Part 70 Operating Permit Renewal
INDIANA DEPARTMENT OF ENVIRIONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
AND VIGO COUNTY AIR POLLUTION CONTROL

Great Dane Trailers
4955 N. 13th Street
Terre Haute, Indiana 47805

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. 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.

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 2-7 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. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-2 and 326 IAC 2-7-10.5, applicable to those conditions.

Operation Permit No.: T167-23624-00011	
Nisha Sizemore, Chief Permits Branch Office of Air Quality George M. Needham, Director Vigo County Air Pollution Control	Issuance Date: Expiration Date:

SECTION A SOURCE SUMMARY 4
A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(15)]
A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]
A.4 Part 70 Permit Applicability [326 IAC 2-7-2]
SECTION B GENERAL CONDITIONS 6
B.1 Definitions [326 IAC 2-7-1]
B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]
B.3 Term of Conditions [326 IAC 2-1.1-9.5]
B.4 Enforceability [326 IAC 2-7-7]
B.5 Severability [326 IAC 2-7-5(5)]
B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]
B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]
B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]
B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)][326 IAC 1-6-3]
B.11 Emergency Provisions [326 IAC 2-7-16]
B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]
B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]
B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]
B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]
B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12][40 CFR 72]
B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]
B.20 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]
B.21 Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2-2-2]
B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]
B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]
B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]
B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]
SECTION C SOURCE OPERATION CONDITIONS 17
Emission Limitations and Standards [326 IAC 2-7-5(1)]
C.1 Opacity [326 IAC 5-1]
C.2 Open Burning [326 IAC 4-1] [IC 13-17-9]
C.3 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
C.4 Fugitive Dust Emissions [326 IAC 6-4]
C.5 Stack Height [326 IAC 1-7]
C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]
Testing Requirements [326 IAC 2-7-6(1)]
C.7 Performance Testing [326 IAC 3-6]
Compliance Requirements [326 IAC 2-1.1-11]
C.8 Compliance Requirements [326 IAC 2-1.1-11]
Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]
C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]
C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]
C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]
C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]
C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]
C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]
Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]
C.17 General Record Keeping Requirements[326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]
C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]
Stratospheric Ozone Protection
C.19 Compliance with 40 CFR 82 and 326 IAC 22-1
SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS 25
Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.1.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]
D.1.2 Hazardous Air Pollutant (HAP) Limitations [40 CFR 63]
D.1.3 PSD Minor Limit [326 IAC 2-2]
D.1.4 Preventative Maintenance Plan [326 IAC 2-7-5(13)]
D.1.5 Particulate Matter (PM) [326 IAC 6.5-1]
Compliance Determination Requirements
D.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)
D.1.7 VOC Emissions
Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]
D.1.8 Monitoring [40 CFR 64]
D.1.9 Particulate Matter
Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]
D.1.10 Record Keeping Requirements
D.1.11 Reporting Requirements
SECTION D.2 FACILITY OPERATION CONDITIONS 29
Emission Limitations and Standards [326 IAC 2-7-5(1)]
D.2.1 Particulate Matter (PM) [326 IAC 6.5-1]
D.2.2 Cold Cleaner Operation [326 IAC 8-3-2]
D.2.3 Cold Cleaner Operation [326 IAC 8-3-5]
CERTIFICATION FORM 31
EMERGENCY OCCURRENCE REPORT 32
PART 70 QUARTERLY REPORT 34
PART 70 QUARTERLY REPORT 35
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT 36

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Vigo County Air Pollution Control (VCAPC). 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 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary trailer manufacturing plant.

Source Address:	4955 N. 13th Street, Terre Haute, IN 47805
Mailing Address:	4955 N. 13th Street, Terre Haute, IN 47805
General Source Phone Number:	812-460-7799
SIC Code:	3715
County Location:	Vigo
Source Location Status:	Maintenance attainment for Sulfur Dioxide (SO_2) Maintenance attainment for the 8-hour Ozone standard Attainment or unclassifiable for PM2.5 Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(15)]

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

(a) One (1) paint booth constructed in 1994, identified as Bogie Booth (unit number 01), equipped with a maximum of two (2) airless spray guns, for metal trailer bogie, using dry filters for overspray control and exhausting at one (1) stack, identified as Stack 01.

(b) One (1) paint booth constructed in 1994, identified as Undercoat Booth (unit number 02), equipped with a maximum of three (3) airless, air-assisted airless cup guns, for metal trailer underbody, using dry filters for overspray control and exhausting at one (1) stack, identified as Stack 02.

(c) One (1) paint booth constructed in 1994, identified as Fab. Primer Booth (unit number 03), equipped with a maximum of eight (8) airless, air-assisted airless spray guns (of which a maximum of two (2) are in use simultaneously), for metal trailer components, using dry filters for overspray control and exhausting at two (2) stacks, identified as Stack 03 and 04.

(d) One (1) paint booth constructed in 1994, identified as Fifth Wheel Booth (unit number 04), equipped with a maximum of three (3) airless spray guns, for metal trailer components, using dry filters for overspray control and exhausting at one (1) stack, identified as Stack 05.

(e) One (1) paint booth constructed in 1994, identified as Fab. Topcoat Booth (unit number 05), equipped with a maximum of eight (8) air-assisted airless spray guns (of which a maximum of two (2) are in use simultaneously), for metal trailer components, using dry filters for overspray control and exhausting at two (2) stack, identified as Stack 06 and 07.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]

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) BTU per hour [326 IAC 6.5].
(b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3-2][326 IAC 8-3-5].
(c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment [326 IAC 6.5].
(d) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
(e) 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 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations [326 IAC 6.5].

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

(a) This permit, T167-23624-00011, 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 and VCAPC, 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, including any permit shield provided in 326 IAC 2-7-15, 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 2-7-7]

(a) 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 and VCAPC, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

(b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by VCAPC.

B.5 Severability [326 IAC 2-7-5(5)]

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 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

(a) The Permittee shall furnish to IDEM, OAQ and VCAPC, within a reasonable time, any information that IDEM, OAQ and VCAPC 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 "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ and VCAPC copies of records required to be kept by this permit.

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

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(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 the "responsible official" 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) The "Responsible Official" is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 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, Indiana 46204-2251

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, IN 47807

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 and VCAPC 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 2-7-5(3); and

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

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)][326 IAC 1-6-3]

(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 and VCAPC upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ and VCAPC. IDEM, OAQ and VCAPC 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

(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 Emergency Provisions [326 IAC 2-7-16]

(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 .

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a 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 VCAPC 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
Vigo County Air Pollution Control phone: (812) 462-3433; fax: (812) 462-3447

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

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

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, IN 47807

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 2-7-5(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 the "responsible official" as defined by 326 IAC 2-7-1(34).

(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 and VCAPC may require that the Preventive Maintenance Plans required under 326 IAC 2-7-

4(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ and VCAPC 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 2-7 and any other applicable rules.

(g) 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.

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

B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(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, IDEM, OAQ, or VCAPC 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. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, or VCAPC has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, or VCAPC has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

(a) All terms and conditions of permits established prior to T167-23624-00011 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

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 2-7-3 and 326 IAC 2-7-4(a).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(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 Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, IN 47807

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 the "responsible official" as defined by 326 IAC 2-7-1(34).

(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 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 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 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, or VCAPC 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 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, or VCAPC 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 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, or VCAPC at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, or VCAPC may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and VCAPC and shall include the information specified in 326 IAC 2-7-4. 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

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

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, IN 47807

(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, and VCAPC 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 2-7 until IDEM, OAQ and VCAPC 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 and VCAPC any additional information identified as being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12][40 CFR 72]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, IN 47807

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)].

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) 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 preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

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

(4) The Permittee notifies the:

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

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, IN 47807

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 2-7-20(b),(c), or (e). 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 and VCAPC in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(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 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(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 "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(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 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(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 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(e) 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.21 Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2-2-2]

(a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

(b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2-2.

B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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, and VCAPC or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 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 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 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 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.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, IN 47807

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, and VCAPC 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, or VCAPC the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), 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.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][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 2-7-5(1)]

C.1 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.2 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.3 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.4 Fugitive Dust Emissions [326 IAC 6-4]

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

C.5 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.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

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

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

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, IN 47807

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 the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.7 Performance Testing [326 IAC 3-6]

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

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

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

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, IN 47807

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(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 the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and VCAPC not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and VCAPC 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.8 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 2-7-5(1)][326 IAC 2-7-6(1)]

C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

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

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

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, IN 47807

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 the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.10 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.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(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 2-7-5][326 IAC 2-7-6]

C.12 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 prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on July 2, 2004.

(b) Upon direct notification by IDEM, OAQ and VCAPC 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.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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

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

(1) initial inspection and evaluation;

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

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

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

(1) monitoring results;

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

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

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

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

(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 the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, IN 47807

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The emission statement 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 and VCAPC on or before the date it is due.

C.17 General Record Keeping Requirements[326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]

(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 or VCAPC makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or VCAPC 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 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

(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 the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

and

Vigo County Air Pollution Control
103 South Third Street
Terre Haute, IN 47807

(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, and VCAPC 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(1) One (1) paint booth constructed in 1994, identified as Bogie Booth (unit number 01), equipped with a maximum of two (2) airless spray guns, for metal trailer bogie, using dry filters for overspray control and exhausting at one (1) stack, identified as Stack 01.

(2) One (1) paint booth constructed in 1994, identified as Undercoat Booth (unit number 02), equipped with a maximum of three (3) airless, air-assisted airless cup guns, for metal trailer underbody, using dry filters for overspray control and exhausting at one (1) stack, identified as Stack 02.

(3) One (1) paint booth constructed in 1994, identified as Fab. Primer Booth (unit number 03), equipped with a maximum of eight (8) airless, air-assisted airless spray guns (of which a maximum of two (2) are in use simultaneously), for metal trailer components, using dry filters for overspray control and exhausting at two (2A) stacks, identified as Stack 03 and 04.

(4) One (1) paint booth constructed in 1994, identified as Fifth Wheel Booth (unit number 04), equipped with a maximum of three (3) airless spray guns, for metal trailer components, using dry filters for overspray control and exhausting to one (1) stack, identified as Stack 05.

(5) One (1) paint booth constructed in 1994, identified as Fab. Topcoat Booth (unit number 05), equipped with a maximum of eight (8) air-assisted airless spray guns (of which a maximum of two (2) are in use simultaneously), for metal trailer components, using dry filters for overspray control and exhausting at two (2) stack, identified as Stack 06 and 07.

(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 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds from unit 01, unit 02, unit 03, unit 04, and unit 05 in excess of 4.3 pounds of VOC per gallon of coating excluding water when using clear coatings, and 3.5 pounds of VOC per gallon of coating excluding water when using air dried coatings.

(b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up 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.1.2 Hazardous Air Pollutant (HAP) Limitations [40 CFR 63]

(a) The use of any single hazardous air pollutant (HAP) in unit numbers 01 - 05, including coatings, dilution solvents, and cleaning solvents shall be limited to less than nine and nine tenths (9.9) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the source-wide potential to emit of single HAPs to less than ten (10) tons per twelve (12) consecutive month period.

(b) The total usage of hazardous air pollutants (HAPs) in unit numbers 01 - 05, including coatings, dilution solvents, and cleaning solvents shall be limited to less than twenty-four and nine tenths (24.9) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the source-wide

potential to emit of total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period.

Compliance with these emission limits will make 40 CFR 63, Subpart MMMM (Surface Coating of Miscellaneous Parts and Products) not applicable.

D.1.3 PSD Minor Limit [326 IAC 2-2]

The source-wide usage of VOC shall be less than two hundred fifty (250) tons of VOC per 12-consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the source-wide potential to emit of VOC to less than 250 tons per 12-consecutive month period. Compliance with this condition will make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.4 Preventative Maintenance Plan [326 IAC 2-7-5(13)]

A Preventative Maintenance Plan, in accordance with Section B – Preventative Maintenance Plan, of this permit is required for these facilities and any control devices.

D.1.5 Particulate Matter (PM) [326 IAC 6.5-1]

Pursuant to 326 IAC 6.5-1, the PM from the paint booths shall not exceed 0.03 grain per dry standard cubic foot (dscf).

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

(a) Compliance with the VOC and HAP usage limitations contained in Conditions D.1.1, D.1.2, and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC and HAP data sheets. IDEM, OAQ and VCAPC reserve the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4. Compliance with the VOC and HAP usage limitations contained in Conditions D.1.1, D.1.2, and D.1.3 shall be demonstrated within 30 days of the end of each month.

(b) Each time credit is taken for waste shipped off-site, the Permittee shall determine the VOC, single HAP and total HAP content of the combined coating material and solvent waste shipped off-site pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner. If a shipment consists of separate containers, the Permittee shall sample each container. The testing shall be conducted in accordance with Section C - Performance Testing, except for notifying IDEM of the test in paragraph (a), all of paragraph (b), and all of paragraph (c).

(c) Each time credit is taken for waste shipped off-site, compliance with the VOC and HAP usage limitations contained in Conditions D.1.1, D.1.2, and D.1.3 shall be based on the total VOC/HAP used for the previous month, minus the VOC/HAP shipped off-site during that same month, and adding it to the previous 11 months total VOC/HAP usage, minus the VOC/HAP shipped off-site during that same period, so as to arrive at VOC/HAP emissions for the most recent twelve (12) consecutive month period.

(1) For the VOC limits in Conditions D.1.1 and D.1.3, the VOC emissions for a month can be arrived at using the following equation:

$$\text{VOC emitted} = VOC_U - VOC_R$$

Where

VOC_U = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents; and

VOC_R = The total amount of VOC, in tons, shipped off-site, including coatings, dilution solvents, and cleaning solvents.

(2) For the HAP limits in Conditions D.1.2, the HAP emissions for a month can be arrived at using the following equation:

HAP emitted = HAP_U - HAP_R

Where

HAP_U = The total amount of HAP, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents; and

HAP_R = The total amount of HAP, in tons, shipped off-site, including coatings, dilution solvents, and cleaning solvents.

D.1.7 VOC Emissions

Compliance with Condition D.1.3 shall be demonstrated within 30 days of the end of each calendar month based on the total volatile organic compound usage for each day.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

D.1.8 Monitoring [40 CFR 64]

(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 (01, 02, 03, 04, 05, 06, and 07) 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 stack 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.

D.1.9 Particulate Matter

In order to comply with Condition D.1.5, the dry filters for PM control shall be in operation and control emissions from the paint booths at all times when the five (5) paint booths (unit number 01, unit number 02, unit number 03, unit number 04, and unit number 05) are in operation.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.10 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1, D.1.2, and D.1.3 the Permittee shall maintain records in accordance with (1) through (5) below when taking credit for the VOC and HAP content of any coating material or solvent waste shipped off-site. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits, the HAP emission limits, and the

compliance determination requirements established in Conditions D.1.1, D.1.2, and D.1.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The amount, VOC content and HAP content of each coating material and solvent used, on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
(2) The quantity of coating material and solvent waste shipped offsite each month. Non-VOC waste shall not be commingled with VOC and/or HAP containing waste, if the VOC and/or HAP content of waste shipped offsite is deducted from the reported monthly VOC and/or HAP usage;
(3) The total VOC and HAP usage for each month;
(4) The weight of VOCs and HAPs emitted for each compliance period; and
(5) The results of the laboratory analysis of the VOC and HAP content of the coating material and solvent waste collected and drummed for disposal offsite. A representative sample of the waste to be shipped offsite shall be analyzed for each waste shipment if the waste VOC and HAP content is deducted from the monthly VOC and HAP usage reported.

(b) To document compliance with Condition D.1.8, 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.1.2 and D.1.3 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 “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) BTU per hour [326 IAC 6.5].

(b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3-2][326 IAC 8-3-5].

(c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment [326 IAC 6.5].

(d) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].

(e) 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 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations [326 IAC 6.5].

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6.5-1]

Pursuant to 326 IAC 6.5-1, the PM from the brazing equipment, cutting torches, soldering equipment, and welding equipment shall not allow or permit discharge into the atmosphere of any gases which contain particulate matter in excess of 0.03 grain per dry standard cubic foot (dscf).

D.2.2 Cold Cleaner Operation [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold cleaner operation) for cold cleaner operations conducted after January 1, 1990, the owner or operator shall:

(1) Equip the cleaner with a cover;
(2) Equip the cleaner with a facility for draining cleaned parts;
(3) Close the degreaser cover whenever parts are not being handled in the cleaner;
(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
(5) Provide a permanent, conspicuous label summarizing the operation requirements;
(6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.2.3 Cold Cleaner Operation [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser without remote solvent reservoirs constructed after July 1, 1990, shall ensure that the following requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120°F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when the solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility, construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
VIGO COUNTY AIR POLLUTION CONTROL

PART 70 OPERATING PERMIT
CERTIFICATION FORM

Source Name: Great Dane Trailers
Source Address: 4955 North 13th Street, Terre Haute, Indiana 47805
Mailing Address: 4955 North 14th Street, Terre Haute, Indiana 47805
Part 70 Permit No.: T167-23624-00011

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)_____

☐ Report (specify)_____

☐ Notification (specify)_____

☐ Affidavit (specify)_____

☐ Other (specify)_____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Signature:
Printed Name:
Title/Position:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865
and
VIGO COUNTY AIR POLLUTION CONTROL
103 South 3rd Street
Terre Haute, IN 47807

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name:	Great Dane Trailers
Source Address:	4955 North 13th Street, Terre Haute, Indiana 47805
Mailing Address:	4955 North 14th Street, Terre Haute, Indiana 47805
Part 70 Permit No.:	T167-23624-00011

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 notify the VCAPC, within four (**4**) business hours (812-462-3433); 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
and
VIGO COUNTY AIR POLLUTION CONTROL

PART 70 QUARTERLY REPORT

Source Name: Great Dane Trailers
Source Address: 4955 North 13th Street, Terre Haute, Indiana 47805
Mailing Address: 4955 North 14th Street, Terre Haute, Indiana 47805
Part 70 Permit No.: T167-23624-00011
Facility: Entire Source
Parameter: VOC Usage
Limit: Great Dane Trailers shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents per 12 consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

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

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
and
VIGO COUNTY AIR POLLUTION CONTROL

PART 70 QUARTERLY REPORT

Source Name: Great Dane Trailers
Source Address: 4955 North 13th Street, Terre Haute, Indiana 47805
Mailing Address: 4955 North 14th Street, Terre Haute, Indiana 47805
Part 70 Permit No.: T167-23624-00011
Facility: Entire Source
Parameter: Single and Combined HAP Usage
Limit: Great Dane Trailers shall use less than nine and nine tenths (9.9) tons of any single HAP per 12 consecutive month period with compliance determined at the end of each month and less than twenty-four and nine tenths (24.9) tons for any combination of HAPs per 12 consecutive month period with compliance determined at the end of each month.

Months: _____ to _____ Year: _____

HAP	Month 1/2/3 (tons)	Previous 11-Month Totals (Month 1/2/3) (tons)	12 Consecutive Month Totals (Month 1/2/3) (tons)
Diethylene Glycol Butyl Ether	/ /	/ /	/ /
Hexamethylene Diicocyanate	/ /	/ /	/ /
Formaldehyde	/ /	/ /	/ /
Naphthalene	/ /	/ /	/ /
Ethylene Glycol	/ /	/ /	/ /
Toluene	/ /	/ /	/ /
Cobalt Soap	/ /	/ /	/ /
Cumene	/ /	/ /	/ /
Methyl Alcohol	/ /	/ /	/ /
Manganese Alkanoate	/ /	/ /	/ /
Methyl Isobutyl Ketone	/ /	/ /	/ /
Ethylbenzene	/ /	/ /	/ /
Xylene	/ /	/ /	/ /
Ethylene Glycol Monobutyl Ether Acetate	/ /	/ /	/ /
Total HAP Emissions	/ /	/ /	/ /

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
and
VIGO COUNTY AIR POLLUTION CONTROL

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Great Dane Trailers
Source Address: 4955 North 13th Street, Terre Haute, Indiana 47805
Mailing Address: 4955 North 14th Street, Terre Haute, Indiana 47805
Part 70 Permit No.: T167-23624-00011

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

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

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
And Vigo County Air Pollution Control

Technical Support Document (TSD) for a Part 70 Permit Renewal

Source Description and Location

Source Name:	**Great Dane Trailers**
Source Location:	**4955 N. 13th Street, Terre Haute, IN 47805**
County:	**Vigo**
SIC Code:	**3715**
Operation Permit No.:	**T167-7793-00011**
Operation Permit Issuance Date:	**June 5, 2002**
Operation Permit Expiration Date:	**June 5, 2007**
Operation Permit Renewal No.:	**T167-23624-00011**
Permit Reviewer:	**Scott Sines**

Existing Approvals

The source was issued Part 70 Operating Permit No. T167-7793-00011 on June 5, 2002. The source has since received the following approvals:

(a) Administrative Amendment No. 167-19634-00011, issued on July 16, 2004; and

(b) Significant Permit Modification No. 167-22906-00011, issued on April 23, 2007.

County Attainment Status

The source is located in Vigo County.

Pollutant	Status
PM10	Attainment
PM2.5	Attainment
SO_2	Maintenance Attainment
NO_2	Attainment
8-hour Ozone	Maintenance Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and nitrogen oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Vigo County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) Vigo County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD

review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions.

(c) Vigo County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 re-designating Delaware, Greene, Jackson, Vanderburgh, Vigo and Warrick Counties to attainment for the eight-hour ozone standard, re-designating Lake County to attainment for the sulfur dioxide standard, and 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, fugitive emissions are not counted toward the determination of PSD applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2006 OAQ emission data (for calendar year 2005).

Pollutant	Actual Emissions (tons/year)
PM	0.168
PM10	0.168
SO_2	0.00105
VOC	35.26
CO	0.147
NO_x	0.175

HAP	Actual Emissions (tons/year)
Diethylene Glycol Butyl Ether	2.08
Hexamethylene Diicocyanate	4.8 E-3
Formaldehyde	0.13
Naphthalene	0.01
Ethylene Glycol	0.01
Toluene	0.02
Cobalt Soap	0.03
Cumene	0.03
Methyl Alcohol	0.04
Manganese Alkanoate	0.06
Methyl Isobutyl Ketone	0.08
Ethylbenzene	0.10
Xylene	0.50
Ethylene Glycol Monobutyl Ether Acetate	1.37
Total HAP Emissions	2.21

Description of Source

The Office of Air Quality (OAQ) has reviewed a renewal application, submitted by Great Dane Trailers on September 7, 2006, relating to the operation of a trailer manufacturing plant. The following is a list of the permitted emission unit(s) and pollution control device(s):

(a) Great Dane Trailers, Incorporated has the following surface coating booths:

(1) One (1) paint booth constructed in 1994, identified as Bogie Booth (unit number 01), equipped with a maximum of two (2) airless spray guns, for metal trailer bogie, using dry filters for overspray control and exhausting at one (1) stack, identified as Stack 01.

(2) One (1) paint booth constructed in 1994, identified as Undercoat Booth (unit number 02), equipped with a maximum of three (3) airless, air-assisted airless cup guns, for metal trailer underbody, using dry filters for overspray control and exhausting at one (1) stack, identified as Stack 02.

(3) One (1) paint booth constructed in 1994, identified as Fab. Primer Booth (unit number 03), equipped with a maximum of eight (8) airless, air-assisted airless spray guns (of which a maximum of two (2) are in use simultaneously), for metal trailer components, using dry filters for overspray control and exhausting at two (2) stacks, identified as Stack 03 and 04.

(4) One (1) paint booth constructed in 1994, identified as Fifth Wheel Booth (unit number 04), equipped with a maximum of three (3) airless spray guns, for metal trailer components, using dry filters for overspray control and exhausting at one (1) stack, identified as Stack 05.

(5) One (1) paint booth constructed in 1994, identified as Fab. Topcoat Booth (unit number 05), equipped with a maximum of eight (8) air-assisted airless spray guns (of which a maximum of two (2) are in use simultaneously), for metal trailer components, using dry filters for overspray control and exhausting at two (2) stack, identified as Stack 06 and 07.

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

(1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) BTU per hour [326 IAC 6.5].
(2) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 BTU per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 BTU per hour.
(3) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
(4) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
(5) The following VOC and HAP storage containers:
    (a) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
    (b) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
(6) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3-2][326 IAC 8-3-5].
(7) Cleaners and solvents characterized as follows:
    (a) Having a vapor pressure equal to or less than 2kPa; 15 mmHg; or 0.3 psi measured at 38 degrees C (100°F) or;
    (b) Having a vapor pressure equal to or less than 0.7 kPa; 5 mmHg; or 0.1 psi measured at 20 degrees C (68°F);

    the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(8) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment [326 IAC 6.5].
(9) Water based adhesives that are less than or equal to 5% by volume VOCs excluding HAPs.
(10) Replacement or repair of electrostatic precipators, bags in baghouses and filters in other filtration equipment.
(11) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
(12) On-site fire and emergency response training approved by the department.
(13) Stationary fire pumps.
(14) 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 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations [326 IAC 6.5].
(15) Filter or coalescer media changeout.

Enforcement Issues

There are no pending enforcement actions.

Emission Calculations

See Appendix A pages 1 - 2 of this document for detailed emission calculations.

Permit Level Determination – Part 70

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, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	Greater than 250
PM10	Greater than 250
SO_2	Less than 25
VOC	Greater than 250
CO	Less than 25
NO_x	Less than 25

HAP	Potential to Emit (tons/year)
Diethylene Glycol Butyl Ether	less than 10
Hexamethylene Diicocyanate	less than 10
Formaldehyde	less than 10
Naphthalene	less than 10
Ethylene Glycol	less than 10
Toluene	less than 10
Cobalt Soap	less than 10
Cumene	less than 10
Methyl Alcohol	less than 10
Manganese Alkanoate	less than 10
Methyl Isobutyl Ketone	less than 10
Ethylbenzene	less than 10
Xylene	less than 10
Ethylene Glycol Monobutyl Ether Acetate	less than 10
Total HAP Emissions	Less than 25

	Limited Potential To Emit (tons/year)						
Process/emission unit	**PM**	**PM-10**	**SO_2**	**VOC**	**CO**	**NO_x**	**HAPs**
#1 Bogie	0.886	--	--	*	--	--	Ethylbenzene 0.00 Toluene 0.09 Xylene 0.19 MIK 0.08 Methanol 0.01 Glycol Ether 0.00
#2 Undercoat	1.346	--	--	*	--	--	Ethylbenzene 0.12 Toluene 0.14 Xylene 0.24 MIK 0.13 Methanol 0.01 Glycol Ether 0.00
#3 Fab. Primer	0.517	--	--	*	--	--	Ethylbenzene 0.04 Toluene 0.00 Xylene 0.21 MIK 0.00 Methanol 0.00 Glycol Ether 0.00
#4 Fab. 5th Wheel	0.5	--	--	*	--	--	Ethylbenzene 0.00 Toluene 0.00 Xylene 0.23 MIK 0.00 Methanol 0.00 Glycol Ether 0.00
#5 Fab. Topcoat	0.735	--	--	*	--	--	Ethylbenzene 0.13 Toluene 0.00 Xylene 2.77 MIK 0.00 Methanol 0.00 Glycol Ether 0.00
Degreaser	--	--	--	**0	--	--	
Total Emissions	3.984	--	--	<250	--	--	Total Combined HAPs = 4.39

* VOC emissions from units #1 Bogie, #2 Undercoat, #3 Fab. Primer, #4 Fab. 5th Wheel, and #5 Fab. Topcoat is limited to less than two hundred-fifty (250) tons per year.

** The parts degreaser utilizes a silicon-based degreasing fluid with zero grams VOC per liter (0g/l).

Federal Rule Applicability Determination

(a) The tanks are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110b, Subpart Kb), due to the size of the tanks. Great Dane's

tanks are below the 40 cubic meters (10,560 gallon) threshold. Therefore, these requirements are not included in the permit.

(b) The degreasing operations are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart T, due to the solvents used. The solvents regulated by Subpart T are not used at the Great Dane facility. Therefore, these requirements are not included in the permit.

(c) Great Dane Trailers is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart MMMM, for Surface Coating of Miscellaneous Parts and Products. Great Dane Trailers is not a major source of HAP emissions and is limited to less than ten (10) tons of any single HAP per 12 consecutive month period and less than twenty-five (25) tons for any combination of HAPs per 12 consecutive month period.

(d) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to an existing pollutant-specific emission unit and meets the following criteria:

(1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;

(2) is subject to an emission limitation or standard for that pollutant; and

(3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each existing emission unit involved:

Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
01 Bogie -PM	Dry filter	Y	177	0.886	100	Y	N
02 Undercoat- PM	Dry filter	Y	269	1.346	100	Y	N
03 Fab. Primer - PM	Dry filter	Y	103	0.517	100	Y	N
04 Fab. 5th Wheel - PM	Dry filter	Y	100	0.5	100	Y	N
05 Fab. Topcoat - PM	Dry filter	Y	147	0.735	100	Y	N

Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
01 Bogie - VOC	None	Y	48.13	48.13	100	N	N
02 Undercoat- VOC	None	Y	31.88	31.88	100	N	N
03 Fab. Primer - VOC	None	Y	115.61	115.61	100	N	N
04 Fab. 5th Wheel - VOC	None	Y	53.03	53.03	100	N	N
05 Fab. Topcoat - VOC	None	Y	7.94	7.94	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to unit numbers 01 - 05 for PM upon issuance of the Title V Renewal. A CAM plan will be incorporated into this Part 70 permit renewal. See the Compliance Determination and Monitoring Requirements section of this TSD for the detailed CAM requirements.

State Rule Applicability Determination

The following state rules are applicable to the source:

326 IAC 2-2 (PSD)
Pursuant to CP-167-4064-00011, issued on December 12, 1994, this facility shall use less than 250 tons of VOC (since it is not one of the 28 listed source categories), per 12 consecutive month period. This usage limit is required to limit the source-wide potential to emit of VOC to less than 250 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
Great Dane Trailers will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)
Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). The source does not have the potential to emit annual emissions greater than or equal to: 2,500 tons per year of carbon monoxide, 2,500 tons per year of oxides of nitrogen, 2,500 tons per year of sulfur dioxide, 250 tons per year of particulate matter less than or equal to 10 micrometers, or 250 tons per year of volatile organic compounds. The source is located in Vigo County. Therefore, in accordance with the compliance schedule in 326 IAC 2-6-3(b), an emission statement must be submitted triennially. The first report is due no later than July 1, 2006, and subsequent reports are due every year thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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.

(c) This source is not located in the area of Vigo County referenced in 326 IAC 5-1-1(c)(8).

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

(a) The source is located in Vigo County.

(b) The source is not specifically listed in 326 IAC 6.5-9.

(c) The source does have the potential to emit one hundred (100) tons or more of particulate matter per year.

(d) The source has actual particulate matter emissions of less than ten (10) tons per year.

Therefore 326 IAC 6.5 applies to the source.

326 IAC 6.5-1-2 (Particulate emission limitation)

Pursuant to 326 IAC 6.5-1-2 (Particulate emission limitation), natural gas-fired combustion sources, welding operations, grinding operations, and surface coating booths shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.03 grain per dry standard cubic foot (dscf). Particulate emissions from the surface coating booths shall be controlled by dry particulate filters in order to comply with this limit.

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

(a) The natural gas-fired combustion units at this source are exempt from this rule and are governed by 326 IAC 6.5-1-2(a).

(b) The welding operations at this source use less than six hundred twenty-five (625) pounds of rod or wire per day and are exempt from this rule and are governed by 326 IAC 6.5-1-2(a).

(c) The grinding operations at this source are exempt from this rule and are governed by 326 IAC 6.5-1-2(a).

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 coating delivered to the applicator at unit 01, unit 02, unit 03, unit 04, and unit 05, shall be limited to the following when coating miscellaneous metal:

Coatings	Limit (pounds of VOC/gallon of coating less water delivered to the applicator)
Clear Coat	4.3
Air Dried Coat	3.5

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

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

326 IAC 8-3-2 (Cold cleaner operation)

Pursuant to 326 IAC 8-3 the Closed Solvent Spray parts washer, installed in 1994, is subject to the requirements under 326 IAC 8-3-2 and 326 IAC 8-3-5 due to the date of construction and lack of remote solvent reservoir.

Pursuant to 326 IAC 8-3-2 (Cold cleaner operation) for cold cleaner operations constructed after January 1, 1990, the owner or operator shall:

(a) Equip the cleaner with a cover;
(b) Equip the cleaner with a facility for draining cleaned parts;
(c) Close the degreaser cover whenever parts are not being handled in the cleaner;
(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
(e) Provide a permanent, conspicuous label summarizing the operation requirements;
(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand or foot if:
  (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
  (B) The solvent is agitated; or
  (C) The solvent is heated.
(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120°F)):
  (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
  (B) A water cover when the solvent which is used is insoluble in, and heavier than, water.
  (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.
(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

326 IAC 8-4-3 (Petroleum liquid storage facilities)
Great Dane Trailers is not subject to the requirements of 326 IAC 8-4-3 (Petroleum liquid storage

facilities), due to the size of the tanks. The tanks are each below the 39,000 gallon threshold.

Compliance Determination and Monitoring Requirements

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

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

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

The surface coating booths have applicable compliance monitoring conditions as specified below:

(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 (01, 02, 03, 04, 05, 06, and 07) 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 stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the dry filters for the surface coating booths must operate properly to ensure compliance with 326 IAC 6.5-1 (Particulate Emission Limitations), 326 IAC 2-7 (Part 70), and 40 CFR 64 (CAM).

Conclusion and Recommendation

The operation of this trailer manufacturing plant shall be subject to the conditions of the attached proposed **Part 70 Permit No. T167-23624-00011.**

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

Company Name: Great Dane Trailers
Address City IN Zip: 4955 N. 13th Street, Terre Haute, IN 47805
Permit Number: T167-23624-00011
Plt ID: 167-00011
Reviewer: Scott Sines
Date: 5/17/2007

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
5th Wheel - Undercoating, Dk Gray Dry flex	11.6	24.05%	0.0%	24.1%	0.0%	58.97%	0.16000	2.500	2.80	2.80	1.12	26.87	4.90	1.55	4.75	90%
5th Wheel - Undercoating, Dk Gray Dry flex	11.6	24.05%	0.0%	24.1%	0.0%	58.97%	1.57000	2.500	2.80	2.80	10.99	263.71	48.13	15.20	4.75	90%
Bogie Booth - Undercoating, Dk Gray Dry flex	11.6	24.05%	0.0%	24.1%	0.0%	58.97%	1.57000	2.500	2.80	2.80	10.99	263.71	48.13	15.20	4.75	90%
Fab Primer Booth - S-2096 Acetone/MPK Epoxy Flush	6.7	47.85%	0.0%	47.9%	0.0%	52.15%	0.60000	2.500	3.20	3.20	4.80	115.24	21.03	2.29	6.14	90%
Fab Primer Booth - Undercoating, Dk Gray Dry flex	11.6	24.05%	0.0%	24.1%	0.0%	58.97%	1.57000	2.500	2.80	2.80	10.99	263.71	48.13	15.20	4.75	90%
Fab Primer Booth - Urethane TC, Great Dane grey	10.7	32.80%	0.0%	32.8%	0.0%	51.97%	0.11000	2.500	3.50	3.50	0.96	23.10	4.22	0.86	6.73	90%
Fab Primer Booth - Primer, Buff 3.5 VOC Epoxy	13.0	27.00%	0.0%	27.0%	0.0%	50.92%	0.93000	2.500	3.51	3.51	8.15	195.71	35.72	9.66	6.89	90%
Fab Primer Booth - Primer, 3.5 VOC gray	12.1	27.00%	0.0%	27.0%	0.0%	53.20%	0.30000	2.500	3.27	3.27	2.45	58.81	10.73	2.90	6.14	90%
Fab Topcoat - Urethane TC, Great Dane grey	10.7	32.80%	0.0%	32.8%	0.0%	51.97%	0.11000	2.500	3.50	3.50	0.96	23.10	4.22	0.86	6.73	90%
Fab Topcoat - Urethane TC, White	11.3	46.36%	39.0%	7.4%	44.0%	53.64%	0.41000	2.500	1.48	0.83	0.85	20.41	3.72	2.71	1.55	90%
Undercoat - Undercoating, Dk Gray Dry flex	11.6	24.05%	0.0%	24.1%	0.0%	58.97%	0.16000	1.250	2.80	2.80	0.56	13.44	2.45	0.77	4.75	90%
Undercoat - Undercoating, Dk Gray Dry flex	11.6	24.05%	0.0%	24.1%	0.0%	58.97%	1.57000	1.250	2.80	2.80	5.49	131.85	24.06	7.60	4.75	90%
Undercoat - Primer, 3.5 VOC gray	12.1	27.00%	0.0%	27.0%	0.0%	53.20%	0.30000	1.250	3.27	3.27	1.23	29.40	5.37	1.45	6.14	90%
Potential Emissions			**Worst case coating added to all solvents**								**59.54**	**1429.04**	**260.80**	**76.26**		

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: Great Dane Trailers
Address City IN Zip: 4955 N. 13th Street, Terre Haute, IN 47805
Permit Number: T167-23624-00011
Plt ID: 167-00011
Permit Reviewer: Scott Sines
Date: 5/17/2007

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Benzene	Weight % Hexane	Weight % Glycol Ethers	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)
5th Wheel - Undercoating, Dk Gray Dry flex	11.6	0.16000	2.500	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
5th Wheel - Undercoating, Dk Gray Dry flex	11.6	1.57000	2.500	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
Bogie Booth - Undercoating, Dk Gray Dry flex	11.6	1.57000	2.500	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
Fab Primer Booth - S-2096 Acetone/MPK Epoxy Flush	6.7	0.60000	2.500	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
Fab Primer Booth - Undercoating, Dk Gray Dry flex	11.6	1.57000	2.500	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
Fab Primer Booth - Urethane TC, Great Dane grey	10.7	0.11000	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	2.50%	0.00%	0.00	0.00	0.00	0.00	0.00	0.32	0.00
Fab Primer Booth - Primer, Buff 3.5 VOC Epoxy	13.0	0.93000	2.500	0.00%	0.00%	0.10%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.13	0.00	0.00	0.00	0.00
Fab Primer Booth - Primer, 3.5 VOC gray	12.1	0.30000	2.500	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
Fab Topcoat - Urethane TC, Great Dane grey	10.7	0.11000	2.500	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
Fab Topcoat - Urethane TC, White	11.3	0.41000	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	2.50%	0.00%	0.00	0.00	0.00	0.00	0.00	1.26	0.00
Undercoat - Undercoating, Dk Gray Dry flex	11.6	0.16000	1.250	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
Undercoat - Undercoating, Dk Gray Dry flex	11.6	1.57000	1.250	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
Undercoat - Primer, 3.5 VOC gray	12.1	0.30000	1.250	2.50%	0.00%	0.00%	0.50%	0.00%	2.50%	0.00%	0.50	0.00	0.00	0.10	0.00	0.50	0.00
Total Potential Emissions											**0.50**	**0.00**	**0.13**	**0.10**	**0.00**	**2.08**	**0.00**

METHODOLOGY

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