



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: February 19, 2007
RE: Bentz Transport Products / 179-23767-00034
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-AM.dot 03/23/06



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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February 19, 2007

Mr. Keith Bentz
Bentz Transport Products, Inc.
4532 Allen Martin Drive
Fort Wayne, Indiana 46806

Re: Exempt Construction and Operation Status,
179-23767-00034

Dear Mr. Bentz:

The application from Bentz Transport Products, Inc., received on October 16, 2006, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following stationary truck and bus bodies manufacturing source, to be located at 25501 East 850 North, Ossian, Indiana 46777, is classified as exempt from air pollution permit requirements:

- (a) One (1) mold fabrication operation, identified as E1, approved for construction in 2006, utilizing manual application methods, exhausting inside the building, capacity: 6 cabs per day.
- (b) One (1) spray booth used for gel coating and resin coating, identified as E2, approved for construction in 2006, equipped with dry filters for particulate control, exhausting inside the building, capacity: 6 cabs per day.
- (c) One (1) trimming operation, identified as E3, approved for construction in 2006, exhausting inside the building, capacity: 8,845 pounds of cab per year.

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:

- (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.

This exemption is the first air approval issued to this source.

Bentz Transport Products, Inc.
Ossian, Indiana
Permit Reviewer: BJP/MES

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179-23767-00034

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Original signed by

Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

BJP/MES

cc: File - Wells County
Wells County Health Department
Air Compliance – Mr. Ryan Hillman
Permit Tracking
Compliance Data Section

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

Technical Support Document (TSD) for New Source Construction and Exemption

Source Background and Description

Source Name:	Bentz Transport Products, Inc.
Source Location:	25501 East 850 North, Ossian, Indiana 46777
County:	Wells
SIC Code:	1893
Operation Permit No.:	179-23767-00034
Permit Reviewer:	Brian J. Pedersen

The Office of Air Quality (OAQ) has reviewed an application from Bentz Transport Products, Inc. relating to the construction and operation of a stationary truck and bus bodies manufacturing source.

Permitted Emission Units and Pollution Control Equipment

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

Unpermitted Emission Units and Pollution Control Equipment

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

New Emission Units and Pollution Control Equipment

The application includes information relating to the prior approval for the construction and operation of the following new equipment:

- (a) One (1) mold fabrication operation, identified as E1, approved for construction in 2006, utilizing manual application methods, exhausting inside the building, capacity: 6 cabs per day.
- (b) One (1) spray booth used for gel coating and resin coating, identified as E2, approved for construction in 2006, equipped with dry filters for particulate control, exhausting inside the building, capacity: 6 cabs per day.
- (c) One (1) trimming operation, identified as E3, approved for construction in 2006, exhausting inside the building, capacity: 8,845 pounds of cab per year.

Existing Approvals

The source has not been operating under any previous approvals.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

There are no stack emissions associated with this operation.

Recommendation

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

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

An application for the purposes of this review was received on October 16, 2006, with additional information received on December 4, 2006.

Emission Calculations

See page 1 of 1 of Appendix A of this document for detailed emission calculations.

The emissions from the fiberglass trimming, identified as E3, have been estimated as follows:

The maximum throughput of all materials combined is 8,845.07 pounds of fiberglass cab per year. Assume a conservative estimate of 50% is abraded from the trimming of cabs and 100% of this is PM/PM₁₀, therefore the fiberglass trimming emits 2.21 tons of PM/PM₁₀ per year.

8,845.07 pounds per 8760 hours * 0.5 (50% abraded)* 1 (100% PM/PM₁₀) 1 ton/2000 pounds = 2.21 tons per 8760 hours. An assumed worst case scenario, in which 50% of the throughput is all PM/PM₁₀, the source would be below registration levels.

Potential to Emit of the Source Before Controls

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

Pollutant	Potential to Emit (tons/yr)
PM	2.93
PM ₁₀	2.93
SO ₂	-
VOC	0.445
CO	-
NO _x	-

HAPs	Potential to Emit (tons/yr)
Styrene	0.440
MMA	0.062
Total	0.502

- (a) The potential to emit of pollutants are less than the levels listed in 326 IAC 2-1.1-3(d)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3. An exemption will be issued.
- (b) The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3. An exemption will be issued.

County Attainment Status

The source is located in Wells County.

Pollutant	Status
PM _{2.5}	Attainment
PM ₁₀	Attainment
SO ₂	Attainment
NO ₂	Attainment
8-Hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Wells County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section of this document.
- (b) Wells County has been classified as unclassifiable or attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM_{2.5} emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions. See the State Rule Applicability for the source section.
- (c) Wells County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the require-

ments for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section of this document.

- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 redesignating Delaware, Greene, Jackson, Vanderburgh, Vigo and Warrick Counties to attainment for the eight-hour ozone standard, redesignating 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 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability. Pursuant to 326 IAC 2-7-2(e), all fugitive emissions are counted toward the determination of Part 70 Applicability.

Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	2.28
PM ₁₀	2.28
SO ₂	-
VOC	0.445
CO	-
NO _x	-
Single HAP (Styrene)	0.440
Combination HAPs	0.502

This new source is **not** a major stationary source because no attainment pollutant is emitted at a rate of two hundred fifty (250) tons per year or greater and it is not in one of the twenty-eight (28) listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

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

- (a) each criteria pollutant is less than one-hundred (100) tons per year,
- (b) a single hazardous air pollutant (HAP) is less than ten (10) tons per year, and
- (c) the combination of HAPs is less than twenty-five (25) tons per year.

This is the first air approval issued to this source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production, (40 CFR 63.5780 Subpart WWW), are not included in the permit for this source because this source is not a major source of HAPs, as defined in 40 CFR 63.2.
- (c) There are no other National Emission Standards for Hazardous Air Pollutants included in the permit for this source.

State Rule Applicability – Entire Source

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

The unrestricted potential emissions of each attainment criteria pollutant are less than two-hundred fifty (250) tons per year. Therefore, this source, which is not one of the twenty-eight (28) listed source categories, is a minor source pursuant to 326 IAC 2-2, PSD.

326 IAC 2-4.1-1 (New source toxics control)

The operation of a stationary manufacturer of truck and bus bodies will emit less than ten (10) tons per year of a single HAP and twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is not located in Lake or Porter County and does not require a Part 70 Operating Permit. Therefore, the requirements of 326 IAC 2-6 do not apply.

326 IAC 5-1 (Opacity Limitations)

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

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

State Rule Applicability – Individual Facilities

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

- (a) The one (1) spray booth used for gel coating and resin coating, identified as E2, not otherwise exempt in 326 IAC 6-3-2(b)(5 - 8) uses less than five (5) gallons of coatings per day, for both operations combined. Therefore, pursuant to 326 IAC 6-3-1(b) (15), the one

(1) spray booth used for gel coating and resin coating, identified as E2, is exempt from the requirements of 326 IAC 6-3.

(b) Pursuant 326 IAC 6-3-1(b)(7) the one (1) mold fabrication operation, identified as E1, using dip coating is exempt from the requirements of 326 IAC 6-3.

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

The potential emissions from the trimming operation, identified as E3, are less than 0.551 pounds per hour. Therefore, pursuant to 326 IAC 6-3-1(b)(14), the trimming operation, identified as E3, is exempt from the requirements of 326 IAC 6-3.

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

The VOC emissions from the one (1) mold fabrication operation and the one (1) spray booth used for gel coating and resin coating, identified as E1 and E2, respectively, are less than twenty-five (25) tons per year, each. Therefore, these emission units are exempt from the requirements of 326 IAC 8-1-6.

Conclusion

The construction and operation of this stationary truck and bus bodies manufacturing source shall be subject to the conditions of the **New Source Construction and Exemption 179-23767-00034**.

**Appendix A: Emissions Calculations
VOC, PM/PM10 and HAP Calculations
Reinforced Plastics and Composites**

Company Name: Bentz Transport Products, Inc.
Address, City, IN, Zip: 2501 East 850 North, Ossian, Indiana 46777
Permit Number: 179-23767-00034
Pit ID: 179-00034
Reviewer: Brian J. Pedersen
Application Date: October 19, 2006

Emission Unit	Density (lb/gal)	Weight % Monomer Styrene	Weight % Monomer MMA	Weight % Monomer MEK	Weight % Monomer Total	CFA Unified Styrene Emission Factor (lbs/ton)	CFA Unified MMA Emission Factor (lbs/ton)	Gallons per hour	Pounds VOC per hour	Pounds VOC per day	Tons of VOC per year	PM tons per year	Transfer Efficiency	Tons of Styrene per Year	Tons of MMA per Year			
E1 and E2																		
Production Resin	9.17	96.0%	0.0%	-	96.0%	154	-	0.059	0.048	1.16	0.212	0.44	75%	0.212	-			
Tooling Gelcoat	9.13	42.0%	4.59%	-	46.5%	278	87.0	0.001	0.001	0.028	0.005	0.00	100%	0.005	0.001			
Production Gelcoat	10.89	30.7%	4.97%	-	35.7%	273	75.0	0.034	0.051	1.22	0.223	0.28	75%	0.223	0.061			
Polymerization Inhibitor	8.4	-	-	2.00%	2.0%	-	-	0.007	0.001	0.028	0.005	0.00	100%	-	-			
PM Controls									90%									
									Potential Before Controls		0.445		0.723		0.440		0.062	
									Potential After Controls									

METHODOLOGY

Potential VOC From Resins/Gel, Pounds per Hour = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Styrene Emission factor (lb/ton) * (1 ton/2000 lbs)

Potential VOC From Resins/Gel, Pounds per Day = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * (24 hrs / 1 day) * Styrene Emission factor (lb/ton) * (1 ton/2000 lbs)

Potential VOC From Resins/Gel, Tons per Year = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * (8760 hr/yr) * (1 ton / 2000 lbs) * Styrene Emission factor (lb/ton) * (1 ton/2000lbs)

Potential VOC From Solvents, Pounds per Hour = Density (lb/gal) * (Weight % Organics) * Gal of Material (gal/unit) * Maximum (unit/hr)

Potential VOC From Solvents, Pounds per Day = Density (lb/gal) * (Weight % Organics) * Gal of Material (gal/unit) * Maximum (unit/hr) * (24 hrs / 1 day)

Potential VOC From Solvents, Tons per Year = Density (lb/gal) * (Weight % Organics) * Gal of Material (gal/unit) * Maximum (unit/hr) * (8760 hr/yr) * (1 ton / 2000 lbs)

PM, tons per year = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * (1 - Weight % Styrene) * (1 - Transfer Efficiency) * (8760 hr/yr) * (1 ton / 2000 lbs)

Styrene emissions, tons per year = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Styrene Emission Factor (lb/ton) * (1 ton Styrene / 2000 lbs Styrene) * (8760 hr/yr) * (1 ton / 2000 lbs)

Emission Factors (lbs Styrene / ton resin or gelcoat) taken from "Unified Emission Factors for Open Molding of Composites", Composite Fabricators Association (CFA), July 2001