



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
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TO: Interested Parties / Applicant
DATE: April 5, 2007
RE: United Express Line, Inc. / 039-23535-00096
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



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

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

April 5, 2007

100 North Senate Avenue
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.idem.IN.gov

Mr. Jared Hochstettler
United Express Line, Inc.
19986 County Road 8
Bristol, Indiana 46507

Re: F039-22535-00096
First Significant Revision to
FESOP 039-11645-00096

Dear Mr. Hochstettler:

United Express Line, Inc. was issued a Federally Enforceable State Operating Permit (FESOP) No. 039-11645-00096 on June 25, 2001 for the operation of manufacturing of covered trailers facility located at 19986 County Road 8, Bristol, Indiana 46507. The Office of Air Quality (OAQ) received an application from the source on January 17, 2006 that requested modifications to the production rates for the trailer operations from three (3) to nine (9) units per hour, the addition of one spray booth to the existing coating operation, the addition of welding units, and the addition of three (3) air makeup units to the FESOP.

Pursuant to the provisions of 326 IAC 2-8-11.1(g)(2), these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision procedures of 326 IAC 2-8-11.1(f) because this revision requires adjustments to emission cap limitations. Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please find attached a copy of the revised FESOP.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact James Farrell, 100 North Senate Avenue, Indianapolis, Indiana, 46204, at 317-233-8396 or at 1-800-451-6027 (ext 3-8396).

Sincerely,

Original document signed by

Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

JF

Attachments: Technical Support Document and revised permit

cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office (NRO)
NRO Air Compliance Section Inspector – Dave North
Compliance Data Section
Administrative and Development
Technical Support and Modeling



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Federally Enforceable State Operating Permit OFFICE OF AIR QUALITY

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

(herein known as the Permittee) is hereby authorized to construct and 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.

Operating Permit No.: F 039-11645-00096	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: June 25, 2001 Expiration Date: June 25, 2006

First Administrative Amendment No.: F039-15095-00096, issued January 14, 2002
Second Administrative Amendment No.: F039-17234-00096, issued June 2, 2003
Third Administrative Amendment No.: F039-20261-00096, issued March 7, 2005

First Significant Permit Revision No.: F039-22535-00096	Pages affected: Entire Permit
Issued by: Nisha Sizemore, Chief Permits Branch	Issuance Date: April 5, 2007 Expiration Date: April 5, 2012

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SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary manufacturing of covered trailers source.

Source Address:	19986 CR 8, Bristol, IN 46507
Mailing Address:	19986 CR 8, Bristol, Indiana 46507
General Source Phone Number:	574-848-7088
SIC Code:	4299
County Location:	Elkhart
Source Location Status:	Nonattainment for 8-hr Ozone and PM-2.5 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 shop installed in November 1999, modified in 2006, exhausting to stacks S1, S2 and S3, capacity: 9.0 trailers per hour, consisting of the following equipment:
 - (1) One (1) metal surface prep area, known as Unit 1;
 - (2) One (1) metal surface coating primer area, known as Unit 2; equipped with filters for particulate overspray control;
 - (3) One (1) metal surface coating topcoat area, known as Unit 2a; equipped with filters for particulate overspray control;
 - (4) One (1) metal surface coating primer area, known as Unit 2b; equipped with filters for particulate overspray control;
 - (5) One (1) spray gun cleaning area, known as Unit 3.
 - (6) One (1) paint booth, known as Unit PB1, equipped with filters for particulate overspray control.
- (b) One (1) plywood surface coating area, known as Unit 4, installed in November 1999, modified in 2006, using High Volume Low Pressure (HVL) Spray Application, exhausted to general ventilation, capacity: 9.0 trailers per hour.
- (c) One (1) woodworking area, known as Plywood, consisting of various woodworking tools, equipped with a cyclone, installed in November 1999, modified in 2006, capacity: 9.0 trailers per hour.

A.3 Specifically Regulated 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 which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.
- (b) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kiloPascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38 C (100 F) or;
 - (2) having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20 C (68 F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (d) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (e) Any operation using aqueous solutions containing less than 1 percent by weight of VOCs excluding HAPs.
- (f) Water based adhesives that are less than or equal to 5 percent by volume of VOCs excluding HAPs.
- (g) Paved and unpaved roads and parking lots with public access.
- (h) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (i) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (j) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (k) Three (3) Air Makeup Units, with the capacity of 2.57 MMBtu/hr, each, known as Air Makeup Units 1, 2, and 3.

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) 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, F039-11645-00096, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ , upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

B.8 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.9 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.10 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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent 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
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

- (a) The Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, for the source as described in 326 IAC 1-6-3. At a minimum, the PMPs shall include:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ . IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

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

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

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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 039-11645-00096 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
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
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
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
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, at 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, at 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, at 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
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 Advanced Source Modification Approval[326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) The requirements to obtain a permit modification under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.25 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] [326 IAC 2-2]

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 make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset) not applicable;
- (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 and fifty (250) tons per twelve (12) consecutive month period.

(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 that 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]

The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140.

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

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

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

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

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

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
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.

C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

within ninety (90) days after the date of issuance of this permit.

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

- (c) If the ERP is disapproved by IDEM, OAQ , the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 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.16 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.17 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 and 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.18 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.19 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
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) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.20 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 EMISSIONS UNIT OPERATION CONDITIONS

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

- (a) One (1) paint shop installed in November 1999, modified in 2006, exhausted to stacks S1, S2 and S3, capacity: 9.0 trailers per hour, consisting of the following equipment:
- (1) One (1) metal surface prep area, known as Unit 1;
 - (2) One (1) metal surface coating primer area, known as Unit 2; equipped with filters for particulate overspray control;
 - (3) One (1) metal surface coating topcoat area, known as Unit 2a; equipped with filters for particulate overspray control;
 - (4) One (1) metal surface coating primer area, known as Unit 2b; equipped with filters for particulate overspray control;
 - (5) One (1) spray gun cleaning area, known as Unit 3.
 - (6) One (1) paint booth, known as Unit PB1, equipped with filters for particulate overspray control.
- (b) One (1) plywood surface coating area, known as Unit 4, installed in November 1999, modified in 2006, using High Volume Low Pressure (HVLP) Spray Application, exhausted to general ventilation, capacity: 9.0 trailers per hour.

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

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

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

The combination of HAPs delivered to the coating applicators in Unit 1, Unit 2, Unit 2a, Unit 2b, Unit 3, Unit PB1 and Unit 4 shall be less than a total of 24.0 tons per twelve (12) consecutive month period and a single HAP delivered to the coating applicators in Unit 1, Unit 2, Unit 2a, Unit 2b, Unit 3 and Unit 4 shall be less than 10.0 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 are not applicable.

D.1.2 Volatile Organic Compounds (VOC) Limit [326 IAC 2-8-4]

The volatile organic compounds (VOCs) delivered to the applicators including cleanup solvents shall not exceed 98.0 tons per twelve (12) consecutive month period, as determined at the end of each month. Therefore the requirements of 326 IAC 2-7 are not applicable.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2(d), particulate matter emissions from Unit 1, Unit 2, Unit 2a, Unit 2b, Unit 3 and Unit PB1 shall be controlled by filters for particulate overspray control, and the Permittee shall operate the control devices in accordance with manufacturer's specifications.
- (b) Pursuant to 326 IAC 6-3-2(d), particulate matter emissions from Unit 4 shall follow the following Work Practices Plan:
- (1) Operate the plywood coating operation inside the facility.
 - (2) Spray coat only wood and wood derived materials.

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

D.1.4 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at Unit 1, Unit 2, Unit 2a, Unit 2b, Unit 3 and Unit PB1 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

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

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

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

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

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

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

Compliance Determination Requirements

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

Compliance with the VOC and HAP usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

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

D.1.8 Particulate Matter (PM)

- (a) The dry filters for PM control shall be in operation at all times when the Unit 1, Unit 2, Unit 2a, Unit 2b, Unit 3 and Unit PB1 are in operation.
- (b) Unit 4 shall follow the Work Practices Plan.

D.1.9 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 S1, S2, and S3 while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

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

D.1.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and/or the VOC and HAP emission limits established in Conditions D.1.1 and D.1.2
 - (1) The amount VOC content and HAPs content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC and HAPs usage for each month; and
 - (5) The weight of VOCs and HAPs emitted for each compliance period.

- (b) To document compliance with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.

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

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the addresses 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)]:

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

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

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

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

The PM emissions from the woodworking operation, Plywood, shall not exceed 6.56 pounds per hour when operating at a process weight rate of 4038 pounds per hour. The pounds per hour limitation was calculated with the following equation:

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

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

D.2.2 PM₁₀ Emission Limitation [326 IAC 2-8]

The PM₁₀ emissions from the woodworking operation, Plywood, shall be limited to less than 18.04 pounds per hour.

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

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

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

D.2.4 Particulate Matter (PM)

In order to comply with D.2.1 and D.2.2, the cyclone for PM control shall be in operation and control emissions from the woodworking operations at all times that woodworking is in operation.

D.2.5 Visible Emissions Notations

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

D.2.6 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). 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 Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.7 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain a record of the daily visible emission notations of the Plywood stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (i.e. the process did not operate that day).
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

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

- (c) The following equipment related to manufacturing activities not resulting in the emissions of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (j) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

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

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

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

The particulate matter (PM) from the brazing equipment, cutting torches, soldering equipment, welding equipment and the grinding and machining operations shall be limited by the following:

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

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

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

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

Source Name: United Express Line, Inc.
Source Address: 19986 CR 8, Bristol, Indiana 46507
Mailing Address: 19986 CR 8, Bristol, Indiana 46507
FESOP No.: F 039-11645-00096

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: United Express Line, Inc.
Source Address: 19986 CR 8, Bristol, Indiana 46507
Mailing Address: 19986 CR 8, Bristol, Indiana 46507
FESOP No.: F 039-11645-00096

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: United Express Line, Inc.
Source Address: 19986 CR 8, Bristol, Indiana 46507
Mailing Address: 19986 CR 8, Bristol, Indiana 46507
FESOP No.: F 039-11645-00096
Facility: Unit 1, Unit 2, Unit 2a, Unit 2b, Unit 3, Unit 4
Parameter: VOC
Limit: Less than 98.0 tons of VOC per twelve (12) consecutive month period.

YEAR: _____

Month			
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: United Express Line, Inc.
Source Address: 19986 CR 8, Bristol, Indiana 46507
Mailing Address: 19986 CR 8, Bristol, Indiana 46507
FESOP No.: F 039-11645-00096
Facility: Unit 1, Unit 2, Unit 2a, Unit 2b, Unit 3, Unit 4
Parameter: Combination of HAPs
Limit: Less than 24.0 tons per consecutive twelve (12) month period for any combination of HAPs.

YEAR: _____

Month			
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: United Express Line, Inc.
Source Address: 19986 CR 8, Bristol, Indiana 46507
Mailing Address: 19986 CR 8, Bristol, Indiana 46507
FESOP No.: F 039-11645-00096
Facility: Unit 1, Unit 2, Unit 2a, Unit 2b, Unit 3, Unit 4
Parameter: Single HAP
Limit: Less than 10.0 tons per consecutive twelve (12) month period for any single HAP.

YEAR: _____

Month			
	This Month	Previous 11 Months	12 Month Total

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

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

Source Name: United Express Line, Inc.
Source Address: 19986 CR 8, Bristol, Indiana 46507
Mailing Address: 19986 CR 8, Bristol, Indiana 46507
FESOP No.: F 039-11645-00096

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Addendum to the Technical Support Document (ATSD)
for a Significant Permit Revision to a
Federally Enforceable State Operating Permit

Source Background and Description

Source Name:	United Express Line, Inc.
Source Location:	19986 County Road 8, Bristol, Indiana 46507
County:	Elkhart
SIC Code:	4299
Operation Permit No.:	F039-11645-00096
Operation Permit Issuance Date:	June 25, 2001
Significant Permit Revision No.:	039-22535-00096
Permit Reviewer:	James Farrell

On February 28, 2007, the Office of Air Quality (OAQ) had a notice published in The Elkhart Truth in Elkhart Indiana, stating that United Express Line, Inc. had applied for a permit modification to the Federally Enforceable State Operating Permit (FESOP) requesting modifications to the production rates for the trailer operations from three (3) to nine (9) units per hour, the addition of one spray booth to the existing coating operation, the addition of welding units, and the addition of three (3) air makeup units to the FESOP. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

No comments were received during or after the Public Notice period for this permit. IDEM, OAQ has decided to make the following additional revisions to the permit. The changes listed below have been made to FESOP No. F039-11645-00096. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**

Additional Changes to Permit

IDEM, OAQ is clarifying that the Permittee needs to make a record of why visible emission notations are or are not taken on a daily basis, (i.e. the process did not operate that day), and that it is not necessary to include the phrase "when exhausting to the atmosphere" for the Plywood operation. Conditions D.2.5(a) and D.2.7(a) are revised as follows:

D.2.5 Visible Emissions Notations

- (a) Daily visible emission notations of the Plywood stack exhaust shall be performed during normal daylight operations ~~when exhausting to the atmosphere~~. A trained employee shall record whether emissions are normal or abnormal.

...

D.2.7 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain **a records of the daily visible emission notations of the Plywood stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (i.e. the process did not operate that day).**
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

Technical Support Document (TSD) for a
Significant Permit Revision to a
Federally Enforceable State Operating Permit

Source Background and Description

Source Name:	United Express Line, Inc.
Source Location:	19986 County Road 8, Bristol, Indiana 46507
County:	Elkhart
SIC Code:	4299
Operation Permit No.:	F039-11645-00096
Operation Permit Issuance Date:	June 25, 2001
Significant Permit Revision No.:	039-22535-00096
Permit Reviewer:	James Farrell

The Office of Air Quality (OAQ) has reviewed a Significant Permit Revision (SPR) application from United Express Line, Inc. relating to the operation of manufacturing of covered trailers.

History

United Express Line, Inc. was issued a Federally Enforceable State Operating Permit (FESOP) No. 039-11645-00096 on June 25, 2001 for the operation of manufacturing of covered trailers facility located at 19986 County Road 8, Bristol, Indiana 46507. The Office of Air Quality (OAQ) received an application from the source on January 17, 2006 requesting modifications to the production rates for the trailer operations from three (3) to nine (9) units per hour, the addition of one spray booth to the existing coating operation, the addition of welding units, and the addition of three (3) air makeup units to the FESOP.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) paint shop installed in November 1999, exhausting to stacks S1, S2 and S3, capacity: 3.0 trailers per hour, consisting of the following equipment:
 - (1) One (1) metal surface prep area, known as Unit 1;
 - (2) One (1) metal surface coating primer area, known as Unit 2; equipped with filters for particulate overspray control;
 - (3) One (1) metal surface coating topcoat area, known as Unit 2a; equipped with filters for particulate overspray control;
 - (4) One (1) metal surface coating primer area, known as Unit 2b; equipped with filters for particulate overspray control;
 - (5) One (1) spray gun cleaning area, known as Unit 3.
- (b) One (1) plywood surface coating area, known as Unit 4, installed in November 1999, exhausted to general ventilation, capacity: 3.0 trailers per hour.

- (c) One (1) woodworking area, known as Plywood, consisting of various woodworking tools, equipped with a cyclone, installed in November 1999, capacity: 3.0 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

The application includes information relating to the prior approval for the construction and operation of the following equipment pursuant to 326 IAC 2-8-4(11):

- (a) One (1) paint shop installed in November 1999, modified in 2006, exhausting to stacks S1, S2 and S3, capacity: 6.0 additional trailers per hour;
 - (6) One (1) paint booth, known as Unit PB1, equipped with filters for particulate overspray control.
- (b) One (1) plywood surface coating area, known as Unit 4, installed in November 1999, modified in 2006, using High Volume Low Pressure (HVLP) Spray Application, exhausted to general ventilation, capacity: 6.0 additional trailers per hour.
- (c) One (1) woodworking area, known as Plywood, consisting of various woodworking tools, equipped with a cyclone, installed in November 1999, modified in 2006, capacity: 6.0 additional trailers per hour.

The capacities of the paint shop, plywood surface coating area and woodworking area have been increased from 3 trailers per hour to 9 trailers per hour.

The following unit will be added to the Insignificant Activity list:

- (k) Three (3) Air Makeup Units, with the capacity of 2.57 MMBtu/hr, each, known as Air Makeup Units 1, 2, and 3.

Existing Approvals

The source has been operating under the previous FESOP 039-11645-00096 issued on June 25, 2001 with an expiration date of June 25, 2006 and the following amendments and revisions:

- (a) First Administrative Amendment F 039-15095 issued on January 14, 2002;
- (b) Second Administrative Amendment F 039-17234 issued on June 2, 2003;
- (c) Third Administrative Amendment F 039-20261 issued on March 7, 2005.

A FESOP Renewal application was submitted on September 23, 2005 and is still under review.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

An application for the purposes of this review was received on January 17, 2006. Additional information was provided on March 14, 2006, June 7, 2006, July 12, 2006 and January 9, 2007.

Emission Calculations

See Appendix A of this TSD for detailed emissions calculations (Appendix A, pages 1 through 7).

Unrestricted Potential To Emit of Modification

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

This table reflects the unrestricted potential to emit (PTE), excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)*
PM	788.8
PM-10	789
SO ₂	2.02
VOC	284.55
CO	7.84
NO _x	8.38

HAPs	Unrestricted Potential Emissions (tons/yr)*
Xylene	>10
Toluene	>10
MIBK	>10
Ethyl Benzene	>10
Combination	>25

* These are based on the new increased capacity of 9 trailers per hour.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM-10 and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 2-7. The source will be maintaining its FESOP status.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and 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 maintaining its FESOP status.

Justification for Revision

The FESOP is being modified through a Significant Permit Revision. This revision is being performed pursuant to 326 IAC 2-8-11.1(g)(2). Any modifications that require an adjustment to the emission cap limitations shall be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f).

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	Attainment
PM2.5	Nonattainment
SO ₂	Attainment
NO ₂	Attainment
8-Hour Ozone	Basic 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 for Emission Offset 326 IAC 2-3.
- (b) 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. Effective October 25, 2006, 326 IAC 1-4-1 has been revised revoking the one-hour ozone standard in Indiana.
- (c) U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Elkhart County as nonattainment for PM_{2.5}. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of non-attainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM₁₀ emissions as surrogate for PM_{2.5} emissions pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability – Entire Source section.
- (d) Elkhart County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (e) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit of Source After Issuance

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 the FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential To Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Unit 1, Unit 2, Unit 2a, Unit 2b Unit 3, Unit 4 and PB1	10.72	10.72	0.00	Less than 98.0	0.00	0.00	Total less than 24.0
Plywood	28.73	Less than 79.0	0.00	0.00	0.00	0.00	0.00
Welding	4.84	4.84	0.00	0.00	0.00	0.00	*Neg.
Air Makeup	0.06	+Neg.	0.02	+Neg.	2.84	3.38	*Neg.
Insignificant Activities	5.0	+5.0	2.0	+2.0	5.0	5.0	*1.0
Total Emissions	49.35	Less than 100	2.02	Less than 100	7.84	8.38	Total less than 25

*The HAPs emissions from the Welding and Air Makeup units are incorporated into the existing insignificant activity limit of 1 ton per year.

+The PM10 and VOC emissions from the Air Makeup units are incorporated into the existing insignificant activity limits of 5 ton per year for PM10 and 2.0 tons per year for VOC.

Federal Rule Applicability (Revision)

- (a) The new Paint Shop Units are not subject to the requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60.390), Subpart MM, Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations due to this source does not surface coat the exterior surface of automobiles or light-duty trucks including hoods, fenders, cargo boxes, doors, and grill opening panels. Therefore, this NSPS is not included in this revision.
- (b) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this revision for this source.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart DDDDD (National Emission Standards for Industrial, Commercial, and Institutional Boiler and Process Heaters) are not included in this revision because this source has limited HAP emissions (See 326 IAC 2-8, FESOP) such that it is not a major source of HAPs.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart IIII (National Emission Standards for Surface Coating of Automobiles and Light-Duty Trucks) are not included in this revision because this source has limited HAP emissions (See 326 IAC 2-8, FESOP) such that it is not a major source of HAPs.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart MMMM (National Emission Standards for Surface Coating of Miscellaneous Metal Parts and Products) are not included in this revision because this source has limited HAP emissions (See 326 IAC 2-8, FESOP) such that it is not a major source of HAPs.
- (f) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this revision for this source.

State Rule Applicability – Revision

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

This source was constructed in 1999 and was modified in 2006. This source is not subject to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) because PM, PM10 and VOC emissions are limited to less than 250 tons per year or more. Therefore, the requirements of 326 IAC 2-2 are not applicable.

326 IAC 2-3 (Emission Offset)

This source was constructed in 1999 and was modified in 2006. This source is not subject to 326 IAC 2-3 (Emission Offset) because VOC emissions are limited to less than 100 tons per year or more. Therefore, the requirements of 326 IAC 2-3 are not applicable.

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

This source was constructed in 1999 and was modified in 2006. The HAP emissions from the entire source are limited to less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for any combination of HAPs (see the discussion of 326 IAC 2-8-4 below). Therefore, the requirements of 326 IAC 2-4.1 are not applicable.

326 IAC 2-6 (Emission Reporting)

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

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the amount of PM10 and VOC shall be limited to less than one hundred (100) tons per year. In addition, the amount of a single HAP shall be limited to less than ten (10) tons per year and the combination of all HAPs shall be limited to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-7 are not applicable.

326 IAC 5-1 (Opacity Limitations)

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

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

326 IAC 8-1-6 (Volatile Organic Compound, New Facilities; General Reduction Requirements)

Although the new facilities are constructed after January 1, 1980, the rules set forth in this rule do not apply because this facility is subject to other 326 IAC 8 requirements.

State Rule Applicability – Individual Facilities

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

- (a) Pursuant to 326 IAC 6-3-2(d), particulate matter emissions from the Unit 1, Unit 2, Unit 2a, Unit 2b, Unit 3 and Unit PB1 shall be controlled by filters for particulate overspray control, and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

- (b) For Unit 4, pursuant to 326 IAC 6-3-2(d), a Work Practices Plan shall be considered an equivalent control device, therefore, particulate matter emissions from Unit 4 shall follow the following Work Practices Plan:
- (1) Operate the plywood coating operation inside the facility.
 - (2) Spray coat only wood and wood derived materials.
 - (3) Employ proper work practices as follows: Maintain and operate the HVLP Spray Application equipment in accordance with the manufacturer's recommendations.
 - (4) If accumulations of overspray are observed on the building or grounds outside the facility in the area of the plywood coating area; then overspray controls shall be installed.

The dry filters shall be in operation at all times that Unit 1, Unit 2, Unit 2a, Unit 2b, Unit 3 and Unit PB1 are in operation, the Permittee shall operate control devices in accordance with manufacturer's specifications and the Work Practices Plan shall be followed for unit 4 in order to comply with this limit.

- (c) The particulate matter (PM) from Plywood is limited to 6.56 pounds per hour when operating at a process weight rate of 4038 pounds per hour. The limit is calculated by the following:

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

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

The cyclone shall be in operation at all times that Plywood is in operation, and the Permittee shall operate the control device in accordance with manufacturer's specifications, in order to comply with this limit.

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

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 Unit 1, Unit 2, Unit 2a, Unit 2b, Unit 3 and Unit PB1 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

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

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

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

The surface coating operations at Unit 4 are subject to the requirements of 326 IAC 8-2-12 since the coatings are being applied to solid wood or wood composition. Pursuant to 326 IAC 8-2-12, the existing HVLP spray applicators used in the painting operation comply with this rule.

326 IAC 6-2-1 (Particulate Emission Limitations for Sources of Indirect Heating)

The air make-up units are not sources of indirect heating. Therefore, 326 IAC 6-2-1 does not apply to the air make-up units.

326 IAC 6-3-1 (Particulate Emission Limitations for Manufacturing Processes)

The welding and torch cutting units are below the exemption levels as specified in 326 IAC 6-3-1(b) (9) and (10). Therefore, 326 IAC 6-3-1 does not apply to the welding and torch cutting units.

State Rule Applicability – Insignificant Activities

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

Pursuant to F 039-11645-00096, issued on June 25, 2001, the particulate matter (PM) from the brazing equipment, cutting torches, soldering equipment, welding equipment and the grinding and machining operations shall be limited by the following:

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

The controls for the grinding and machining operations shall be in operation at all times that those facilities are in operation, and the Permittee shall operate the control device in accordance with manufacturer's specifications, in order to comply with this limit.

Testing Requirements (Revision)

The existing testing requirements will not change as a result of this revision. The source shall continue to comply with the applicable requirements and permit conditions as contained in FESOP No. F039-11645-00096.

Compliance Requirements (Revision)

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 appropriate corrective actions within a specific time period.

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

- (a) The dry filters used for control in Unit 1, Unit 2, Unit 2a, Unit 2b, Unit 3 and Unit PB1 have applicable compliance monitoring conditions as specified below:
 - (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters for Unit 1, Unit 2, Unit 2a, Unit 2b, Unit 3 and Unit PB1. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks S1, S2, and S3 while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be

considered a deviation from this permit.

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

- (b) Unit 4 shall follow the Work Practices Plan.

These monitoring conditions are necessary because the dry filters must operate properly and the Work Practices Plan must be followed to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-8 (FESOP).

- (c) The cyclone has applicable compliance monitoring conditions as specified below:

- (1) Daily visible emission notations of the Plywood stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (2) In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the cyclone for the woodworking operations must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-8 (FESOP)

Changes to the FESOP Due to this Revision:

For Section D.1, the 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP. 326 IAC 6-3-2(d) is now applicable to Unit 1, Unit 2, Unit 2a, Unit 2b, Unit 3 and Unit PB1 in Condition D.1.3 because these units have control devices. 326 IAC 6-3-2(e) is applicable to Unit 4 because it is not subject to 326 IAC 6-3-2(b)-(d). Based upon additional review of the FESOP 039-11645-00096, Unit 4 is being removed from Condition D.1.4, Miscellaneous Metal Coating Operations, which are subject to 326 IAC 8-2-9, and Condition D.1.9, now D.1.8, which requires that filters for control are in operation at all times when Unit 1, Unit 2, Unit 2a, Unit 2b Unit 3 and Unit PB1 are in operation, because, Unit 4 is a plywood surface coating operation, not metal and it does not use filters for overspray control.

For Section D.2, in Condition D.2.2, IDEM has determined the tons per year limitation is no longer required because it is not practically enforceable and the pounds per hour limit is revised to reflect the adjustment to the emission cap limitation as requested by the source.

The permit is revised as follows with deleted language as ~~strikeouts~~ and new language **bolded**:

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

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

- (a) One (1) paint shop installed in November 1999, **modified in 2006**, exhausting to stacks S1,

S2 and S3, capacity: ~~3-09.0~~ trailers per hour, consisting of the following equipment:

- (1) ...
 - (5) ...
 - (6) One (1) paint booth, known as Unit PB1, equipped with filters for particulate overspray control.**
- (b) One (1) plywood surface coating area, known as Unit 4, installed in November 1999, **modified in 2006, using High Volume Low Pressure (HVL) Spray Application**, exhausted to general ventilation, capacity: ~~3-09.0~~ trailers per hour.
- (c) One (1) woodworking area, known as Plywood, consisting of various woodworking tools, equipped with a cyclone, installed in November 1999, **modified in 2006**, capacity: ~~3-09.0~~ trailers per hour.

A.3 Specifically Regulated 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 which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) ...
- (j) ...
- (k) Three (3) Air Makeup Units, with the capacity of 2.57 MMBtu/hr, each, known as Air Makeup Units 1, 2, and 3.**

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

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

- (a) One (1) paint shop installed in November 1999, **modified in 2006**, exhausted to stacks S1, S2 and S3, capacity: ~~9.03-0~~ trailers per hour, consisting of the following equipment:
 - (1) ...
 - (5) ...
 - (6) One (1) paint booth, known as Unit PB1, equipped with filters for particulate overspray control.**
- (b) One (1) plywood surface coating area, known as Unit 4, installed in November 1999, **modified in 2006, using High Volume Low Pressure (HVL) Spray Application**, exhausted to general ventilation, capacity: ~~9.03-0~~ trailers per hour.

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

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

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

The combination of HAPs delivered to the coating applicators in Unit 1, Unit 2, Unit 2a, Unit 2b, Unit 3, **Unit PB1** and Unit 4 shall be less than a total of 24.0 tons per twelve (12) consecutive month period and a single HAP delivered to the coating applicators in Unit 1, Unit 2, Unit 2a, Unit 2b, Unit 3 and Unit 4 shall be less than 10.0 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 are not applicable.

D.1.2 Volatile Organic Compounds (VOC) Limit [326 IAC 2-8-4]

The volatile organic compounds (VOCs) delivered to the applicators including cleanup solvents shall not exceed 98.0 tons per twelve (12) consecutive month period, **as determined at the end of each month**. Therefore the requirements of 326 IAC 2-7 are not applicable.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2(d), particulate matter emissions ~~The PM from Unit 1, Unit 2, Unit 2a, Unit 2b, Unit 3 and Unit PB1 shall be controlled by filters for particulate overspray control, and the Permittee shall operate the control devices in accordance with manufacturer's specifications. Unit 4 shall not exceed the pound per hour emission rate established as E in the following formula:~~

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

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

- (b) Pursuant to 326 IAC 6-3-2(d), particulate matter emissions from Unit 4 shall follow the following Work Practices Plan:
- (1) Operate the plywood coating operation inside the facility.
 - (2) Spray coat only wood and wood derived materials.
 - (3) Employ proper work practices as follows: Maintain and operate the HVLP Spray Application equipment in according with the manufacturer's recommendations.
 - (4) If accumulations of overspray are observed on the building or grounds outside the facility in the area of the plywood coating area; then overspray controls shall be installed.

D.1.4 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at Unit 1, Unit 2, Unit 2a, Unit 2b, Unit 3 and **Unit PB1** ~~Unit 4~~ shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

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

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

...

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

Compliance with the VOC and HAP usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

~~D.1.8 VOC and HAP Emissions~~

~~Compliance with Condition D.1.1 and D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.~~

D.1.89 Particulate Matter (PM)

- (a) The dry filters for PM control shall be in operation at all times when the Unit 1, Unit 2, Unit 2a, Unit 2b Unit 3 **and Unit PB1** and Unit 4 are in operation.
- (b) **Unit 4 shall follow the Work Practices Plan.**

D.1.940 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 S1, S2, S3 while one or more of the booths are in operation. ~~The Compliance Response Plan shall be followed whenever~~ **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 - ~~Compliance Monitoring Plan - Failure to Take Response Steps~~ **Response to Excursions or Exceedances**, shall be considered a ~~violation of~~ **deviation from** this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when~~ **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.** ~~The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step.~~ Failure to take response steps in accordance with Section C - ~~Compliance Monitoring Plan - Failure to Take Response Steps~~ **Response to Excursions or Exceedances**, shall be considered a ~~violation of~~ **deviation from** this permit.
- ~~(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

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

D.1.1044 Record Keeping Requirements

- (a) ...
 - (1) ...
 - (5) ...
- (b) To document compliance with Condition D.1.940, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections. ~~and these additional inspections prescribed by the Preventive Maintenance Plan.~~
- (c) ...

D.1.1142 Reporting Requirements

...

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (c) One (1) woodworking area, known as Plywood, consisting of various woodworking tools, equipped with a cyclone, installed in November 1999, **modified in 2006**, capacity: ~~3.09.0~~ trailers per hour.

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

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

The PM emissions from the woodworking operation, Plywood, shall not exceed ~~3-196.56~~ **196.56** pounds per hour when operating at a process weight rate of ~~13764038~~ pounds per hour. The pounds per hour limitation was calculated with the following equation:

...

D.2.2 PM₁₀ Emission Limitation [326 IAC 2-8]

The PM₁₀ emissions from the woodworking operation, Plywood, shall be limited to less than ~~85.6~~ **18.04** tons per year equivalent to ~~19.5~~ **18.04** pounds per hour.

...

D.2.4 Particulate Matter (PM)

In order to comply with D.2.1 **and D.2.2**, the cyclone for PM control shall be in operation and control emissions from the woodworking operations at all times that woodworking is in operation.

D.2.5 Visible Emissions Notations

- (a) ...
- (d) ...

- (e) ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an~~ **If abnormal emissions are** 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 - ~~Compliance Monitoring Plan - Failure to Take Response Steps,~~ **Response to Excursions or Exceedances** shall be considered a **deviation from** ~~violation of~~ this permit.

~~provisions of this permit (Section B - Emergency Provisions).~~

D.2.6 Cyclone Inspections

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

D.2.67 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - ~~Compliance Monitoring Plan - Failure to Take Response Steps~~ **Response to Excursions or Exceedances**, shall be considered a ~~violation of~~ **deviation from** this permit.

D.2.78 Record Keeping Requirements

- (a) To document compliance with Condition D.2.54, the Permittee shall maintain records of daily visible emission notations of the Plywood stack exhaust.
- (b) ~~To document compliance with Condition D.2.5, the Permittee shall maintain records of the results of the inspections required under Condition D.2.5 and the dates the vents are redirected.~~
- (e) ~~All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~

Additional Changes to Permit

IDEM, OAQ has decided to make the following additional revisions to the permit:

- (a) All references to IDEM, OAQ's mailing address have been revised as follows:

Indiana Department of Environmental Management
Office of Air Quality
100 North Senate Avenue, ~~P.O. Box 6015~~
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**
- (b) All references to the IDEM, OAQ, Compliance Section telephone and facsimile numbers have been revised as follows: ~~317-233-5674~~ **317-233-0178** and ~~317-233-5967~~ **317-233-6865**, respectively.
- (c) Condition A.1 of the FESOP has been revised to reflect that the Authorized individual no longer needs to be listed and changes in the attainment status of Elkhart County as follows:

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

The Permittee owns and operates a stationary manufacturing of covered trailers source.

Authorized individual:	Jared Hochstetler
Source Address:	19986 CR 8, Bristol, Indiana 46507
Mailing Address:	19986 CR 8, Bristol, Indiana 46507
General Source Phone:	(574) 848-7088
SIC Code:	4299
Source Location Status:	Elkhart
Source Status:	Nonattainment for 8-hr ozone and PM-2.5 Attainment for all other criteria pollutants Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD and Emission Offset Rules ; Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

- (d) **Section A – Prior Permit Conditions**
Condition A.5 – Prior Permit Conditions has been revised and moved to Condition B.13.
- (e) **Section B – Permit No Defense**
Condition B.1 – Permit No Defense has been relocated to the cover page.
- (f) **Section B – Supersession Revisions**
To clarify the permit term and the term of the conditions, original Conditions B.3 – Permit Term, now B.2, and B.17 – Permit Renewal have been modified. Additionally, a new Section B condition, B.3 – Term of Conditions has been added.
- (g) **Section B – Compliance with Permit Conditions**
Condition B.10 - Compliance with Permit Conditions has been relocated to the Cover Page.
- (h) **Section B – Annual Compliance Certification**
Instructions for the original Condition B.12, now B.10 – Annual Compliance Certification (ACC) have been revised. The emission statement reporting requirements changed. The submission date for the ACC will continue to depend on which county the source is located.

- (i) **Section B – PMP and Emergency Conditions**
IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, IDEM has deleted paragraph (b) of the original Condition B.13 – Preventive Maintenance Plan, now B.11 and has amended the original Condition B.14 – Emergency Provisions, now B.12.
- (j) **Section B – Operational Flexibility**
For clarification purposes, Condition B.19 – Operational Flexibility has been revised.
- (k) **Section B – Credible Evidence**
Indiana has incorporated the credible evidence provision in 326 IAC 1-1-6. This rule became effective on March 16, 2005; therefore the condition reflecting this rule will be incorporated into the permit as condition B.25.
- (l) **326 IAC 6-3-2 and C.1 Condition**
Revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective on June 12, 2002 and were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. Condition C.1 – Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour has been added to the permit.
- (m) **Section C – Operation of Equipment**
In order to avoid duplication of requirements which may be included in D sections, Condition C.6 – Operation of Equipment has been removed from the permit.
- (n) **Section C – Asbestos Abatement Projects**
Condition C.8 – Asbestos Abatement Projects language has been revised.
- (o) **Section C – Maintenance of Emission Monitoring Equipment**
The original Condition C.12 – Maintenance of Emission Monitoring Equipment has been deleted from the permit because there are no continuous emissions monitoring for this source.
- (p) **Section C – Instrument Specifications**
IDEM realizes that the specifications of original Condition C.14 – Pressure Gauge and Other Instrument Specifications, can only be practically applied to analog units, and has therefore clarified the condition to state that the condition only applies to analog units. Upon further review, IDEM has also determined that the accuracy of the instruments is not nearly as important as whether the instrument has a range that is appropriate for the normal expected reading of the parameter. Therefore, the language in original Condition C.14, now C.13, has been revised.
- (q) **Section C – Response to Excursions or Exceedances**
IDEM has reconsidered the requirement to develop and follow a Compliance Monitoring Plan (original Condition C.17). The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated. Therefore, original Condition C.17 for the “Compliance Response Plan” has been replaced by Condition C.16 for the “Response to Excursions or Exceedances”. The Section D conditions that refer to this condition have been revised to reflect the new condition title.

- (r) **PMP Required Routine Control Device Inspections**
IDEM has determined that it is the Permittee's responsibility to include routine control device inspection requirements in the applicable preventive maintenance plan. Since the Permittee is in the best position to determine the appropriate frequency of control device inspections and the details regarding which components of the control device should be inspected, the conditions requiring control device inspections have been removed from the permit. In addition, the requirement to keep records of the inspections has been removed.
- (s) **Quarterly Deviation and Compliance Monitoring Report**
The third sentence on the Quarterly Deviation and Compliance Monitoring report form has been changed to be consistent with the condition in Section B - Deviations from Permit Requirements and Conditions:

The changes listed below have been made to Federally Enforceable State Operating Permit No. F039-11645-00096. Deleted language appears as ~~struckthroughs~~ and new language appears in **bold**:

Cover Page:

...

(herein known as the Permittee) is hereby authorized to **construct and** 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.

A.3 **Specifically Regulated** 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 **which are specifically regulated**, as defined in 326 IAC 2-7-1(21):

A.5 ~~Prior Permit Conditions~~

~~(a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.~~

~~(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.~~

B.1 ~~Permit No Defense [IC 13]~~

~~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.~~

B.12 Definitions [326 IAC 2-8-1]

...

B.23 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]

- (a) This permit, **F039-11645-00096**, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date **of this permit**.

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

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

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

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

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

...

~~B.5 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.56 Severability [326 IAC 2-8-4(4)]

...

B.67 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

...

~~B.78 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]~~

- (a) ~~The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:
Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015~~

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

- (b) ~~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 the "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. or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-8-4(5)(E)]~~

- (be) **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.89 Compliance Order Issuance [326 IAC 2-8-5(b)]

...

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- ~~(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, is grounds for:
 - ~~(1) Enforcement action;~~
 - ~~(2) Permit termination, revocation and reissuance, or modification; and~~
 - ~~(3) Denial of a permit renewal application.~~~~
- ~~(b) 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.~~
- ~~(c) 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.~~

B.914 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- ~~(a) ...~~
- ~~(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.**~~

...

B.1042 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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted ~~in letter form~~ no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6045
Indianapolis, Indiana 462064-2251

and

**United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590**

- (b) ...
- (c) ...
 - (1) ...
 - (4) ...

- (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 notification which shall be submitted **submittal** by the Permittee does require the certification

by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.1143 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 prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, ~~including the following information on each facility:~~ **for the source as described in 326 IAC 1-6-3. At a minimum, the PMPs shall include:**
...
The PMP extension notification does not require the certification by ~~an the~~ "authorized individual" as defined by 326 IAC 2-1.1-1(1)..
- (b) ~~The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.~~
- (c) ~~A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation.~~ **is the primary contributor to an exceedance of any limitation on emissions or potential to emit.** The PMPs does not require the certification by ~~an the~~ "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.**
- (d) ~~Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept 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.1244 Emergency Provisions [326 IAC 2-8-12]

- (a) ...
- (b) ...
- (1) ...
- (3) ...
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ 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: 317-233-5674-**0178** (ask for Compliance Section)
- Facsimile Number: 317-233-5967-**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:
- ...
- The notification which shall be submitted by the Permittee does not require the certification by ~~an the~~ "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- ...

- (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.

...

- (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 039-11645-00096 and issued pursuant to permitting programs approved into the state implementation plan have been either:**

- (1) **incorporated as originally stated,**
- (2) **revised, or**
- (3) **deleted.**

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

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

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

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

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

...

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. ~~A deviation that are~~ **required to be reported by 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 notification by the Permittee~~ **Quarterly Deviation and Compliance Monitoring Report** does require the certification by ~~the an~~ **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 or a rule. It does not include:**

- ~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~
- ~~(2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.~~

- ~~(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.~~

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 FESOP** 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 the~~ "authorized individual" as defined by 326 IAC 2-1.1-1(1).

...

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 the~~ "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
Indianapolis, Indiana 46204-2251

- (b) ~~Timely Submittal of Permit Renewal [326 IAC 2-8-3]~~

~~(1) — A timely renewal application is one that is:~~

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

~~(2B) 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.~~

~~(2) — If IDEM, OAQ upon receiving a timely and complete 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.~~

- (c) ~~Right to Operate After Application for Renewal [326 IAC 2-8-9]~~

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

...

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

- (c) The Permittee may implement ~~the~~ 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 this~~ 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) ...
- (2) ...
- (3) The changes do not result in emissions which exceed the ~~emissions allowable under limitations provided in~~ this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) ...
- (5) The Permittee maintains records on-site, **on a rolling five (5) year basis**, which document, ~~on a rolling five (5) year basis~~, all such changes and emissions trading **trades** that are subject to 326 IAC 2-8-15(b) through (d). ~~and makes~~ **The Permittee shall make** such records available, upon reasonable request, ~~to~~ **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) ~~The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:~~

- ~~(1) A brief description of the change within the source;~~
- ~~(2) The date on which the change will occur;~~
- ~~(3) Any change in emissions; and~~
- ~~(4) Any permit term or condition that is no longer applicable as a result of the change.~~

~~The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

- ~~(c) Emission Trades [326 IAC 2-8-15(c)]~~

~~The Permittee may trade **emissions** increases and decreases in emissions in 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).~~

- ~~(dc) 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 Permit Revision 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, H**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, I**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, S**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, U**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) ...
- (b) ...

The application which shall be submitted by the Permittee does require the certification by **an** ~~the~~ "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~~44(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) ...
- (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 ~~317-233-0425~~ **317-233-4230** (ask for OAQ, **Billing, Licensing, and Training Section** ~~Technical Support and Modeling Section~~), to determine the appropriate permit fee.

B.24 Advanced Source Modification Approval[326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) **The requirements to obtain a permit modification under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.**
- (b) **Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is**

suspended for a continuous period of one (1) year or more.

B.25 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.

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

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 make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable; ~~(keep or delete as applicable)~~

(2) ...

(3) ...

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two-hundred and fifty (250) tons per twelve (12) consecutive month period.

~~(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)~~ ...

C.32 Opacity [326 IAC 5-1]

...

C.43 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. ~~326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.~~

C.54 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

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

C.65 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). ~~326 IAC 6-4-2(4) is not federally enforceable.~~

~~C.6 — Operation of Equipment [326 IAC 2-8-5(a)(4)]~~

~~Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.~~

~~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. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(e) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.~~

~~C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]~~

~~**The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140.**~~

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

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

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

~~(2) — If there is a change in the following:
(A) — Asbestos removal or demolition start date;
(B) — Removal or demolition contractor; or
(C) — Waste disposal site.~~

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

~~(d) — The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3). All required notifications shall be submitted to:
Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
The notifications do not require a certification by the "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 14-10-4 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) — Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The~~

~~requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.~~

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

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

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

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

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 the~~ "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 the~~ "authorized individual" as defined by 326 IAC 2-1.1-1(1).

...

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.

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

...
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 the~~ "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

~~C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]~~

- ~~(a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no often less than once an hour until such time as the continuous monitor is back in operation.~~
- ~~(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.~~

~~C.1243~~ Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

...

~~C.1344~~ ~~Pressure Gauge and Other Instrument Specifications~~ [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)]
[326 IAC 2-8-5(1)]

- (a) ~~Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed~~ **When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device** shall have a scale such that the expected normal **maximum** reading shall be no less than twenty percent (20%) of full scale. ~~and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.~~
- (b) ~~Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.~~
- (eb) The Permittee may request **that** the IDEM, OAQ approve the use of a ~~pressure gauge or other~~ **an** instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative ~~pressure gauge or other~~ instrument specification will adequately ensure compliance with permit conditions requiring the measurement of ~~pressure drop or other~~ **the** parameters.

~~C.1445~~ Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

...

~~C.1546~~ Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.245]

If a regulated substance, ~~subject to 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.**

~~40 CFR 68 is an applicable requirement and the Permittee shall submit:~~

- (a) ~~A compliance schedule for meeting the requirements of 40 CFR 68; or~~
- (b) ~~As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and~~

~~C.17~~ ~~Compliance Monitoring Plan - Failure to Take Response Steps~~ [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) ~~The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:~~
- (1) ~~This condition;~~
 - (2) ~~The Compliance Determination Requirements in Section D of this permit;~~
 - (3) ~~The Compliance Monitoring Requirements in Section D of this permit;~~
 - (4) ~~The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and~~

- ~~(5) — A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:~~
- ~~(A) — Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and~~
- ~~(B) — A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.~~
- ~~(b) — For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.~~
- ~~(c) — Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:~~
- ~~(1) — A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.~~
- ~~(2) — The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.~~
- ~~(3) — An automatic measurement was taken when the process was not operating.~~
- ~~(4) — The process has already returned or is returning to operating within "normal" parameters and no response steps are required.~~
- ~~(d) — Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.~~
- ~~(e) — All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.~~
- ~~(f) — At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.~~

C.16 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.1748 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) ...
- (c) ...

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

C.1849 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 ~~kept~~ **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) ...

C.1920 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The ~~source~~ **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** ~~the~~ "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** Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- (c) ...
- (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** ~~the~~ "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, **unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.**

C.2024 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.

...

Quarterly Deviation and Compliance Monitoring Report:

...

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. ~~Deviations that are required to be reported by an applicable~~

~~requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.~~ **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".

The FESOP Quarterly Report, the Limit for a single HAP is revised as follows:

...

Limit: Less than 10.0 tons per consecutive twelve (12) month period for any ~~combination~~ **single** of HAPs.

...

Conclusion

The operation of this source shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. F039-22535-00096.

**Appendix A: Emissions Calculations
Emission Summary**

**Company Name: United Express Lines
Address: 19986 CR 8, Bristol, Indiana 46507
Operation Permit No.: F039-11645-00096
Permit Revision No.: F039-22535-00096
Reviewer: James Farrell
Date: 17-Jul-06**

Process Description	Source Modification Potential Emissions (tons/yr)										
	Criteria Pollutants							Hazardous Air Pollutants			
	PM	PM10	SO2	NOx	VOC	CO	Total HAPs	Worst Case HAPs (Xylene) (Toluene) (MIBK) (Ethyl Benzene)			
Surface Coating	10.72	10.72	0	0	282.36	0	101.60	45.45	22.86	21.53	10.83
Welding	4.84	4.84	0	0	0	0	0.14				
Air Makeup	0.06	0.26	0.02	3.38	0.19	2.84	Neg.				
Plywood	768.22	768.22	0.00	0.00	0.00	0.00	0.00				
Insignificant Activities	5.00	5.00	2.00	5.00	2.00	5.00	1.00				
Totals	788.8	789.0	2.02	8.38	284.55	7.84	101.74				

Process Description	Source Wide Allowable Emissions (tons/yr)										
	Criteria Pollutants							Hazardous Air Pollutants			
	PM	PM10	SO2	NOx	VOC	CO	Total HAPs	Worst Case HAPs (Xylene) (Toluene) (MIBK) (Ethyl Benzene)			
Surface Coating	10.72	10.72	0	0	<98	0	<24	<10	<10	<10	<10
Welding	4.84	4.84	0	0	0	0	Neg.				
Air Makeup	0.06	Neg.	0.02	3.38	Neg.	2.84	Neg.				
Plywood	28.73	*<79	0	0	0.00	0	0				
Insignificant Activities	5.00	5.00	2	5	2.00	5	1				
Totals	49.4	<100	2.02	8.38	<100	7.84	<25				

*The PM10 Emission Limit is being adjusted to allow for the Welding Emissions

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

Company Name: United Express Lines
Address City IN Zip: 19986 CR 8, Bristol, Indiana 46507
Permit Number: 039-22535
Pit ID: 039-00096
Reviewer: James Farrell
Date: 17-Jul-06

Material	Density (Lb/Gal)	Weight % Volatile (H2O & 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
Unit 1																
Toluene	7.25	100.00%	0.0%	100.0%	0.0%	0.00%	0.08000	9.000	7.25	7.25	5.22	125.28	22.86	0.00	n/a	100%
Unit 4 General Ventilation																
Roof Adhesive/Sealer	9.76	2.97%	0.0%	3.0%	0.0%	97.00%	0.20500	9.000	0.29	0.29	0.53	12.84	2.34	0.00	0.30	100%
Silicone Sealer	8.68	4.03%	0.0%	4.0%	0.0%	95.00%	0.20500	9.000	0.35	0.35	0.65	15.49	2.83	0.00	0.37	100%
Russel Spray Adhesive	6.60	80.00%	0.0%	80.0%	0.0%	80.00%	0.01500	9.000	n/a	5.28	0.71	17.11	3.12	0.00	n/a	100%
									Uncontrolled		7.11	170.71	31.15			
Unit 2																
Alkyd FD Gray Primer	13.69	20.11%	0.0%	20.1%	0.0%	59.46%	0.15000	9.000	2.75	2.75	3.72	89.20	16.28	16.17	4.63	75%
Unit 2a																
FD 35 Black Enamel	9.16	37.54%	0.0%	37.5%	0.0%	50.54%	0.89000	9.000	3.44	3.44	27.54	661.05	120.64	50.18	6.80	75%
Unit 2b																
Undercoat	11.52	18.02%	5.0%	13.0%	4.6%	92.00%	1.59000	9.000	1.57	1.50	21.46	515.13	94.01	147.98	1.63	75%
Clean Up																
Unit 3 Gun Cleaning																
Mineral Spirits	6.43	100.00%	0.0%	100.0%	0.0%	0.00%	0.08000	9.000	6.43	6.43	4.63	111.11	20.28	0.00	n/a	100%
									PM Control Efficiency	95.00%						
									Uncontrolled		110.95	1547.20	282.36	214.33		
									Controlled					10.72		
									Limit				<98.0			

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: United Express Lines
Address City IN Zip: 19986 CR 8, Bristol, Indiana 46507
Permit Number: 039-11645
Pit ID: 039-00096
Reviewer: James Farrell
Date: 17-Jul-06**

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % MIBK	Weight % MEK	Weight % Ethylene Glycol	Weight % Ethyl Benzene	Weight% Ethyl Acrylate	Weight % Toluene	Xylene Emissions (tons/yr)	MIBK Emissions (tons/yr)	MEK Emissions (tons/yr)	Ethylene Glycol (tons/yr)	Ethyl Benzene (tons/yr)	Ethyl Acrylate Emissions (tons/yr)	Toluene Emissions (tons/yr)
Unit 1																	
Toluene	7.25	0.08000	9.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%	0.00	0.00	0.00	0.00	0.00	0.00	22.86
Unit 4 General Ventilation																	
ADSeal	9.76	0.20500	9.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Unit 2																	
Primer AD Gray	13.69	0.15000	9.000	6.08%	0.00%	0.00%	0.00%	1.11%	0.00%	0.00%	4.92	0.00	0.00	0.00	0.90	0.00	0.00
Unit 2a																	
FD35 Black Enamel	9.16	0.89000	9.000	12.61%	6.70%	0.29%	0.00%	3.09%	0.00%	0.00%	40.52	21.53	0.93	0.00	9.93	0.00	0.00
Unit 2b																	
Undercoat	11.52	1.59000	9.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Individual Total											45.45	21.53	0.93	0.000	10.83	0.000	22.86
Overall Total											101.6						
Overall Limit											<24.0						

METHODOLOGY

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

Appendix A: Emissions Calculations

Welding and Thermal Cutting

Company Name: United Express Lines, Inc.
 Address City IN Zip: 19889 County Road 8, Bristol, Indiana 46507
 Permit Number: 039-22535
 Pit ID: 039-00096
 Reviewer: James Farrell
 Date: 17-Jul-06

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Metal Inert Gas (MIG)(carbon steel)	10	5		5.20E-03	3.18E-04	1.00E-06	1.00E-06	2.60E-01	1.59E-02	5.00E-05	5.00E-05	1.60E-02
Metal Inert Gas (MIG)(carbon steel)	10	5		5.20E-03	3.18E-04	1.00E-06	1.00E-06	2.60E-01	1.59E-02	5.00E-05	5.00E-05	1.60E-02
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene Cutting	5	1	12	1.62E-01	5.00E-04	1.00E-04	5.84E-01	5.84E-01	5.84E-05	5.84E-09	2.84E-10	5.84E-05
EMISSION TOTALS												
Potential Emissions lbs/hr								1.10	0.03	neg.	neg.	0.03
Potential Emissions lbs/day								26.49	0.76	neg.	neg.	0.77
Potential Emissions tons/year								4.84	0.14	neg.	neg.	0.14

METHODOLOGY

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

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

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

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

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

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

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

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

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

Company Name: United Express Lines
Address City IN Zip: 19986 CR 8, Bristol, Indiana 46507
Permit Number: 039-22535
Plt ID: 039-00096
Reviewer: James Farrell
Date: 17-Jul-06

Heat Input Capacity
 MMBtu/hr

Potential Throughput
 MMCF/yr

7.7

67.5

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.06	0.26	0.02	3.38	0.19	2.84

*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 6 for HAPs emissions calculations.

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

Company Name: United Express Lines
Address City IN Zip: 19986 CR 8, Bristol, Indiana 46507
Permit Number: 039-22535
Pit ID: 039-00096
Reviewer: James Farrell
Date: 17-Jul-06

HAPs - Organics						
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03	
Potential Emission in tons/yr	7.092E-05	4.052E-05	2.533E-03	6.079E-02	1.148E-04	6.354E-02

HAPs - Metals						
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	
Potential Emission in tons/yr	1.688E-05	3.715E-05	4.728E-05	1.283E-05	7.092E-05	1.851E-04

Methodology is the same as page 1.

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: Emission Calculations
Baghouse Operations**

**Company Name: United Express Lines
Address City IN Zip: 19986 CR 8, Bristol, Indiana 46507
FESOP: 039-22535
Plt ID: 039-00096
Reviewer: James Farrell
Date: 17-Jul-06**

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	Emission Rate before Controls (lb/hr)	Emission Rate before Controls (tons/yr)	Emission Rate after Controls (lb/hr)	Emission Rate after Controls (tons/yr)
Plywood	99.0%	0.1044000	1960.0	175.39	768.2	1.754	7.682

The equipment that was controlled by baghouse EU-2 is now controlled by Eu-3 and/or EU-5

Methodology

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

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

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

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

Allowable Rate of Emissions

EU	Process Rate (lbs/hr)	Process Weight Rate (tons/hr)	Allowable Emissions (lbs/hr)
EU-3	4038	2.019	6.56

Methodology

Allowable Emissions = 4.10(Process Weight Rate)^{0.67}