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

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: July 25, 2007

RE: Haulmark Industries, Inc. / 039-21958-00254

FROM: Nisha Sizemore
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 03/23/06

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100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.in.gov/idem

Federally Enforceable State Operating Permit Renewal
OFFICE OF AIR QUALITY

Haulmark Industries, Inc.
14054 CR 4 East
Bristol, Indiana 46507

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

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

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

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

Operation Permit No.: F 039-21958-00254	
Issued by/Original Signed By: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: July 25, 2007 Expiration Date: July 25, 2012

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a metal cargo trailer manufacturing source.

Source Address:	14054 CR 4 East, Bristol, Indiana 46507
Mailing Address:	P.O. Box 281, Bristol, Indiana 46507
General Source Phone Number:	800-348-7530
SIC Code:	3715
County Location:	Elkhart
Source Location Status:	Nonattainment for 8-hour ozone Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

(a) One (1) paint station, identified as EU-01A, constructed in 1998, using HVLP spray applicators, equipped with dry filters for overspray control, exhausting to Stacks S-1 and S-2, capacity: 15.0 metal cargo trailers per hour.

(b) One (1) undercoating spray application process, identified as EU-02 and formerly part of the one (1) general assembly area, constructed in 1998, using HLVP spray applicators, exhausting to general ventilation (GV), capacity: 15.0 metal cargo trailers per hour and 165 metal cargo trailers per day.

(c) One (1) plywood wall adhesive spray application process, identified as EU-03 and formerly part of the one (1) general assembly area, constructed in 1998, using HVLP spray applicators, equipped with dry filters for overspray control, exhausting to general ventilation (GV), capacity: the plywood walls of 15.0 metal cargo trailers per hour.

(d) One (1) general assembly area, identified as EU-04, using hand, brush, or caulk gun application methods, constructed in 1998, exhausting to general ventilation (GV), capacity: 15.0 metal cargo trailers per hour.

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

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

(a) The following equipment related to manufacturing activities not resulting in the emission of HAPs:

(1) Cutting torches with a maximum capacity of fourteen (14) one inch cuts per hour.

(2) Welding equipment with a maximum capacity of 56 pounds of weld wire per hour, 1,845 parts welded per hour, and 9,542 pounds of finished material per hour.

(b) Natural gas-fired combustion sources with heat input equal or less than ten million (10,000,000) Btu per hour, including:

(1) One (1) curing area with a natural gas heating system to ensure a uniform temperature for proper curing of the trailers, heat input capacity: 0.67 million British thermal units per hour.

(2) One (1) make-up air heater with a heat input capacity of 7.86 million British thermal units per hour.

(c) One (1) wood burning heater, installed in October 2005, used for comfort heating for the employees, heat input capacity: 0.65 million British thermal units per hour.

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

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

SECTION B GENERAL CONDITIONS

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

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

(a) This permit, F 039-21958-00254, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

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

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

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

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

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

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

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

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

(a) Where specifically designated by this permit or required by an applicable requirement, any

application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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

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

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

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

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

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

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

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a state health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

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

And

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

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

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

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

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

(a) All terms and conditions of permits established prior to F 039-21958-00254 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised or

(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

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

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

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

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

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

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

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

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

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

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

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

Request for renewal shall be submitted to:

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

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the

shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

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

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

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

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

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

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

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

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

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

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

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

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

(b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

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

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

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

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

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

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

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

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

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action or revocation of this permit.

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 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 Overall Source Limit [326 IAC 2-8]

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

(a) Pursuant to 326 IAC 2-8:

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

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

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

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

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

C.3 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity

monitor) in a six (6) hour period.

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

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

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

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

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

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

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

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

C.8 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
MC 61-52 IGCN 1003

Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

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

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

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

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

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

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

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

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records;

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C – Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Surface Coating

(a) One (1) paint station, identified as EU-01A, constructed in 1998, using HVLP spray applicators, equipped with dry filters for overspray control, exhausting to Stacks S-1 and S-2, capacity: 15.0 metal cargo trailers per hour.

(b) One (1) undercoating spray application process, identified as EU-02 and formerly part of the one (1) general assembly area, constructed in 1998, using HLVP spray applicators, exhausting to general ventilation (GV), capacity: 15.0 metal cargo trailers per hour and 165 metal cargo trailers per day.

(c) One (1) plywood wall adhesive spray application process, identified as EU-03 and formerly part of the one (1) general assembly area, constructed in 1998, using HVLP spray applicators, equipped with dry filters for overspray control, exhausting to general ventilation (GV), capacity: the plywood walls of 15.0 metal cargo trailers per hour.

(d) One (1) general assembly area, identified as EU-04, using hand, brush, or caulk gun application methods, constructed in 1998, exhausting to general ventilation (GV), capacity: 15.0 metal cargo trailers per hour.

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

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

D.1.1 Hazardous Air Pollutants (HAPs) Limitations [326 IAC 2-8-4]

(a) The amount of each individual HAP used at the general assembly area, identified as EU-04, shall be limited to less than nine and thirty-two hundredths (9.32) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit the potential to emit each individual HAP to less than nine and thirty-two hundredths (9.32) tons per year from the general assembly area and less than ten (10.0) tons per year from the entire source.

(b) The amount of any combination of HAPs used at the general assembly area, identified as EU-04, shall be limited to less than twenty and nine-tenths (20.9) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit the potential to emit any combination of HAPs to less than twenty and nine-tenths (20.9) tons per year from the general assembly area and less than twenty-five (25.0) tons per year from the entire source.

(c) Compliance with these limitations shall render the requirements of 326 IAC 2-7, Part 70, not applicable.

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compounds (VOC) content of coatings delivered to the applicators at the paint station, identified as EU-01A, the plywood spray adhesive application process, identified as EU-03, and the general assembly area, identified as EU-04, metal coating operations shall be limited to 3.5 pounds of VOC per gallon of coating less water, for extreme performance coatings computed on a daily volume weighted basis.

D.1.3 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 the application equipment at the paint station, identified as EU-01A, the plywood spray adhesive application process, identified as EU-03, and the general assembly area, identified as EU-04 during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.1.4 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), particulate from the paint station, identified as EU-01A , and the plywood wall adhesive spray application process, identified as EU-03, shall be controlled by a dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.5 Particulate Limitations [326 IAC 2-2]

Pursuant to 326 IAC 2-2, PSD, the PM emissions from the paint station, identified as EU-01 A, and the plywood wall spray adhesive application process, identified as EU-03, shall be limited as follows:

(a) The coatings applied by the paint station, identified as EU-01 A shall be limited such that the total PM emissions shall not exceed 86.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(1) The transfer efficiency at the paint station, identified as EU-01 A shall not be less than 75%.

(2) The control efficiency of the dry filters shall not be less than 96%.

(b) The coatings applied by the plywood spray application process, identified as EU-03, shall be limited such that the total PM emissions shall not exceed 1.80 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(1) The transfer efficiency at the plywood spray application process, identified as EU-03, shall not be less than 75%.

(2) The control efficiency of the dry filters shall not be less than 80%.

Compliance with these limitations in combination with the unrestricted potential emissions from the undercoating spray application process, identified as EU-02, and from insignificant activities, shall render the requirements of 326 IAC 2-2, PSD, not applicable.

D.1.6 Particulate Matter (PM_{10}) [326 IAC 2-2] [326 IAC 2-8-4]

Pursuant to 326 IAC 2-2, PSD, and 326 IAC 2-8-4, the PM_{10} emissions from the paint station, identified as EU-01 A, and the plywood wall spray adhesive application process, identified as EU-03, shall be limited as follows:

(a) The coatings applied by the paint station, identified as EU-01 A shall be limited such that the total PM_{10} emissions shall not exceed 86.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(1) The transfer efficiency at the paint station, identified as EU-01 A shall not be less than 75%.

(2) The control efficiency of the dry filters shall not be less than 96%.

(b) The coatings applied by the plywood spray application process, identified as EU-03, shall be limited such that the total PM_{10} emissions shall not exceed 1.80 tons per twelve (12)

consecutive month period, with compliance determined at the end of each month.

(1) The transer efficiency at the plywood spray application process, identified as EU-03, shall not be less than 75%.

(2) The control efficiency of the dry filters shall not be less than 80%.

Compliance with these limitations in combination with the unrestricted potential emissions from the undercoating spray application process, identified as EU-02, and from insignificant activities, shall render the requirements of 326 IAC 2-2, PSD, and 326 IAC 2-7, Part 70, not applicable.

D.1.7 Volatile Organic Compounds [326 IAC 2-3] [326 IAC 2-8-4]

The use of VOC, including coatings, dilution solvents, and cleaning solvents at the paint station, identified as EU-01A, the undercoating spray application process, identified as EU-02, the plywood wall adhesive spray application process, identified as EU-03, and the general assembly area, identified as EU-04, shall be less than 99.7 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit renders 326 IAC 2-3, Emission Offset, and 326 IAC 2-7, Part 70, not applicable.

D.1.8 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the paint booth, identified as EU-01A , and the plywood wall adhesive spray application process, identified as EU-03, and their dry particulate filters.

Compliance Determination Requirements

D.1.9 Volatile Organic Compounds

In order to ensure compliance with the requirements of 326 IAC 8-2-9 in Condition D.1.2, volume weighted averaging of all coatings used per day will be required. The daily volume weighted average of VOC content from the paint station, identified as EU-01A, the plywood spray adhesive application process, identified as EU-03, and the general assembly area, identified as EU-04 be calculated only on days when one (1) or more of the coating materials exceed a VOC content of 3.5 pounds of VOC per gallon of coating less water using the following formula, where n is the number of coatings (c):

$$\frac{\sum_{c=1}^{c=n} \text{coating c (gal)} \times \text{VOC content of c (lbs/gal, less water)}}{\sum_{c=1}^{c=n} \text{coating c (gal)}}$$

D.1.10 Hazardous Air Pollutants (HAPs) and Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the HAPs and VOC usage limitations contained in Conditions D.1.1 and D.1.7 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.1.11 Particulate Matter (PM/PM_{10}) Emissions Determination [326 IAC 2-2] [326 IAC 2-8-4]

Compliance with Conditions D.1.5 and D.1.6 shall be determined by calculating the PM/PM_{10} emissions associated with each coating applied in the paint station, identified as EU-01 A, and the plywood wall adhesive spray application process, identified as EU-03, using the following equation:

$PM/PM_{10} = CU \times D \times W\%S \times (1 - TE/100) \times (1 - CE/100) \times 1/2000$

Where:

PM/PM_{10}= The total PM/PM_{10} emissions in tons per month for a given coating.

CU = The total coating use of a given coating (gallons of a coating per month).

D = Density of a given coating (pounds of coating per gallon of coating).

W%S= Weight percent solids of a given coating (pounds of solids per pound of coating).

TE = Transfer efficiency (%) of the spray applicators. This value shall equal 75%.

CE = Control efficiency (%) of the dry filters. This value shall equal 96% for EU-01 A and 80% for EU-03.

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

D.1.12 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth Stacks S-1 and S-2 while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from the Stacks S-1 and S-2 and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.1.13 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.7, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAPs and VOC usage limits established in Conditions D.1.1 and D.1.7. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on a monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data

sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The cleanup solvent usage for each month;

(4) The total VOC, single HAP, and combination of all HAPs usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.2. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on a daily basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The volume weighted average VOC content of the coatings used for each day;

(4) The cleanup solvent usage for each day;

(5) The total VOC usage for each day; and

(6) The weight of VOCs emitted for each compliance period.

(c) To document compliance with Conditions D.1.5 and D.1.6 the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the PM and PM_{10} emission limits established in Conditions D.1.5 and D.1.6

(1) The amount of each coating material used as (as applied). Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(2) The density and weight percent solids of each coating material used (as applied).

(3) Calculations as determined by Condition D.1.11.

(d) To document compliance with Condition D.1.12, the Permittee shall maintain a log of weekly overspray observations, and monthly inspections.

(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.14 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1, D.1.5, D.1.6, and D.1.7 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(a) The following equipment related to manufacturing activities not resulting in the emission of HAPs:

(1) Cutting torches with a maximum capacity of fourteen (14) one inch cuts per hour.

(2) Welding equipment with a maximum capacity of 56 pounds of weld wire per hour, 1,845 parts welded per hour, and 9,542 pounds of finished material per hour.

(b) Natural gas-fired combustion sources with heat input equal or less than ten million (10,000,000) Btu per hour, including:

(1) One (1) curing area with a natural gas heating system to ensure a uniform temperature for proper curing of the trailers, heat input capacity: 0.67 million British thermal units per hour.

(2) One (1) make-up air heater with a heat input capacity of 7.86 million British thermal units per hour.

(c) One (1) wood burning heater, installed in October 2005, used for comfort heating for the employees, heat input capacity: 0.65 million British thermal units per hour.

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

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the insignificant welding operations shall not exceed 11.7 pounds per hour when operating at a process weight rate of less than 9,598 pounds per hour.

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

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

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Haulmark Industries, Inc.
Source Address: 14054 CR 4 East, Bristol, Indiana 46507
Mailing Address: P.O. Box 281, Bristol, Indiana 46507
FESOP No.: F 039-21958-00254

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify) _____

☐ Report (specify) _____

☐ Notification (specify) _____

☐ Affidavit (specify) _____

☐ Other (specify) _____

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

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Haulmark Industries, Inc.
Source Address: 14054 CR 4 East, Bristol, Indiana 46507
Mailing Address: P.O. Box 281, Bristol, Indiana 46507
FESOP No.: F 039-21958-00254

This form consists of 2 pages **Page 1 of 2**

☐ This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Haulmark Industries, Inc.
Source Address: 14054 CR 4 East, Bristol, Indiana 46507
Mailing Address: P.O. Box 281, Bristol, Indiana 46507
FESOP No.: F 039-21958-00254
Facility: General assembly area, identified as EU-04
Parameter: Individual HAP Usage
Limit: Less than nine and thirty-two hundredths (9.32) tons per twelve (12) consecutive month period, with compliance determination at the end of each month.

YEAR:_____

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

☐ No deviation occurred in this month.

☐ Deviation/s occurred in this month.
Deviation has been reported on _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Haulmark Industries, Inc.
Source Address: 14054 CR 4 East, Bristol, Indiana 46507
Mailing Address: P.O. Box 281, Bristol, Indiana 46507
FESOP No.: F 039-21958-00254
Facility: General assembly area, identified as EU-04
Parameter: Combination of all HAPs Usage
Limit: Less than twenty and nine-tenths (20.9) tons per twelve (12) consecutive month period, with compliance determination at the end of each month.

YEAR:_____

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

☐ No deviation occurred in this month.

☐ Deviation/s occurred in this month.
Deviation has been reported on _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Haulmark Industries, Inc.
Source Address: 14054 CR 4 East, Bristol, Indiana 46507
Mailing Address: P.O. Box 281, Bristol, Indiana 46507
FESOP No.: F 039-21958-00254
Facilities: Paint station, identified as EU-01A, the undercoating spray application process, identified as EU-02, the plywood wall adhesive spray application process, identified as EU-03, and the general assembly area, identified as EU-04
Parameter: VOC Usage
Limit: Less than ninety-nine and seven-tenths (99.7) tons per twelve (12) consecutive month period, with compliance determination at the end of each month.

YEAR:_____

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

☐ No deviation occurred in this month.

☐ Deviation/s occurred in this month.
Deviation has been reported on _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Haulmark Industries, Inc.
Source Address: 14054 CR 4 East, Bristol, Indiana 46507
Mailing Address: P.O. Box 281, Bristol, Indiana 46507
FESOP No.: F 039-21958-00254
Facility: Paint Station, identified as EU-01 A
Parameter: PM Emissions
Limit: Less than eighty-nine and six-tenths (89.6) tons per twelve (12) consecutive month period, with compliance determination at the end of each month (as calculated by Condition D.1.11).

YEAR:_____

Month	PM Emissions (tons)	PM Emissions (tons)	PM Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

☐ No deviation occurred in this month.

☐ Deviation/s occurred in this month.
Deviation has been reported on _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Haulmark Industries, Inc.
Source Address: 14054 CR 4 East, Bristol, Indiana 46507
Mailing Address: P.O. Box 281, Bristol, Indiana 46507
FESOP No.: F 039-21958-00254
Facility: Paint Station, identified as EU-01 A
Parameter: PM_{10} Emissions
Limit: Less than eighty-nine and six-tenths (89.6) tons per twelve (12) consecutive month period, with compliance determination at the end of each month (as calculated by Condition D.1.11).

YEAR:_____

Month	PM_{10} Emissions (tons)	PM_{10} Emissions (tons)	PM_{10} Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

☐ No deviation occurred in this month.

☐ Deviation/s occurred in this month.
Deviation has been reported on _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Haulmark Industries, Inc.
Source Address: 14054 CR 4 East, Bristol, Indiana 46507
Mailing Address: P.O. Box 281, Bristol, Indiana 46507
FESOP No.: F 039-21958-00254
Facility: Plywood Wall Adhesive Spray Application Process, identified as EU-03
Parameter: PM Emissions
Limit: Less than one and eighty hundredths (1.80) tons per twelve (12) consecutive month period, with compliance determination at the end of each month (as calculated by Condition D.1.11).

YEAR:_____

Month	PM Emissions (tons)	PM Emissions (tons)	PM Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

☐ No deviation occurred in this month.

☐ Deviation/s occurred in this month.
Deviation has been reported on _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Haulmark Industries, Inc.
Source Address: 14054 CR 4 East, Bristol, Indiana 46507
Mailing Address: P.O. Box 281, Bristol, Indiana 46507
FESOP No.: F 039-21958-00254
Facility: Plywood Wall Adhesive Spray Application Process, identified as EU-03
Parameter: PM_{10} Emissions
Limit: Less than one and eighty hundredths (1.80) tons per twelve (12) consecutive month period, with compliance determination at the end of each month (as calculated by Condition D.1.11).

YEAR:_____

Month	PM_{10} Emissions (tons)	PM_{10} Emissions (tons)	PM_{10} Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

☐ No deviation occurred in this month.

☐ Deviation/s occurred in this month.
Deviation has been reported on _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

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

Source Name: Haulmark Industries, Inc.
Source Address: 14054 CR 4 East, Bristol, Indiana 46507
Mailing Address: P.O. Box 281, Bristol, Indiana 46507
FESOP No.: F 039-21958-00254

Months: _____ **to** _____ **Year:** _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for Federally Enforceable State Operating Permit (FESOP) Renewal

Source Name:	**Haulmark Industries, Inc.**
Source Location:	**14054 CR 4 East, Bristol, Indiana 46507**
County:	**Elkhart**
FESOP:	**F 039-21958-00254**
SIC Code:	**3715**
Permit Reviewer:	**Michael A. Morrone/MES**

On June 23, 2007, the Office of Air Quality (OAQ) had a notice published in the The Elkhart Truth, Auburn, Indiana, stating that Haulmark Industries, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) renewal to operate a truck trailer manufacturing source with dry filters for particulate control. The notice also stated that OAQ proposed to issue a FESOP renewal for this operation and provided information on how the public could review the proposed FESOP renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP renewal should be issued as proposed.

Upon further review, the OAQ has decided to make the following changes to the FESOP: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded)**:

Change 1:

Condition B.12(b)(5) of the permit has been updated to include the address of the Northern Regional Office as follows:

B.12 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a state health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,

Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877

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

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

And

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

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

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

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	**Haulmark Industries, Inc.**
Source Location:	**14054 CR 4 East, Bristol, Indiana 46507**
County:	**Elkhart**
SIC Code:	**3715**
Operation Permit No.:	**F 039-14190-00254**
Operation Permit Issuance Date:	**August 21, 2001**
Permit Renewal No.:	**F 039-21958-00254**
Permit Reviewer:	**Michael A. Morrone**

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Haulmark Industries, Inc. relating to the operation of a truck trailer manufacturing source. The original FESOP 039-14190-00254 was issued on August 21, 2001.

Permitted Emission Units and Pollution Control Equipment

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

(a) One (1) paint station, identified as EU-01A, constructed in 1998, using HVLP spray applicators, equipped with dry filters for overspray control, exhausting to Stacks S-1 and S-2, capacity: 15.0 metal cargo trailers per hour.

(b) One (1) undercoating spray application process, identified as EU-02 and formerly part of the one (1) general assembly area, constructed in 1998, using HLVP spray applicators, exhausting to general ventilation (GV), capacity: 15.0 metal cargo trailers per hour and 165 metal cargo trailers per day.

(c) One (1) plywood wall adhesive spray application process, identified as EU-03 and formerly part of the one (1) general assembly area, constructed in 1998, using HVLP spray applicators, equipped with dry filters for overspray control, exhausting to general ventilation (GV), capacity: the plywood walls of 15.0 metal cargo trailers per hour.

(d) One (1) general assembly area, identified as EU-04, using hand, brush, or caulk gun application methods, constructed in 1998, exhausting to general ventilation (GV), capacity: 15.0 metal cargo trailers per hour.

Unpermitted Emission Units and Pollution Control Equipment

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

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

There are no proposed emission units during this review process.

Emission Units and Pollution Control Equipment Removed

One (1) small parts paint station, identified as EU-01B, constructed in 2003, using HVLP spray applicators, equipped with dry filters for overspray control, capacity: 1.41 metal cargo trailers per hour.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) The following equipment related to manufacturing activities not resulting in the emission of HAPs:

(1) Cutting torches with a maximum capacity of fourteen (14) one inch cuts per hour.

(2) Welding equipment with a maximum capacity of 56 pounds of weld wire per hour, 1,845 parts welded per hour, and 9,542 pounds of finished material per hour.

(b) Natural gas-fired combustion sources with heat input equal or less than ten million (10,000,000) Btu per hour, including:

(1) One (1) curing area with a natural gas heating system to ensure a uniform temperature for proper curing of the trailers, heat input capacity: 0.67 million British thermal units per hour.

(2) One (1) make-up air heater with a heat input capacity of 7.86 million British thermal units per hour.

(c) One (1) wood burning heater, installed in October 2005, used for comfort heating for the employees, heat input capacity: 0.65 million British thermal units per hour.

Existing Approvals

The source has been operating under the previous FESOP 039-14190-00254 issued on August 21, 2001 and the following amendments and revisions:

(a) Administrative Amendment 039-9391-00254 issued on September 12, 2002;

(b) Significant Permit Revision 039-15419-00254 issued on August 25, 2003; and

(c) Administrative Amendment 039-20126-00254 issued on December 9, 2004.

All terms and conditions from previous approvals were either incorporated as originally stated, revised or deleted by this FESOP. The following terms and conditions have been revised:

(a) Condition D.1.1 from SPR 039-15419-00254, issued on August 25, 2003:

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

The input of volatile organic compounds (VOC) delivered to the applicators including clean-up solvents at the two (2) Paint Stations, identified as EU-01A; one (1) Small Parts Booth, identified as EU-01B; and the one (1) General Assembly Area, identified as Assembly shall be limited to less than 100 tons per year. Compliance with this limit will make 326 IAC 2-7 Part 70 Permit Program not applicable.

Reason revised:

Elkhart County was designated as basic nonattainment in 2004 for the 8-hour ozone standard, making VOC and NO_X reviewable pursuant to 326 IAC 2-3, Emission Offset. As a result, the title of the condition was revised to make reference to Emission Offset and the limit was changed from less than one hundred (100) tons of VOC used per twelve (12) consecutive month period to less than 99.7 tons per twelve (12) consecutive month period to allow for VOCs from the insignificant activities. In addition, EU-01B is no longer in operation at the source. This revised condition now appears as Condition D.1.5 in the permit.

(b) Condition D.1.2 from SPR 039-15419-00254, issued on August 25, 2003:

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

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the daily volume weighted average volatile organic compound (VOC) content of coating delivered to the applicators at EU-01A, EU-01B and Assembly, when coating metal parts, shall be limited to three and five-tenths (3.5) pounds of VOCs per gallon of coating less water, for 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.

Based on the MSDS submitted by the source and calculations made, EU-01A, EU-01B and Assembly are in compliance with this requirement. The source shall comply with this rule by limiting the VOC content on a daily basis. The daily volume weighted average of VOC content shall be calculated using the following formula:

lb VOC/gal less water = Σ coating [D * O * Q] / [1-w * Dc/Dw]
(Σ coats, gal / unit)

Where:

Dc = density of coating, lb/gal
Dw = density of water, 8.33 lb/gal
O = weight percent organics, %
W = percent volume water, %
Q = quantity of coating, gal/unit
C = Total coatings used, gal/unit

Reason Revised:

This condition has been revised because EU-01B is no longer at the source and the formula used to calculate the daily volume weighted average of VOC content has been updated and is now listed as a Compliance Determination Requirement. The revised condition is still Condition D.1.2 in the permit.

(c) Condition D.1.4 from SPR 039-15419-00254, issued on August 25, 2003:

D.1.4 HAPs [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8:

(a) The single HAP input delivered to the applicators including clean-up solvents at two (2)

Paint Stations, identified as EU-01A; one (1) Small Parts Booth, identified as EU-01B; and the one (1) General Assembly Area, identified as Assembly shall be limited to less than ten (10) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Therefore, the requirements of 326 IAC 2-7 do not apply.

(b) The combined HAPs input delivered to the applicators including clean-up solvents at two (2) Paint Stations, identified as EU-01A; one (1) Small Parts Booth, identified as EU- 01B; and the one (1) General Assembly Area, identified as Assembly shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Therefore, the requirements of 326 IAC 2-7 do not apply.

Reason Revised:

This condition has been revised to remove reference to EU-01B because it is no longer in operation at the source. In addition, the individual HAP limit has been changed from less than ten (10.0) tons per twelve (12) consecutive month period from the surface coating to less than nine and thirty-two hundreths (9.32) tons per twelve (12) consecutive month period from EU-04 to allow for HAPs emissions from insignificant activities. Similarly, the combination of all HAPs limit has been changed from less than twenty-five (25.0) tons per twelve (12) consecutive month period from the paint booths to less than twenty and nine-tenths (20.9) tons per twelve (12) consecutive months from EU-04 to allow for HAPs emissions from insignificant activities. The revised condition now appears as Condition D.1.1 in the permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

An administratively complete FESOP renewal application for the purposes of this review was received on November 7, 2005. Additional information was received on August 21, September 25, October 6, 2006, March 5, 2007, April 10, and April 12, 2007.

Emission Calculations

See pages 1 through 10 of Appendix A of this document for detailed emissions calcuations.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	450
PM_{10}	451
SO_2	0.094
VOC	Greater than 250
CO	4.85
NO_x	5.13

HAPs	Unrestricted Potential Emissions (tons/yr)
Single HAP	Greater than 10.0
Total HAPs	Greater than 25.0

(a) The unrestricted potential emissions of VOC and PM_{10} are equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.

(b) The unrestricted potential emissions of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.

Potential to Emit After Issuance

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

Potential To Emit (tons/year)							
Process/emission unit	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_x**	**HAPs**
Paint station (EU-01A)	86.9	86.9	0.00	Less than 99.7	0.00	0.00	0.00
Undercoating spray application process (EU-02)	1.09	1.09	0.00		0.00	0.00	0.00
Plywood wall adhesive spray application process (EU-03)	1.80	1.80	0.00		0.00	0.00	0.609 single (Hexane); 1.22 total
General assembly area (EU-04)	0.00	0.00	0.00		0.00	0.00	Less than 9.32 for a single HAP and less than 20.9 for a total of all HAPs
Insignificant Welding Operations	8.84	8.84	0.00	0.00	0.00	0.00	2.70 single HAP; 2.70 total of all HAPs
All other Insignificant Activities	1.20	1.40	0.094	0.242	4.85	5.13	0.067 single HAP; 2.86 total of all HAPs
Total Emissions	Less than 250	Less than 100	0.094	Less than 100	4.85	5.13	Less than 10.0 single HAP. Less than 25.0 total of all HAPs

The table above reflects the unrestricted potential emissions except for the following:

(a) PM and PM_{10} emissions from the paint station, identified as EU-01A, are limited to 86.9 tons per year and are limited to 1.80 tons per year from the plywood wall adhesive spray application process, identified as EU-03. Compliance with these limitations shall also render the requirements of 326 IAC 2-2, PSD and 326 IAC 2-7, Part 70, not applicable.

(b) VOC usage at the paint station, identified as EU-01A, the undercoating spray application process, identified as EU-02, the plywood wall adhesive spray application process, identified as EU-03, and the general assembly area, identified as EU-04, shall be limited to less than ninety-nine and seven tenths (99.7) tons per twelve (12) consecutive month period, total. This shall limit VOC usage from the entire source to less than one hundred (100) tons per twelve consecutive month period, rendering the requirements of 326 IAC 2-7, Part 70, and 326 IAC 2-3, Emission Offset, not applicable.

(c) The greatest single HAP from the general assembly area, identified as EU-04, is limited to less than nine and thirty-two hundredths (9.32) tons per twelve (12) consecutive month period and to less than twenty and nine-tenths (20.9) tons per twelve (12) consecutive month period for a total of all HAPs. This shall limit the entire source to less than ten (10.0) tons per twelve (12) consecutive month period for a single HAP and less than twenty-five (25.0) tons per twelve (12) consecutive month period for a total of all HAPs, rendering the requirements of 326 IAC 2-7, Part 70, not applicable.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
$PM_{2.5}$	attainment
PM_{10}	attainment
SO_2	attainment
NO_x	attainment
8-Hour Ozone	nonattainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and nitrogen oxides (NO_X) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_X emissions were reviewed pursuant to the requirements of 326 IAC 2-3, Emission Offset. See the State Rule Applicability - Entire Source section of this document.

(b) Elkhart County has been classified as unclassifiable or attainment for $PM_{2.5}$. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for $PM_{2.5}$ emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for $PM_{2.5}$ emissions, it has directed states to regulate PM_{10} emissions as a surrogate for $PM_{2.5}$ emissions. See the State Rule Applicability – Entire Source Section of this document.

(c) Elkhart County has been classified as attainment or unclassifiable in Indiana for PM_{10}, SO_2, NO_2, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section of this document.

(d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

Source Status

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

Pollutant	Emissions (tons/yr)
PM	72.2
PM_{10}	72.4
SO_2	0.094
VOC	Less than 100
CO	4.85
NO_x	5.13
Single HAP	Less than 10.0
Combination HAPs	Less than 25.0

(a) This existing source is not a major stationary source under 326 IAC 2-3, Emission Offset, because no nonattainment regulated pollutant is emitted at a rate of one hundred (100) tons per year or greater, and it is not in one of the twenty-eight (28) listed source categories.

(b) This existing source is not a major stationary source under 326 IAC 2-2, PSD, because no attainment regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or greater, and it is not in one of the twenty-eight (28) listed source categories.

(c) These emissions are based on calculations presented on pages 1 through 10 of Appendix A of this document.

Federal Rule Applicability

(a) There is no automobile or light duty truck manufacturing taking place at the source. Therefore, the requirements of the New Source Performance Standard, 40 CFR 60, Subpart MM, Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations, are not included in the permit.

(b) The insignificant wood burning heater used for comfort heating meets the basic definition of a wood heater in 40 CFR 60.531, but its weight of 3,950 pounds is heavier than the maximum weight of 1,760 pounds as outlined in the definition of a wood heater. Therefore, the requirements of the New Source Performance Standard, 40 CFR 60, Subpart AAA, Standards of Performance for New Residential Wood Heaters, are not included in this permit.

(c) There are no other New Source Performance Standards included in the permit for this source.

(d) This source is an area source for HAPs. Therefore, the requirements of the National Emission Standard for Hazardous Air Pollutants, 40 CFR 63, Subpart MMMM, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, are not included in the permit.

(e) There are no other National Emission Standards for Hazardous Air Pollutants included in the permit for this source.

State Rule Applicability – Entire Source

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

(a) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability. Pursuant to 326 IAC 2-7-2(e), all fugitive emissions are counted toward the determination of Part 70 Applicability.

(b) The unrestricted potential to emit PM is greater than two hundred fifty (250) tons per year. Therefore, the source shall limit PM emissions to less than two hundred fifty (250) tons per year, as follows:

(1) The PM emissions from the surface coating facilities shall be limited as follows:

(A) The coatings applied by the paint station, identified as EU-01 A shall be limited such that the total PM emissions shall not exceed 86.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(i) The transfer efficiency at the paint station, identified as EU-01 A shall not be less than 75%.

(ii) The control efficiency of the dry filters shall not be less than 96%.

(B) The coatings applied by the plywood spray application process, identified as EU-03, shall be limited such that the total PM emissions shall not exceed 1.80 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(i) The transer efficiency at the plywood spray application process, identified as EU-03, shall not be less than 75%.

(ii) The control efficiency of the dry filters shall not be less than 80%.

(C) The PM values discussed in (A) and (B) above shall be calculated using the following equation:

PM = CU x D x W%S x (1 - TE/100) x(1 - CE/100) x 1/2000

Where:

PM = The total PM emissions in tons per month for a given coating.

CU = The total coating use of a given coating (gallons of a coating per month).

D = Density of a given coating (pounds of coating per gallon of coating).

W%S = Weight percent solids of a given coating (pounds of solids per pound of coating).

TE = Transfer efficiency (%) of the spray applicators. This value shall equal 75%.

CE = Control efficiency (%) of the dry filters. This value shall equal 96% for EU-01 A and 80% for EU-03.

(2) Compliance with these limitations in combination with the unrestricted potential PM emissions of 1.09 tons per year from the undercoating spray application process, identified as EU-02, and 10.04 tons per year from the insignificant activities, shall limit source-wide PM emissions to less than two hundred fifty tons per year and render the requirements of 326 IAC 2-2, PSD, not applicable.

(c) The unrestricted potential to emit PM_{10} is greater than two hundred fifty (250) tons per year. As a result, the source shall limit PM_{10} emissions to less than one hundred (100) tons per year, which is less than two hundred fifty (250) tons per year, as follows:

(1) The PM_{10} emissions from the surface coating facilities shall be limited as follows:

(A) The coatings applied by the paint station, identified as EU-01 A shall be limited such that the total PM_{10} emissions shall not exceed 86.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(i) The transfer efficiency at the paint station, identified as EU-01 A shall not be less than 75%.

(ii) The control efficiency of the dry filters shall not be less than 96%.

(B) The coatings applied by the plywood spray application process, identified as EU-03, shall be limited such that the total PM_{10} emissions shall not exceed 1.80 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(i) The transer efficiency at the plywood spray application process, identified as EU-03, shall not be less than 75%.

(ii) The control efficiency of the dry filters shall not be less than 80%.

(C) The PM_{10} values discussed in (A) and (B) above shall be calculated using the following equation:

$PM_{10} = CU \times D \times W\%S \times (1 - TE/100) \times (1 - CE/100) \times 1/2000$

Where:

PM_{10} = The total PM_{10} emissions in tons per month for a given coating.

CU = The total coating use of a given coating (gallons of a coating per month).

D = Density of a given coating (pounds of coating per gallon of coating).

W%S = Weight percent solids of a given coating (pounds of solids per pound of coating).

TE = Transfer efficiency (%) of the spray applicators. This value shall equal 75%.

CE = Control efficiency (%) of the dry filters. This value shall equal 96% for EU-01 A and 80% for EU-03.

(2) Compliance with these limitations in combination with the unrestricted potential PM emissions of 1.09 tons per year from the undercoating spray application process, identified as EU-02, and 10.24 tons per year from the insignificant activities shall limit source-wide PM_{10} emissions to less than one hundred (100) tons per year to ensure compliance with 326 IAC 2-8-4 and also render the requirements of 326 IAC 2-2, PSD, not applicable.

(d) The unrestricted potential to emit all remaining attainment pollutants is less than two hundred fifty (250) tons per year. Therefore, this source, which is not one of the twenty-eight (28) listed source catergories, is a minor source, pursuant to 326 IAC 2-2, PSD.

326 IAC 2-3 (Emission Offset)

The unrestricted VOC emissions are greater than one hundred (100) tons per twelve (12) consecutive month period. However, the source will limit VOC emissions to less than one hundred (100) tons per year as follows:

The VOC usage at the paint station, identified as EU-01A, the undercoating spray application process, identified as EU-02, the plywood wall adhesive spray application process, identified as EU-03, and the general assembly area, identified as EU-04, shall be limited to less than ninety-nine and seven tenths (99.7) tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month. This will limit the VOC emissions from EU-01A, EU-03, and EU-04 to less than ninety-nine and seven tenths (99.7) per twelve (12) consecutive month period and less than one hundred (100) tons per twelve (12) consecutive month period from the entire source.

Compliance with these limitations shall ensure compliance with 326 IAC 2-8-4 and render this source a minor source pursuant to 326 IAC 2-3, Emission Offset.

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

The source-wide emissions of a single HAP are limited to less than ten (10.0) tons per year and the emissions of a combination of HAPs is limited to less than twenty-five (25.0) tons per year. Therefore, the requirements of 326 IAC 2-4.1 do not apply. See 326 IAC 2-8-4 (FESOP) for a detailed discussion of these limits.

326 IAC 2-6 (Emission Reporting)

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

326 IAC 2-8-4 (FESOP)

(a) The source-wide amount of a single HAP shall be limited to less than ten (10.0) tons per year and the source-wide combination of HAPs shall be limited to less than twenty-five (25.0) tons per year. Compliance with these limitations will allow the source to comply with the requirements of 326 IAC 2-8-4, FESOP. The specific limitations are as follows:

(1) The paint station, identified as EU-01A, uses a HAPs-free coating. Therefore, it does not need to be included in the HAPs limitation for the general assembly area, identified as EU-04.

(2) The unrestricted potential to emit each individual HAP at the plywood wall spray adhesive application process, identified as EU-03, is less than ten (10.0) tons per year, and the unrestricted potential to emit a combination of all HAPs is less than twenty-five (25.0) tons per year. Therefore, the plywood wall spray adhesive application process, identified as EU-03, does not need to be included in the HAPs limitation for the general assembly area, identified as EU-04.

(3) The amount of each individual HAP used at the general assembly area, identified as EU-04, shall be limited to less than nine and thirty-two hundredths (9.32) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit the potential to emit each individual HAP to less than ten (10.0) tons per year from the entire source.

(4) The amount of any combination of HAPs used at the general assembly area, identified as EU-04, shall be limited to less than twenty and nine-tenths (20.9) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit the source-wide potential to emit any combination of HAPs to less than twenty-five (25.0) tons per year from the entire source.

(b) The source-wide VOC usage shall be limited to less than one hundred (100) tons per year. Compliance with the following limitation will allow the source to comply with the requirements of 326 IAC 2-8-4, FESOP. The specific limitation is as follows:

The VOC usage from the Paint Station, identified as EU-01A, the undercoating spray application process, identified as EU-02, the plywood wall adhesive spray application process, identified as EU-03, and the general assembly area, identified as EU-04, shall be limited to less than ninety-nine and seven tenths (99.7) tons per twelve (12) consecutive month period, total, with compliance

determined at the end of each month. This will limit the source-wide VOC emissions to less than one hundred (100) tons per year, from the entire source.

(c) The source-wide PM_{10} emissions shall be limited to less than one hundred (100) tons per year. Compliance with this limitation in combination with the unrestricted potential PM_{10} emissions of 1.09 tons per year from the undercoating spray application process, identified as EU-02, 0.284 tons per year from the insignificant natural gas-fired combustion sources, 1.07 tons per year from the wood burning furnace, and 0.001 tons per year from the insignificant thermal cutting shall render the requirements of 326 IAC 2-7, Part 70, not applicable:

(1) The PM_{10} emissions from the surface coating facilities shall be limited as follows:

(A) The coatings applied by the paint station, identified as EU-01 A shall be limited such that the total PM_{10} emissions shall not exceed 17.3 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(i) The transfer efficiency at the paint station, identified as EU-01 A shall not be less than 75%.

(ii) The control efficiency of the dry filters shall not be less than 96%.

(B) The coatings applied by the plywood spray application process, identified as EU-03, shall be limited such that the total PM_{10} emissions shall not exceed 1.21 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(i) The transfer efficiency at the plywood spray application process, identified as EU-03, shall not be less than 75%.

(ii) The control efficiency of the dry filters shall not be less than 80%.

(2) The PM_{10} emissions from the insignificant welding operations shall be limited to 11.7 pounds per hour, which is equivalent to 51.2 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 the permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

326 IAC 6-4 (Fugitive Dust Emissions)

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

State Rule Applicability – Individual Facilities

326 IAC 6-3-2 (Particulate emission limitations, work practices and control technologies)

(a) Pursuant to 326 IAC 6-3-2(d), the dry filters for particulate control shall be in operation in accordance with manufacturer's specifications and control emissions from the paint station, identified as EU-01A, at all times when the paint station, identified as EU-01A, is in operation.

(b) The undercoating spray application process, identified as EU-02, has particulate matter emissions of less than 0.551 pounds per hour. Therefore, pursuant to 326 IAC 6-3-1(b)(14), the requirements of 326 IAC 6-3-2 are not applicable.

(c) Pursuant to 326 IAC 6-3-2(d), the dry filters for particulate control shall be in operation in accordance with manufacturer's specifications and control emissions from the plywood wall adhesive spray application process, identified as EU-03, at all times when the plywood wall adhesive spray application process, identified as EU-03, is in operation.

(d) The general assembly area, identified as EU-04, uses hand or brush application methods. Therefore, pursuant to 326 IAC 6-3-1(b)(5 through 8), the requirements of 326 IAC 6-3-2 are not applicable.

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

(a) The paint station, identified as EU-01A, the plywood wall adhesive spray application process, identified as EU-03, and the general assembly area, identified as EU-04 were constructed after November 1, 1980 and have potential VOC emissions of twenty-five (25.0) tons or greater per year. Therefore, pursuant to 326 IAC 8-2-1(a)(2), the requirements of 326 IAC 8-2-9, Miscellaneous Metal Coating, are applicable to the paint station, identified as EU-01A, the plywood wall adhesive spray application process, identified as EU-03, and the general assembly area, identified as EU-04.

(b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coating delivered to the applicator at the paint station, identified as EU-01A, the plywood spray adhesive application process, identified as EU-03, and the general assembly area, identified as EU-04 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, when coating metal parts, for forced warm air dried coatings.

(1) In order to ensure compliance with the requirements of 326 IAC 8-2-9, volume weighted averaging of all coatings used per day will be required for the paint station, identified as EU-01A, the plywood spray adhesive application process, identified as EU-03, and the general assembly area, identified as EU-04, as follows:

$$\frac{\sum_{c=1}^{n} \text{coating c (gal)} \times \text{VOC content of c (lbs/gal, less water)}}{\sum_{c=1}^{n} \text{coating c (gal)}}$$

where:

c= an individual coating
n= number of coatings

(2) 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.

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

(a) The paint station, identified as EU-01A, the undercoating spray application process, identified as EU-02, and the general assembly area, identified as EU-04, coat metal truck trailers. Therefore, the requirements of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating) are not applicable.

(b) The (1) one plywood adhesive application process, identified as EU-03, is not coating wood furniture or cabinets. Therefore, the requirements of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating) are not applicable.

State Rule Applicability – Insignificant Activities

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

The insignificant curing area, the make up heater, and the wood burner heater are not sources of indirect heating. Therefore, the requirements of 326 IAC 6-2, Particulate Emission Limitations for Sources of Indirect Heating, are not applicable.

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

(a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the insignificant welding operations shall not exceed 11.7 pounds per hour when operating at a process weight rate of 9,598 pounds per hour.

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

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

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

(b) The insignificant torch cutting operations cut less than three thousand four hundred (3,400) pieces per hour of stock one (1) inch thickness. Therefore, pursuant to 326 IAC 6-3-1(a)(10), the requirements of 326 IAC 6-3-2 are not applicable.

(c) The particulate emissions from the insignificant curing area, the make up heater, and the wood burner heater are less than 0.551 pounds per hour, each. Therefore, pursuant to 326 IAC 6-3-1(a)(14), the requirements of 326 IAC 6-3-2 are not applicable.

Testing Requirements

No testing is proposed for this source. All HAPs and VOC emissions are based on Material Safety Data Sheets.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the approporiate corrective actions within a specific time period.

The Compliance Determination Requirements applicable to this source are as follows:

The paint station, identified as EU-01 A, the undercoating spray application process, identified as EU-02, the plywood wall adhesive spray application process, identified as EU-03, and the general assembly area, identified as EU-04, have the following Compliance Determination Requirement:

(a) Compliance with the VOC and HAPs content and usage limitations shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) Compliance with the PM and PM_{10} emission limitations shall be determined by calculating the PM_{10} emissions associated with the coatings in the paint station, identified as EU-01 A, and the plywood wall adhesive spray application process, identified as EU-03, using the following equation:

$PM/PM_{10} = CU \times D \times W\%S \times (1 - TE/100) \times (1 - CE/100) \times 1/2000$

Where:

PM/PM_{10} = The total PM/PM_{10} emissions in tons per month for a given coating.

CU = The total coating use of a given coating (gallons of a coating per month).

D = Density of a given coating (pounds of coating per gallon of coating).

W%S = Weight percent solids of a given coating (pounds of solids per pound of coating).

TE = Transfer efficiency (%) of the spray applicators. This value shall equal 75%.

CE = Control efficiency (%) of the dry filters. This value shall equal 96% for EU-01 A and 80% for EU-03.

The Compliance Monitoring Requirements applicable to this source are as follows:

Control	Parameter	Frequency	Range	Excursions and Exceedances
Dry Particulate Filter	Overspray	Weekly	No Overspray – Presence of Overspray	Response Steps
		Monthly	No Overspray- Presence of Overspray	
			No Change of Overspray- Noticeable Change in Overspray	

These monitoring conditions are necessary because the dry particulate filters for the paint station, identified as EU-01A, and the plywood adhesive spray application process, identified as EU-03, must operate properly to ensure compliance with 326 IAC 6-3-2.

Conclusion

The operation of this metal cargo trailer manufacturing source shall be subject to the conditions of the **FESOP** 039-21958-00254.

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

Company Name: Haulmark Industries, Inc.
Address City IN Zip: 14054 CR 4 East, Bristol, Indiana 46507
FESOP Renewal: F 039-21958-00254
Reviewer: Michael A. Morrone
Date: June 7, 2007

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	Substrate
One (1) paint station, identified as EU-01A																	
Black HAPs Free High Gloss Air Dry Enamel 411 FC	10.2	30.1%	0.00%	30.1%	0.00%	45.2%	3.70	15.0	3.07	3.07	170	4090	746	433	6.79	75%	metal
One (1) undercoating spray application process, identified as EU-02																	
Yoder Truck-Bus Undercoating	8.30	60.0%	60.00%	0.0%	0.00%	0.0%	0.020	15.0	0.00	0.00	0.00	0.00	0.00	1.09	n/a	75%	metal
One (1) plywood wall adhesive spray application process, identified as EU-03																	
TACC 283 Spray Grade Adhesive	6.62	81.5%	44.10%	37.4%	44.10%	18.5%	0.300	15.0	4.43	2.48	11.1	267	48.8	6.03	13.4	75%	plywood
									PM Control Efficiency for EU-01 A:	96.00%							
									PM Control Efficiency for EU-03	80.00%							
Add worst case coating to all solvents										**Uncontrolled**	**182**	**4357**	**795**	**440**			
										Controlled	**182**	**4357**	**795**	**19.6**			

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Haulmark Industries, Inc
Address City IN Zip: 14054 CR 4 East, Bristol, IN 46507
FESOP Renewal: F 039-21958-00254
Permit Reviewer: Michael A. Morrone
Date: June 7, 2007

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Toluene	Weight % Xylene	Weight % Hexane	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Hexane Emissions (tons/yr)	Total Emissions (ton/yr)
One paint station, identified as EU-01A										
Black HAPs Free High Gloss Air Dry Enamel 411 FC	10.2	3.70	12.5	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
One (1) undercoating spray application process, known as EU-02										
Yoder Truck-Bus Undercoating	8.30	0.140	12.5	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00
One (1) plywood wall adhesive spray application process, identified as EU-03							0.00	0.00	0.00	
TACC 283 Spray Grade Adhesive	6.6	0.014	15.0	10.0%	0.00%	10.0%	0.609	0.00	0.609	1.218
						TOTAL	**0.609**	**0.00**	**0.609**	**1.218**

Worst Case HAP	**0.507**
All HAPs	**1.020**

METHODOLOGY

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

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

Company Name: Haulmark Industries, Inc.
Address City IN Zip: 14054 CR 4 East, Bristol, IN 46507
FESOP Renewal: F 039-21958-00254
Reviewer: Michael A. Morrone
Date: June 7, 2007

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
8.53	75

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.90	7.60	0.600	100 **see below	5.50	84.0
Potential Emission in tons/yr	0.071	0.284	0.022	3.74	0.205	3.14

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
See page 4 for HAPs emissions calculations.

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

Company Name: Haulmark Industries, Inc.
Address City IN Zip: 14054 CR 4 East, Bristol, IN 46507
FESOP Renewal: F 039-21958-00254
Reviewer: Michael A. Morrone
Date: June 7, 2007

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	0.00210	0.00120	0.07500	1.80000	0.00340
Potential Emission in tons/yr	0.00008	0.00004	0.003	0.067	0.0001

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	
Emission Factor in lb/MMcf	0.0005	0.0011	0.0014	0.0004	0.0021	**Total**
Potential Emission in tons/yr	0.00002	0.00004	0.00005	0.00001	0.0001	**0.071**

Methodology is the same as page 3.

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

Appendix A: Emissions Calculations
External Combustion Boiler
Wood Waste Combustion (uncontrolled)
Dry Wood

Company Name: Haulmark Industries, Inc
Address City IN Zip: 14054 CR 4 East, Bristol, IN 46507
FESOP Renewal: F 039-21958-00254
Reviewer: Michael A. Morrone
Date: June 7, 2007

Capacity (MMBtu/hr) 0.650

	Pollutant						
	PM*	**PM10***	**PM2.5***	**SO2**	**NOx**	**VOC**	**CO****
Emission Factor in lb/MMBtu	0.4	0.377	0.327	0.025	0.49	0.013	0.6
Potential Emissions in tons/yr	1.14	1.07	0.931	0.071	1.40	0.037	1.71

Methodology

To convert from tons/hr capacity to MMBtu/hr capacity:
Heat Input Capacity (MMBtu/hr) = Capacity (tons/hr) x Higher Heating Value of wood fuel (Btu/lb) x (1 MMBtu/10^6 Btu/) x 2000 lbs/1 ton

Emission Factors are from AP-42 Chapter 1.6 (revised 3/02), SCCs #1-0X-009-YY where X = 1 for utilities, 2 for industrial, and 3 for commercial/institutional; Y = 01 for bark-fired boilers, 02 for bark and wet wood-fired boilers, 03 for wet wood-fired bo

Emissions (tons/yr) = Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760hrs/yr x 1ton/2000lbs

Appendix A: HAPs Emissions Calculations
External Combustion Boiler
Wood Waste Combustion (uncontrolled)
All Wood Waste Fuel Types

Company Name: Haulmark Industries, Inc
Address City IN Zip: 14054 CR 4 East, Bristol, IN 46507
FESOP Renewal: F 039-21958-00254
Reviewer: Michael A. Morrone
Date: June 7, 2007

Capacity (MMBtu/hr) 0.650

	Selected Hazardous Air Pollutants					
	Acrolein	**Benzene**	**Formaldehyde**	**Hydrogen Chloride**	**Styrene**	**Total**
Emission Factor in lb/MMBtu	0.004	0.004	0.004	0.019	0.002	
Potential Emissions in tons/yr	0.011	0.012	0.013	0.054	0.005	0.095

Methodology

To convert from tons/hr capacity to MMBtu/hr capacity:

Heat Input Capacity (MMBtu/hr) = Capacity (tons/hr) x Higher Heating Value of wood fuel (Btu/lb) x (1 MMBtu/10^6 Btu/) x 2000 lbs/1 ton

Emission Factors are from AP-42 Chapter 1.6 (revised 3/02), SCCs #1-0X-009-YY where X = 1 for utilities, 2 for industrial, and 3 for commercial/institutional; Y = 01 for bark-fired boilers, 02 for bark and wet wood-fired boilers, 03 for wet wood-fired bo

Emissions (tons/yr) = Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760hrs/yr x 1ton/2000lbs

These factors include the five HAPs with the highest AP-42 emission factors.

Appendix A: Emissions Calculations
Welding and Thermal Cutting

Company Name: Haulmark Industries, Inc
Address City IN Zip: 14054 CR 4 East, Bristol, IN 46507
FESOP Renewal: F 039-21958-00254
Reviewer: Michael A. Morrone
Date: June 7, 2007

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
WELDING				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Submerged Arc	1.00	56.0		0.036	0.011			2.02	0.616	0.00	0.00	0.616
	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
FLAME CUTTING				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	1.00	1.00	0.230	0.1622	0.0005	0.0001	0.0003	0.002	0.000001	0.0000000001	################	0.000001
EMISSION TOTALS												
Potential Emissions lbs/hr								2.02	0.62	0.00	0.00	0.62
Potential Emissions lbs/day								48.4	14.8	0.00	0.00	14.78
Potential Emissions tons/year								8.84	2.70	0.00	0.00	2.70

METHODOLOGY

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

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick r

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

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

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

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

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

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

Appendix A: Emissions Calculations
Summary

Company Name: Haulmark Industries, Inc.
Address City IN Zip: 14054 CR 4 East, Bristol, IN 46507
FESOP Renewal: F 039-21958-00254
Reviewer: Michael A. Morrone
Date: June 7, 2007

Summary of Emissions

Uncontrolled Potential Emissions

Significant Emission Units	**PM**	**PM-10**	**SO2**	**NOx**	**VOC**	**CO**	**Toluene**	**Hexane**	**Formal-dehyde**	**Acrolein**	**Benzene**	**Styrene**	**Hydrogen Chloride**	**Manganese**	**Total HAPs**
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
One (1) paint station, identified as EU-01A	433	433	0.00	0.00	746	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) undercoating spray application process, identified as EU-02	1.09	1.09	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.000
One (1) plywood wall adhesive spray application process, identified as EU-03	6.03	6.03	0.00	0.00	48.8	0.00	0.609	0.609	0.00	0.00	0.00	0.00	0.00	0.00	1.22
One (1) General Assembly Operations, identified as EU-04	0.00	0.00	0.00	0.00	Greater than 100	0.00	Greater than 10.0 for a single HAP								Greater than 25.0
Subtotal Significant Emission Units	440	440	0.00	0.00	Greater than 895	0.00	Greater than 10.0 for a single HAP								Greater than 25.0
Insignificant Activities															
Natural gas-fired combustion sources	0.071	0.284	0.022	3.74	0.205	3.14	0.00	0.067	0.003	0.00	0.00	0.00	0.00	0.00	0.070
Wood-burning furnace	1.14	1.07	0.071	1.40	0.037	1.71	0.00	0.00	0.013	0.01	0.012	0.005	0.054	0.00	0.095
Welding	8.84	8.84	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.70	2.70
Thermal Cutting	0.001	0.001	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.000004	0.000004
Subtotal Insignificant Activities	10.0	10.2	0.094	5.13	0.242	4.85	0.00	0.067	0.015	0.011	0.012	0.005	0.054	2.70	2.86
Total	450	451	0.094	5.13	Greater than 895	4.85	Greater than 10.0 for a single HAP								Greater than 25.0

Company Name: **Haulmark Industries, Inc.**
Address City IN Zip: **14054 CR 4 East, Bristol, IN 46507**
FESOP Renewal: **F 039-21958-00254**
Reviewer: **Michael A. Morrone**
Application Date: **June 7, 2007**

Controlled Potential Emissions

	PM	PM-10	SO2	NOx	VOC	CO	Toluene	Hexane	Formal-dehyde	Acrolein	Benzene	Styrene	Hydrogen Chloride	Manganese	Total HAPs
Significant Emission Units	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
One (1) paint station, identified as EU-01A	17.3	17.3	0.00	0.00	746	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) undercoating spray application process, identified as EU-02	1.09	1.09	0.00	0.00	0.0	0.00	0.000	0.000	0.00	0.00	0.00	0.00	0.00	0.00	0.000
One (1) plywood wall adhesive spray application process, identified as EU-03	1.21	1.21	0.00	0.00	48.8	0.00	0.609	0.609	0.00	0.00	0.00	0.00	0.00	0.00	1.22
One (1) General Assembly Operations, identified as EU-04	0.00	0.00	0.00	0.00	Greater than 100	0.00	Greater than 10.0 for a single HAP								Greater than 25.0
Subtotal Significant Emission Units	19.6	19.6	0.00	0.00	Greater than 895	0.00	Greater than 10.0 for a single HAP								Greater than 25.0
Insignificant Activities															
Natural gas-fired combustion sources	0.071	0.284	0.022	3.74	0.205	3.14	0.00	0.067	0.003	0.00	0.000	0.000	0.000	0.000	0.070
Wood-burning furnace	1.14	1.07	0.071	1.40	0.037	1.71	0.00	0.0	0.013	0.011	0.012	0.005	0.054	0.00	0.095
Welding	8.84	8.84	0.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.70	2.70
Thermal Cutting	0.001	0.001	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.000004	0.000004
Subtotal Insignificant Activities	10.0	10.2	0.094	5.13	0.242	4.85	0.00	0.067	0.015	0.011	0.012	0.005	0.054	2.698	2.86
Total	29.7	29.8	0.094	5.13	Greater than 895	4.85	Greater than 10.0 for a single HAP								Greater than 25.0

Company Name: **Haulmark Industries, Inc.**
Address City IN Zip: **14054 CR 4 East, Bristol, IN 46507**
FESOP Renewal: **F 039-21958-00254**
Reviewer: **Michael A. Morrone**
Application Date: **June 7, 2007**

Limited Potential to Emit

	PM	PM-10	SO2	NOx	VOC	CO	Toluene	Hexane	Formal-dehyde	Acrolein	Benzene	Styrene	Hydrogen Chloride	Manganese	Total HAPs
Significant Emission Units	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
One (1) paint station, identified as EU-01A	86.9	86.9	0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) undercoating spray application process, identified as EU-02	1.09	1.09	0.00	0.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) plywood wall adhesive spray application process, identified as EU-03	1.80	1.80	0.00	0.00	Less than 99.7	0.00	0.609	0.609	0.000	0.000	0.000	0.000	0.000	0.000	1.22
One (1) General Assembly Operations, identified as EU-04	0.00	0.00	0.00	0.00		0.00	Less than 9.32 for a single HAP								Less than 20.9
Subtotal Significant Emission Units	89.8	89.8	0.00	0.00	Less than 99.7	0.00	Less than 9.32 for a single HAP								Less than 20.9
Insignificant Activities															
Natural gas-fired combustion sources	0.071	0.284	0.022	3.74	0.205	3.14	0.00	0.067	0.003	0.00	0.000	0.000	0.000	0.00	0.070
Wood-burning furnace	1.14	1.07	0.071	1.40	0.037	1.71	0.00	0.00	0.013	0.011	0.012	0.005	0.054	0.00	0.095
Welding	8.84	8.84	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.70	2.70
Thermal Cutting	0.001	0.001	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.000004	0.000004
Subtotal Insignificant Activities	10.0	10.2	0.094	5.13	0.242	4.85	0.00	0.067	0.015	0.011	0.012	0.005	0.054	2.70	2.86
Total	Less than 250	Less than 100	0.094	5.13	Less than 100	4.85	Less than 9.32 for a single HAP								Less than 25.0