



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

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

TO: Interested Parties / Applicant  
DATE: January 29, 2008  
RE: Medtec Ambulance Corporation / 039-23045-00551  
FROM: Matthew Stuckey, Deputy Branch Chief  
Permits Branch  
Office of Air Quality

### Notice of Decision: Approval - Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures  
FNPER.dot12/03/07



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## Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

**Medtec Ambulance Corporation  
2429 Lincoln Way East  
Goshen, Indiana 46526-9292**

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

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

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 MSOP under 326 IAC 2-6.1.

Operation Permit No.: M039-23045-00551	
Issued by:	Issuance Date: January 29, 2008
<i>Original document signed by</i>	Expiration Date: January 29, 2018
Chrystal Wagner, Section Chief Permits Branch Office of Air Quality	

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## SECTION A SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary Ambulance Manufacturer.

Source Address:	2429 Lincoln Way East, Goshen, Indiana 46526-9292
Mailing Address:	2429 Lincoln Way East, Goshen, Indiana 46526-9292
General Source Phone Number:	(574) 534-2631
SIC Code:	3713
County Location:	Elkhart
Source Location Status:	Attainment for 8-hour ozone standard Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

#### Plant 2

- (a) Cleaning operations, known as P06, capacity: 1,022 pounds of thinner per month and 336 pounds of mineral spirits per month.

#### Plants 2, 3, 4, 5, 6 and 7

- (b) Gluing operations, known as P01, exhausted through Stacks S01 - S04, capacity: 14,877 pounds of glue per month.

#### Plant 3 and 6

- (c) Welding operations, known as P04, consisting of one (1) stick welding station, one (1) TIG welding station, two (2) MIG welding stations and one (1) plasma cutter, capacity: 500 pounds of electrode per month and one (1) oxyacetylene flame-cutting operation.

#### Plant 6 and 7

- (d) Painting operations, known as P02, equipped with HVLP spray applicators and dry filters for PM overspray control, exhausted through Stack S05, capacity: 883 pounds of paint per month and 927 pounds of primer per month.
- (e) Woodworking operations, known as P03, consisting of six (6) 10-inch table saws, five (5) 14-inch band saws, two (2) 6-inch belt sanders, three (3) 9-inch chop saws, five (5) 10-inch chopsaws, and one (1) CNC machine, capacity: 300 pounds of plywood per hour.

**Combustion, known as P05, consisting of:**

**Plant 1**

- (f) Two (2) natural gas-fired Reznor Furnaces, known as 1 and 2, rated at 0.170 million British thermal units per hour, each.
- (g) One (1) natural gas-fired Dayton Furnace, rated at 0.200 million British thermal units per hour.
- (h) One (1) natural gas-fired water heater, rated at 0.034 million British thermal units per hour.
- (i) One (1) natural gas-fired office furnace, rated at 0.125 million British thermal units per hour.

**Plant 2**

- (j) Four (4) natural gas-fired overhead heaters, known as 1 - 4, rated at 0.100 million British thermal units per hour, each.
- (k) One (1) electric water heater.

**Plant 3**

- (l) Five (5) natural gas-fired overhead heaters, known as 1 - 5, rated at 0.120 million British thermal units per hour, each.
- (m) One (1) electric water heater.

**Plant 4**

- (n) Two (2) natural gas-fired overhead heaters, known as 1 and 2, rated at 0.200 million British thermal units per hour, each.
- (o) Two (2) electric overhead heaters, known as 3 and 4.
- (p) One (1) natural gas-fired water heater, rated at 0.036 million British thermal units per hour.

**Plant 5**

- (q) One (1) natural gas-fired water utility furnace, rated at 0.132 million British thermal units per hour.
- (r) One (1) natural gas-fired water heater, rated at 0.032 million British thermal units per hour.

**Plant 6**

- (s) One (1) electric Lennox.
- (t) One (1) electric York.
- (u) One (1) natural gas-fired water heater, rated at 0.034 million British thermal units per hour.

- (v) One (1) natural gas-fired Roberts-Gordon, rated at 0.840 million British thermal units per hour.

**Plant 7**

- (w) Five (5) natural gas-fired overhead heaters, known as 1 through 5, rated at 0.120 million British thermal units per hour, each.
- (x) One (1) natural gas-fired air make-up unit, rated at 3.520 million British thermal units per hour.

## **SECTION B GENERAL CONDITIONS**

### **B.1 Definitions [326 IAC 2-1.1-1]**

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

### **B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]**

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- (a) This permit, M039-23045-00551, is issued for a fixed term of ten (10) 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]**

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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**

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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**

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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**

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

### **B.7 Duty to Provide Information**

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

#### B.8 Certification

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

#### B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]

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- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:  
  
Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, IN 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

#### B.10 Preventive Maintenance Plan [326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

**B.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to M039-23045-00551 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.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]**

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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 ninety (90) days prior to the date of expiration of the Permittee's existing permit, consistent with 326 IAC 2-6.1-7.

**B.13 Permit Renewal [326 IAC 2-6.1-7]**

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- (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 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
  - (1) Submitted at least ninety (90) days 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 2-6.1 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.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]**

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(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

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

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

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

(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

**B.15 Source Modification Requirement**

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

**B.16 Inspection and Entry**

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

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

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

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

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

**B.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]**

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(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

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

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

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

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

**B.18 Annual Fee Payment [326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

**B.19 Credible Evidence [326 IAC 1-1-6]**

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-6.1-5(a)(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 Permit Revocation [326 IAC 2-1.1-9]

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

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

#### C.3 Opacity [326 IAC 5-1]

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

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

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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]

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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]

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-52 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

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

### **Testing Requirements [326 IAC 2-6.1-5(a)(2)]**

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

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

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

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

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

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

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

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

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

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

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

### **C.13 Instrument Specifications [326 IAC 2-1.1-11]**

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- (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**

### **C.14 Response to Excursions or Exceedances**

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- (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; and/or

- (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
  - (1) monitoring data;
  - (2) monitor performance data, if applicable; and
  - (3) corrective actions taken.

**C.15 Actions Related to Noncompliance Demonstrated by a Stack Test**

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

**C.16 Malfunctions Report [326 IAC 1-6-2]**

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

**C.17 General Record Keeping Requirements [326 IAC 2-6.1-5]**

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- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.18 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]**

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- (a) Reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Unless otherwise specified in this permit, 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).
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description: Cleaning, Gluing and Surface Coating

#### Plant 2

- (a) Cleaning operations, known as P06, capacity: 1,022 pounds of thinner per month and 336 pounds of mineral spirits per month.

#### Plants 2, 3, 4, 5, 6 and 7

- (b) Gluing operations, known as P01, exhausted through Stacks S01 - S04, capacity: 14,877 pounds of glue per month.

#### Plant 7

- (d) Painting operations, known as P02, equipped with HVLP spray applicators and dry filters for PM overspray control, exhausted through Stack S05, capacity: 883 pounds of paint per month and 927 pounds of primer per month.

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

### Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

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

Pursuant to 326 IAC 8-2-12, the surface and gluing coatings applied to solid wood, wood composition or simulated wood materials, including plywood shall utilize one of the following application methods:

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

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

#### D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(d)]

- (a) Particulate from the Painting Operations P02 shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications. Pursuant to 326 IAC 6-3-2, the dry filters for particulate matter control shall be in operation at all times when the painting processes are in operation.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

- (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

**D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]**

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

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description: Welding and Woodworking Operations

#### Plant 3 and 6

- (c) Welding operations, known as P04, consisting of one (1) stick welding station, one (1) TIG welding station, two (2) MIG welding stations and one (1) plasma cutter, capacity: 500 pounds of electrode per month and one (1) oxyacetylene flame-cutting operation.

#### Plant 6 and 7

- (e) Woodworking operations, known as P03, consisting of six (6) 10-inch table saws, five (5) 14-inch band saws, two (2) 6-inch belt sanders, three (3) 9-inch chop saws, five (5) 10-inch chop saws, and one (1) CNC machine capacity: 300 pounds of plywood per hour.

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

### Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

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

The particulate emissions from the Permittee facilities shall be limited by the following:

- (a) The particulate emissions from the Woodworking operations, known as P03, shall be less than 1.15 pounds per hour when operating at a process weight rate of 0.15 tons per hour, based on the equation below.

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 following 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 Preventive Maintenance Plan [326 IAC 1-6-3]

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

### Compliance Determination Requirements

#### D.2.2 Particulate Matter (PM)

The dust collectors attached to the stationary woodworking equipment shall be in operation at all times the Woodworking facility is in operation.

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

**MINOR SOURCE OPERATING PERMIT (MSOP)  
CERTIFICATION**

Source Name: Medtec Ambulance Corporation  
Source Address: 2429 Lincoln Way East, Goshen, IN 46526-9292  
Mailing Address: 2429 Lincoln Way East, Goshen, IN 46526-9292  
MSOP No.: M039-23045-00551

**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 Notification

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**

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

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

<b>Company Name:</b>	Medtec Ambulance Corporation
<b>Address:</b>	2429 Lincoln Way East
<b>City:</b>	Goshen, Indiana 46526-9292
<b>Phone #:</b>	(574) 534-2631
<b>MSOP #:</b>	M039-23045-00551

I hereby certify that Medtec Ambulance Corporation is :  still in operation.  
 no longer in operation.  
I hereby certify that Medtec Ambulance Corporation is :  in compliance with the requirements of MSOP M039-23045-00551.  
 not in compliance with the requirements of MSOP M039-23045-00551.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

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

<b>Noncompliance:</b>

### MALFUNCTION REPORT

#### INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY FAX NUMBER - 317 233-6865

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM / PM

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

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_

INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

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

**326 IAC 1-6-1 Applicability of rule**

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

**326 IAC 1-2-39 "Malfunction" definition**

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

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

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

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

Technical Support Document (TSD) for a Minor Source Operating Permit Renewal

**Source Background and Description**

<b>Source Name:</b>	<b>Medtec Ambulance Corporation</b>
<b>Source Location:</b>	<b>2429 Lincoln Way East, Goshen, IN 46526-9292</b>
<b>County:</b>	<b>Elkhart</b>
<b>SIC Code:</b>	<b>3713</b>
<b>Permit Renewal No.:</b>	<b>M039-23045-00551</b>
<b>Permit Reviewer:</b>	<b>Donald McQuigg</b>

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Medtec Ambulance Corporation relating to the operation of a stationary ambulance refitting and manufacturing facility.

**History**

Medtec Ambulance Corporation was a family owned business purchased by Oshkosh Truck Corporation (OTC) and is now a wholly owned subsidiary of OTC. Medtec Ambulance Corporation elected to apply for and was issued a MSOP permit M039-13707-00551 on July 30, 2001. On May 3, 2006 Medtec Ambulance Corporation submitted applications to the OAQ requesting to renew its operating permit. On September 12, 2006, Medtec Ambulance Corporation completed mass balance emission tests on their Woodworking facilities. This renewal also incorporates a change in SIC code from 7532 to 3713, per a request by the Permittee on December 06, 2006.

**Permitted Emission Units and Pollution Control Equipment**

This stationary source consists of seven (7) plants including the following emission units and pollution control devices:

**Plant 2**

- (a) Cleaning operations, known as P06, capacity: 1,022 pounds of thinner per month and 336 pounds of mineral spirits per month.

**Plants 2, 3, 4, 5, 6 and 7**

- (b) Gluing operations, known as P01, exhausted through Stacks S01 - S04, capacity: 14,877 pounds of glue per month.

**Plant 3 and 6**

- (c) Welding operations, known as P04, consisting of one (1) stick welding station, one (1) TIG welding station, two (2) MIG welding stations and one (1) plasma cutter, capacity: 500 pounds of electrode per month and one (1) oxyacetylene flame-cutting operation.

**Plant 6 and 7**

- (d) Painting operations, known as P02, equipped with HVLP spray applicators and dry filters for PM overspray control, exhausted through Stack S05, capacity: 883 pounds of paint per month and 927 pounds of primer per month.
- (e) Woodworking operations, known as P03, consisting of six (6) 10-inch table saws, five (5) 14-inch band saws, two (2) 6-inch belt sanders, three (3) 9-inch chop saws, five (5) 10-inch chop saws, and one (1) CNC machine, capacity: 300 pounds of plywood per hour.

**Combustion, known as P05, consisting of:**

**Plant 1**

- (f) Two (2) natural gas-fired Reznor Furnaces, known as 1 and 2, rated at 0.170 million British thermal units per hour, each.
- (g) One (1) natural gas-fired Dayton Furnace, rated at 0.200 million British thermal units per hour.
- (h) One (1) natural gas-fired water heater, rated at 0.034 million British thermal units per hour.
- (i) One (1) natural gas-fired office furnace, rated at 0.125 million British thermal units per hour.

**Plant 2**

- (j) Four (4) natural gas-fired overhead heaters, known as 1 - 4, rated at 0.100 million British thermal units per hour, each.
- (k) One (1) electric water heater.

**Plant 3**

- (l) Five (5) natural gas-fired overhead heaters, known as 1 - 5, rated at 0.120 million British thermal units per hour, each.
- (m) One (1) electric water heater.

**Plant 4**

- (n) Two (2) natural gas-fired overhead heaters, known as 1 and 2, rated at 0.200 million British thermal units per hour, each.
- (o) Two (2) electric overhead heaters, known as 3 and 4.
- (p) One (1) natural gas-fired water heater, rated at 0.036 million British thermal units per hour.

**Plant 5**

- (q) One (1) natural gas-fired water utility furnace, rated at 0.132 million British thermal units per hour.

- (r) One (1) natural gas-fired water heater, rated at 0.032 million British thermal units per hour.

**Plant 6**

- (s) One (1) electric Lennox.
- (t) One (1) electric York.
- (u) One (1) natural gas-fired water heater, rated at 0.034 million British thermal units per hour.
- (v) One (1) natural gas-fired Roberts-Gordon, rated at 0.840 million British thermal units per hour.

**Plant 7**

- (w) Five (5) natural gas-fired overhead heaters, known as 1 through 5, rated at 0.120 million British thermal units per hour, each.
- (x) One (1) natural gas-fired air make-up unit, rated at 3.520 million British thermal units per hour.

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

The Source also consists of the following emission units that were constructed and/or are operating without a permit:

**Plants 2, 3, 4, 5, 6 and 7**

- (a) Woodworking operations, identified as P03, consisting of five (5) 10-inch chop saws, installed in 2003 and one (1) CNC machine installed in 2007.
- (b) Gluing operations, identified as P01, consisting of two (2) additional gluing stations, constructed in 2004.
- (c) Welding operations, identified as P04, consisting of one (1) TIG welding station, and two (2) MIG welding stations with a maximum capacity of 1000 pounds of electrode and wire combined per month; and one (1) plasma cutting station, constructed in 2005.

**Existing Approvals**

Since the issuance of the MSOP 039-13707-00551 on July 30, 2001, the Permittee has been operating under the following approvals as well:

- (a) Notice-Only Change No. 039-18880-00551 issued on July 7, 2004.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

**Enforcement Issue**

There are no enforcement actions pending.

### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S01	Gluing	14	3.99	10,000	70
S02	Gluing	14	3.99	10,000	70
S03	Gluing	10	2.82	10,000	70
S04	Gluing	10	2.82	10,000	70
S05	Painting	2	3.38	8,000	70

### Emission Calculations

See Appendix A of this document for detailed emission calculations.

### County Attainment Status

The Permittee is located in Elkhart County.

Pollutant	Status
PM <sub>10</sub>	attainment
PM <sub>2.5</sub>	attainment
SO <sub>2</sub>	attainment
NOx	attainment
8-hour Ozone	attainment
CO	attainment
Lead	attainment

- (a) Elkhart County has been classified as unclassifiable or attainment for PM<sub>2.5</sub>. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM<sub>2.5</sub> emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM<sub>2.5</sub> emissions, it has directed states to regulate PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx emissions are considered when evaluating the rule applicability relating to ozone standards. On July 19, 2007, Elkhart County was redesignated to attainment for the 8-hour ozone standard at the federal level. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) Elkhart County has been classified as attainment or unclassifiable in Indiana for PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (e) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD applicability.

### Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	Potential to Emit (tons/year)
PM	37.58
PM-10	37.76
SO <sub>2</sub>	0.02
VOC	35.22
CO	2.68
NO <sub>x</sub>	3.19

HAPs	Potential to Emit (tons/year)
Xylene	0.35
Ethylbenzene	0.09
Toluene	4.44
Methanol	1.91
MDI	1.94
MIBK	0.39
Hexane	0.06
Manganese	0.41
Total	9.59

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants is less than 100 tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less 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 less than twenty-five (25) tons per year.
- (c) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

### Actual Emissions

No previous emission data has been received from the source.

### Potential to Emit 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 this MSOP 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 <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Surface Coating	0.01	0.01	-	35.04	-	-	9.13
Woodworking	5.04	5.04	-	-	-	-	-
Combustion	0.06	0.24	0.02	0.18	2.68	3.19	0.06
Welding & Cutting	0.22	0.22	-	-	-	-	0.41
Total Emissions	5.33	5.51	0.02	35.22	2.68	3.19	9.60

"-" denotes no emission

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

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (b) The Permittee is not subject to the requirements of the National Emission Standards for Wood Furniture Manufacturing Operations 40 CFR 63, Subpart JJ, because the source does not emit more than 10 tons per year of a single HAP or more than 25 tons per year of combined HAPs, and hence is not a major source of HAPs pursuant to 40 CFR Part 63.2.
- (c) The Permittee is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR Part 63, Subpart QQQQ for Wood Building Products Surface Coating), effective as of May 28, 2003, because the source is not a major source of hazardous air pollutants pursuant to 40 CFR Part 63.2.
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

### State Rule Applicability - Entire Source

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

The Permittee is not subject to the requirements of 326 IAC 2-2 because the potential to emit of all criteria pollutants are less than 250 tons per year and there have been no major modifications.

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

The Permittee is not subject to the requirements of 326 IAC 2-4.1 because the potential to emit any single HAP is less than ten (10) tons per year and the potential to emit any combinations of HAPs is less than twenty-five (25) tons per year.

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

The Permittee is located in Elkhart County and the potential to emit of each criteria pollutant is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

#### 326 IAC 5-1 (Opacity Limitations)

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

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

### State Rule Applicability – Individual Facilities

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

The particulate emissions from the Permittee facilities shall be limited by the following:

- (a) Pursuant to 326 IAC 6-3-1(13) the hand held Woodworking tools are exempt from 326 IAC 6-3 because they are trivial activities as defined by 326 IAC 2-7-1(40)(F).
- (b) The Woodworking operation, known as P03, is subject to 326 IAC 6-3-2(e) because the process weight rate is over 100 pounds of wood per hour and it is not a process regulated by 326 IAC 6-3-2(b) through (d). Based on the following equation and a process weight rate of 0.15 tons per hour, the particulate emissions shall not exceed 1.15 pounds particulate matter (PM) per hour. Therefore, the PM potential to emit is 5.04 tons per year (1.15 lbs/hr x 8760 hrs/year x 1 ton/2000 lbs).

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 Woodworking facility is equipped with dust collectors with 90% control efficiency for particulate control. Utilizing the dust collectors for PM control, the maximum controlled particulate emission rate from the Woodworking operation is 0.838 pounds PM per hour, which is less than 1.15 pounds PM per hour allowable emission rate calculated from the above equation. Therefore, the Woodworking operation shall comply with 326 IAC 6-3-2 by using the dust collectors attached to the stationary woodworking equipment for particulate control at all times during operation.

- (c) The Painting operations are subject to the requirements of 326 IAC 6-3-2(d). This surface coating operation shall be controlled by a dry particulate filter, waterwash, or an equivalent control device operated in accordance with the manufacturer's specifications. If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such an observation:

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

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

- (d) Pursuant to 326 IAC 6-3-1(b)(9), the Welding operation is exempt from 326 IAC 6-3 because less than six hundred twenty-five (625) pounds of rod or wire is consumed per day.
- (e) Pursuant to 326 IAC 6-3-1(b)(10), the Plasma and Flame cutting operations are exempt from 326 IAC 6-3 because less than three thousand four hundred (3,400) inches per hour of stock one (1) inch thickness or less is cut.

326 IAC 8-1-6 (New Facilities; general reduction requirements)

This rule applies to new facilities as of January 1, 1980, with the potential to emit 25 tons or more per year of VOC and that are not otherwise regulated by other provisions of 326 IAC 8.

- (a) The Painting operations have a potential to emit of 4.24 tons of VOC per year; therefore, the provisions of 326 IAC 8-1-6 are not applicable to the Painting operations.
- (b) The Gluing operations have a potential to emit of 62.25 tons of VOC per year however, the Gluing operations are subject to 326 IAC 8-2-12. Therefore, the provisions of 326 IAC 8-1-6 are not applicable to the Gluing operations.
- (c) The Cleaning operations have a potential to emit of 8.51 tons of VOC per year, therefore, the provisions of 326 IAC 8-1-6 are not applicable to the Cleaning operations.

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

- (a) Pursuant to 326 IAC 8-2-9(b)(4), sources which perform customized top coating of automobiles and trucks at a rate of less than thirty-five (35) vehicles per day are not subject to the requirements of this rule. The Painting operation qualifies as a top coating operation of less than thirty-five (35) vehicles per day, therefore, is not subject to the requirements of 326 IAC 8-2-9.
- (b) Pursuant to 326 IAC 8-2-9(b)(7), the application of adhesives or preparation of adhesives are not subject to the requirements of this rule. Therefore, the Gluing operations are not subject to 326 IAC 8-2-9.

326 IAC 8-2-12 (Surface coating emission limitations: wood furniture and cabinet coating)

- (a) Pursuant to 326 IAC 8-2-12, the surface and gluing coatings applied to solid wood, wood composition or simulated wood materials, including plywood 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.

Pursuant to 326 IAC 8-2-12, the existing hand-held HVLP applicators and hand wipe methods used in the gluing operation comply with this rule.

- (b) The Touch-up painting operations are not subject to the requirements of 326 IAC 8-2-12 because less than ten (10) gallons of coating per day are used for touch-up and repair operations.

326 IAC 8-6 (Organic solvent emission limitations)

Although some of the facilities were constructed prior to January 1, 1980, the potential to emit VOC from the entire source is less than one hundred (100) tons per year. Therefore, the requirements of this rule are not applicable.

### **Recommendation**

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

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

An application for the purposes of this review was received on May 3, 2006. Additional information was received on September 12, 2006, December 6, 2006, and August 27, 2007.

### **Conclusion**

The operation of this ambulance refitting and manufacturing facility shall be subject to the conditions of the attached MSOP Renewal No. 039-23045-00551.

## Appendix A: Emission Calculations

**Company Name:** Medtec Ambulance Corporation  
**Address City IN Zip:** 2429 Lincoln Way East, Goshen, IN 46526-9292  
**Permit Number:** M039-23045-00551  
**Plt ID:** 039-00551  
**Reviewer:** Donald McQuigg  
**Date:** 11/30/2007

<b>Uncontrolled Potential Emissions (tons/year)</b>					
Pollutant	Surface Coating	Natural Gas Combustion	Woodworking Operations	Welding Operations	<b>TOTAL</b>
	Operations				
PM	0.60	0.06	36.70	0.22	37.58
PM10	0.60	0.24	36.70	0.22	37.76
SO2	0.00	0.02	0.00	0.00	0.02
NOx	0.00	3.19	0.00	0.00	3.19
VOC	35.04	0.18	0.00	0.00	35.22
CO	0.00	2.68	0.00	0.00	2.68
total HAPs	9.13	0.06	0.00	0.41	9.60
worst case single HAP	4.44 (Toluene)	0.06 (Hexane)	0.00	0.40 (Mn)	4.44 (Toluene)
Total emissions based on rated capacity at 8,760 hours/year.					
<b>Controlled Potential Emissions (tons/year)</b>					
Pollutant	Surface Coating	Natural Gas Combustion	Woodworking Operations	Welding Operations	<b>TOTAL</b>
	Operations				
PM	0.01	0.06	5.04	0.22	5.33
PM10	0.01	0.24	5.04	0.22	5.51
SO2	0.00	0.02	0.00	0.00	0.02
NOx	0.00	3.19	0.00	0.00	3.19
VOC	35.04	0.18	0.00	0.00	35.22
CO	0.00	2.68	0.00	0.00	2.68
total HAPs	9.13	0.06	0.00	0.41	9.60
worst case single HAP	4.44 (Toluene)	0.06 (Hexane)	0.00	0.40 (Mn)	4.44 (Toluene)
Total emissions based on rated capacity at 8,760 hours/year, after control.					

**Appendix A: Emissions Calculations  
Woodworking Emissions**

**Company Name:** Medtec Ambulance Corporation  
**Address City IN Zip:** 2429 Lincoln Way East, Goshen, IN 46526-9292  
**MSOP:** M039-23045-00551  
**Pit ID:** 039-00551  
**Reviewer:** Donald McQuigg  
**Date:** 8/27/2007

Assumption 1 - equipment with maximum potential rate of PM generation = table saw  
 Assumption 2 - table saw dust collector capture efficiency is conservatively assumed to be 90%  
 Assumption 3 - PM = PM10

**Test Data Summary for Determining Process Emission Factor**

Pounds of wood processed at table saw over 16 hours (8/24, 8/26/06)	Pounds of PM collected from the dust collector at table saw	Pounds of PM collected from the table saw dust collector per pound of wood processed at table saw	Total Pounds of PM generated per pound of wood processed at table saw assuming 90% dust collector efficiency <sup>a</sup>
2704	68.65	0.0254	0.0279

a) Permittee applied a 90% capture efficiency to account for any uncaptured sawdust.

**Uncontrolled Potential to Emit of Particulate Matter from the Woodworking Operations known as P03**

Maximum process weight rate in pounds per hour of the woodworking operations	Pounds of PM generated per pound of wood processed	Potential to emit PM from Woodworking Operations (lb/hr)	Potential to emit of PM from the Woodworking Operations (tons/year)
300	0.0279	<b>8.38</b>	<b>36.70</b>

Uncontrolled Potential to emit of PM (lb/hr) = maximum process weight rate (lbs/hr)\*pounds of PM generated per pound of wood  
 Uncontrolled Potential to emit of PM (tons/yr) = maximum process weight rate (lbs/hr)\*pounds of PM generated per pound of wood\*8760(hr/yr)/2000 (lb/ton)

**Controlled Potential to Emit Particulate Matter from the Woodworking Operations known as P03**

Controlled Potential to Emit assuming 90% capture efficiency of the dust collectors (lb/hr)
<b>0.838</b>

Controlled Potential to Emit of the woodworking operations (lb/hr) = Potential to Emit PM from woodworking Operations (lb/hr) - (Potential to Emit PM from Woodworking Operations (lb/hr) \* 0.90)

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

**Company Name:** Medtec Ambulance Corporation  
**Address City IN Zip:** 2429 Lincoln Way East, Goshen, Indiana 46526  
**Permit Number:** M039-23045-00551  
**Plt ID:** 039-00551  
**Permit Reviewer:** Donald McQuigg  
**Date:** 11/30/2007

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Cumene	Weight % Ethyl benzene	Weight % Glycol Ethers	Weight % MDI	Weight % HDI	Weight % MIBK	Weight % Phenol	Weight % Styrene	Weight % Toluene	Weight % Xylene	Weight % Methanol	Cumene Emissions (ton/yr)	Ethyl benzene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	MDI Emissions (ton/yr)	HDI Emissions (ton/yr)	MIBK Emissions (ton/yr)	Phenol Emissions (ton/yr)	Styrene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Methanol Emissions (ton/yr)	
<b>Cleaning</b>																										
M600 Degreaser Mineral Spirits	6.30	0.0707	1.00	0.00%	1.90%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
DX 440 Wax & Grease remover	6.94	0.2071	1.00	0.00%	20.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	3.70%	60.00%	0.00%	0.00	1.26	0.00	0.00	0.00	0.00	0.00	0.00	0.23	3.78	0.00	0.00
Pure Grade Laquer Thinner	7.01	0.2071	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	60.00%	0.00%	30.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.82	0.00	1.91	0.00
<b>Gluing</b>																										
Con-Bond C105	6.83	1.5800	1.00	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	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Pur-Fect Lok 91-834A	6.72	1.3200	1.00	0.00%	0.00%	0.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	1.94	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
L555A Sheet Vinyl Adhesive	9.34	0.2400	1.00	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	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Primer</b>																										
DP-48LF, DP-402LF, DTV-801	10.06	0.1000	1.00	0.00%	0.71%	2.86%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.03	0.13	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
DP-50LF, DP-402LF, DTV-801	9.9	0.1000	1.00	0.00%	0.71%	2.86%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.03	0.12	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
DX-1793, DX-1796	8.07	0.1000	1.00	0.00%	2.50%	0.00%	0.00%	0.00%	2.86%	0.00%	0.00%	6.14%	3.00%	0.00%	0.00	0.09	0.00	0.00	0.00	0.10	0.00	0.00	0.22	0.11	0.00	0.00
EMCFRTS	8.04	0.1000	1.00	0.00%	1.50%	0.00%	0.00%	0.00%	11.08%	0.10%	0.00%	7.00%	6.20%	0.00%	0.00	0.05	0.00	0.00	0.00	0.39	0.00	0.00	0.25	0.22	0.00	0.00
<b>Painting</b>																										
DBU-1, DRR-1170	7.69	0.0400	1.00	0.00%	2.60%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	28.00%	10.00%	0.00%	0.00	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.38	0.13	0.00	0.00
DC-3000, DCH-3085	7.90	0.0400	1.00	0.00%	4.00%	0.00%	0.00%	0.20%	0.00%	0.00%	0.80%	4.00%	30.00%	0.00%	0.00	0.06	0.00	0.00	0.00	0.00	0.00	0.01	0.06	0.42	0.00	0.00
DCC-2185, DCX-61, DT-870	9.25	0.0400	1.00	0.00%	0.57%	0.00%	0.00%	0.14%	0.00%	0.00%	0.00%	8.57%	2.86%	0.00%	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.14	0.05	0.00	0.00
DCC-9300, DCX-61, DT-870	8.00	0.0400	1.00	0.00%	2.86%	0.00%	0.00%	0.14%	0.00%	0.00%	0.00%	9.43%	7.43%	0.00%	0.00	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.13	0.10	0.00	0.00
DCU-2042, DCX-61, DT-870	7.94	0.0400	1.00	0.00%	3.33%	0.00%	0.00%	0.17%	0.00%	0.00%	0.67%	5.00%	0.00%	0.00%	0.00	0.05	0.00	0.00	0.00	0.00	0.00	0.01	0.07	0.00	0.00	0.00
DCU-2082, DCH-2084	7.97	0.0400	1.00	0.00%	3.00%	0.00%	0.00%	0.00%	13.00%	0.00%	0.00%	10.00%	13.00%	0.00%	0.00	0.04	0.00	0.00	0.00	0.18	0.00	0.00	0.14	0.18	0.00	0.00
396602	8.13	0.0400	1.00	0.00%	1.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.51%	0.06%	9.44%	0.00%	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.13	0.00	0.00
385560	8.85	0.0400	1.00	0.13%	0.81%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.02%	3.45%	0.00%	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.05	0.00	0.00
396603	8.05	0.0400	1.00	0.00%	2.35%	0.32%	0.00%	0.00%	0.00%	0.00%	0.52%	0.06%	10.03%	0.00%	0.00	0.03	0.00	0.00	0.00	0.00	0.00	0.01	0.00	0.14	0.00	0.00
40556	10.29	0.0400	1.00	0.00%	0.40%	0.00%	0.00%	0.05%	0.00%	0.00%	0.00%	0.00%	1.30%	0.00%	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.02	0.00	0.00
04525RTS	10.80	0.0400	1.00	0.00%	1.80%	0.00%	0.00%	0.00%	7.00%	0.00%	0.00%	0.00%	9.40%	0.00%	0.00	0.03	0.00	0.00	0.00	0.13	0.00	0.00	0.00	0.18	0.00	0.00
04526RTS	11.10	0.0400	1.00	0.00%	2.00%	0.60%	0.00%	0.00%	6.20%	0.00%	0.00%	0.00%	10.80%	0.00%	0.00	0.04	0.01	0.00	0.00	0.12	0.00	0.00	0.00	0.21	0.00	0.00
Autocoat LV HS Clear RTS	8.27	0.0400	1.00	0.17%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.20%	2.11%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.03	0.00	0.00

Total Potential HAP Emissions (worst case) 0.00    0.09    0.00    1.94    0.00    0.39    0.00    0.00    4.44    0.35    1.91

**METHODOLOGY** Total Worst Case Combined HAP Emissions    9.13

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs  
Worst case coatings: cleaning = Laquer Thinner; gluing = Pur-Fect Lok 91-834A; Primer = EMCFRTS; Painting = DBU-1

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

**Company Name: Medtec Ambulance Corporation  
Address City IN Zip: 2429 Lincoln Way East, Goshen, Indiana 46526  
Permit Number: M039-23045-00551  
Plt ID: 039-00551  
Reviewer: Donald McQuigg  
Date: 11/30/2007**

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds/hour)	Potential VOC (pounds/day)	Potential VOC (tons/year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
<b>Cleaning</b>																
Mineral Spirits	6.94	100.00%	0.0%	100.0%	0.0%	0.00%	0.07	1.00	6.94	6.94	0.49	11.76	2.15	0.00	n/a	100%
Prue Grade Laquer Thinner (worst case)	7.01	100.00%	0.0%	100.0%	0.0%	0.00%	0.21	1.00	7.01	7.01	1.45	34.84	6.36	0.00	n/a	100%
<b>Gluing</b>																
Pur-Fect Lok 91-834A	8.90	5.00%	0.0%	5.0%	0.0%	95.0%	1.58	1.00	0.45	0.45	0.70	16.87	3.08	0.00	n/a	100%
Con-bond 105 (worst case)	6.83	61.90%	0.0%	61.9%	0.0%	38.1%	1.32	1.00	4.23	4.23	5.58	133.94	24.44	0.00	n/a	100%
L555A Lonseal	9.34	0.00%	0.0%	0.0%	0.0%	100.0%	0.24	1.00	0.00	0.00	0.00	0.00	0.00	0.00	n/a	100%
<b>Painting Operations</b>																
Worst case VOC Primer (DX-1793)	8.07	88.07%	0.0%	88.1%	0.0%	11.9%	0.10	1.00	7.11	7.11	0.71	17.06	3.11	0.00	0.00	75%
Worst case PM Primer (DP-48LF)	10.06	69.15%	0.0%	69.2%	0.0%	30.9%	0.10	1.00	6.96	6.96	0.00	0.00	0.00	0.34	0.00	75%
Worst case VOC Paint (DBU-1)	7.69	83.75%	0.0%	83.8%	0.0%	16.3%	0.04	1.00	6.44	6.44	0.26	6.18	1.13	0.00	0.00	75%
Worst case PM Paint (LCV Base SBFLNA3042L)	8.85	33.68%	0.0%	33.7%	0.0%	58.0%	0.04	1.00	2.98	2.98	0.00	0.00	0.00	0.26	0.00	75%

Particulate control with dry filters assumed to be

99%

**Uncontrolled  
Controlled**

**9.19      220.65      35.04      0.60  
9.19      220.65      35.04      0.01**

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lbs/gal) \* Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1-Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)

Total = Worst case coatings and solvents used.

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

**Company Name:** Medtec Ambulance Corporation  
**Address City IN Zip:** 2429 Lincoln Way East, Goshen, IN 46526-9292  
**Permit Number:** M039-23045-00551  
**Pit ID:** 039-00551  
**Reviewer:** Donald McQuigg  
**Date:** 7/23/2007

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

7.293

63.9

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.061	0.243	0.019	3.194	0.176	2.683

\*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

Note to Reviewer: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

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

**Company Name:** Medtec Ambulance Corporation  
**Address City IN Zip:** 2429 Lincoln Way East, Goshen, IN 46526-9292  
**Permit Number:** M039-23045-00551  
**Pit ID:** 039-00551  
**Reviewer:** Donald McQuigg  
**Date:** 7/23/2007

HAPs - Organics						Total
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	6.708E-05	3.833E-05	2.396E-03	5.750E-02	1.086E-04	6.011E-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	1.597E-05	3.514E-05	4.472E-05	1.214E-05	6.708E-05	1.750E-04
Total						6.028E-02

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: Emissions Calculations  
Welding and Thermal Cutting**

**Company Name:** Medtec Ambulance Corporation  
**Address City IN Zip:** 2429 Lincoln Way East, Goshen, IN 46526-9292  
**Permit Number:** M039-23045-00551  
**Plt ID:** 039-00551  
**Reviewer:** Donald McQuigg  
**Date:** 7/3/2007

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Metal Inert Gas (MIG)(aluminum)	2	0.198		0.0816	0.232	0.00171	0.00139	0.032	0.092	0.001	0.00055044	0.093
Stick (E7018 electrode)	1	0.08		0.0211	0.0009			0.002	0.000	0.000	0	0.000
Tungsten Inert Gas (TIG)(carbon steel)	1	1.09		0.0055	0.0005			0.006	0.001	0.000	0	0.001
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	1	0.0625	11.667	0.1622	0.0005	0.0001	0.0003	0.007	0.000	0.000	0.000	0.000
Plasma**	1	0.0625	11.667	0.0039				0.003	0.000	0.000	0.000	0.000
<b>EMISSION TOTALS</b>												
Potential Emissions lbs/hr								0.05				0.09
Potential Emissions lbs/day								1.20				2.25
Potential Emissions tons/year								0.22				0.41

**METHODOLOGY**

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

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

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

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

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

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

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

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