the degreasing operations do not use a solvent that contains any of the halogenated compounds listed in 326 IAC 20-6-1(a).

State Rule Applicability - Propane-Fired Forklift

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

Pursuant to 326 IAC 6-3-1(b)(14), each of the propane-fired forklifts are exempt from the requirements of 326 IAC 6-3, because they each have potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

Testing Requirements

Testing is not required for each of the operations at this source, since the emissions from each are considered low.

Compliance Requirements

Compliance monitoring is not required for each of the operations at this source, since the emissions from each are considered low.

Conclusion

The operation of this source shall be subject to the conditions of the attached Minor Source Operating Permit (MSOP) No 039-21926-00639.

**Appendix A: Emissions Calculations
Emission Summary**

**Company Name: Aluminum Trailer Company & TN Trailers Inc.
Address City IN Zip: 306 South Nappanee Street, IN 46550
Permit Number: 039-21926
Plt ID: 039-00639
Reviewer: Nathan C. Bell
Date: November 19, 2005**

Uncontrolled Potential Emissions (tons/year)									
Emissions Generating Activity									
Category	Pollutant	Aluminum Trailer Company			TN Trailers, Inc.				TOTAL
		Welding & Flame Cutting	Assembly Sealant/Adhesive (ATC-SA)	Wood and Metal Cutting	Welding & Flame Cutting	Paint Booth (TNT-PB)	Assembly Sealant/Adhesive (TNT-SA)	Plywood Cutting (TNT-PD)	
Criteria Pollutants	PM	0.41	0	4.66	0.33	46.42	0	32.10	83.92
	PM10	0.41	0	4.66	0.33	46.42	0	32.10	83.92
	SO2								0
	NOx								0
	VOC		39.92			10.80	3.66		54.39
	CO								0
Hazardous Air Pollutants	Xylenes		7.83						7.83
	Toluene		1.43				1.09		2.51
	n-Hexane		1.43				2.71		4.14
	Ethylene Glycol		0.16						0.16
	Methanol		0.97						0.97
	Chromium	1.4E-04			6.8E-05				2.0E-04
	Cobalt	2.6E-05			5.7E-05				8.3E-05
	Manganese	8.7E-03			0.02				0.03
	Nickel	2.6E-05			5.7E-05				8.3E-05
	Totals	0.01	11.81	0	0.02	0	3.80	0	15.63
								7.83	

Total emissions based on rated capacity at 8,760 hours/year.

Controlled Potential Emissions (tons/year)									
Emissions Generating Activity									
Category	Pollutant	Aluminum Trailer Company			TN Trailers, Inc.				TOTAL
		Welding & Flame Cutting	Assembly Sealant/Adhesive (ATC-SA)	Wood and Metal Cutting	Welding & Flame Cutting	Paint Booth (TNT-PB)	Assembly Sealant/Adhesive (TNT-SA)	Plywood Cutting (TNT-PD)	
Criteria Pollutants	PM	0.41	0	4.66	0.33	2.79	0	8.03	16.22
	PM10	0.41	0	4.66	0.33	2.79	0	8.03	16.22
	SO2								0
	NOx								0
	VOC		39.92			10.80	3.66		54.39
	CO								0
Hazardous Air Pollutants	Xylenes		7.83						7.83
	Toluene		1.43				1.09		2.51
	n-Hexane		1.43				2.71		4.14
	Ethylene Glycol		0.16						0.16
	Methanol		0.97						0.97
	Chromium	1.4E-04			6.8E-05				2.0E-04
	Cobalt	2.6E-05			5.7E-05				8.3E-05
	Manganese	8.7E-03			0.02				0.03
	Nickel	2.6E-05			5.7E-05				8.3E-05
	Totals	0.01	11.81	0	0.02	0	3.80	0	15.63
								7.83	

Total emissions based on rated capacity at 8,760 hours/year.

**Appendix A: Emissions Calculations
Welding and Flame Cutting Operation**

**Company Name: Aluminum Trailer Company & TN Trailers Inc.
Address City IN Zip: 306 South Nappanee Street, IN 46550
Permit Number: 039-21926
Pit ID: 039-00639
Reviewer: Nathan C. Bell
Date: November 19, 2005**

Aluminum Trailer Company

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	Max. electrode consumption per station (lbs/day)	Max. electrode consumption (lbs/year)	EMISSION FACTORS* (lb pollutant/lb electrode)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
					PM = PM10	Cr	Co	Mn	Ni	PM = PM10	Cr	Co	Mn	Ni	
WELDING															
Gas Metal Arc Welding (ER70S)*	6	1.0	24.0	52,560	5.4E-03	1.0E-06	1.0E-06	3.2E-04	1.0E-06	3.2E-02	6.0E-06	6.0E-06	1.9E-03	6.0E-06	1.9E-03
Gas Metal Arc Welding (ER5154)*	10	0.25	6.0	21,900	2.4E-02	1.0E-05		3.4E-05		6.0E-02	2.5E-05		8.5E-05		1.1E-04

Total Potential Emissions lbs/hr	9.3E-02	3.1E-05	6.0E-06	2.0E-03	6.0E-06	2.0E-03
Total Potential Emissions lbs/day	2.22	7.4E-04	1.4E-04	4.8E-02	1.4E-04	4.9E-02
Total Potential Emissions tons/year	0.41	1.4E-04	2.6E-05	8.7E-03	2.6E-05	8.9E-03

TN Trailers, Inc.

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	Max. electrode consumption per station (lbs/day)	Max. electrode consumption (lbs/year)	EMISSION FACTORS* (lb pollutant/lb electrode)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
					PM = PM10	Cr	Co	Mn	Ni	PM = PM10	Cr	Co	Mn	Ni	
WELDING															
Gas Metal Arc Welding (ER70S)*	13	1.0	24.0	113,880	5.4E-03	1.0E-06	1.0E-06	3.2E-04	1.0E-06	7.0E-02	1.3E-05	1.3E-05	4.1E-03	1.3E-05	4.2E-03
Gas Metal Arc Welding (ER5154)*	1	0.25	6.0	2,190	2.4E-02	1.0E-05		3.4E-05		6.0E-03	2.5E-06		8.5E-06		1.1E-05

Total Potential Emissions lbs/hr	7.6E-02	1.6E-05	1.3E-05	4.1E-03	1.3E-05	4.2E-03
Total Potential Emissions lbs/day	1.83	3.7E-04	3.1E-04	9.9E-02	3.1E-04	1.0E-01
Total Potential Emissions tons/year	0.33	6.8E-05	5.7E-05	1.8E-02	5.7E-05	1.8E-02

Abbreviations

Cr = Chromium
Co = Cobalt
Mn = Manganese
Ni = Nickel

METHODOLOGY

*Emission Factors are default values for Gas Metal Arc Welding (GMAW) (SCC 3-09-052) Electrode Type ER70S, AP-42

**For this calculation, it was assumed that the aluminum-based wire (4043 wire) had properties and associated emission factors similar to the Gas Metal Arc Welding (GMAW) (SCC 3-09-052) Electrode Type ER5154, AP-42

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

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

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
Surface Coating
Volatile Organic Compounds (VOC) and Particulate Matter (PM)**

**Company Name: Aluminum Trailer Company & TN Trailers Inc.
Address City IN Zip: 306 South Nappanee Street, IN 46550
Permit Number: 039-21926
Plt ID: 039-00639
Reviewer: Nathan C. Bell
Date: November 19, 2005**

Aluminum Trailer Company Assembly Operation, Sealant/Adhesive Application (ATC-SA)

Operation and Material*	Primary Type of Surface Coated	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water + Non-VOCs	Weight % Solids	Weight % VOCs	Volume % Water + Non-VOCs	Volume % Solids	Usage (gal/unit)	Maximum Capacity (unit/hr)	Maximum Usage (gal/day)	Maximum Usage (lb/hr)	Pounds VOC per gallon of coating less water and non-VOCs	Pounds VOC per gallon of coating	PTE VOC (lb/hr)	PTE VOC (lb/day)	PTE VOC (tons/yr)	PTE PM (lb/hr)	PTE PM (tons/yr)	lb VOC per gal solids	Transfer Efficiency
Silkflex 227 Sealant	Metal, (minimal Wood)	10.59	4.15%	0.0%	95.8%	4.2%	0.0%	95.0%	0.20	0.5	2.40	1.06	0.44	0.44	0.04	1.06	0.19	0	0	0.46	100%
AdChem 4549 Silicone Adhesive	Metal, (minimal Wood)	10.51	3.0%	0.0%	97.0%	3.0%	0.0%	95.0%	1.39	0.5	16.68	7.30	0.32	0.32	0.22	5.26	0.96	0	0	0.33	100%
PL-400(R) Structural Adhesive	Metal, (minimal Wood)	9.18	33.54%	0.0%	66.5%	33.5%	0.0%	55.0%	0.71	0.5	8.52	3.26	3.08	3.08	1.09	26.24	4.79	0	0	5.60	100%
SF-550 High Performance Adhesive	Metal, (minimal Wood)	11.48	30.0%	29.85%	70.0%	0.15%	44.0%	55.0%	0.31	0.5	3.72	1.78	0.03	0.02	0.003	0.06	0.01	0	0	0.03	100%
Source E900 Tile Adhesive	Metal, (minimal Wood)	9.34	33.0%	0.0%	67.0%	33.0%	0.0%	55.0%	2.78	0.5	33.36	12.98	3.08	3.08	4.28	102.83	18.77	0	0	5.60	100%
Acrysol Cleanup Solvent	NA (Cleanup Solvent)	6.55	100%	0.0%	0.0%	100.0%	0.0%	0.0%	1.06	0.5	12.72	3.47	6.55	6.55	3.47	83.32	15.21	0	0	---	100%

Total Uncontrolled Potential to Emit (PTE) =	9.12	218.8	39.92	0.00	0.00
Actual Emissions based on 8 hours per day =	9.12	72.9			

TN Trailers, Inc. Paint Booth (TNT-PB)

Operation and Material*	Primary Type of Surface Coated	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water + Non-VOCs	Weight % Solids	Weight % VOCs	Volume % Water + Non-VOCs	Volume % Solids	Usage (gal/unit)	Maximum Capacity (unit/hr)	Maximum Usage (gal/day)	Maximum Usage (lb/hr)	Pounds VOC per gallon of coating less water and non-VOCs	Pounds VOC per gallon of coating	PTE VOC (lb/hr)	PTE VOC (lb/day)	PTE VOC (tons/yr)	PTE PM (lb/hr)	PTE PM (tons/yr)	lb VOC per gal solids	Transfer Efficiency
Z Tech ZPG-9902S Undercoating	Metal, (minimal Wood)	10.43	45.0%	41.82%	55.0%	3.18%	52.2%	45.0%	0.69	3.75	62.10	26.97	0.69	0.33	0.86	20.59	3.76	8.902	38.99	0.74	40%
Patriot Black W.R. Enamel	Metal, (minimal Wood)	8.39	75.7%	61.9%	24.3%	13.8%	62.1%	21.9%	0.37	3.75	33.30	11.64	3.06	1.16	1.608	38.58	7.04	1.70	7.43	5.29	40%

Total Uncontrolled Potential to Emit (PTE) =	2.47	59.2	10.80	10.60	46.42
Actual Emissions based on 8 hours per day =	2.47	19.7			

TNT-PB Dry Filter Control Efficiency =	94.0%
TNT-PB PM/PM10 Emissions after controls =	0.64 2.79

TN Trailers, Inc Assembly Operation, Sealant/Adhesive Application (TNT-SA)

Operation and Material*	Primary Type of Surface Coated	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water + Non-VOCs	Weight % Solids	Weight % VOCs	Volume % Water + Non-VOCs	Volume % Solids	Usage (gal/unit)	Maximum Capacity (unit/hr)	Maximum Usage (gal/day)	Maximum Usage (lb/hr)	Pounds VOC per gallon of coating less water and non-VOCs	Pounds VOC per gallon of coating	PTE VOC (lb/hr)	PTE VOC (lb/day)	PTE VOC (tons/yr)	PTE PM (lb/hr)	PTE PM (tons/yr)	lb VOC per gal solids	Transfer Efficiency
TACC T2832-05 Adhesive	Metal, (minimal Wood)	6.61	80.4%	20.0%	19.6%	60.4%	25.0%	90.0%	0.05	3.75	4.50	1.24	5.32	3.99	0.75	17.96	3.28	0	0	4.43	100%
Tremco 638 GD Self-Leveling Sealant	Metal, (minimal Wood)	12.11	3.22%	0.0%	96.8%	3.2%	0.0%	97.0%	0.06	3.75	5.40	2.72	0.39	0.39	0.09	2.11	0.38	0	0	0.40	100%

Total Uncontrolled Potential to Emit (PTE) =	0.84	20.1	3.66	0.00	0.00
Actual Emissions based on 8 hours per day =	0.84	6.7			

METHODOLOGY

Maximum Usage (lbs/hr) = Maximum Usage (gal/day) * Density (lb/gal) / (24 hour/day)
 Maximum Usage (gal/day) = Usage (gallons/unit) * Maximum Capacity (units/hour) * 24 hours/day
 Pounds of VOC per Gallon Coating less Water and non-VOCs = (Density (lb/gal) * Weight % VOCs) / (1-Volume % water and non-VOCs)
 Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % VOCs)
 Potential VOC Pounds per Hour = Maximum Usage (lbs/hr) * Weight % VOCs
 Potential VOC Pounds per Day = Potential VOC (lbs/hr) * (24 hours/day)
 Potential VOC Tons per Year = Potential VOC (lbs/day) * (365 days/yr) * (1 ton/2000 lbs)
 Particulate Potential Tons per Year = Density (lbs/gal) * Maximum Usage (gal/day) * (Weight % Solids) * (1-Transfer efficiency) * (365 days/yr) * (1 ton/2000 lbs)
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % VOCs) / (Volume % solids)
 Controlled Potential to Emit = Uncontrolled Potential to Emit * (1 - Control Efficiency)

Appendix A: Emissions Calculations
Surface Coatings and Solvents: Hazardous Air Pollutants (HAPs)

Company Name: Aluminum Trailer Company & TN Trailers Inc.
Address City IN Zip: 306 South Nappanee Street, IN 46550
Permit Number: 039-21926
Plt ID: 039-00639
Reviewer: Nathan C. Bell
Date: November 19, 2005

Aluminum Trailer Company Assembly Operation, Sealant/Adhesive Application (ATC-SA)

Operation and Material	Density (lb/gal)	Maximum Usage (gal/day)	Weight % Xylenes	Xylenes Emissions (tons/yr)	Weight % Toluene	Toluene Emissions (tons/yr)	Weight % Hexane	Hexane Emissions (tons/yr)	Weight % EG	EG Emissions (tons/yr)	Weight % MOH	MOH Emissions (tons/yr)	Total (tons/yr)
Silkaflex 227 Sealant	10.59	2.40	5.0%	0.232	0%	0	0%	0	0%	0	0%	0	0.23
PL-400(R) Structural Adhesive	9.18	8.52	0%	0	10.0%	1.428	10.0%	1.428	0%	0	0%	0	2.86
SF-550 High Performance Adhesive	11.48	3.72	0%	0	0%	0	0%	0	2.0%	0.156	0%	0	0.16
Source E900 Tile Adhesive	9.34	33.36	0%	0	0%	0	0%	0	0%	0	1.7%	0.967	0.97
Acrysol Cleanup Solvent	6.55	12.72	50%	7.603	0%	0	0%	0	0%	0	0%	0	7.60
Totals				7.835		1.428		1.428		0.156		0.967	11.81

TN Trailers, Inc. Assembly Operation, Sealant/Adhesive Application (TNT-SA)

Operation and Material	Density (lb/gal)	Maximum Usage (gal/day)	Weight % Xylenes	Xylenes Emissions (tons/yr)	Weight % Toluene	Toluene Emissions (tons/yr)	Weight % Hexane	Hexane Emissions (tons/yr)	Weight % EG	EG Emissions (tons/yr)	Weight % MOH	MOH Emissions (tons/yr)	Total (tons/yr)
TACC T2832-05 Adhesive	6.61	4.50	0.0%	0	20%	1.085	50%	2.713	0%	0	0%	0	3.80
Totals				0		1.085		2.713		0		0	3.80

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Maximum Usage (gal/day) * Weight % HAP * 365 days/yr * 1 ton/2000 lbs

ACRONYMS

EG = ethylene glycol
 MOH = methanol