



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: January 10, 2007
RE: Total Fleet Service, LLC / 003-23910-00208
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this approval 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 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-MOD.dot 03/23/06



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

January 10, 2007

Mr. Kevin Smith
Total Fleet Service, LLC
4808 Kroemer Road
Fort Wayne, IN 46808

Re: 003-23910-00208
Third Minor Permit Revision to
FESOP 003-13899-00208

Dear Mr. Smith:

Total Fleet Service, LLC was issued a Federally Enforceable State Operating Permit (FESOP) F 003-13899-00208 on August 19, 2002 for a stationary motor freight and warehousing source, located at 4808 Kroemer Road, Fort Wayne, Indiana 46818. A letter requesting changes to this permit was received on November 20, 2006. Pursuant to the provisions of 326 IAC 2-8-11.1 a Minor Permit Revision to this permit is hereby approved as described in the attached Technical Support Document.

The revision consists of the construction and operation of the proposed spray paint booth, identified as E6. Potential VOC emissions are less than twenty five (25) tons per year and the source wishes to incorporate this booth into the existing VOC and HAP limits that have been established for the existing five (5) spray paint booths.

The following construction conditions are applicable to the proposed project:

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

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the minor permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire revised FESOP, with all revisions and amendments made to it, is being provided.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Brian J. Pedersen, c/o OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204-2251, at 631-691-3395 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Original signed by

Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

BJP/MES

Attachments

cc: File - Allen County
U.S. EPA, Region V
Allen County Health Department
Air Compliance Section Inspector – Patrick Burton
Compliance Branch
Administrative and Development Section
Technical Support and Modeling - Michele Boner



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

**Total Fleet Service, LLC
4808 Kroemer Road
Fort Wayne, Indiana 46818**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 003-13899-00208	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: August 19, 2002 Expiration Date: August 19, 2007

First Minor Permit Revision 003-16790-00208, issued on April 9, 2003
First Administrative Amendment 003-16621-00208, issued on July 15, 2004
Second Minor Permit Revision 003-19659-00208, issued on November 11, 2004
Second Administrative Amendment 003-21008-00208, issued on May 5, 2005

Third Minor Permit Revision No.: 003-23910-00208	Section/Conditions Affected: A.1, A.2, C.8, Facility Description D.1, D.1.1 – D.1.4, D.1.10 – D.1.14, and the Report Forms
Issued by:Original signed by Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date:January 10, 2007 Expiration Date: August 19, 2007

TABLE OF CONTENTS

SECTION A	SOURCE SUMMARY	5
A.1	General Information [326 IAC 2-8-3(b)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3	Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]	
A.4	FESOP Applicability [326 IAC 2-8-2]	
A.5	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
SECTION B	GENERAL CONDITIONS	8
B.1	Permit No Defense [IC 13]	
B.2	Definitions [326 IAC 2-8-1]	
B.3	Permit Term [326 IAC 2-8-4(2)]	
B.4	Enforceability [326 IAC 2-8-6]	
B.5	Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]	
B.6	Severability [326 IAC 2-8-4(4)]	
B.7	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.8	Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5 (a)(4)]	
B.9	Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.10	Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]	
B.11	Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]	
B.12	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.13	Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]	
B.14	Emergency Provisions [326 IAC 2-8-12]	
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	
B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]	
B.17	Permit Renewal [326 IAC 2-8-3(h)]	
B.18	Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]	
B.19	Operational Flexibility [326 IAC 2-8-15]	
B.20	Permit Revision Requirement [326 IAC 2-8-11.1]	
B.21	Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]	
B.22	Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
B.23	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]	
SECTION C	SOURCE OPERATION CONDITIONS	18
	Emission Limitations and Standards [326 IAC 2-8-4(1)]	
C.1	Overall Source Limit [326 IAC 2-8] [326 IAC 2-2]	
C.2	Opacity [326 IAC 5-1]	
C.3	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]	
C.5	Fugitive Dust Emissions [326 IAC 6-4]	
C.6	Operation of Equipment [326 IAC 2-8-5(a)(4)]	
C.7	Stack Height [326 IAC 1-7]	
C.8	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61 Subpart M]	
	Testing Requirements [326 IAC 2-8-4(3)]	
C.9	Performance Testing [326 IAC 3-6]	
	Compliance Requirements [326 IAC 2-1.1-11]	
C.10	Compliance Requirements [326 IAC 2-1.1-11]	

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

- C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]
- C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

- C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]
- C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4, 5]
- C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4, 5]

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

- C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]
- C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

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

SECTION D.1 FACILITY OPERATION CONDITIONS: Spray Paint Booths..... 25

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

- D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]
- D.1.2 Hazardous Air Pollutants (HAPs) Limitations [326 IAC 2-8-4]
- D.1.3 Particulate [326 IAC 6-3-2(d)]
- D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-6] [326 IAC 2-8-11.1(f)]
- D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.1.6 Volatile Organic Compounds (VOC)
- D.1.7 VOC Emissions
- D.1.8 Hazardous Air Pollutants (HAPs)
- D.1.9 Hazardous Air Pollutants (HAPs) Emissions

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

- D.1.10 Monitoring

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

- D.1.11 Record Keeping Requirements
- D.1.12 Reporting Requirements

SECTION D.2 FACILITY OPERATION CONDITIONS: Two (2) fuel oil storage tanks 28

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

- D.2.1 Record Keeping Requirements [326 IAC 12] [40 CFR 60.116b Subpart Kb]

SECTION D.3 FACILITY OPERATION CONDITIONS: Insignificant Activities 29

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

- D.3.1 Particulate Matter Limitation (PM) [326 IAC 6-2-3]
- D.3.2 Particulate Matter Limitation (PM) [326 IAC 6-2-4]
- D.3.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]
- D.3.4 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]

Certification 31
Emergency Occurrence Report 32
Quarterly Reports..... 34
Quarterly Deviation and Compliance Monitoring Report..... 37

SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary motor freight and warehousing source.

Authorized Individual:	Kevin Smith
Source Address:	4808 Kroemer Road, Fort Wayne, Indiana 46818
Mailing Address:	4808 Kroemer Road, Fort Wayne, Indiana 46818
General Source Phone:	260 - 429 - 1390
SIC Code:	7699
County Location:	Allen County
Source Location Status:	Nonattainment for ozone under the 8-hour ozone standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act

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

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

- (a) Three (3) spray paint booths, known as E1 (Paint Rooms A and D), E2 (Paint Room B) and E3 (Paint Room C), constructed prior to 1975, equipped with three (3) low pressure air atomized spray guns that operate one (1) at a time, and dry filters for overspray control, exhausting to stacks E1, E2, and E3, respectively, capacity: 0.38 trailers per hour, each.
- (b) One (1) spray paint booth, known as E4 (Paint Room E), consisting of undercoat, topcoat, or washdown operations that operate one (1) at a time, equipped with low pressure air atomized spray guns and dry filters to control particulate overspray, exhausting to Stacks E4a, E4b, E4c, and E4d, capacity: 0.25 trailers per hour.
- (c) One (1) spray paint booth, known as E5 (Paint Room F), equipped with one (1) low pressure air atomized spray gun and dry filters to control particulate overspray, exhausting to Stacks E5a and E5b, capacity: 0.25 trailer parts of various substrates (metal, fiberglass, etc.) per hour.
- (d) One (1) spray paint booth, identified as E6, approved for construction in 2007, equipped with one (1) low pressure air atomized spray gun and dry filters to control particulate overspray, exhausting to Stack E6, capacity: 0.25 trailer parts of various substrates (metal, fiberglass, etc.) per hour.
- (e) Two (2) fuel oil storage tanks, known as Tanks 1 and 2, constructed in 1990, capacity: 15,000 gallons, each.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour. including the following.
 - (1) Two (2) natural gas-fired air make up units, heat input capacity: 3.85 million British thermal units per hour, each;
 - (2) One (1) natural gas-fired air make up unit, heat input capacity: 2.79 million British thermal units per hour;
 - (3) Thirty-seven (37) natural gas-fired tube heaters, heat input capacity: 0.10 million British thermal units per hour, each;
 - (4) Forty-two (42) natural gas-fired space heaters, heat input capacity: 0.16 million British thermal units per hour, each;
 - (5) One (1) natural gas-fired boiler, constructed in 1994, heat input capacity: 0.63 million British thermal units per hour; (326 IAC 6-2-4)
 - (6) Two (2) natural gas-fired boilers, constructed 1977, heat input capacity: 3.00 million British thermal units per hour, each; and (326 IAC 6-2-3)
 - (7) One (1) natural gas-fired boiler, constructed 1977, heat input capacity: 1.56 million British thermal units per hour. (326 IAC 6-2-3)
 - (8) One (1) air make-up unit, heat input capacity: 1.325 million British thermal units per hour.
- (b) Seven (7) waste oil heat exchangers, heat input capacity: 0.5 million British thermal units per hour, each.
- (c) Combustion source flame safety purging on startup.
- (d) A gasoline fuel (diesel fuel only) 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.
- (e) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
- (f) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.
- (g) Closed loop heating and cooling systems.
- (h) Paved and unpaved roads and parking lots with public access.
- (i) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (j) Two (2) diesel powered emergency generators, power output capacity: 4,600 horsepower, total.

- (k) Stationary fire pumps.
- (l) Maintenance cold cleaning degreasers, including Crystal Clean units with capacities less than 15 gallons each, constructed in 2000, equipped with remote solvent reservoirs, using only non-HAP materials and having a VOC usage rate less than 15 pounds per day, total. (326 IAC 8-3-2)

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2 (a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, 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.

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

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

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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

B.6 Severability [326 IAC 2-8-4(4)]

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

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

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

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

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

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

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also

furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U.S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]

- (c) 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.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

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

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
- (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

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

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

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

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes 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 / Indianapolis Offices, 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 No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,

Telephone No.: 317-233-0178 (ask for Compliance Section)
Facsimile No.: 317-233-6865

Failure to notify IDEM, OAQ / Indianapolis Offices, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

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

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

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

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

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

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

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4 (5) (C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated non-compliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

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

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

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

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

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

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period;
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Any change or modification that increases the potential to emit PM to 250 tons per year or more shall cause this source to become a major source pursuant to 326 IAC 2-2, PSD, and shall require prior OAQ approval.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

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(3)]

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

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 Operation of Equipment [326 IAC 2-8-5(a)(4)]

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

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 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
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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

C.9 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
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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

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

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

Any monitoring or testing performed 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.

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

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

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

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

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

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

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

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

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

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

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

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept 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 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or

certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

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 FACILITY OPERATION CONDITIONS

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

- (a) Three (3) spray paint booths, known as E1 (Paint Rooms A and D), E2 (Paint Room B) and E3 (Paint Room C), constructed prior to 1975, equipped with three (3) low pressure air atomized spray guns that operate one (1) at a time, and dry filters for overspray control, exhausting to stacks E1, E2, and E3, respectively, capacity: 0.38 trailers per hour, each.
- (b) One (1) spray paint booth, known as E4 (Paint Room E), consisting of undercoat, topcoat, or washdown operations that operate one (1) at a time, equipped with low pressure air atomized spray guns and dry filters to control particulate overspray, exhausting to Stacks E4a, E4b, E4c, and E4d, capacity: 0.25 trailers per hour.
- (c) One (1) spray paint booth, known as E5 (Paint Room F), equipped with one (1) low pressure air atomized spray gun and dry filters to control particulate overspray, exhausting to Stacks E5a and E5b, capacity: 0.25 trailer parts of various substrates (metal, fiberglass, etc.) per hour.
- (d) One (1) spray paint booth, identified as E6, approved for construction in 2007, equipped with one (1) low pressure air atomized spray gun and dry filters to control particulate overspray, exhausting to Stack E6, capacity: 0.25 trailer parts of various substrates (metal, fiberglass, etc.) per hour.

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]

The total amount of VOC delivered to the applicators at the six (6) spray paint booths (E1, E2, E3, E4, E5, and E6) shall not exceed 95.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This will limit the potential to emit VOC from the entire source, including insignificant activities to less than one hundred (100) tons per year. Compliance with this limit shall make the requirements of 326 IAC 2-7 and 326 IAC 2-3 not applicable.

D.1.2 Hazardous Air Pollutants (HAPs) Limitations [326 IAC 2-8-4]

- (a) Each single HAP delivered to the coating applicators at the six (6) spray paint booths (E1, E2, E3, E4, E5, and E6) shall not exceed 9.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This will limit the potential to emit of each single HAP for the entire source, including insignificant activities, to less than ten (10) tons per year. Compliance with this limit shall make the requirements of 326 IAC 2-7 not applicable.
- (b) The total combination of HAPs delivered to the coating applicators at the six (6) spray paint booths (E1, E2, E3, E4, E5, and E6) shall not exceed 24.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This will limit the potential to emit of the combination of HAPs from the entire source, including insignificant activities, to less than twenty-five (25) tons per year. Compliance with this limit shall make the requirements of 326 IAC 2-7 not applicable.

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

Pursuant to 326 IAC 6-3-2(d), the dry filters for particulate control shall be operation in accordance with manufacturer's specifications and control emissions from the six (6) spray paint booths (E1, E2, E3, E4, E5, and E6), at all times when these paint booths are in operation.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-6] [326 IAC 2-8-11.1(f)]

Any change or modification that increases the potential to emit from spray paint booth (E5) to greater than twenty-five (25) tons per year may render the requirements of 326 IAC 8-1-6 and 326 IAC 2-8-11.1(f) applicable to spray paint booth (E5) and shall require prior IDEM, OAQ approval.

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B.13 - Preventive Maintenance Plan, of this permit, is required for the five (5) spray paint booths and the dry filters.

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC)

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

D.1.7 VOC Emissions

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

D.1.8 Hazardous Air Pollutants (HAPs)

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

D.1.9 Hazardous Air Pollutants (HAPs) Emissions

Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the total single and total combination HAPs usage for the twelve (12) month period.

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

D.1.10 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (E1, E2, E3, E4a, E4b, E4c, E4d, E5a, E5b and E6) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.11 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.1.1 and the HAPs usage limits and the HAPs emission limits established in Condition D.1.2.
- (1) The amount and VOC and HAP 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 and degreasing solvents;
 - (2) The cleanup solvent usage for each month;
 - (3) The total VOC, as well as total individual HAP and total combination of HAPs usage for each month; and
 - (4) The weight of VOCs, as well as total individual and total HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain records of the total VOC usage at spray paint booth (E5).
- (c) To document compliance with Condition D.1.10, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Two (2) fuel oil storage tanks

- (e) Two (2) fuel oil storage tanks, known as Tanks 1 and 2, constructed in 1990, capacity: 15,000 gallons, each.

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

There are no emission limitations and standards, compliance determination requirements, and compliance monitoring requirements for these storage tanks.

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

D.2.1 Record Keeping Requirements [326 IAC 12] [40 CFR 60.116b Subpart Kb]

The Permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel for the life of the source.

SECTION D.3

FACILITY OPERATION CONDITIONS

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including the following.
 - (1) Two (2) natural gas-fired air make up units, heat input capacity: 3.85 million British thermal units per hour, each;
 - (2) One (1) natural gas-fired air make up unit, heat input capacity: 2.79 million British thermal units per hour;
 - (3) Thirty-seven (37) natural gas-fired tube heaters, heat input capacity: 0.10 million British thermal units per hour, each;
 - (4) Forty-two (42) natural gas-fired space heaters, heat input capacity: 0.16 million British thermal units per hour, each;
 - (5) One (1) natural gas-fired boiler, constructed in 1994, heat input capacity: 0.63 million British thermal units per hour; (326 IAC 6-2-4)
 - (6) Two (2) natural gas-fired boilers, constructed 1977, heat input capacity: 3.00 million British thermal units per hour, each; (326 IAC 6-2-3)
 - (7) One (1) natural gas-fired boiler, constructed 1977, heat input capacity: 1.56 million British thermal units per hour; and (326 IAC 6-2-3)
 - (8) One (1) air make-up unit, heat input capacity: 1.325 million British thermal units per hour.
- (b) Seven (7) waste oil heat exchangers, heat input capacity: 0.5 million British thermal units per hour, each.
- (c) Combustion source flame safety purging on startup.
- (d) A gasoline fuel (diesel fuel only) 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.
- (e) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
- (f) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.
- (g) Closed loop heating and cooling systems.
- (h) Paved and unpaved roads and parking lots with public access.
- (i) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (j) Two (2) diesel powered emergency generators, power output capacity: 4,600 horsepower, total.
- (k) Stationary fire pumps.
- (l) Maintenance cold cleaning degreasers, including Crystal Clean units with capacities less than 15 gallons each, constructed in 2000, equipped with remote solvent reservoirs, using only non-HAP materials and having a VOC usage rate less than 15 pounds per day, total. (326 IAC 8-3-2)

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

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

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

Pursuant to 326 IAC 6-2-3(e), the PM emissions from the three (3) insignificant boilers constructed in 1977, rated at 3.00, 3.00, and 1.56 million British thermal units per hour respectively, shall not exceed 0.6 pound per million British thermal units.

D.3.2 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a), the PM emissions from the one (1) insignificant boiler constructed in 1994, rated at 0.63 million British thermal units per hour, shall not exceed 0.6 pound per million British thermal units.

D.3.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2, The following requirements shall apply to the operation of the insignificant cold cleaning degreasers, constructed in 2000:

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

D.3.4 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]

Any change or modification that increases the potential to emit VOC to more than 2.63 tons per year from the insignificant maintenance degreasers, may cause the potential to emit VOC for the entire source to be greater than one hundred (100) tons per year and make the requirements of 326 IAC 2-7 applicable and shall require prior IDEM, OAQ, approval.

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

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

Source Name: Total Fleet Service, LLC
Source Address: 4808 Kroemer Road, Fort Wayne, Indiana 46818
Mailing Address: 4808 Kroemer Road, Fort Wayne, Indiana 46818
FESOP No.: F 003-13899-00208

**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
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

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

Source Name: Total Fleet Service, LLC
Source Address: 4808 Kroemer Road, Fort Wayne, Indiana 46818
Mailing Address: 4808 Kroemer Road, Fort Wayne, Indiana 46818
FESOP No.: F 003-13899-00208

This form consists of 2 pages

Page 1 of 2

<p>9 This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">C 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); andC The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16
--

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

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Total Fleet Service, LLC
Source Address: 4808 Kroemer Road, Fort Wayne, Indiana 46818
Mailing Address: 4808 Kroemer Road, Fort Wayne, Indiana 46818
FESOP No.: F 003-13899-00208
Facilities: Six (6) spray paint booths, known as E1, E2, E3, E4, E5, and E6
Parameter: VOC delivered to the applicators
Limit: Total not to exceed 95.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Total VOC usage (tons)	Total VOC usage (tons)	Total VOC usage (tons)
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Total Fleet Service, LLC
Source Address: 4808 Kroemer Road, Fort Wayne, Indiana 46818
Mailing Address: 4808 Kroemer Road, Fort Wayne, Indiana 46818
FESOP No.: F 003-13899-00208
Facilities: Six (6) spray paint booths, known as E1, E2, E3, E4, E5, and E6
Parameter: Individual HAP delivered to the applicators
Limit: Total not to exceed 9.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Individual HAP Usage (tons)	Individual HAP Usage (tons)	Individual HAP Usage (tons)
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Total Fleet Service, LLC
Source Address: 4808 Kroemer Road, Fort Wayne, Indiana 46818
Mailing Address: 4808 Kroemer Road, Fort Wayne, Indiana 46818
FESOP No.: F 003-13899-00208
Facilities: Six (6) spray paint booths, known as E1, E2, E3, E4, E5, and E6
Parameter: Combination of HAPs delivered to the applicators
Limit: Total not to exceed 24.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Combination of HAPs Usage (tons)	Combination of HAPs Usage (tons)	Combination of HAPs Usage (tons)
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

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

Source Name: Total Fleet Service, LLC
Source Address: 4808 Kroemer Road, Fort Wayne, Indiana 46818
Mailing Address: 4808 Kroemer Road, Fort Wayne, Indiana 46818
FESOP No.: F 003-13899-00208

Months: _____ to _____ Year: _____

Page 1 of 2

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

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:	

- 9 No deviation occurred in this quarter.
 - 9 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

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

Source Background and Description

Source Name:	Total Fleet Service, LLC
Source Location:	4808 Kroemer Road, Fort Wayne, Indiana 46818
County:	Allen
SIC Code:	7699
Operation Permit No.:	F 003-13899-00208
Operation Permit Issuance Date:	August 19, 2002
Minor Permit Revision No.:	MPR 003-23910-00208
Permit Reviewer:	Brian J. Pedersen/MES

The Office of Air Quality (OAQ) has reviewed a Minor Permit Revision application from Total Fleet Service, LLC relating to the construction and operation of the following emission units and pollution control devices:

One (1) spray paint booth, identified as E6, approved for construction in 2007, equipped with one (1) low pressure air atomized spray gun and dry filters to control particulate overspray, exhausting to Stack E6, capacity: 0.25 trailer parts of various substrates (metal, fiberglass, etc.) per hour.

History

On November 20, 2006 Total Fleet Service, LLC submitted an application to the OAQ requesting to add an additional surface coating booth to their existing plant. Total Fleet Service, LLC was issued a Federally Enforceable State Operating Permit (FESOP) on August 19, 2002.

Total Fleet Service, LLC was also issued a First Minor Permit Revision 003-16790-00208 on April 9, 2003 which added a spray paint booth (E4) and a First Administrative Amendment 003-16621-00208 on July 15, 2004 which added five (5) insignificant waste oil heat exchangers. A Second Minor permit revision 003-19659-00208 was issued on November 10, 2004, which added a spray paint booth (E5). Then on May 5, 2005 Total Fleet Service, LLC was issued a Second Administrative Amendment 003-21008-00208 to reflect a name change from North American Van, LLC to Total Fleet Service, LLC.

Total Fleet Service, LLC has requested to incorporate a new spray paint booth (E6) in each existing surface coating emission limitation that is currently in Section D.1 of MPR 003-19659-00208, issued on November 10, 2004.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
E6	Surface Coating	15.0	2.00	9,000	80.0

Recommendation

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

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

An application for the purposes of this review was received on November 20, 2006. Additional information was received on December 1, 2006.

Emission Calculations

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

Potential To Emit of Revision

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

This table reflects the PTE before controls for this revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	3.20
PM ₁₀	3.20
SO ₂	-
VOC	20.0
CO	-
NO _x	-

HAPs	Potential To Emit (tons/year)
Ethyl Benzene	0.035
Glycol	1.04
Methanol	0.916
MIBK	1.54
Toluene	0.692
TOTAL	4.21

* Single and total HAP emissions are based on the worst case coating with the gun wash.

Justification for Revision

The FESOP is being revised through a FESOP Minor Permit Revision. This revision is being performed pursuant to 326 IAC 2-8-11.1(d)(4).

County Attainment Status

The source is located in Allen County.

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

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO_x) are nonattainment under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements of 326 IAC 2-3, Emission Offset. See the State Rule Applicability - Entire Source section of this document.
- (b) Allen County has been classified as unclassifiable or attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM_{2.5} emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions. See the State Rule Applicability for the source section.
- (c) Allen County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section of this document.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 redesignating Delaware, Greene, Jackson, Vanderburgh, Vigo and Warrick Counties to attainment for the eight-hour ozone standard, redesignating Lake County to attainment for the sulfur dioxide standard, and revoking the one-hour ozone standard in Indiana.
- (e) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

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

Pollutant	Emissions (tons/year)
PM	51.3
PM ₁₀	51.3
SO ₂	0.114
VOC	Limited to less than 100
CO	17.8
NO _x	42.4

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of two-hundred fifty (250) tons per year or more and no nonattainment regulated pollutant is emitted at a rate of one hundred (100) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) These emissions are based upon the TSD from MPR 003-19659-00208, issued on November 10, 2004.

Potential to Emit of Revision After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this FESOP revision.

Process/facility	Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Spray Paint Booth (EU6)	0.320	0.320	-	20.0	-	-	4.21
PSD or Emission Offset Threshold Level	250	250	250	100	250	250	-

This revision to an existing minor stationary source is not major because the emission increase is less than the PSD and Emission Offset threshold levels. Therefore, pursuant to 326 IAC 2-2 and 326 IAC 2-3, the PSD and Emission Offset requirements do not apply.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this proposed modification.
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), for Reinforced Plastic Composites Production, 40 CFR 63.4480, Subpart PPPP, are not

included in the permit for this proposed modification because pursuant to 326 IAC 2-8-4, the entire source is limited to area source HAPs levels.

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63.3881 Subpart M, are not included in the permit for this proposed modification because pursuant to 326 IAC 2-8-4, the entire source is limited to area source HAPs levels.
- (d) There are no other National Emission Standards for Hazardous Air Pollutants included in the permit for this source.

State Rule Applicability - Individual Facilities

326 IAC 2-3 (Emission Offset) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This motor freight and warehousing source is not 1 of the 28 major PSD source categories pursuant to 326 IAC 2-2. The three (3) spray paint booths, identified as E1, E2, and E3 were each constructed prior to 1975, which is prior to the August 7, 1977 applicability date of this rule.

The two (2) spray paint booths, identified as E4 and E5, were constructed in 2003 and 2004, respectively, were considered minor modifications to an existing minor PSD source because the potential to emit of each criteria pollutant from the entire source continued to be less than two hundred-fifty (250) tons per year.

The potential to emit of PM₁₀, SO₂, and CO from the entire source, including the new proposed spray paint booth (E6) is less than two hundred-fifty (250) tons per year. In addition, the limited potential to emit of VOC and the unrestricted potential to emit of NO_x from the entire source, including the spray paint booth (E6), is less than one hundred (100) tons per year. Therefore, this source will continue to operate as a minor PSD and minor under Emission Offset.

326 IAC 2-8-4 (FESOP)

The spray paint booth (E6) has been incorporated into the existing FESOP limitations as follows:

- (a) The total amount of VOC delivered to the applicators at the six (6) spray paint booths (E1, E2, E3, E4, E5, and E6) shall not exceed 95.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This will limit the potential to emit VOC from the entire source, including insignificant activities to less than one hundred (100) tons per year. Compliance with this limit shall make the requirements of 326 IAC 2-7 and 326 IAC 2-3 not applicable.
- (b) The total combination of HAPs delivered to the coating applicators at the six (6) spray paint booths (E1, E2, E3, E4, E5, and E6), shall not exceed 24.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This will limit the potential to emit of the combination of HAPs from the entire source, including insignificant activities, to less than twenty-five (25) tons per year. Compliance with this limit shall make the requirements of 326 IAC 2-7 not applicable.
- (c) Each single HAP delivered to the coating applicators at the six (6) spray paint booths (E1, E2, E3, E4, E5, and E6), shall not exceed 9.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This will limit the potential to emit of a single HAP for the entire source, including insignificant activities, to less than ten (10) tons per year. Compliance with this limit shall make the requirements of 326 IAC 2-7 not applicable.

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

The one (1) spray paint booth (E6), which will be constructed after January 1, 1980, is not subject to the requirements of 326 IAC 8-1-6 because the potential to emit of VOC is less than twenty-five (25) tons per year.

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

This source does not surface coat large farm machinery, small household appliances, office equipment, or industrial machinery. Furthermore, this source coats metal parts or products under the Standard Industrial Classification (SIC) Code #76, which is not one the SIC codes listed in 326 IAC 8-2-9(a)(5). Therefore, the requirements of 326 IAC 8-2-9 do not apply to the one (1) spray paint booth (E6).

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

Pursuant to 326 IAC 6-3-2(d), the dry filters for particulate control shall be operation in accordance with manufacturer's specifications and control emissions from the one (1) spray paint booths(E6), at all times when this paint booth is in operation.

Testing Requirements

Since all emissions totals are based upon material usage, along with the MSDS for the materials applied, testing requirements are not being required for this source.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

The compliance monitoring requirements applicable to the spray paint booth, identified as E6, is as follows:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (E6) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

These monitoring conditions are necessary to ensure compliance with 326 IAC 6-3 (Particulate emission limitations, work practices and control technologies) and 326 IAC 2-8 (FESOP).

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in bold):

Change 1:

All references to IDEM, OAQ's mailing address and the phone and fax number for IDEM, OAQ (Compliance Section) have been revised as follows:

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

Phone: 317-233-~~5674~~ **0178**
Fax: 317-233-~~5967~~ **6865**

Change 2:

The source address and SIC code have been revised as follows:

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

The Permittee owns and operates a stationary motor freight and warehousing source.

Authorized Individual:	Kevin Smith
Source Address:	4808 Kroemer Road, Fort Wayne, Indiana 46818 5001 U.S. Highway 30 West, Fort Wayne, Indiana 46818
Mailing Address:	4808 Kroemer Road, Fort Wayne, Indiana 46818
General Source Phone Number:	260 - 429 - 1390
SIC Code:	7699 4213
County Location:	Allen County
Source Location Status:	Nonattainment for ozone under the 8-hour ozone standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules and Emission Offset Rules Nonattainment NSR; Minor Source, Section 112 of the Clean Air Act

Change 3:

All conditions in Section C are federally enforceable unless otherwise specified. Therefore, Condition C.8 has been amended as follows:

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

- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. ~~The requirement that the inspector be accredited is federally enforceable.~~

Change 4:

The addition of the one (1) spray coating booth, identified as E6, has resulted in the following changes:

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

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

- (a) Three (3) spray paint booths, known as E1 (Paint Rooms A and D), E2 (Paint Room B) and E3 (Paint Room C), constructed prior to 1975, equipped with three (3) low pressure air atomized spray guns that operate one (1) at a time, and dry filters for overspray control, exhausting to stacks E1, E2, and E3, respectively, capacity: 0.38 trailers per hour, each.
- (b) One (1) spray paint booth, known as E4 (Paint Room E), consisting of undercoat, topcoat, or washdown operations that operate one (1) at a time, equipped with low pressure air atomized spray guns and dry filters to control particulate overspray, exhausting to Stacks E4a, E4b, E4c, and E4d, capacity: 0.25 trailers per hour.
- (c) One (1) spray paint booth, known as E5 (Paint Room F), equipped with one (1) low pressure air atomized spray gun and dry filters to control particulate overspray, exhausting to Stacks E5a and E5b, capacity: 0.25 trailer parts of various substrates (metal, fiberglass, etc.) per hour.
- (d) One (1) spray paint booth, identified as E6, approved for construction in 2007, equipped with one (1) low pressure air atomized spray gun and dry filters to control particulate overspray, exhausting to Stack E6, capacity: 0.25 trailer parts of various substrates (metal, fiberglass, etc.) per hour.**
- ~~(e)~~(d) Two (2) fuel oil storage tanks, known as Tanks 1 and 2, constructed in 1990, capacity: 15,000 gallons, each.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: ~~Five (5) spray paint booths~~ **Spray Paint Booths**

- (a) Three (3) spray paint booths, known as E1 (Paint Rooms A and D), E2 (Paint Room B) and E3 (Paint Room C), constructed prior to 1975, equipped with three (3) low pressure air atomized spray guns that operate one (1) at a time, and dry filters for overspray control, exhausting to stacks E1, E2, and E3, respectively, capacity: 0.38 trailers per hour, each.
- (b) One (1) spray paint booth, known as E4 (Paint Room E), consisting of undercoat, topcoat, or washdown operations that operate one (1) at a time, equipped with low pressure air atomized spray guns and dry filters to control particulate overspray, exhausting to Stacks E4a, E4b, E4c, and E4d, capacity: 0.25 trailers per hour.
- (c) One (1) spray paint booth, known as E5 (Paint Room F), equipped with one (1) low pressure air atomized spray gun and dry filters to control particulate overspray, exhausting to Stacks E5a and E5b, capacity: 0.25 trailer parts of various substrates (metal, fiberglass, etc.) per hour.
- (d) **One (1) spray paint booth, identified as E6, approved for construction in 2007, equipped with one (1) low pressure air atomized spray gun and dry filters to control particulate overspray, exhausting to Stack E6, capacity: 0.25 trailer parts of various substrates (metal, fiberglass, etc.) per hour.**

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]

- ~~(a) The total amount of VOC delivered to the applicators at the **six (6) five (5)** spray paint booths (E1, E2, E3, E4, ~~and E5, and E6~~) shall not exceed 95.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This will limit the potential to emit VOC from the entire source, including insignificant activities to less than one hundred (100) tons per year. Compliance with this limit shall make the requirements of 326 IAC 2-7 and **326 IAC 2-3** ~~326 IAC 2-1.1-5~~ not applicable.~~
- ~~(b) The requirements from FESOP 003-5768-00208, issued on December 9, 1996, Condition D.1.1, that the volatile organic compound (VOC) emissions from the three (3) paint booths (E1, E2, and E3) shall not exceed 8.25 tons per month has not been included in the renewal because the limit in Condition D.1.1(a) shall limit the potential to emit VOC from the entire source to less than one hundred (100) tons of VOC per year. Thus, the requirements of 326 IAC 2-7 are still not applicable and Condition D.1.1 of FESOP 003-5768-00208 is hereby rescinded.~~

D.1.2 Hazardous Air Pollutants (HAPs) Limitations [326 IAC 2-8-4]

- (a) ~~Each~~ **Each** The total worst case single HAP delivered to the coating applicators at the **six (6) five (5)** spray paint booths (E1, E2, E3, E4, ~~and E5, and E6~~) shall not exceed 9.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This will limit the potential to emit of **each** a single HAP for the entire source, including insignificant activities, to less than ten (10) tons per year. Compliance with this limit shall make the requirements of 326 IAC 2-7 not applicable.
- (b) The total combination of HAPs delivered to the coating applicators at the **six (6) five (5)** spray paint booths (E1, E2, E3, E4, ~~and E5, and E6~~) shall not exceed 24.0 tons per twelve (12)

consecutive month period with compliance determined at the end of each month. This will limit the potential to emit of the combination of HAPs from the entire source, including insignificant activities, to less than twenty-five (25) tons per year. Compliance with this limit shall make the requirements of 326 IAC 2-7 not applicable.

- ~~(c) The requirements from FESOP 003-5768-00208, issued on December 9, 1996, Condition D.1.2 that the amount of any single hazardous air pollutant (HAP) delivered to the applicators shall not exceed 0.75 tons per month and the amount of any combination of HAPs delivered to the applicators shall not exceed 2.00 tons per month has not been included in the renewal because the limit in Condition D.1.2(a) and (b) shall make the requirements of 326 IAC 2-7 still not applicable. Thus, Condition D.1.2 of FESOP 003-5768-00208 is hereby rescinded.~~

~~D.1.3 Particulate Matter (PM) [40 CFR 52 Subpart P]~~

~~Pursuant to FESOP 003-5768-00208, issued on December 9, 1996 and 40 CFR 52 Subpart P, the PM from the five (5) spray paint booths (E1, E2, E3, E4, and E5) shall not exceed the pound per hour emission rate established as E in the following formula:~~

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

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

~~or~~

~~Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:~~

$$~~E = 55.0 P^{0.44} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and}~~
~~P = \text{process weight rate in tons per hour}~~$$

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

Pursuant to 326 IAC 6-3-2(d), the dry filters for particulate control shall be operation in accordance with manufacturer's specifications and control emissions from six (6) spray paint booths (E1, E2, E3, E4, E5, and E6), at all times when these paint booths are in operation.

~~D.1.10 Particulate [326 IAC 6-3-2(d)]~~

~~Pursuant to FESOP 003-5768-00208, issued on December 9, 1996, 326 IAC 6-3-2(d) and in order to comply with Condition D.1.3, the dry filters for particulate control shall be in operation at all times in accordance with manufacturer's specifications when the five (5) spray paint booths (E1, E2, E3, E4, and E5) are in operation.~~

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

D.1.10 D.1.11 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (E1, E2, E3, E4a, E4b, E4c, E4d, E5a, ~~and E5b, and E6~~) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the

presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.12 Nonapplicability of Daily Visible Emissions Notations

~~The requirement from FESOP 003-5768-00208, issued on December 9, 1996, Condition D.1.7 to perform daily visible emissions notations has not been included in the renewal. This requirement is no longer applicable because the daily inspections of the filter, weekly observations of the overspray from the stacks and monthly inspections of emissions required by Condition D.1.10 are sufficient compliance monitoring requirements to ensure compliance with the applicable rules. Thus, Condition D.1.7 of FESOP 003-5768-00208 is hereby rescinded.~~

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

D.1.11 ~~D.1.13~~ Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.1.1 and the HAPs usage limits and the HAPs emission limits established in Condition D.1.2.
- (1) The amount and VOC and HAP 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 and degreasing solvents;
 - (2) The cleanup solvent usage for each month;
 - (3) The total VOC, as well as total individual HAP and total combination of HAPs usage for each month; and
 - (4) The weight of VOCs, as well as total individual and total HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain records of the total VOC usage at spray paint booth (E5).
- (c) To document compliance with **Condition D.1.10** ~~Conditions D.1.10 and D.1.14~~, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D1.12 ~~D.1.14~~ Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit,

using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Two (2) fuel oil storage tanks

(e)(d) Two (2) fuel oil storage tanks, known as Tanks 1 and 2, constructed in 1990, capacity: 15,000 gallons, each.

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

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

FESOP Quarterly Report

Source Name: Total Fleet Service, LLC
Source Address: **4808 Kroemer Road, Fort Wayne, Indiana 46818** ~~5004 U.S. Highway 30 West, Fort Wayne, Indiana 46818~~
Mailing Address: 4808 Kroemer Road, Fort Wayne, Indiana 46818
FESOP No.: F 003-13899-00208
Facilities: **Six (6)** ~~Five (5)~~ spray paint booths, known as E1, E2, E3, E4, ~~and E5,~~ and **E6**
Parameter: VOC delivered to the applicators
Limit: Total not to exceed 95.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Total VOC usage (tons)	Total VOC usage (tons)	Total VOC usage (tons)
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Total Fleet Service, LLC
Source Address: **4808 Kroemer Road, Fort Wayne, Indiana 46818** ~~5001 U.S. Highway 30 West, Fort Wayne, Indiana 46818~~
Mailing Address: 4808 Kroemer Road, Fort Wayne, Indiana 46818
FESOP No.: F 003-13899-00208
Facilities: **Six (6)** ~~Five (5)~~ spray paint booths, known as E1, E2, E3, E4, ~~and E5,~~ and **E6**
Parameter: Individual HAP delivered to the applicators
Limit: Total not to exceed 9.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Individual HAP Usage (tons)	Individual HAP Usage (tons)	Individual HAP Usage (tons)
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Total Fleet Service, LLC
Source Address: **4808 Kroemer Road, Fort Wayne, Indiana 46818** ~~5001 U.S. Highway 30 West, Fort Wayne, Indiana 46818~~
Mailing Address: 4808 Kroemer Road, Fort Wayne, Indiana 46818
FESOP No.: F 003-13899-00208
Facilities: **Six (6)** ~~Five (5)~~ spray paint booths, known as E1, E2, E3, E4, ~~and E5,~~ and **E6**
Parameter: Combination of HAPs delivered to the applicators
Limit: Total not to exceed 24.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Combination of HAPs Usage (tons)	Combination of HAPs Usage (tons)	Combination of HAPs Usage (tons)
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Conclusion

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Minor Permit Revision No. 003-23910-00208.

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

**Company Name: Total Fleet Services, LLC
Address City IN Zip: Fort Wayne, IN 46818
Permit Number: MPR 003-23910-00208
Pit ID: 003-00208
Reviewer: Brian J. Pedersen
Application Date: November 20, 2006**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Paint Booth E6																
Base Coat System 1	10.4	21.5%	0.00%	21.5%	0.00%	60.4%	7.00	0.050	2.24	2.24	0.784	18.8	3.44	3.13	3.71	75%
Base Coat System 2	8.55	61.4%	0.00%	61.4%	0.00%	33.4%	16.0	0.050	5.25	5.25	4.20	101	18.4	2.89	15.7	75%
Clear Coat System	8.11	50.0%	0.00%	50.0%	0.00%	50.0%	13.0	0.050	4.06	4.06	2.64	63.3	11.6	2.88	8.12	75%
DT-5 Gun Wash	6.83	85.9%	0.00%	85.9%	0.00%	0.00%	1.25	0.050	5.87	5.87	0.367	8.80	1.61	0.066	NA	75%

PM Control Efficiency: 90.0%

Add worst case coating to all solvents

Uncontrolled	4.57	110	20.0	3.20
Controlled	4.57	110	20.0	0.320

METHODOLOGY

- Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
- Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
- Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
- Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
- Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
- Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
- Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
- Total = Worst Coating + Sum of all solvents used

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

Company Name: Total Fleet Services, LLC
Address City IN Zip: Fort Wayne, IN 46818
Permit Number: MPR 003-23910-00208
Plt ID: 003-00208
Permit Reviewer: Brian J. Pedersen
Application Date: November 20, 2006

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethyl Benzene	Weight % Glycol Ethers	Weight % Methanol	Weight % MIBK	Weight % Toluene	Ethyl Benzene Emissions (ton/yr)	Glycol Emissions (ton/yr)	Methanol Emissions (ton/yr)	MIBK Emissions (ton/yr)	Toluene Emissions (ton/yr)	Total Emissions (ton/yr)
Paint Booth E6														
Base Coat System 1	10.4	7.00	0.050	0.00%	0.00%	0.00%	0.880%	0.00%	0.00	0.00	0.00	0.14	0.00	0.140
Base Coat System 2	8.55	16.0	0.050	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Clear Coat System	8.11	13.0	0.050	0.150%	4.49%	0.00%	6.65%	0.00%	0.035	1.04	0.00	1.54	0.00	2.61
DT-5 Gun Wash	6.83	1.25	0.050	0.00%	0.00%	49.0%	0.00%	37.0%	0.00	0.00	0.916	0.00	0.692	1.61

0.035 1.037 0.916 1.54 0.692 4.21

METHODOLOGY

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