



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
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(800) 451-6027  
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TO: Interested Parties / Applicant  
DATE: July 12, 2007  
RE: Total Fleet Service, LLC/ 003-23915-00208  
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 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, 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.dot 03/23/06



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## Federally Enforceable State Operating Permit 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.

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

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.

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 003-23915-00208	
Issued by: Original signed by  Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: July 12, 2007  Expiration Date: July 12, 2012

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## SECTION A

## SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary trailer surface coating source.

Source Address:	4808 Kroemer Road, Fort Wayne, Indiana 46818
Mailing Address:	4808 Kroemer Road, Fort Wayne, Indiana 46818
General Source Phone Number:	260 - 469 - 6901
SIC Code:	7699
County Location:	Allen
Source Location Status:	Nonattainment for 8-hour ozone standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clear Air Act

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

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

- (a) Five (5) spray paint booths, identified as E1A (Bay 45), E1Da (Bay 42), E1Db (Bay 41), E2 (Bay 44) and E3, installed prior to 1975, equipped with low pressure air atomized spray guns and dry filters to control particulate overspray, exhausting to stacks E1, E2, and E3, respectively, capacity: 0.38 trailer parts of various substrates (metal or plastic) per hour, each.
- (b) One (1) spray paint booth, identified as E4, installed in 2003, consisting of undercoat, top-coat, or wash down 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 trailer parts of various substrates (metal, fiberglass, etc.) per hour.
- (c) One (1) spray paint booth, identified as E5, installed in 2004, 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, identified as Tanks 1 and 2, installed in 1990, capacity: 15,000 gallons, each.
- (f) One pneumatic abrasive blaster, identified as AB-1, installed in 1996, equipped with a bag-house for particulate control, venting indoors, capacity: 309 pounds of sand per hour.

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) Five (5) natural gas-fired air make up units, heat input capacity: 15.67 million British thermal units per hour, total;
  - (2) Thirty-seven (37) natural gas-fired tube heaters, heat input capacity: 0.10 million British thermal units per hour, each;
  - (3) Forty-two (42) natural gas-fired space heaters, heat input capacity: 0.17 million British thermal units per hour, each;
  - (4) 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]
  - (5) 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]
  - (6) One (1) natural gas-fired boiler, constructed 1977, heat input capacity: 1.56 million British thermal units per hour. [326 IAC 6-2-3]
- (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, installed 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]

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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).

## **SECTION B GENERAL CONDITIONS**

### **B.1 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.2 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]**

- (a) This permit, F 003-23915-00208, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

### **B.3 Term of Conditions [326 IAC 2-1.1-9.5]**

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

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

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 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.6 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.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]**

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

B.8 Certification [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. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual 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 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, as IDEM, OAQ may require to determine the compliance status of the source.

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

B.10 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.11 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) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 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 describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;  
  
Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or  
Telephone Number: 317-233-0178 (ask for Compliance Section)  
Facsimile Number: 317-233-6865
  - (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or

facsimile to:

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

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

The notice fulfills the requirement of 326 IAC 2-8-4(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 an "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) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(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.

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

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

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- (a) All terms and conditions of permits established prior to 003-23915-00208 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised
  - (3) deleted
- (b) All previous registrations and permits are superseded by this permit.

**B.14 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]**

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least 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.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]**

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

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

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

The Quarterly Deviation and Compliance Monitoring Report does require the certification by an "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.

**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]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 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 being 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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement 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] [326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:
- Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- and
- United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590
- in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

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

- (b) **Emission Trades [326 IAC 2-8-15(c)]**  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) **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.
- (d) **Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.**

**B.20 Source Modification Requirement [326 IAC 2-8-11.1]**

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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] [IC 13-17-3-2] [IC 13-30-3-1]**

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

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- (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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

- (c) The Permittee may implement 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.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [62 FR 8314] [326 IAC 1-1-6]

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

#### C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

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

#### C.2 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. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
- (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) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(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.3 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

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

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

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

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

All required notifications shall be submitted to:

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

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

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

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

#### **C.8 Performance Testing [326 IAC 3-6]**

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

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

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

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

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

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

#### **C.9 Compliance Requirements [326 IAC 2-1.1-11]**

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

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

#### **C.10 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 within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

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

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

#### **C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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

#### **C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]**

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

#### **C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

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

#### **C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]**

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

- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
  - (1) initial inspection and evaluation
  - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records;
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
  - (1) monitoring data;
  - (2) monitor performance data, if applicable; and
  - (3) corrective actions taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [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 twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

### **C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

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

### **C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## **Stratospheric Ozone Protection**

### **C.18 Compliance with 40 CFR 82 and 326 IAC 22-1**

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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 2-7-5(15)]: Paint Booths

- (a) Five (5) spray paint booths, identified as E1A (Bay 45), E1Da (Bay 42), E1Db (Bay 41), E2 (Bay 44) and E3, installed prior to 1975, equipped with low pressure air atomized spray guns and dry filters to control particulate overspray, exhausting to stacks E1, E2, and E3, respectively, capacity: 0.38 trailer parts of various substrates (metal or plastic) per hour, each.
- (b) One (1) spray paint booth, identified as E4, installed in 2003, consisting of undercoat, topcoat, or wash down 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 trailer parts of various substrates (metal, fiberglass, etc.) per hour.
- (c) One (1) spray paint booth, identified as E5, installed in 2004, 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, identified as Tanks 1 and 2, installed 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.)

### 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 eight (8) spray paint booths (E1A, E1Da, E1Db, E2, E3, E4, E5, and E6) shall not exceed a total of 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 eight (8) spray paint booths (E1A, E1Da, E1Db, E2, E3, E4, E5, and E6) shall not exceed a total of nine (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 eight (8) spray paint booths (E1A, E1Da, E1Db, E2, E3, E4, E5, and E6) shall not exceed a total of twenty-four (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 twelve (12) consecutive month period. 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 the eight (8) spray paint booths (E1A, E1Da, E1Db, E2, E3, E4, E5, and E6), at all times when these paint booths are in operation.

**D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

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

**Compliance Determination Requirements**

**D.1.5 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP)**

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

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

**D.1.6 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. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

**D.1.7 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 (5) below. Records maintained for (1) through (5) 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 VOC and HAP content of each coating material and solvent used.
- (2) The amount of coating material and solvent less water used on monthly basis.
- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

- (3) The cleanup solvent usage for each month;
  - (4) The total VOC and HAP usage for each month; and
  - (5) The weight of VOCs and HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.8 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 2-7-5(15)]: Abrasive Blaster

- (f) One pneumatic abrasive blaster, identified as AB-1, installed in 1996, equipped with a baghouse for particulate control, venting indoors, capacity: 309 pounds of sand 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.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the pneumatic abrasive blaster, identified as AB-1, shall not exceed one and eighteen tenths (1.18) pounds per hour when operating at a process weight rate of three hundred nine (309) pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

#### D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

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

#### D.2.3 Particulate Control

- (a) In order to comply with D.2.1, the baghouse used for particulate control shall be in operation and control emissions from the pneumatic abrasive blaster, identified as AB-1, at all times that the pneumatic abrasive blaster is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

#### D.2.4 Baghouse Parametric Monitoring

- (a) The Permittee shall record the pressure drop across the baghouse used in conjunction with the pneumatic abrasive blaster, identified as AB-1, at least once per day when the pneumatic abrasive blaster is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of one (1.0) and four (4.0) inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take

response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

- (b) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every six (6) months.

#### D.2.5 Broken or Failed Bag Detection

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- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the pneumatic abrasive blaster, identified as AB-1. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, or dust traces.

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

#### D.2.6 Record Keeping Requirements

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- (a) To document compliance with Condition D.2.4, the Permittee shall maintain daily records of the pressure drop across the baghouse controlling the pneumatic abrasive blaster, identified as AB-1. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the process did not operate that day).
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.3

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]: 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) Five (5) natural gas-fired air make up units, heat input capacity: 15.67 million British thermal units per hour, total;
  - (2) Thirty-seven (37) natural gas-fired tube heaters, heat input capacity: 0.10 million British thermal units per hour, each;
  - (3) Forty-two (42) natural gas-fired space heaters, heat input capacity: 0.16 million British thermal units per hour, each;
  - (4) One (1) natural gas-fired boiler, installed in 1994, heat input capacity: 0.63 million British thermal units per hour; (326 IAC 6-2-4)
  - (5) Two (2) natural gas-fired boilers, installed in 1977, heat input capacity: 3.00 million British thermal units per hour, each; and (326 IAC 6-2-3)
  - (6) One (1) natural gas-fired boiler, installed in 1977, heat input capacity: 1.56 million British thermal units per hour. (326 IAC 6-2-3)
- (b) 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 [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3(e) (Particulate Emission Limitations for Sources of Indirect Heating): emission limitations for the three (3) insignificant natural gas-fired boilers, installed in 1977, with input heat ratings of 3.00, 3.00, and 1.56 million British thermal units, shall in no case exceed six-tenths (0.6) pounds of particulate matter per million British thermal units heat input.

#### D.3.2 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a) (Particulate Emission Limitations for Sources of Indirect Heating) emission limitations for the one (1) insignificant natural gas-fired boiler, installed in 1994, with an input heat rating of 0.63 million British thermal units, shall in no case exceed six-tenths (0.6) pounds of particulate matter per million British thermal units heat input.

#### D.3.3 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;

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

**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 003-23915-00208

**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:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-0178  
Fax: 317-233-6865**

**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 003-23915-00208

**This form consists of 2 pages**

**Page 1 of 2**

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

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

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , 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 003-23915-00208  
Facility: Eight (8) spray paint booths (E1A, E1Da, E1Db, E2, E3, E4, E5, and E6)  
Parameter: VOC delivered to the applicators  
Limit: Shall not exceed a total of 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 month.
- Deviation/s occurred in this month.  
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 003-23915-00208  
Facility: Eight (8) spray paint booths (E1A, E1Da, E1Db, E2, E3, E4, E5, and E6)  
Parameter: Combination HAP delivered to the applicators  
Limit: Shall not exceed a total of twenty-four (24.0) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

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

- No deviation occurred in this month.
- Deviation/s occurred in this month.  
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 003-23915-00208  
Facility: Eight (8) spray paint booths (E1A, E1Da, E1Db, E2, E3, E4, E5, and E6)  
Parameter: Individual HAP delivered to the applicators  
Limit: Shall not exceed a total of nine (9.0) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

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

- No deviation occurred in this month.
- Deviation/s occurred in this month.  
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 003-23915-00208

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

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

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

## Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a  
Federally Enforceable State Operating Permit (FESOP) Renewal

**Source Name:** Total Fleet Service, LLC  
**Source Location:** 4808 Kroemer Road, Fort Wayne, Indiana 46818  
**County:** Allen  
**FESOP:** F 003-23915-00208  
**SIC Code:** 7699  
**Permit Reviewer:** Brian J. Pedersen/MES

On June 5, 2007, the Office of Air Quality (OAQ) had a notice published in the Wayne Journal Gazette, Fort Wayne, Indiana, stating that Total Fleet Service, LLC had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a stationary trailer surface coating source with baghouses and dry filters used for particulate control. The notice also stated that OAQ proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

Upon further review, the OAQ has decided to make the following changes to the FESOP: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

### D.2.6 Record Keeping Requirements

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- (a) To document compliance with Condition D.2.4, the Permittee shall maintain **daily** records ~~once per day~~ of the pressure drop across the baghouse controlling the pneumatic abrasive blaster, identified as AB-1. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the process did not operate that day).
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit  
(FESOP) Renewal

**Source Background and Description**

<b>Source Name:</b>	<b>Total Fleet Service, LLC</b>
<b>Source Location:</b>	<b>4808 Kroemer Road, Fort Wayne, Indiana 46818</b>
<b>County:</b>	<b>Allen</b>
<b>SIC Code:</b>	<b>7699</b>
<b>Operation Permit No.:</b>	<b>F 003-13899-00208</b>
<b>Operation Permit Issuance Date:</b>	<b>August 19, 2002</b>
<b>Permit Renewal No.:</b>	<b>F 003-23915-00208</b>
<b>Permit Reviewer:</b>	<b>Brian J. Pedersen</b>

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Total Fleet Service, LLC relating to the operation of a stationary trailer surface coating source.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) Five (5) spray paint booths, identified as E1A (Bay 45), E1Da (Bay 42), E1Db (Bay 41), E2 (Bay 44) and E3, installed prior to 1975, equipped with low pressure air atomized spray guns and dry filters to control particulate overspray, exhausting to stacks E1, E2, and E3, respectively, capacity: 0.38 trailer parts of various substrates (metal or plastic) per hour, each.
- (b) One (1) spray paint booth, identified as E4, installed in 2003, consisting of undercoat, topcoat, or wash down 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 trailer parts of various substrates (metal or plastic) per hour.
- (c) One (1) spray paint booth, identified as E5, installed in 2004, 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 or plastic) 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 or plastic) per hour.
- (e) Two (2) fuel oil storage tanks, identified as Tanks 1 and 2, installed in 1990, capacity: 15,000 gallons, each.

**Unpermitted Emission Units and Pollution Control Equipment**

The source also consists of the following unpermitted emission units:

- (f) One (1) pneumatic abrasive blaster, identified as AB-1, installed in 1996, equipped with a baghouse for particulate control, venting indoors, capacity: 309 pounds of sand per hour.

## **New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval**

There are no proposed emission units during this review process.

### **Insignificant Activities**

The source also consists of 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) Five (5) natural gas-fired air make up units, heat input capacity: 15.67 million British thermal units per hour, total;
  - (2) Thirty-seven (37) natural gas-fired tube heaters, heat input capacity: 0.10 million British thermal units per hour, each;
  - (3) Forty-two (42) natural gas-fired space heaters, heat input capacity: 0.17 million British thermal units per hour, each;
  - (4) 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]
  - (5) 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]
  - (6) One (1) natural gas-fired boiler, constructed 1977, heat input capacity: 1.56 million British thermal units per hour. [326 IAC 6-2-3]
- (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 horse-power, total.

- (k) Stationary fire pumps.
- (l) Maintenance cold cleaning degreasers, including Crystal Clean units with capacities less than 15 gallons each, installed 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]

### Existing Approvals

The source has been operating under the previous FESOP 003-13899-00208 issued on August 19, 2002, with an expiration date of August 19, 2007, and the following amendments and revisions:

- (a) MPR 003-16790-00208 issued on April 9, 2003;
- (b) AA 003-16621-00208 issued on July 15, 2004;
- (c) MPR 003-19659-00208 issued on November 10, 2004;
- (d) AA 003-21008-00208 issued on May 5, 2005; and
- (e) MPR 003-23910-00208 issued on January 10, 2006.

All conditions from previous approvals were incorporated into this FESOP.

### Enforcement Issue

- (a) IDEM is aware that the pneumatic abrasive blaster has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the heading *Unpermitted Emission Units and Pollution Control Equipment*.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

### Recommendation

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

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

An administratively complete FESOP renewal application for the purposes of this review was received on November 20, 2006.

### Emission Calculations

See pages 1 through 16 of Appendix A of this document for detailed emission calculations.

**Unrestricted Potential Emissions**

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

<b>Pollutant</b>	<b>Unrestricted Potential Emissions (tons/yr)</b>
PM	84.9
PM <sub>10</sub>	68.3
SO <sub>2</sub>	0.184
VOC	182
CO	19.3
NO <sub>x</sub>	44.0

<b>HAPs</b>	<b>Unrestricted Potential Emissions (tons/yr)</b>
Dichlorobenzene	0.00014
Lead	0.00008
Cadmium	0.00014
Chromium	0.021
Manganese	0.00005
Nickel	0.006
Arsenic	0.0003
Cobalt	0.0006
Phosphorus	0.004
Toluene	20.3
Hexane	0.274
Naphthalene	0.0014
Phenanthrene	0.0012
Pyrene	0.0008
Benz(a)anthracene/chrysene	0.0004
Benzo(a)pyrene	0.0004
Ethyl Benzene	3.03
MIBK	5.12
Methanol	1.71
Glycol Ethers	5.78
Xylene	15.7
Formaldehyde	0.012
Total	52.0

### Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential To Emit (tons/year)						
	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Spray Paint Booths (E1A, E1Da, E1Db, E2, E3, E4, E5, and E6)	2.83	2.83	-	Limited to 95.5	-	-	Limited to 9 for single
							Limited to 24 for combination
Insignificant Noncombustion Activities	55.5	38.8	-	*2.00	-	-	-
Insignificant Combustion Activities	1.10	1.16	0.184	1.76	19.3	44.0	0.323
Total Emissions	59.4	42.8	0.184	Less than 100	19.3	44.0	Single less than 10
							Combination less than 25

\* Since VOC emission from the insignificant maintenance cold cleaning degreasers are less than 15 pounds per day a conservative estimate of two (2) tons per year has been established for this operation.

### County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM <sub>2.5</sub>	Attainment
PM <sub>10</sub>	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
8-Hour Ozone	Nonattainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are consider-

ed 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<sub>x</sub> 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<sub>2.5</sub>. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM<sub>2.5</sub> emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM<sub>2.5</sub> emissions, it has directed states to regulate PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions. See the State Rule Applicability - Entire Source Section of this document.
- (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 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, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	59.4
PM <sub>10</sub>	42.8
SO <sub>2</sub>	0.184
VOC	Less than 100
CO	19.3
NO <sub>x</sub>	44.0
Single HAP	Less than 10
Combination HAPs	Less than 25

- (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 greater and it is not in one of the twenty-eight (28) listed source categories.

- (b) This existing source is **not** a major stationary source because no nonattainment regulated pollutant is emitted at a rate of one hundred (100) tons per year or greater, and it is not in one of the twenty-eight (28) listed source categories.

### **Federal Rule Applicability**

- (a) The requirements of the New Source Performance Standard for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978, 326 IAC 12 (40 CFR 60.40a Subpart Da) are not included in the permit for the two (2) insignificant natural gas fired boilers, installed in 1977, rated at 3.0 million British thermal units per hour each, and the one (1) insignificant natural gas fired boiler, installed in 1977, rated at 1.56 million British thermal units per hour, because the construction of these units commenced prior to September 18, 1978, the applicability date of this rule. The requirements of this rule are also not included for the one (1) insignificant natural gas fired boiler, installed in 1994, rated at 0.63 million British thermal units per hour, because it has an input heat capacity less than two hundred fifty (250) million British thermal units per hour.
- (b) The requirements of the New Source Performance Standard for Industrial-Commercial-Institutional Steam Generating Units, 326 IAC 12 (40 CFR 60.40b Subpart Db) are not included in the permit for the two (2) insignificant natural gas fired boilers, installed in 1977, rated at 3.0 million British thermal units per hour and the one (1) insignificant natural gas fired boiler, installed in 1977, rated at 1.56 million British thermal units per hour, because the construction of these units commenced prior to June 19, 1984, the applicability date of this rule. The requirements of this rule are also not included for the one (1) insignificant natural gas fired boiler, installed in 1994, rated at 0.63 million British thermal units per hour, because it has a heat input capacity less than one hundred (100) million British thermal units per hour.
- (c) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 326 IAC 12 (40 CFR 60.40c Subpart Dc) are not included in the permit for the two (2) insignificant natural gas fired boilers, installed in 1977, rated at 3.0 million British thermal units per hour and the one (1) insignificant natural gas fired boiler, installed in 1977, rated at 1.56 million British thermal units per hour, because the construction of these units commenced prior to June 9, 1989, the applicability date of this rule. The requirements of this rule are also not included for the one (1) insignificant natural gas fired boiler, installed in 1994, rated at 0.63 million British thermal units per hour, because it has an input heat capacity less than ten (10) million British thermal units per hour.
- (d) The requirements of the New Source Performance Standard Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, 326 IAC 12 (40 CFR 60.110(b), Subpart Kb), are not included in the permit for this source because the two (2) fuel storage tanks, identified as Tanks 1 and 2, installed in 1990, have capacities less than seventy-five (75) cubic meters, each.
- (e) The requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations, 326 IAC 12 (40 CFR 60.390, Subpart MM), are not included in the permit for this source because this source does not apply coatings to automobiles or light duty trucks as defined by 40 CFR 60.391.
- (f) This requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63.7485, Subpart DDDDD, for Industrial, Commercial, Institutional Boilers and

Process Heaters are not included in the permit for this source because the source has chosen to limit the potential to emit of HAPs below major source thresholds.

- (g) This requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63.3880, Subpart MMMM, for Miscellaneous Metal Parts and Products Surface Coating are not included in the permit for this source because this source has chosen to limit the potential to emit of HAPs below major source thresholds.
- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63.3080, Subpart IIII, for Automobile & Light Duty Truck Surface Coating are not included in the permit for this source because this source has chosen to limit the potential to emit of HAPs below major source thresholds.
- (i) The requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63.4480, Subpart PPPP, for Surface Coating of Plastic Parts and Products are not included in the permit for this source because this source has chosen to limit the potential to emit of HAPs below major source thresholds.
- (j) There are no other National Emission Standards for Hazardous Air Pollutants included in the permit for this source.

#### **State Rule Applicability – Entire Source**

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

- (a) In 2004 Allen County was designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO<sub>x</sub> emissions are now reviewed under 326 IAC 2-3 (Emission Offset). In order to comply with 326 IAC 2-8-4, source wide VOC emissions are limited to less than one hundred (100) tons per year so that this source will not be subject to Part 70 rules. Therefore, this source is considered minor under 326 IAC 2-3 (Emission Offset).
- (b) The unrestricted potential emissions of each attainment criteria pollutant are less than two hundred fifty (250) tons per year. Therefore, this source, which is not one of the twenty-eight (28) listed source categories, is a minor source pursuant to 326 IAC 2-2, PSD.

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

The operation of this stationary trailer surface coating source will limit HAP emissions to less than ten (10) tons per year of a single HAP and twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

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

This source is not located in Lake or Porter County, does not emit five (5) tons per year or more of lead and does not require a Part 70 Operating Permit. Therefore, the requirements of 326 IAC 2-6 do not apply.

##### 326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the amount of VOC shall be limited to less than one hundred (100) tons per year from the entire source. In addition, the amount of each single HAP shall be limited to less than ten (10) tons per year and the combination of all HAPs shall be limited to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-7, do not apply.

- (a) The total amount of VOC delivered to the applicators at the eight (8) spray paint booths (E1A, E1Da, E1Db, E2, E3, E4, E5, and E6) shall not exceed a total of 95.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This will limit source-wide emissions of VOC 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) Each single HAP delivered to the coating applicators at the eight (8) spray paint booths (E1A, E1Da, E1Db, E2, E3, E4, E5, and E6), shall not exceed a total of 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.
- (c) The total combination of HAPs delivered to the coating applicators at the eight (8) spray paint booths (E1A, E1Da, E1Db, E2, E3, E4, E5, and E6), shall not exceed a total of 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.

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

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

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

#### State Rule Applicability – Individual Facilities

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

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the pneumatic abrasive blaster, identified as AB-1, shall not exceed 1.18 pounds per hour when operating at a process weight rate of 309 pounds per hour (0.155 tons per hour).

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

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

The baghouse shall be in operation at all times the pneumatic abrasive blaster, identified as AB-1, is in operation, in order to comply with this limit. The potential to emit particulate after controls from the pneumatic abrasive blaster from page 16 of 16 of Appendix A is 0.127 pounds per hour, which is less than 1.18 pounds per hour. Therefore, the pneumatic abrasive blaster, identified as AB-1, can comply with this rule.

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 eight (8) spray paint booths (E1A, E1Da, E1Db, E2, E3, E4, E5, and E6) at all times when these spray paint booths are in operation.

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

- (a) The five (5) spray paint booths, identified as E1A, E1Da, E1Db, E2, E3 installed in 1975, were installed prior to the applicability date of January 1, 1980. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.
- (b) The three (3) spray paint booths, identified as E4 through E6, installed in 2003, 2004 and approved for construction in 2007, respectively, each have potential VOC emissions less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations)

The eight (8) spray paint booths (E1A, E1Da, E1Db, E2, E3, E4, E5, and E6), located in Allen County are not coating automobiles or light duty trucks. Therefore, the requirements of 326 IAC 8-2-2 are not applicable.

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 Code (SIC) #76, which is not one of 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 eight (8) spray paint booths (E1A, E1Da, E1Db, E2, E3, E4, E5, and E6).

**State Rule Applicability – Insignificant Activities**

326 IAC 6-2-3(e) (Particulate emission limitations for sources of indirect heating)

The three (3) insignificant boilers, rated at 7.56 million British thermal units per hour total, all installed in 1977, shall comply with the particulate matter emission rate specified by the following equation given in 326 IAC 6-2-3(a).

$$Pt = (C \times a \times h) / (76.5 \times Q^{0.75} \times N^{0.25})$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

- C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal fifty (50) micrograms per cubic meter for a period not to exceed a sixty (60) minute time period.
- N = Number of stacks in fuel burning operation.
- a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 million British thermal units per hour heat input.
- h = Stack height in feet. If a number of stacks of different heights exist, the average stack height will be computed using a weighted average of stack heights.

$$Pt = (50 \mu\text{g}/\text{m}^3 \times 0.67 \times 51.5 \text{ ft}) / (76.5 \times 7.56^{0.75} \times 1^{0.25}) = 4.95 \text{ lb PM} / \text{MMBtu for the (3) insignificant boilers}$$

This number is greater than the allowable emissions stated in 326 IAC 6-2-3(e). Therefore the allowable emissions for the boilers constructed after June 8, 1972 shall be limited to 0.6 lb of PM per million British thermal units. The potential PM emissions of the three (3) boilers are shown on page 9 of 16 of the TSD Appendix A and are as follows:

$$\text{PM} = 0.063 \text{ tons of PM per year} / 7.65 \text{ MMBtu per hour} = 0.014 \text{ pounds of PM per hour} / 7.65 \text{ MMBtu per hour} = 0.0019 \text{ pounds of PM per million British thermal units.}$$

Therefore, these three (3) insignificant boilers can comply with this rule.

#### 326 IAC 6-2-4 (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1(a))

Pursuant to 326 IAC 6-2-4(a), for Q less than ten (10) million British thermal units per hour, Pt shall not exceed 0.6. Therefore, the PM emissions from the one (1) insignificant natural gas fired boiler, rated at 0.63 million British thermal units per hour, installed in 1994, will be limited to 0.6 pound per million British thermal unit.

Based on page 2 of Appendix A, potential PM emission rate is for the heat boiler, identified as HB1, rated at 0.63 million British thermal units per hour, is as follows:

$$0.005 \text{ ton/yr} \times (2000 \text{ lbs/ton} / 8760 \text{ hrs/yr}) = 0.001 \text{ lb/hr}$$

$$(0.001 \text{ lb/hr} / 0.63 \text{ mmBtu/hr}) = 0.0016 \text{ lb PM per mmBtu}$$

Therefore, based on page 9 of 16 of Appendix A, this insignificant boiler, can comply with this rule.

#### 326 IAC 8-3-2 (Cold Cleaner Operations)

The insignificant cold cleaning degreasers were installed after January 1, 1980. Therefore the requirements of 326 IAC 8-3-2 are applicable. Pursuant to 326 IAC 8-3-2, for the insignificant cold cleaner operations, the Permittee shall:

- (1) Equip the cleaner with a cover;

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

#### 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The insignificant cold cleaning degreasers were installed after July 1, 1990, and are equipped with a remote solvent reservoir. Pursuant to 326 IAC 8-3-1(b)(2), 326 IAC 8-3-5 applies to cold cleaning degreasers without remote solvent reservoirs. Therefore, the requirements of 326 IAC 8-3-5 are not applicable.

#### 326 IAC 8-4-3 (Petroleum liquid storage facilities)

The insignificant fuel oil storage tanks have capacities less than 150,000 liters (39,000 gallons). Therefore, the requirements of 326 IAC 8-4-3 are not applicable.

### **Testing Requirements**

Since all emissions are based upon AP-42 emission factors, material usage and the MSDS for the materials applied, testing requirements are not being proposed 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 this source are as follows:

The eight (8) spray paint booths (E1A, E1Da, E1Db, E2, E3, E4, E5, and E6) have applicable compliance monitoring conditions as specified below:

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. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the dry filters for particulate control must operate properly in order to ensure compliance with 326 IAC 6-3-2 (Particulate emission limitations, work practices and control technologies) and 326 IAC 2-8 (FESOP).

The pneumatic abrasive blaster, identified as AB-1, has applicable compliance monitoring conditions as specified below:

- (a) The Permittee shall record the pressure drop across the baghouse used in conjunction with the pneumatic abrasive blaster, identified as AB-1, at least once per day when the pneumatic abrasive blaster, identified as AB-1, is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 4.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

- (b) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the pneumatic abrasive blaster, identified as AB-1. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, or dust traces.

These monitoring conditions are necessary because the baghouse for particulate control must operate properly in order to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-8 (FESOP).

## **Conclusion**

The operation of this stationary trailer surface coating source shall be subject to the conditions of the FESOP 003-23915-00208.



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

**Company Name: Total Fleet Service, LLC  
Address City IN Zip: 4808 Kroemer Road, Fort Wayne, IN 46818  
Permit Number: F 003-23915-00208  
Reviewer: Brian J. Pedersen  
Date: March 29, 2007**

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Methanol	Weight % Glycol Ethers	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	Methanol Emissions (tons/yr)	Glycol Ethers Emissions (tons/yr)	Total Emissions (tons/yr)
<b>Five (5) spray paint booths (E1A, E1Da, E1Db, E2, and E3)</b>												
<b>E1A, E1Da, E1Db and E3</b>												
Navl Blue	7.67	2.50	0.38	23.00%	16.00%	0.00%	0.00%	7.34	5.11	0.00	0.00	12.4
Reducer	6.74	2.50	0.38	0.00%	10.00%	0.00%	11.00%	0.00	2.80	0.00	3.08	5.89
Naval White	9.30	1.25	0.38	17.00%	10.00%	0.00%	0.00%	3.29	1.93	0.00	0.00	5.22
Reducer	7.21	1.25	0.38	0.00%	10.00%	0.00%	11.00%	0.00	1.50	0.00	1.65	3.15
Camcote	9.40	7.00	0.38	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Wipe Down	6.71	0.50	0.38	0.00%	50.00%	0.00%	0.00%	0.00	2.79	0.00	0.00	2.79
<b>E1A</b>												
Floor Repair	7.31	0.50	0.38	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
<b>E2</b>												
Navl White	9.30	0.15	0.06	17.00%	10.00%	0.00%	0.00%	0.06	0.04	0.00	0.00	0.099
Reducer	7.21	0.15	0.06	0.00%	10.00%	0.00%	11.00%	0.00	0.03	0.00	0.03	0.060
Wipe Down	6.71	0.50	0.06	0.00%	50.00%	0.00%	0.00%	0.00	0.44	0.00	0.00	0.441
<b>Clean-up Solvent</b>												
Gun Cleaner	6.55	0.125	1.00	0.00%	17.00%	5.00%	0.00%	0.00	0.61	0.179	0.00	0.789
<b>Total</b>								<b>10.7</b>	<b>15.3</b>	<b>0.179</b>	<b>4.77</b>	<b>30.9</b>

**METHODOLOGY**

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

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

Company Name: Total Fleet Service, LLC  
Address City IN Zip: 4808 Kroemer Road, Fort Wayne, IN 46818  
Permit Number: F 003-23915-00208  
Reviewer: Brian J. Pedersen  
Date: March 29, 2007

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency						
<b>Spray Paint Booth (E4)</b>																						
<i>Undercoating Operation</i>																						
E360 Epoxy Primer/Sealer	10.61	40.2%	0.00%	40.2%	0.00%	59.7%	1.00	0.250	4.27	4.27	1.07	25.59	4.67	1.74	7.14	75%						
E375 Hardener	7.46	68.4%	0.00%	68.4%	0.00%	31.6%	1.00	0.250	5.10	5.10	1.27	30.60	5.58	0.65	16.12	75%						
											<b>2.34</b>	<b>56.2</b>	<b>10.3</b>	<b>2.38</b>								
<i>Topcoat Operation</i>																						
N0141H1 White Urethane	8.96	51.0%	0.00%	51.0%	0.00%	49.0%	1.50	0.250	4.57	4.57	1.71	41.13	7.51	1.80	9.33	75%						
200-Activator	7.79	56.1%	0.00%	56.1%	0.00%	43.9%	0.500	0.250	4.37	4.37	0.546	13.1	2.39	0.47	9.95	75%						
Super Accelarotor Catylist	7.25	98.5%	0.00%	98.5%	0.00%	1.50%	0.030	0.250	7.14	7.14	0.054	1.29	0.235	0.00	476.08	75%						
											2.31	55.5	10.1	2.27								
<i>Washdown Operation</i>																						
AE60 Acid-Etch Washprimer	9.76	50.9%	0.00%	50.9%	0.00%	49.1%	0.500	0.250	4.97	4.97	0.62	14.90	2.72	0.66	10.12	75%						
R60F Reducer/Additive	6.92	100%	0.00%	100%	0.00%	100%	0.500	0.250	6.92	6.92	0.87	20.76	3.79	0.00	6.92	75%						
											1.49	35.66	6.51	0.66								
<b>Add worst case coating to all solvents</b>									PM Control Efficiency		90.00%		<b>Uncontrolled</b>		<b>2.34</b>		<b>56.2</b>		<b>10.3</b>		<b>2.38</b>	
													<b>Controlled</b>		<b>2.34</b>		<b>56.2</b>		<b>10.3</b>		<b>0.238</b>	

**Potential Emissions**

METHODOLOGY

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



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

Company Name: Total Fleet Service, LLC  
Address City IN Zip: 4808 Kroemer Road, Fort Wayne, IN 46818  
Permit Number: F 003-23915-00208  
Reviewer: Brian J. Pedersen  
Date: March 29, 2007

Material	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Material (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (lbs/hr)	Potential VOC (lbs/day)	Potential VOC (tons/yr)	Particulate Potential (tons/yr)	VOC solids (lbs/gal)	Transfer Efficiency
<b>Spray Paint Booth (E5)</b>																
Navi Blue	7.67	67.2%	0.00%	67.2%	0.00%	20.8%	1.25	0.25	5.15	5.15	1.61	38.7	7.05	0.86	24.8	75%
Reducer	6.74	100%	0.00%	100%	0.00%	0.00%	1.25	0.25	6.74	6.74	2.11	50.6	9.23	0.00	N/A	75%
<b>R-T-S</b>	<b>7.21</b>	<b>82.5%</b>	<b>0.00%</b>	<b>82.5%</b>	<b>0.00%</b>	<b>10.4%</b>	<b>2.50</b>	<b>0.25</b>	<b>5.95</b>	<b>5.95</b>	<b>3.7</b>	<b>89.2</b>	<b>16.3</b>	<b>0.86</b>	<b>57.18</b>	<b>75%</b>
Navi White	9.30	46.00%	0.00%	46.0%	0.00%	14.2%	1.25	0.25	4.28	4.28	1.34	32.1	5.86	1.72	30.1	75%
Reducer	6.74	100%	0.00%	100%	0.00%	0.00%	1.25	0.25	6.74	6.74	2.11	50.6	9.23	0.00	N/A	75%
<b>R-T-S</b>	<b>8.02</b>	<b>68.7%</b>	<b>0.00%</b>	<b>68.7%</b>	<b>0.00%</b>	<b>7.10%</b>	<b>2.50</b>	<b>0.25</b>	<b>5.51</b>	<b>5.51</b>	<b>3.44</b>	<b>82.6</b>	<b>15.1</b>	<b>1.72</b>	<b>77.59</b>	<b>75%</b>
Wipedown	6.71	100%	0.00%	100%	0.00%	0.00%	0.25	0.25	6.71	6.71	0.419	10.1	1.84	0.00	N/A	100%
<b>Potential Emissions</b>	<b>Add worst case coating to all solvents</b>								PM Control Efficiency	90.00%	<b>Uncontrolled</b>	<b>4.14</b>	<b>99.3</b>	<b>18.1</b>	<b>0.86</b>	
										<b>Controlled</b>	<b>4.14</b>	<b>99.3</b>	<b>18.1</b>	<b>0.086</b>		

**METHODOLOGY**

RTS Density (lbs/gal) = ((Da\*Va)+(Db\*Vb))/(Va+Vb)

RTS Weight % H2O + Organics = ((Wa\*Da\*Va)+(Wb\*Db\*Vb))/((Da\*Va)+(Db\*Vb))

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) \* Flash-off

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

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) \* Flash-off

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) \* Flash-off

Total = R-T-S ( Ready-to-Spray)

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

**Company Name:** Total Fleet Service, LLC  
**Address City IN Zip:** 4808 Kroemer Road, Fort Wayne, IN 46818  
**Permit Number:** F 003-23915-00208  
**Reviewer:** Brian J. Pedersen  
**Date:** March 29, 2007

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Glycol Ethers	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	Glycol Ethers (tons/yr)	Total Emissions (ton/yr)
<b>Spray Paint Booth (E5)</b>										
Navi Blue	7.67	1.25	0.25	23.00%	16.00%	0.00%	2.41	1.68	0.00	4.09
Reducer	6.74	1.25	0.25	0.00%	10.00%	11.00%	0.00	0.923	1.01	1.94
Navi White	9.30	1.25	0.25	17.00%	10.00%	0.00%	2.16	1.27	0.00	3.44
Reducer	6.74	1.25	0.25	0.00%	10.00%	11.00%	0.00	0.923	1.01	1.94
Wipedown	6.71	0.250	0.25	0.00%	50.00%	0.00%	0.00	0.918	0.00	0.92
<b>Total</b>							<b>2.41</b>	<b>3.52</b>	<b>1.01</b>	<b>6.95</b>

**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

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

**Company Name: Total Fleet Service, LLC  
Address City IN Zip: 4808 Kroemer Road , Fort Wayne, IN 46818  
Permit Number: F 003-23915-00208  
Reviewer: Brian J. Pedersen  
Date: March 29, 2007**

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
<b>Spray Paint Booth (E6)</b>																
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%

<b>Potential Emissions</b>	<b>Add worst case coating to all solvents</b>	PM Control Efficiency:	90.0%				
		<b>Uncontrolled</b>	<b>4.57</b>	<b>110</b>	<b>20.0</b>	<b>3.20</b>	
		<b>Controlled</b>	<b>4.57</b>	<b>110</b>	<b>20.0</b>	<b>0.320</b>	

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 Service, LLC  
Address City IN Zip: 4808 Kroemer Road, Fort Wayne, IN 46818  
Permit Number: F 003-23915-00208  
Reviewer: Brian J. Pedersen  
Date: March 29, 2007**

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)
<b>Spray Paint Booth (E6)</b>														
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

**Total      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

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

**Company Name: Total Fleet Service, LLC**  
**Address City IN Zip: 4808 Kroemer Road, Fort Wayne, IN 46818**  
**Permit Number: F 003-23915-00208**  
**Reviewer: Brian J. Pedersen**  
**Date: March 29, 2007**

Insignificant Natural Gas Combustion boilers

Two (2) boilers @ 3.00 mmBTU/hr, each  
 One (1) boiler @ 1.56 mmBTU/hr  
 One (1) boiler @ 0.63 mmBTU/hr

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

8.19

71.7

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.068	0.273	0.022	3.59	0.197	3.01

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

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See page 10 for HAPs emissions calculations.

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

**Company Name: Total Fleet Service, LLC**  
**Address City IN Zip: 4808 Kroemer Road, Fort Wayne, IN 46818**  
**Permit Number: F 003-23915-00208**  
**Reviewer: Brian J. Pedersen**  
**Date: March 29, 2007**

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 0.0021	Dichlorobenzene 0.0012	Formaldehyde 0.075	Hexane 1.8	Toluene 0.0034
Potential Emission in tons/yr	0.0001	0.00004	0.003	0.065	0.0001

HAPs - Metals

Emission Factor in lb/MMcf	Lead 0.0005	Cadmium 0.0011	Chromium 0.0014	Manganese 0.00038	Nickel 0.0021	Total HAPs
Potential Emission in tons/yr	0.00002	0.00004	0.00005	0.00001	0.00008	0.068

Methodology is the same as page 9.

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

**Appendix A: Emission Calculations  
Internal Combustion Engines - Diesel Fuel  
Turbine (>600 HP)**

**Company Name:** Total Fleet Service, LLC  
**Address City IN Zip:** 4808 Kroemer Road, Fort Wayne, IN 46818  
**Permit Number:** F 003-23915-00208  
**Reviewer:** Brian J. Pedersen  
**Application Date:** March 29, 2007

One (1) insignificant emergency generator @ 2200 hp  
 One (1) insignificant emergency generator @ 2400 hp

**Emissions calculated based on output rating (hp)**

Power Output                      Potential Throughput based on 500 hours                      S= 0.50% = WEIGHT % SULFUR  
 Horsepower (hp)                      hp-hr/yr

4600                      2300000.0

Emission Factor in lb/hp-hr	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	0.0007	not provided	0.00004 (.00809S)	0.024 **see below	0.00071	0.00550
Potential Emission in tons/yr	0.805	0.0	0.047	27.6	0.811	6.33

\*\*NOx emission factor: uncontrolled = 0.024 lb/hp-hr, controlled by ignition timing retard = 0.013 lb/hp-hr  
 Note that the PM10 emission factor in lb/hp-hr is not provided in the Supplement B update of AP-42.  
 An average conversion factor of 1hp-hr = 7,000Btu is provided below.

**Methodology**

Potential Throughput (hp-hr/yr) = hp \* 500 hr/yr

Emission Factors are from AP 42 (Supplement B 10/96)Table 3.4-1 and Table 3.4-2

1 hp-hr = 7000 Btu, AP42 (Supplement B 10/96), Table 3.3-1, Footnote a.

Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] \* 8760 hr/yr / (2,000 lb/ton )

Emission (tons/yr) = [Potential Throughput (hp-hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton )

\*No information was given regarding which method was used to determine the PM emission factor or whether condensable PM is included. The PM10 emission factor is filterable and condensable PM10 combined.

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

**Company Name: Total Fleet Service, LLC**  
**Address City IN Zip: 4808 Kroemer Road, Fort Wayne, IN 46818**  
**Permit Number: F 003-23915-00208**  
**Reviewer: Brian J. Pedersen**  
**Date: March 29, 2007**

Insignificant Natural Gas Combustion except boilers

Five (5) air make up units @ 15.67 mmBTU/hr, total  
 Thirty-Seven (37) Tube Heaters @ 0.10 mmBTU/hr, each  
 Forty-Two (42) Space Heaters @ 0.17 mmBTU/hr, each

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
26.5	232.2

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.221	0.882	0.070	11.61	0.639	9.75

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

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See page 13 for HAPs emissions calculations.

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

**Company Name: Total Fleet Service, LLC  
 Address City IN Zip: 4808 Kroemer Road , Fort Wayne, IN 46818  
 Permit Number: F 003-23915-00208  
 Reviewer: Brian J. Pedersen  
 Date: March 29, 2007**

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 0.0021	Dichlorobenzene 0.0012	Formaldehyde 0.075	Hexane 1.8	Toluene 0.0034
Potential Emission in tons/yr	0.0002	0.0001	0.009	0.209	0.0004

HAPs - Metals

Emission Factor in lb/MMcf	Lead 0.0005	Cadmium 0.0011	Chromium 0.0014	Manganese 0.00038	Nickel 0.0021	Total HAPs
Potential Emission in tons/yr	0.00006	0.0001	0.0002	0.00004	0.0002	0.219

Methodology is the same as page 12.

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

**Appendix A: Emissions Calculations  
Waste Oil Combustion**

**Company Name:** Total Fleet Service, LLC  
**Address City IN Zip:** 4808 Kroemer Road, Fort Wayne, IN 46818  
**Permit Number:** F 003-23915-00208  
**Reviewer:** Brian J. Pedersen  
**Date:** March 29, 2007

Seven (7) Insignificant Waste Oil Burners

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	A = Weight % Ash =	1.09%
3.50	220.5755396	L = Weight % Lead =	0.001%
		S = Weight % Sulfur =	0.41%

	Pollutant						
Emission Factor in lb/kgal	PM*	PM10*	SO2	NOx	VOC	CO	Pb
	0.031 (2.8A)	0.00 (ND)	0.4 (100S)	11.0	1.0	1.7	0.00000205 (0.41L)
Potential Emission in tons/yr	0.003	0.00	0.045	1.213	0.110	0.187	0.00000023

\*No information was given in AP-42 regarding whether the PM/PM10 emission factors included filterable and condensable PM.

**Methodology**

Emission Factor Units are lb/1000 gal

ND = No data was available for the PM10 emission factor.

A = weight% ash in fuel, L = weight% lead in fuel, S = weight % sulfur in fuel

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.139 MM Btu

Emission Factors from AP-42, Chapter 1.11, SCC 1-05-001-14 (Supplement B 10/96)

Emission (tons/yr) = Throughput kgals per year x Emission Factor (lb/kgal)/2,000 lb/ton

See page 15 for HAPs calculations.

**Appendix A: Emissions Calculations  
Waste Oil Combustion  
HAPs Calculations**

**Company Name: Total Fleet Service, LLC**  
**Address City IN Zip: 4808 Kroemer Road, Fort Wayne, IN 46818**  
**Permit Number: F 003-23915-00208**  
**Reviewer: Brian J. Pedersen**  
**Date: March 29, 2007**

Seven (7) Insignificant Waste Oil Burners

HAPs - Metals

Emission Factor in lb/kgal	Arsenic 0.0025	Chromium 0.19	Cobalt 0.0057	Nickel 0.05	Phosphorus 0.036
Potential Emission in tons/yr	0.0003	0.021	0.0006	0.006	0.004

HAPs - Organics

Emission Factor in lb/kgal	Naphthalene 0.013	Phenanthrene/ anthracene 0.011	Pyrene 0.0071	Benz(a)anthracene/c hrysene 0.004	Benzo(a) pyrene 0.004	Total HAPs
Potential Emission in tons/yr	0.0014	0.0012	0.0008	0.0004	0.0004	0.036

Methodology is the same as previous page.

The five metal and five organic HAPs with the highest emission factors are presented above.

Additional emission factors for additional HAPs with smaller emission factors are available in AP-42, 5th edition (Supplement B 10/96).

**Abrasive Blasting - Confined**  
**Company Name: Total Fleet Service, LLC**  
**Address City IN Zip: 4808 Kroemer Road, Fort Wayne, IN 46818**  
**Permit Number: F 003-23915-00208**  
**Reviewer: Brian J. Pedersen**  
**Date: March 29, 2007**

**Table 1 - Emission Factors for Abrasives**

Abrasive	Emission Factor	
	lb PM / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	

**Table 2 - Density of Abrasives (lb/ft3)**

Abrasive	Density (lb/ft3)
Al oxides	160
Sand	99
Steel	487

**Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)**

Flow rate of Sand Through a Blasting Nozzle as a Function of Nozzle pressure and Internal Diameter

Internal diameter, in	Nozzle Pressure (psig)							
	30	40	50	60	70	80	90	100
1/8	28	35	42	49	55	63	70	77
3/16	65	80	94	107	122	135	149	165
1/4	109	138	168	195	221	255	280	309
5/16	205	247	292	354	377	420	462	507
3/8	285	355	417	477	540	600	657	720
7/16	385	472	560	645	755	820	905	940
1/2	503	615	725	835	945	1050	1160	1265
5/8	820	990	1170	1336	1510	1680	1850	2030
3/4	1140	1420	1670	1915	2160	2400	2630	2880
1	2030	2460	2900	3340	3780	4200	4640	5060

**Calculations**

*Adjusting Flow Rates for Different Abrasives and Nozzle Diameters*

Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID)  
 FR1 = Sand flow rate (lb/hr) with internal nozzle diameter (ID1) From Table 3 =  
 D = Density of abrasive (lb/ft3) From Table 2 =  
 D1 = Density of sand (lb/ft3) =  
 ID = Actual nozzle internal diameter (in) =  
 ID1 = Nozzle internal diameter (in) from Table 3 =

309
99
99
0.25
0.25

**Flow Rate (FR) (lb/hr) = 309.000 per nozzle**

**PM Emissions**

EF = emission factor (lb PM/ lb abrasive) From Table 1 =  
 FR = Flow Rate (lb/hr) =  
 w = fraction of time of wet blasting =  
 N = number of nozzles =

0.041
309.000
0
1

<b>Uncontrolled PM Emissions =</b>	<b>12.67 lb/hr</b>
	<b>55.49 ton/yr</b>
<b>Controlled PM Emissions =</b>	<b>0.127 lb/hr</b>
	<b>0.555 ton/yr</b>

**Baghouse 90% Control**

**PM10 Emissions**

EF = emission factor (lb PM10/ lb abrasive) From Table 1 =  
 FR = Flow Rate (lb/hr) =  
 w = fraction of time of wet blasting =  
 N = number of nozzles =

0.700
lb/hr
0
1

<b>Uncontrolled PM10 Emissions =</b>	<b>8.87 lb/hr</b>
	<b>38.84 ton/yr</b>
<b>Controlled PM10 Emissions =</b>	<b>0.089 lb/hr</b>
	<b>0.388 ton/yr</b>

**Baghouse 90% Control**

**METHODOLOGY**

Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)

Ton/yr = lb/hr X 8760 hr/yr X ton/2000 lbs

Flow Rate (FR) (lb/hr) = FR1 x (ID/ID1)2 x (D/D1)

E = EF x FR x (1-w/200) x N

w should be entered in as a whole number (if w is 50%, enter 50)