



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: December 7, 2007

RE: Vanguard National Trailer Corporation / 181-23841-00043

FROM: Matthew Stuckey, Deputy Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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.



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Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**Vanguard National Trailer Corporation
289 East Water Tower Drive
Monon, Indiana 47959**

(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.

Operation Permit No.: T181-23841-00043	
Issued by:  Matthew Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality	Issuance Date: December 7, 2007 Expiration Date: December 7, 2012

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary truck trailer manufacturing facility.

Source Address:	289 East Water Tower Drive, Monon, Indiana 47959
Mailing Address:	289 East Water Tower Drive, Monon, Indiana 47959
General Source Phone Number:	219-253-2000
SIC Code:	3715
County Location:	White
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) Finish paint booth, identified as 1-001, with a maximum capacity of 55.2 gal/hr of paint, using dry filters as particulate control, and exhausting to stacks 1-001a - 1-001e.
- (b) Paint booth, identified as 1-002, with a maximum capacity of 13.8 gal/hr of paint, using dry filters as particulate control, and exhausting to stacks 1-002a - 1-002c.
- (c) Assembly operations using caulk and glue, identified as 1-003, with a maximum capacity of 11.3 gal/hr of glue and caulk.
- (d) Dutch oven boiler, rated at 29 million Btu/hr, using natural gas as fuel, identified as 2-006, exhausting to stack 2-006a. Under NSPS Subpart Dc, this emission unit is considered a small industrial steam-generating unit.
- (e) Primer booth and oven, identified as 2-001, with a maximum capacity of 13.8 gal/hr of paint, using dry filters as particulate control, and exhausting to stacks 2-001a - 2-001c.
- (f) Finish paint booth, identified as 2-002, with a maximum capacity of 10.2 gal/hr of paint, using dry filters as particulate control, and exhausting to stack 2-002a.
- (g) Small paint booth, identified as 2-003, with a maximum capacity of 33.0 gal/hr, using dry filters as particulate control, and exhausting to stack 2-003a.
- (h) Area welding, identified as 2-007, with a maximum capacity of 1345.7 lbs/hr of weld wire.

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) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (b) 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, or woodworking operations. [326 IAC 6-3-2]

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, T181-23841-00043, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, 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]

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

B.5 Severability [326 IAC 2-7-5(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, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(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) A "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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than 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

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by 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 prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, 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.

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

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

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

- (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

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 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 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, 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, 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, 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 T181-23841-00043 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 Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

The Quarterly Deviation and Compliance Monitoring Report does require the certification by 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 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 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 at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(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 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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

- (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
- 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

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 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]

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

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, 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

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 within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) 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 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 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.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

C.4 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.5 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.6 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.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by 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.8 Performance Testing [326 IAC 3-6]

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by 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 not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 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.10 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

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.11 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.12 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.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; and/or

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

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [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) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 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 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

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 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]

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

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by 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
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by 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:

- (a) Finish paint booth, identified as 1-001, with a maximum capacity of 55.2 gal/hr of paint, using dry filters as particulate control, and exhausting to stacks 1-001a - 1-001e.
- (b) Paint booth, identified as 1-002, with a maximum capacity of 13.8 gal/hr of paint, using dry filters as particulate control, and exhausting to stacks 1-002a - 1-002c.
- (c) Primer booth and oven, identified as 2-001, with a maximum capacity of 13.8 gal/hr of paint, using dry filters as particulate control, and exhausting to stacks 2-001a - 2-001c.
- (d) Finish paint booth, identified as 2-002, with a maximum capacity of 10.2 gal/hr of paint, using dry filters as particulate control, and exhausting to stack 2-002a.
- (e) Small paint booth, identified as 2-003, with a maximum capacity of 33.0 gal/hr, using dry filters as particulate control, and exhausting to stack 2-003a.

(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 Prevention of Significant Deterioration (PSD Minor) [326 IAC 2-2]

The source-wide potential to emit VOC, PM₁₀, and PM shall each be limited to less than 250 tons per 12 consecutive month period with compliance demonstrated at the end of each month as follows:

- (a) The input of VOC to the five (5) paint booths, identified as Finish Paint Booth (1-001), Paint Booth (1-002), Primer Booth and Oven (2-001), Finish Paint Booth (2-002), and Small Paint Booth (2-003) shall be less than 235 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 VOC to less than 250 tons per twelve (12) consecutive month period.
- (b) The controlled potential to emit PM/PM₁₀ to the five (5) paint booths, identified as Finish Paint Booth (1-001), Paint Booth (1-002), Primer Booth and Oven (2-001), Finish Paint Booth (2-002), and Small Paint Booth (2-003) shall be less than 205 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This limit is required to limit the source-wide potential to emit of PM/PM₁₀ to less than 250 tons per twelve (12) consecutive month period.
 - (1) To comply with this limit, the source shall maintain the use of dry particulate filters for each of the five (5) paint booths. The filters shall have a minimum control efficiency of 75%, and shall be in use at all times the booths are in operation.
- (c) Compliance with these limits makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Particulate from the surface coating booths, identified as Finish Paint Booth (1-001), Paint Booth (1-002), Primer Booth (2-001), Finish Paint Booth (2-002), and Small Paint Booth (2-003), shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.3 Miscellaneous Metal Coating Operations [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coating delivered to the applicator at the surface coating facilities identified as Finish Paint Booth (1-001), Paint Booth (1-002), Primer Booth and Oven (2-001), Finish Paint Booth (2-002), and Small Paint Booth (2-003) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried and forced warm air dried coatings.
- (b) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.

Compliance Determination Requirements

D.1.5 Miscellaneous Metal Coating Operations

Compliance with the VOC content limitations pursuant to 326 IAC 8-2-9 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.6 Visible Emissions Notations [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 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.

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

D.1.7 Record Keeping Requirement

- (a) To document compliance with Conditions D.1.1(a) and D.1.1(b), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken daily and shall be complete and sufficient to establish

compliance with the VOC, PM₁₀, and PM emission limits established in Condition D.1.1(a) and D.1.1(b).

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month;
 - (5) The weight of VOC, PM₁₀, and PM emitted for each compliance period; and
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain a log of the visible emission notations.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.

D.1.8 Reporting Requirement

A quarterly summary of the information to document compliance with Conditions D.1.1(a) and D.1.1(b) 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 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) 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, or woodworking operations.
- (b) Area welding, identified as 2-007, with a maximum capacity of 1345.7 lbs/hr of weld wire.
- (c) Dutch oven boiler, rated at 29 million Btu/hr, using natural gas as fuel, identified as 2-006, exhausting to stack 2-006a. Under NSPS Subpart Dc, this emission unit is considered a small industrial steam-generating unit.

(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.2.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, the particulate emissions from the boiler shall be limited to 0.6 pounds of PM per million Btu (lb/MMBtu) heat input.

D.2.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

- (a) The grinding and machining operations listed as insignificant in this permit operate at a process weight rate of less than 100 pounds per hour. Therefore, the allowable rate of emission is 0.551 pound per hour.
- (b) The area welding, identified as 2-007, is subject to 326 IAC 6-3-2. When operating at a total process weight of 6,400.7 pounds per hour, the PM emissions shall not exceed 8.94 pounds per hour, based on the following equation:

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

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

New Source Performance Standards [326 IAC 12] [40 CFR 60]

D.2.3 New Source Performance Standard for Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units [326 IAC 12] [40 CFR 60, Subpart Dc]

The Permittee which operates a small industrial steam generating unit, as defined in 40 CFR 60, Subpart Dc, shall comply with the provisions of 40 CFR Part 60, Subpart Dc as follows:

§ 60.40c *Applicability and delegation of authority.*

(a) Except as provided in paragraph (d) of this section, the affected facility to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/hr)) or less, but greater than or equal to 2.9 MW (10 MMBtu/hr).

(b) In delegating implementation and enforcement authority to a State under section 111(c) of the Clean Air Act, §60.48c(a)(4) shall be retained by the Administrator and not transferred to a State.

(c) Steam generating units that meet the applicability requirements in paragraph (a) of this section are not subject to the sulfur dioxide (SO₂) or particulate matter (PM) emission limits, performance testing requirements, or monitoring requirements under this subpart (§§60.42c, 60.43c, 60.44c, 60.45c, 60.46c, or 60.47c) during periods of combustion research, as defined in §60.41c.

(d) Any temporary change to an existing steam generating unit for the purpose of conducting combustion research is not considered a modification under §60.14.

(e) Heat recovery steam generators that are associated with combined cycle gas turbines and meet the applicability requirements of subpart GG or KKKK of this part are not subject to this subpart. This subpart will continue to apply to all other heat recovery steam generators that are capable of combusting more than or equal to 2.9 MW (10 MMBtu/hr) heat input of fossil fuel but less than or equal to 29 MW (100 MMBtu/hr) heat input of fossil fuel. If the heat recovery steam generator is subject to this subpart, only emissions resulting from combustion of fuels in the steam generating unit are subject to this subpart. (The gas turbine emissions are subject to subpart GG or KKKK, as applicable, of this part).

(f) Any facility covered by subpart AAAA of this part is not covered by this subpart.

(g) Any facility covered by an EPA approved State or Federal section 111(d)/129 plan implementing subpart BBBB of this part is not covered by this subpart.

§ 60.41c Definitions.

As used in this subpart, all terms not defined herein shall have the meaning given them in the Clean Air Act and in subpart A of this part.

Annual capacity factor means the ratio between the actual heat input to a steam generating unit from an individual fuel or combination of fuels during a period of 12 consecutive calendar months and the potential heat input to the steam generating unit from all fuels had the steam generating unit been operated for 8,760 hours during that 12-month period at the maximum design heat input capacity. In the case of steam generating units that are rented or leased, the actual heat input shall be determined based on the combined heat input from all operations of the affected facility during a period of 12 consecutive calendar months.

Coal means all solid fuels classified as anthracite, bituminous, subbituminous, or lignite by the American Society of Testing and Materials in ASTM D388 (incorporated by reference, see §60.17), coal refuse, and petroleum coke. Coal-derived synthetic fuels derived from coal for the purposes of creating useful heat, including but not limited to solvent refined coal, gasified coal, coal-oil mixtures, and coal-water mixtures, are also included in this definition for the purposes of this subpart.

Coal refuse means any by-product of coal mining or coal cleaning operations with an ash content greater than 50 percent (by weight) and a heating value less than 13,900 kilojoules per kilogram (kJ/kg) (6,000 Btu per pound (Btu/lb) on a dry basis.

Cogeneration steam generating unit means a steam generating unit that simultaneously produces both electrical (or mechanical) and thermal energy from the same primary energy source.

Combined cycle system means a system in which a separate source (such as a stationary gas turbine, internal combustion engine, or kiln) provides exhaust gas to a steam generating unit.

Combustion research means the experimental firing of any fuel or combination of fuels in a steam generating unit for the purpose of conducting research and development of more efficient combustion or more effective prevention or control of air pollutant emissions from combustion, provided that, during these periods of research and development, the heat generated is not used for any purpose other than preheating combustion air for use by that steam generating unit (*i.e.* , the heat generated is released to the atmosphere without being used for space heating, process heating, driving pumps, preheating combustion air for other units, generating electricity, or any other purpose).

Conventional technology means wet flue gas desulfurization technology, dry flue gas desulfurization technology, atmospheric fluidized bed combustion technology, and oil hydrodesulfurization technology.

Distillate oil means fuel oil that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials in ASTM D396 (incorporated by reference, see §60.17).

Dry flue gas desulfurization technology means a SO₂ control system that is located between the steam generating unit and the exhaust vent or stack, and that removes sulfur oxides from the combustion gases of the steam generating unit by contacting the combustion gases with an alkaline reagent and water, whether introduced separately or as a premixed slurry or solution and forming a dry powder material. This definition includes devices where the dry powder material is subsequently converted to another form. Alkaline reagents used in dry flue gas desulfurization systems include, but are not limited to, lime and sodium compounds.

Duct burner means a device that combusts fuel and that is placed in the exhaust duct from another source (such as a stationary gas turbine, internal combustion engine, kiln, etc.) to allow the firing of additional fuel to heat the exhaust gases before the exhaust gases enter a steam generating unit.

Emerging technology means any SO₂ control system that is not defined as a conventional technology under this section, and for which the owner or operator of the affected facility has received approval from the Administrator to operate as an emerging technology under §60.48c(a)(4).

Federally enforceable means all limitations and conditions that are enforceable by the Administrator, including the requirements of 40 CFR parts 60 and 61, requirements within any applicable State implementation plan, and any permit requirements established under 40 CFR 52.21 or under 40 CFR 51.18 and 51.24.

Fluidized bed combustion technology means a device wherein fuel is distributed onto a bed (or series of beds) of limestone aggregate (or other sorbent materials) for combustion; and these materials are forced upward in the device by the flow of combustion air and the gaseous products of combustion. Fluidized bed combustion technology includes, but is not limited to, bubbling bed units and circulating bed units.

Fuel pretreatment means a process that removes a portion of the sulfur in a fuel before combustion of the fuel in a steam generating unit.

Heat input means heat derived from combustion of fuel in a steam generating unit and does not include the heat derived from preheated combustion air, recirculated flue gases, or exhaust gases from other sources (such as stationary gas turbines, internal combustion engines, and kilns).

Heat transfer medium means any material that is used to transfer heat from one point to another point.

Maximum design heat input capacity means the ability of a steam generating unit to combust a stated maximum amount of fuel (or combination of fuels) on a steady state basis as determined by the physical design and characteristics of the steam generating unit.

Natural gas means: (1) A naturally occurring mixture of hydrocarbon and nonhydrocarbon gases found in geologic formations beneath the earth's surface, of which the principal constituent is methane; or (2)

liquefied petroleum (LP) gas, as defined by the American Society for Testing and Materials in ASTM D1835 (incorporated by reference, see §60.17).

Noncontinental area means the State of Hawaii, the Virgin Islands, Guam, American Samoa, the Commonwealth of Puerto Rico, or the Northern Mariana Islands.

Oil means crude oil or petroleum, or a liquid fuel derived from crude oil or petroleum, including distillate oil and residual oil.

Potential sulfur dioxide emission rate means the theoretical SO₂ emissions (nanograms per joule (ng/J) or lb/MMBtu heat input) that would result from combusting fuel in an uncleaned state and without using emission control systems.

Process heater means a device that is primarily used to heat a material to initiate or promote a chemical reaction in which the material participates as a reactant or catalyst.

Residual oil means crude oil, fuel oil that does not comply with the specifications under the definition of distillate oil, and all fuel oil numbers 4, 5, and 6, as defined by the American Society for Testing and Materials in ASTM D396 (incorporated by reference, see §60.17).

Steam generating unit means a device that combusts any fuel and produces steam or heats water or any other heat transfer medium. This term includes any duct burner that combusts fuel and is part of a combined cycle system. This term does not include process heaters as defined in this subpart.

Steam generating unit operating day means a 24-hour period between 12:00 midnight and the following midnight during which any fuel is combusted at any time in the steam generating unit. It is not necessary for fuel to be combusted continuously for the entire 24-hour period.

Wet flue gas desulfurization technology means an SO₂ control system that is located between the steam generating unit and the exhaust vent or stack, and that removes sulfur oxides from the combustion gases of the steam generating unit by contacting the combustion gases with an alkaline slurry or solution and forming a liquid material. This definition includes devices where the liquid material is subsequently converted to another form. Alkaline reagents used in wet flue gas desulfurization systems include, but are not limited to, lime, limestone, and sodium compounds.

Wet scrubber system means any emission control device that mixes an aqueous stream or slurry with the exhaust gases from a steam generating unit to control emissions of PM or SO₂.

Wood means wood, wood residue, bark, or any derivative fuel or residue thereof, in any form, including but not limited to sawdust, sanderdust, wood chips, scraps, slabs, millings, shavings, and processed pellets made from wood or other forest residues.

§ 60.48c Reporting and recordkeeping requirements.

(g)(1) Except as provided under paragraphs (g)(2) and (g)(3) of this section, the owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each operating day.

(2) As an alternative to meeting the requirements of paragraph (g)(1) of this section, the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in §60.48c(f) to demonstrate compliance with the SO₂ standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month.

(3) As an alternative to meeting the requirements of paragraph (g)(1) of this section, the owner or operator of an affected facility or multiple affected facilities located on a contiguous property unit where the only fuels combusted in any steam generating unit (including steam generating units not subject to this subpart) at that property are natural gas, wood, distillate oil meeting the most current requirements in §60.42C to use fuel certification to demonstrate compliance with the SO₂ standard, and/or fuels, excluding coal and residual oil, not subject to an emissions standard (excluding opacity) may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Vanguard National Trailer Corporation
Source Address: 289 East Water Tower Drive, Monon, Indiana 47959
Mailing Address: 289 East Water Tower Drive, Monon, Indiana 47959
Part 70 Permit No.: T181-23841-00043

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:

Phone:

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**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Vanguard National Trailer Corporation
Source Address: 289 East Water Tower Drive, Monon, Indiana 47959
Mailing Address: 289 East Water Tower Drive, Monon, Indiana 47959
Part 70 Permit No.: T181-23841-00043

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
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**

Part 70 Quarterly Report

Source Name: Vanguard National Trailer Corporation
Source Address: 289 East Water Tower Drive, Monon, Indiana 47959
Mailing Address: 289 East Water Tower Drive, Monon, Indiana 47959
Part 70 Permit No.: T181-23841-00043
Facility: Five (5) paint booths, identified as Finish Paint Booth (1-001), Paint Booth (1-002), Primer Booth and Oven (2-001), Finish Paint Booth (2-002), and Small Paint Booth (2-003)
Parameter: VOC Usage
Limit: Less than 235 tons per twelve (12) consecutive month period

QUARTER :

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	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:

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Vanguard National Trailer Corporation
 Source Address: 289 East Water Tower Drive, Monon, Indiana 47959
 Mailing Address: 289 East Water Tower Drive, Monon, Indiana 47959
 Part 70 Permit No.: T181-23841-00043

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

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Addendum to the
Technical Support Document for a Part 70 Permit Renewal

Source Name: Vanguard National Trailer Corporation
Source Location: 289 East Water Tower Drive, Monon, Indiana 47959
County: White
SIC Code: 3715
Operation Permit No.: T181-23841-00043
Permit Reviewer: Stephanie Wilkerson

On October 12, 2007, the Office of Air Quality (OAQ) had a notice published in the Monticello Herald Journal in Monticello, Indiana, stating that Vanguard National Trailer Corporation had applied for a Part 70 permit renewal for a stationary truck trailer manufacturing operation. The notice also stated that OAQ proposed to issue a permit renewal for this operation and provided information on how the public could review the proposed permit renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit renewal should be issued as proposed.

No comments from the source or the public were received regarding the issuance of this permit renewal. However, one administrative change will be made.

Changes to the permit are noted as follows: ~~struck~~ language has been deleted; **bold** language has been added. The Table of Contents has been modified to reflect these changes.

Administrative Change:

Operation Permit No.: T181-23841-00043	
Issued by: Nisha Sizemore, Chief Matthew Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	Vanguard National Trailer Corporation
Source Location:	289 East Water Tower Drive, Monon, Indiana 47959
County:	White
SIC Code:	3715
Permit Renewal No.:	T181-23841-00043
Permit Reviewer:	Stephanie Wilkerson

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Vanguard National Trailer Corporation relating to the operation of a stationary truck trailer manufacturing operation.

History

On November 2, 2006, Vanguard National Trailer Corporation submitted an application to the OAQ requesting to renew its operating permit. Vanguard National Trailer Corporation was issued a Part 70 Operating Permit (T181-9293-00043) on April 19, 2001.

Source Definition

This Source Definition from the issued Part 70 Operating Permit is incorporated into this permit as follows:

This stationary truck trailer manufacturing company consists of three (3) plants and one (1) warehouse. These plants are located on one or more contiguous properties, have the same SIC code and are under common ownership, therefore they will be considered one (1) major source, as defined by 326 IAC 2-7-1(22).

Permitted Emission Units and Pollution Control Equipment

Plant 1 consists of:

- (a) Finish paint booth, identified as 1-001, with a maximum capacity of 55.2 gal/hr of paint, using dry filters as particulate control, and exhausting to stacks 1-001a - 1-001e.
- (b) Paint booth, identified as 1-002, with a maximum capacity of 13.8 gal/hr of paint, using dry filters as particulate control, and exhausting to stacks 1-002a - 1-002c.
- (c) Assembly operations using caulk and glue, identified as 1-003, with a maximum capacity of 11.3 gal/hr of glue and caulk.

Plant 2 consists of:

- (a) Dutch oven boiler, rated at 29 million Btu/hr, using natural gas as fuel, identified as 2-006, exhausting to stack 2-006a. Under NSPS Subpart Dc, this emission unit is considered a small industrial steam-generating unit.
- (b) Primer booth and oven, identified as 2-001, with a maximum capacity of 13.8 gal/hr of paint, using dry filters as particulate control, and exhausting to stacks 2-001a - 2-001c.

- (c) Finish paint booth, identified as 2-002, with a maximum capacity of 10.2 gal/hr of paint, using dry filters as particulate control, and exhausting to stack 2-002a.
- (d) Small paint booth, identified as 2-003, with a maximum capacity of 33.0 gal/hr, using dry filters as particulate control, and exhausting to stack 2-003a.
- (e) Area welding, identified as 2-007, with a maximum capacity of 1345.7 lbs/hr of weld wire.

Emission Units and Pollution Control Equipment Operated without a Permit

At the time of permit renewal, all emissions units and pollution control equipment at the source are operating without a permit because the source failed to submit a timely renewal application. The original Part 70 Operating Permit, T181-9293-00043, expired on April 19, 2006.

Emission Units and Pollution Control Equipment Removed From the Source

The following emissions units have been removed from the source since the issuance of the Part 70 Permit T181-9293-00043:

- (a) Primary paint booth, identified as 2-001, with a maximum capacity of 27.6 gal/hr of paint, using dry filters as particulate control.
- (b) Chassis prime and finish paint line, identified as 6-001, with a maximum capacity of 28.2 gal/hr of paint, using dry filters as particulate control.
- (c) Steel grit blaster, identified as 6-002, with a maximum capacity of 67,200 lbs/hr of steel grit to blast metal frames, using a baghouse, identified as 6-002a, as particulate control.
- (d) Steel shot blaster, identified as 6-003, with a maximum capacity of 108,000 lbs/hr of steel shot to blast metal parts, using a baghouse, identified as 6-003a, as particulate control.
- (e) Converter dolly paint booth and oven, identified as 7-001, with a maximum capacity of 10.2 gal/hr of paint, using dry filters as particulate control.
- (f) Hub paint booth, identified as 7-002m, with a maximum capacity of 4.7 gal/hr of paint, using dry filters as particulate control.
- (g) Glass and steel shot blaster, identified as 8-004, with a maximum capacity of 2,520 lbs/hr of glass or steel shot, using a baghouse, identified as 8-004a, as particulate control.
- (h) Large steel shot blaster, identified as 8-005, with a maximum capacity of 13,500 lbs/hr steel shot, using a baghouse, identified as 8-005a, as particulate control.
- (i) Halogenated solvent cleaner, identified as 1-004, with a maximum capacity of 10 gallons.
- (j) Board coating booth (air atomized), identified as 5-011 with a maximum capacity to coat 1,750 linear feet per hour of wood floor boards for trailers, using dry filters as particulate control.

The 29 million Btu/hr wood fired Dutch oven boiler identified as 8-006 was converted to primary natural gas in 2002, and no longer uses the multi-cyclone collector to control particulate emissions. This unit is used solely for heating purposes.

The following emissions units were removed from the permit per the Second Administrative Amendment, 181-18003-00043, dated October 29, 2003:

- (a) One 30 million BTU/hr wood-fired boiler, identified as 5-001, with particulate emissions exhausting through stack 5-001a.
- (b) One 29 million BTU/hr wood-fired Dutch oven boiler, identified as 5-002, with particulate emissions controlled by a multi-cyclone collector, exhausting through stack 5-002a.
- (c) Hog grinder and woodworking operations, identified as 5-003, with a maximum capacity to process 12,600 lbs/hr of wood to produce truck floors, using two baghouses as particulate matter control.
- (d) One planer, identified as 5-004, with a maximum capacity to plane 43,500 lb/hr and excess truck floors, using a baghouse, identified as 5-004a, as particulate matter control.

Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (b) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
- (c) 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.
- (d) 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.
- (e) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (f) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (g) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (h) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (i) The following equipment related to maintenance activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (j) Closed loop heating and cooling systems.
- (k) Any of the following structural steel and bridge fabrication activities:
 - (1) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent.
 - (2) Using 80 tons or less of welding consumables.
- (l) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (m) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

- (n) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (o) Vents from ash transport systems not operated at positive pressure.
- (p) Infrared cure equipment
- (q) Blow down from any of the following: sight glass, boiler, cooling tower, compressors, or pumps.
- (r) 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, or woodworking operations. [326 IAC 6-3-2]
- (s) Filter media changeout.
- (t) Painting operation that has the potential to emit less than the 5 tons per year of particulate matter (PM) and 10 tons per year of volatile organic compounds (VOC).
- (u) Woodworking operation that has the potential to emit less than 5 tons per year of particulate matter (PM).

Existing Approvals

Since the issuance of the Part 70 Operating Permit 181-9293-00043 on April 19, 2001, the source has constructed or has been operating under the following approvals as well:

- (a) Administrative Amendment No. 181-14416-00043, issued on July 11, 2001;
- (b) Second Administrative Amendment No. 181-18003-00043, issued on October 29, 2003; and
- (c) Third Administrative Amendment No. 181-18365-00043, issued December 11, 2003.

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

The following terms and conditions from previous approvals have been revised in this Part 70 Operating Permit Renewal:

- (a) New Source Performance Standards (NSPS)

While the source is still subject to New Source Performance Standard for Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60, Subpart Dc), parts of the rule no longer apply as the source no longer burns wood for fuel in this unit. The currently applicable sections of the rule are found in the Federal Rule Applicability section of this document.

Enforcement Issue

IDEM is aware that equipment has been operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled "Emission Units and Pollution Control Equipment Operated without a Permit".

- (a) IDEM is reviewing this matter and will take appropriate action.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
1-001a	Finish Paint Booth 1-001	25	3.3	12,800	70
1-001b	Finish Paint Booth 1-001	25	3.3	12,800	70
1-001c	Finish Paint Booth 1-001	25	4.0	28,500	70
1-001d	Finish Paint Booth 1-001	25	2.5	15,000	70
1-001e	Finish Paint Booth 1-001	25	3.0	0	---
1-002a	Paint Booth 1-002	18	4.0	28,500	70
1-002b	Paint Booth 1-002	18	4.0	28,500	70
2-001a	Primer Booth & Oven 2-001	25	3.0	12,800	70
2-001b	Primer Booth & Oven 2-001	25	3.0	12,800	70
2-001c	Primer Booth & Oven 2-001	25	1.5	3,900	400
2-002a	Finish Paint Booth 2-002	25	3.3	26,000	70
2-003a	Small Paint Booth 2-003	35	4.5	15,000	70
2-006a	Dutch Oven Boiler 2-006	55	4.75	14,300	450

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in White County.

Pollutant	Status
PM ₁₀	Attainment
PM _{2.5}	Attainment
SO ₂	Attainment
NOx	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) White County has been classified as 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 – Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx emissions are considered when evaluating the rule applicability relating to ozone. White County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) White County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (e) Fugitive Emissions
Since this type of operation is not in one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	473.89
PM-10	474.69
SO ₂	0.1
VOC	1531.17
CO	10.7
NO _x	12.7

HAPs	tons/year
Methyl Methacrylate	3.15
N,N-Dimethylaniline	0.02
Manganese	2.95
Xylene	0.59
Ethylbenzene	0.59
Naphthalene	0.59
Total	7.89

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of both PM₁₀ and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2005 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM-2.5	3.478
PM-10	4.167
SO₂	0.010
VOC	22.275
CO	1.416
NO_x	1.685
HAP Methylene Chloride	0.006

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/Emission Unit	Potential to Emit (tons/year)						HAPs (single/combined)
	PM	PM10	SO ₂	VOC	CO	NO _x	
Finish Paint Booth 1-001	Less than 205		-	Less than 235	-	-	0.59 each, xylene, ethylbenzene, and naphthalene/1.78 combined
Paint Booth 1-002			-		-		
Primer Booth & Oven 2-001			-		-		
Finish Paint Booth 2-002			-		-		
Small Paint Booth 2-003			-		-		
Dutch Oven Boiler 2-006	0.2	1.0	0.1	0.7	10.7	12.7	-
Assembly operations (caulk and glue)	-	-	-	3.16	-	-	3.16
Area welding	32.42	32.42	-	-	-	-	2.95
Insignificant Sources	10.7	10.9	-	11.08	-	-	-
Total	Less than 250		0.1	Less than 250	10.7	12.7	7.89
Major Source Threshold (PSD Major/HAPs Major)	250	250	250	250	250	250	10/25

The source has chosen to take source-wide limits to maintain emissions to less than 250 tons per year for VOC and PM/PM₁₀ to become a minor source, pursuant to 326 IAC 2-2, Prevention of Significant Deterioration. These limits are reflected in the table above.

Federal Rule Applicability

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to a pollutant-specific emission unit that 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 and specified pollutant subject to CAM:

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)
Paint Booth 1-001 - VOC	N	Y	668.33	Less than 235	100	N	N
Paint Booth 1-002 - VOC	N	Y	167.08		100	N	N
Paint Booth 2-001 - VOC	N	Y	167.08		100	N	N
Paint Booth 2-002 - VOC	N	Y	123.50		100	N	N
Paint Booth 2-003 - VOC	N	Y	399.54		100	N	N
Paint Booth 1-001 - PM	Y	Y	193.32	Less than 205	100	Y	N
Paint Booth 1-002 - PM	Y	Y	48.33		100	N	N
Paint Booth 2-001 - PM	Y	Y	48.33		100	N	N
Paint Booth 2-002 - PM	Y	Y	35.72		100	N	N
Paint Booth 2-003 - PM	Y	Y	115.57		100	Y	N
Assembly Operations (1-003) - VOC	N	Y	3.16	3.16	100	N	N
Assembly Operations (1-003) - HAP	N	Y	3.16	3.16	10 Single/25 Combined	N	N
Dutch Oven Boiler (8-006) - PM	N	Y	1.0*	1.0*	100	N	N
Dutch Oven Boiler (8-006) - NO _x	N	Y	12.7	12.7	100	N	N
MIG Welding - HAP	N	N	2.95	2.95	10 Single/25 Combined	N	N
MIG Welding - PM	N	N	32.42	32.42	100	N	N

*Represents the potential to emit PM10, the larger of the PM/PM10 potentials.

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to the Finish Paint Booth, identified as 1-001, and the Small Paint Booth, identified as 2-003, for particulate matter upon issuance of the Title V Renewal. A CAM plan will be incorporated into this Part 70 permit renewal. The Compliance Determination and Monitoring Requirements section includes a detailed description of the CAM requirements.

- (b) The 29 MMBtu/hr Dutch oven boiler, identified as 2-006, is subject to the New Source Performance Standard for Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60, Subpart Dc), which is incorporated by reference as 326 IAC 12. The 29 MMBtu/hr Dutch oven boiler, identified as 2-006, was

constructed after June 9, 1989 and has a maximum operating capacity between 10 and 100 MMBtu/hr.

Nonapplicable portions of the NSPS will not be included in the permit. The 29 MMBtu Butch oven boiler is subject to the following portions of Subpart Dc:

- (1) 40 CFR 60.40c
 - (2) 40 CFR 60.48c(g)
- (c) This source is not subject to 40 CFR Part 60, Subpart EE (New Source Performance Standards for Surface Coating of Metal Furniture) because the source does not apply coatings to metal furniture.
 - (d) This source is not subject to 40 CFR Part 60, Subpart MM (New Source Performance Standards for Automobile and Light Duty Truck Surface Coating Operations) because the source does not apply surface coatings to light duty truck components.
 - (e) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.
 - (1) This source is not subject to the requirements of NESHAP regulation because it is not a major source of Hazardous Air Pollutants (HAPs).

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on December 12, 1997. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 1-5-2 (Emergency Reduction Plans)

The source has submitted a revised Emergency Reduction Plan (ERP) on January 3, 2000. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

326 IAC 2-2 (Prevention of Significant Deterioration)

The source-wide potential to emit VOC, PM₁₀, and PM shall be limited to less than 250 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month.

- (a) The input of VOC to the five (5) paint booths, identified as Finish Paint Booth (1-001), Paint Booth (1-002), Primer Booth and Oven (2-001), Finish Paint Booth (2-002), and Small Paint Booth (2-003) shall be limited to less than 235 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 VOC to less than 250 tons per twelve (12) consecutive month period.
- (b) The controlled potential to emit for PM₁₀ and PM from the five (5) paint booths, identified as Finish Paint Booth (1-001), Paint Booth (1-002), Primer Booth and Oven (2-001), Finish Paint Booth (2-002), and Small Paint Booth (2-003) shall be limited to less than a total of 205 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This limit is required to limit the source-wide potential to emit of PM₁₀ and PM to less than 250 tons per twelve (12) consecutive month period.
 - (1) To comply with this limit, the source shall maintain the use of dry particulate filters for each of the five (5) paint booths. The filters shall have a minimum control efficiency of 75%, and shall be in use at all times the booths are in operation.

- (c) Compliance with these limits makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

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

The operation of this source will emit less than 10 tons per year of a single HAP and less than 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 subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit under 326 IAC 2-7, Part 70 program. Pursuant to this rule, the Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. Because the source does not have a potential to emit greater than the thresholds given in 326 IAC 2-6-3(a)(1), the source shall submit an emissions report on a triennial basis, rather than an annual basis.

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2004 and every 3 years after. Therefore, the next emission statement for this source must be submitted by July 1, 2007. 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.

State Rule Applicability – Individual Facilities

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

Pursuant to the 326 IAC 6-2-1, the 29 MMBtu/hour Dutch oven boiler identified as 2-006 and constructed after September 21, 1983, must meet the requirements of 326 IAC 6-2-4. Because the total maximum operating capacity rating for the facility is less than 10,000 MMBtu/hr, particulate emissions from the boiler shall be limited to 0.6 pounds of PM per million Btu (lb/MMBtu) heat input.

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

- (a) Particulate from the surface coating booths, identified as Finish Paint Booth (1-001), Paint Booth (1-002), Primer Booth (2-001), Finish Paint Booth (2-002), and Small Paint Booth (2-003), shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) The area welding, identified as 2-007, is subject to 326 IAC 6-3-2. When operating at a total process weight of 6,400.7 pounds per hour, the PM emissions shall not exceed 8.94 pounds per hour, based on the following equation:

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

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

The uncontrolled potential PM emissions from the welding process are 7.40 pounds per hour, so the source is able to comply with the limit calculated above without the use of a control.

- (c) The grinding and machining operations listed as insignificant in this permit operate at a process weight rate of less than 100 pounds per hour. Therefore, the allowable rate of emission is 0.551 pound per hour.

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

The five (5) paint booths identified as Finish Paint Booth (1-001), Paint Booth (1-002), Primer Booth and Oven (2-001), Finish Paint Booth (2-002), and Small Paint Booth (2-003) are subject to 326 IAC 8-2-9 because the paint booths were constructed after July 1990, the potential to emit of VOC is greater than fifteen (15) pounds per day and the surface coating of metal truck trailer parts takes place at these booths.

Therefore, pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coating delivered to the applicator at the surface coating facilities identified as Finish Paint Booth (1-001), Paint Booth (1-002), Primer Booth and Oven (2-001), Finish Paint Booth (2-002), and Small Paint Booth (2-003) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried and forced warm air dried coatings.

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

Based on the information submitted by the source and calculations made, the paint booths are able to comply with this requirement.

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:

- (a) The five (5) paint booths, identified as Finish Paint Booth (1-001), Paint Booth (1-002), Primer Booth and Oven (2-001), Finish Paint Booth (2-002), and Small Paint Booth (2-003), have applicable compliance monitoring conditions as specified below:

- (1) Visible Emissions Notations
 - (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 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 particulate filters for the paint booths must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), 326 IAC 2-7 (Part 70), and 40 CFR 64 (Compliance Assurance Monitoring).

Recommendation

The staff recommends to the Commissioner that the Part 70 Operating Permit Renewal be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on November 2, 2006. Additional information was received on June 5, 2007, June 11, 2007, June 18, 2007, and June 21, 2007.

Conclusion

The operation of this stationary truck trailer manufacturing operation shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. 181-23841-00043.

Appendix A: Emissions Calculations
Welding and Thermal Cutting

Company Name: Vanguard National Trailer Corporation
Address City IN Zip: 289 East Water Tower Drive, Monon, IN 47959
Permit Number: T181-23841-00043
Pit ID: 181-00043
Reviewer: Stephanie Wilkerson
Date: June 8, 2007

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)	
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr		
WELDING												
Submerged Arc	0	0	0.036	0.011			0.000	0.000	0.000	0	0.000	
Metal Inert Gas (MIG)(carbon steel)	1	1345.7	0.0055	0.0005			7.401	0.673	0.000	0	0.673	
Stick (E7018 electrode)	0	0	0.0211	0.0009			0.000	0.000	0.000	0	0.000	
Tungsten Inert Gas (TIG)(carbon steel)	0	0	0.0055	0.0005			0.000	0.000	0.000	0	0.000	
Oxyacetylene(carbon steel)	0	0	0.0055	0.0005			0.000	0.000	0.000	0	0.000	
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	0	0	0	0.1622	0.0005	0.0001	0.0003	0.000	0.000	0.000	0.000	0.000
Oxymethane	0	0	0	0.0815	0.0002		0.0002	0.000	0.000	0.000	0.000	0.000
Plasma**	0	0	0	0.0039				0.000	0.000	0.000	0.000	0.000
EMISSION TOTALS												
Potential Emissions lbs/hr								7.40				0.67
Potential Emissions lbs/day								177.63				16.15
Potential Emissions tons/year								32.42				2.95

METHODOLOGY

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

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

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

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

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

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

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

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

Appendix A: Emission Calculations
HAP Emission Calculations - All Paint Booths

Company Name: Vanguard National Trailer Corporation
Address City IN Zip: 289 East Water Tower Drive, Monon, IN 47959
Permit Number: T181-23841-00043
Plt ID: 181-00043
Permit Reviewer: Stephanie Wilkerson
Date: June 19, 2007

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Ethylbenzene	Weight % Naphthalene	Xylene Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Naphthalene Emissions (ton/yr)
Valspar Valflex									
Finish Booth (1-001)	10.76	1.000000	55.00	0.01%	0.01%	0.01%	0.26	0.26	0.26
Paint Booth (1-002)	10.76	1.000000	13.80	0.01%	0.01%	0.01%	0.07	0.07	0.07
Primer Booth (8-001)	10.76	1.000000	13.80	0.01%	0.01%	0.01%	0.07	0.07	0.07
Finish Booth (8-002)	10.76	1.000000	10.20	0.01%	0.01%	0.01%	0.05	0.05	0.05
Small Paint Booth (8-003)	10.76	1.000000	33.00	0.01%	0.01%	0.01%	0.16	0.16	0.16

Total Potential Emissions **0.59 0.59 0.59**

METHODOLOGY 1.78

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

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR <100
 Plant 2 - Dutch Oven Boiler**

Company Name: Vanguard National Trailer Corporation
Address City IN Zip: 289 East Water Tower Drive, Monon, IN 47959
Permit Number: T181-23841-00043
Pit ID: 181-00043
Reviewer: Stephanie Wilkerson
Date: June 8, 2007

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

29.0

254.0

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.2	1.0	0.1	12.7	0.7	10.7

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 4 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR <100
 Plant 2 - Dutch Oven Boiler
 HAPs Emissions**

Company Name: Vanguard National Trailer Corporation
Address City IN Zip: 289 East Water Tower Drive, Monon, IN 47959
Permit Number: T181-23841-00043
Pit ID: 181-00043
Reviewer: Stephanie Wilkerson
Date: June 8, 2007

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.667E-04	1.524E-04	9.527E-03	2.286E-01	4.319E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	6.351E-05	1.397E-04	1.778E-04	4.827E-05	2.667E-04

Methodology is the same as page 3.

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

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

Company Name: Vanguard National Trailer Corporation
Address City IN Zip: 289 East Water Tower Drive, Monon, IN 47959
Permit Number: T181-23841-00043
Pit ID: 181-00043
Reviewer: Stephanie Wilkerson
Date: June 8, 2007

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

8.6

75.0

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.1	0.3	0.0	3.7	0.2	3.1

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 6 for HAPs emissions calculations.

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR <100
 Insignificant Activities
 HAPs Emissions**

Company Name: Vanguard National Trailer Corporation
Address City IN Zip: 289 East Water Tower Drive, Monon, IN 47959
Permit Number: T181-23841-00043
Pit ID: 181-00043
Reviewer: Stephanie Wilkerson
Date: June 8, 2007

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	7.873E-05	4.499E-05	2.812E-03	6.749E-02	1.275E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.875E-05	4.124E-05	5.249E-05	1.425E-05	7.873E-05

Methodology is the same as page 5.

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

Appendix A: Emission Calculations
HAP Emission Calculations - Assembly Glue/Caulk

Company Name: Vanguard National Trailer Corporation
Address City IN Zip: 289 East Water Tower Drive, Monon, IN 47959
Permit Number: T181-23841-00043
Plt ID: 181-00043
Permit Reviewer: Stephanie Wilkerson
Date: June 19, 2007

Material	Density (Lb/Gal)	Maximum Material Usage (gal/hr)	Weight % N,N-Dimethylaniline	Weight % Methyl Methacrylate	N,N - Dimethylaniline Emissions (ton/yr)	Methyl Methacrylate Emissions (ton/yr)
Lord 406	9.36	0.008000	5.00%	35.00%	0.02	0.11
Lord 410	9.42	0.210000	0.00%	35.00%	0.00	3.03

Total Potential Emissions **0.02** **3.15**

METHODOLOGY

Total **3.16**

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

**Appendix A - Emission Calculations
Fuel-Dispensing Operations
VOC Emissions**

Company Name: Vanguard National Trailer Corporation
Address City IN Zip: 289 East Water Tower Drive, Monon, IN 47959
Permit Number: T181-23841-00043
Plant ID: 181-00043
Reviewer Name: Stephanie Wilkerson
Date: June 25, 2007

Fuel Emissions

1. Loading (AP-42, Chapter 5)

Loading Losses:

$$LL = 12.46 \frac{SPM}{T}$$

where S = Saturation Factor (Table 5.2-1, AP-42)
P = True vapor pressure of liquid loaded (psia)
M = Molecular weight of vapors (lb/lb-mole)
T = Temperature, °R (°F + 460)
LL = Loading Loss Emission Factor (lb/kgal)

For gasoline:

S =	1.45	Throughput =	5859 gal/year
P =	9	Uncontrolled Emissions =	118.6369896 lb/year
M =	66		0.059318495 tons/year
T =	530		

LL = 20.24867547 lb/kgal
0.020248675 lb/gal

For diesel fuel:

S =	1.45	Throughput =	8481 gal/year
P =	0.009	Uncontrolled Emissions =	0.338254124 lb/year
M =	130		0.000169127 tons/year
T =	530		

LL = 0.039883755 lb/kgal
3.98838E-05 lb/gal

2. Storage

Storage Losses (TANKS 4.0.9d)

For gasoline:

Uncontrolled Emissions = 150.86 lbs/year
0.07543 tons/year

For diesel:

Uncontrolled Emission = 0.27 lbs/year
0.000135 tons/year

3. Vehicle Refueling

Uncontrolled Displacement Losses

(AP-42, Table 5-2.7)

$$E = 11.0(F)$$

where E = Uncontrolled Emissions (lb/year)
 F = Throughput (kgal)

For gasoline:

F = 5.859 kgal
 E = 64.449 lb/year
 0.0322245 tons/year

For diesel:

F = 8.841 kgal
 E = 97.251 lb/year
 0.0486255 tons/year

Summary

Gasoline:

Loading Emissions	0.059318495	
Storage Emissions	0.07543	
Refueling Emissions	0.0322245	
	0.166972995	Total Gasoline VOC Emissions
		tons/year

Diesel

Loading Emissions	0.000169127	
Storage Emissions	0.000135	
Refueling Emissions	0.0486255	
	0.048929627	Total Diesel VOC Emissions
		tons/year

Total Fuel VOC Emissions **0.21590262 tons/year**

**Appendix A: Emissions Calculations
PSD Limits
From Surface Coating Operations - All Booths**

Company Name: Vanguard National Trailer Corporation
Address City IN Zip: 289 East Water Tower Drive, Monon, IN 47959
Permit Number: T181-23841-00043
Plt ID: 181-00043
Reviewer: Stephanie Wilkerson
Date: June 26, 2007

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Maximum Allowable Usage (gal/hr)	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**
All Booths	10.8	25.69%	0.0%	25.7%	0.0%	57.21%	18.90000	2.76	2.76	52.24	1253.86	228.83	66.19	4.83	90%

Annual Paint Usage Limit **894 tons/yr** **52.24** **1253.86** **228.83** **66.19**

METHODOLOGY

**Efficiency reference EPA AP-42 4.2.2.1.1

Annual Paint Usage Limit = Maximum Allowable Usage (gal/hr)*Density (lb/gal)*(8760 hr/yr)*(1 ton/2000 lbs)