



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: August 1, 2008

RE: Dexter Chassis Group – Plant 56 / 039-24691-00498

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

Notice of Decision: Approval – Effective Immediately

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

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

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

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

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

- (1) the name and address of the person making the request;

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

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

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

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

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**Dexter Chassis Group - Plant 56
2501 Jeanwood Drive
Elkhart, Indiana 46514**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-24691-00498	
Issued by:	Issuance Date: August 1, 2008
<i>Original document signed by</i>	Expiration Date: August 1, 2013
Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	

TABLE OF CONTENTS

A. SOURCE SUMMARY.....	5
A.1	General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]
A.3	Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
A.4	Part 70 Permit Applicability [326 IAC 2-7-2]
B. GENERAL CONDITIONS	7
B.1	Definitions [326 IAC 2-7-1]
B.2	Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]
B.3	Term of Conditions [326 IAC 2-1.1-9.5]
B.4	Enforceability [326 IAC 2-7-7]
B.5	Severability [326 IAC 2-7-5(5)]
B.6	Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
B.7	Duty to Provide Information [326 IAC 2-7-5(6)(E)]
B.8	Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]
B.9	Annual Compliance Certification [326 IAC 2-7-6(5)]
B.10	Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]
B.11	Emergency Provisions [326 IAC 2-7-16]
B.12	Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]
B.13	Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]
B.14	Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]
B.17	Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]
B.18	Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]
B.19	Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]
B.20	Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]
B.21	Source Modification Requirement [326 IAC 2-7-10.5]
B.22	Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]
B.23	Transfer of Ownership or Operational Control [326 IAC 2-7-11]
B.24	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]
B.25	Advanced Source Modification Approval [326 IAC 2-7-5(16)] [326 IAC 2-7-10.5]
B.26	Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]
C. SOURCE OPERATION CONDITIONS	18
Emission Limitations and Standards [326 IAC 2-7-5(1)]	
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]
C.2	Opacity [326 IAC 5-1]
C.3	Open Burning [326 IAC 4-1] [IC 13-17-9]
C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2]
C.5	Fugitive Dust Emissions [326 IAC 6-4]
C.6	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]
C.7	Stack Height [326 IAC 1-7]

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

- C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]
- C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]
- C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)]
[326 IAC 2-7-6(1)]

Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]

- C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]
- C.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]
- C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

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

- C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
[326 IAC 2-6]
- C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
- C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

- C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1. EMISSIONS UNIT OPERATION CONDITIONS..... 25

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

- D.1.1 Prevention of Significant Deterioration (PSD) Minor Limits [326 IAC 2-2]
- D.1.2 Particulate emission limitations, work practices, and control technologies [326 IAC 6-3-2]
- D.1.3 Miscellaneous Metal Coating Operations [326 IAC 8-2-9]
- D.1.4 General Provisions relating to VOC rules: Military Specifications [326 IAC 8-1-7]
- D.1.5 Preventative Maintenance Plan [326 IAC 2-7-4(9)]

Compliance Determination Requirements

- D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4(a)(3)][326 IAC 8-1-2(a)]

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

- D.1.7 Monitoring

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

- D.1.8 Record Keeping Requirement
- D.1.9 Reporting Requirement

D.2. EMISSIONS UNIT OPERATION CONDITIONS..... 29

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

- D.2.1 Particulate Matter from Sources of Indirect Heating [326 IAC 6-2-4]
- D.2.2 Particulate Emission Limitations, Work Practices, and Control Technologies [326 IAC 6-3-2]
- D.2.3 Cold Cleaner Operations [326 IAC 8-3-2]
- D.2.4 Cold Cleaner Degreaser Operation and Control [326 IAC 8-3-5]

Certification 33
Emergency Occurrence Report 34
Quarterly Report..... 36
Quarterly Deviation and Compliance Monitoring Report 37

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary trailer frame fabrication and surface coating manufacturing plant.

Source Address:	2501 Jeanwood Drive, Elkhart, Indiana 46514
Mailing Address:	2501 Jeanwood Drive, Elkhart, IN 46514
General Source Phone Number:	574-266-7356
SIC Code:	3499, 3714
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) spray coating operation, constructed in 2001, exhausting to stacks PB1, PB2, PB3, and BO1, consisting of the following equipment:
 - (1) One (1) paint booth, identified as Booth 1, consisting of four (4) spray guns, with a maximum capacity of 180 units per hour, with emissions controlled by dry filters.
 - (2) One (1) flash-off/cool down area.
 - (3) One (1) natural gas-fired bake/cure oven, identified as BKO-1, with a maximum heat input capacity of 3.5 MMBtu/hr.
- (b) One (1) epoxy and acrylic electro coating operation, constructed in 1998, exhausting to vents EF1 through EF5 and stacks S3 through S6, consisting of the following equipment:
 - (1) Eighteen (18) dip tanks, with an aggregate maximum capacity of 181.2 pounds resin per hour, coating 25.137 units per hour, and 166.8 pounds of aqueous cleaner per hour, with epoxy or acrylic dip application method.
 - (2) One (1) cool down area.
 - (3) One (1) natural gas-fired E-coat cure oven, identified as CO-1, with a maximum heat input capacity of 1.9 MMBtu/hr.
 - (4) One (1) natural gas-fired burn-off oven, identified as BOO-1, with a maximum heat input capacity of 1.6 MMBtu/hr.

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

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

- (a) Two (2) natural gas fired boilers, identified as BO-1 and BO-2, each with a maximum heat input capacity of 7.0 MMBtu/hr., used to provide indirect heat for hot water. [326 IAC 6-2-4]
- (b) One (1) powder coat system, constructed in 2006, exhausting to stacks W-1 through W-4, DOS-2 and COS-2, consisting of the following equipment: [326 IAC 6-3-2]
 - (1) One (1) aqueous wash line with two (2) natural gas-fired process heaters, identified as WH-1 and WH-2, each with a maximum heat input capacity of 2.5 MMBtu/hr. The wash line uses aqueous solutions containing less than or equal to one percent (1%) by weight of VOCs excluding HAPs.
 - (2) One (1) natural gas-fired drying oven, identified as DO-2, with a maximum heat input capacity of 1.5 MMBtu/hr.
 - (3) One (1) powder coating booth, identified as PC-1, with a maximum capacity of coating 3000 square feet of metal per hour. The booth includes one (1) powder recycling unit which exhausts inside the plant.
 - (4) One (1) natural gas-fired cure oven, identified as CO-3, with a maximum heat input capacity of 4.0 MMBtu/hr.
- (c) Activities with emissions equal to or less than the following thresholds: 5 tons per year PM or PM10, 1.0 ton per year of a single HAP, or 2.5 tons per year of any combination of HAPs: Ninety (90) MIG (Metal Inert Gas) welding stations with a capacity of 0.59 lb. of wire per hour per station. [326 IAC 6-3-2]
- (d) Grinding and machining operations controlled with fabric filters with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, and abrasive blasting. [326 IAC 6-3-2]
- (e) The following equipment related to manufacturing activities not resulting in the emissions of HAPs: brazing equipment, cutting torches, and soldering equipment. [326 IAC 6-3-2]
- (f) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]

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

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

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, T039-24691-00498, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-7-7]

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

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

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

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

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

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

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by the "responsible official" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(34).

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

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

and

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

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

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall 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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Northern Regional Office 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
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

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

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
 - (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

- (a) All terms and conditions of permits established prior to T039-24691-00498 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

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

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

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.

- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

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

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

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

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

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

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)

77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b),(c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

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

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

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

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

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as

such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Advanced Source Modification Approval [326 IAC 2-7-5(16)] [326 IAC 2-7-10.5]

- (a) The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.26 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

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

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

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

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

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

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

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

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

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

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

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

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

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

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

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

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

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]

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

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on August 8, 2000.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;

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

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

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

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall

contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

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

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

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

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) 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.20 Compliance with 40 CFR 82 and 326 IAC 22-1

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

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) spray coating operation, constructed in 2001, exhausting to stacks PB1, PB2, PB3, and BO1, consisting of the following equipment:
 - (1) One (1) paint booth, identified as Booth 1, consisting of four (4) spray guns, with a maximum capacity of 180 units per hour, with emissions controlled by dry filters.
 - (2) One (1) flash-off/cool down area.
 - (3) One (1) natural gas-fired bake/cure oven, identified as BKO-1, with a maximum heat input capacity of 3.5 MMBtu/hr.
- (b) One (1) epoxy and acrylic electro coating operation, constructed in 1998, exhausting to vents EF1 through EF5 and stacks S3 through S6, consisting of the following equipment:
 - (1) Fifteen (15) dip tanks, with an aggregate maximum capacity of 181.2 pounds resin per hour, coating 25.137 units per hour, and 166.8 pounds of aqueous cleaner per hour, with epoxy or acrylic dip application method.
 - (2) One (1) cool down area.
 - (3) One (1) natural gas-fired E-coat cure oven, identified as CO-1, with a maximum heat input capacity of 1.9 MMBtu/hr.
 - (4) One (1) natural gas-fired burn-off oven, identified as BOO-1, with a maximum heat input capacity of 1.6 MMBtu/hr.

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

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

D.1.1 PSD Minor Limits [326 IAC 2-2]

The permittee shall comply with the following:

The VOC input to the one (1) paint booth identified as Booth 1, the one (1) electro coat operation, and the one (1) powder coat operation shall be less than 247.23 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit VOC from other emission units at the source, shall limit the VOC from the entire source to less than 250 tons per twelve (12) consecutive month period and render 326 IAC 2-2 (PSD) not applicable to this source.

D.1.2 Particulate emission limitations, work practices, and control technologies [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), particulate from the one (1) paint booth, identified as Booth 1, shall be controlled by dry particulate filters and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

Pursuant to 326 IAC 6-3-2(e)(2), the particulate from the natural gas fired bake/cure oven, identified as BKO-1 shall be less than 0.551 pounds per hour when operating at process weight rates of less than 100 pounds per hour. Due to the variable rates of the BKO-1 the following equations shall be used to determine the particulate limit for differing throughput weights. This limitation is based on the following:

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:

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

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic content (VOC) of coating applied to the fabricated metal surface at the one (1) spray booth, identified as Booth 1, and at the one (1) electro-coating operation shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator, for forced warm air dried coatings.

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

D.1.4 General Provisions Relating to VOC Rules: Military Specifications [326 IAC 8-1-7]

Part of the source's operation consists of surface coating military vehicles, if emission limitations set forth in 326 IAC 8 conflict with military specifications, the owner or operator of a source may petition the commissioner to have military specifications be the controlling limitation. If the commissioner approves the petition, the modified limitation shall be submitted to the U.S. EPA as a SIP revision.

D.1.5 Preventative Maintenance Plan [326 IAC 2-7-4(9)]

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

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC limitations contained in Conditions D.1.1 and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC 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 2-7-5(1)][326 IAC 2-7-6(1)]

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters used to control emissions from the spray coating operation. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks PB1, PB2, PB3, and BO-1 while the booth is 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 2-7-5(3)] [326 IAC 2-7-19]

D.1.8 Record Keeping Requirement

- (a) To document compliance with Conditions D.1.1 and D.1.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Conditions D.1.1 and D.1.3.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on daily 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 volume weighted VOC content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and

- (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily, and monthly inspections.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirement

A quarterly summary of the monthly VOC emissions from the surface coat operations covered by Condition D.1.1 calculated in accordance with Condition D.1.9 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. the report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Insignificant Activities

Emissions Unit Description:

- (a) Two (2) natural gas fired boilers, identified as BO-1 and BO-2, each with a maximum heat input capacity of 7.0 MMBtu/hr., used to provide indirect heat for hot water. [326 IAC 6-2-4]
- (b) One (1) powder coat system, constructed in 2006, exhausting to stacks W-1 through W-4, DOS-2 and COS-2, consisting of the following equipment: [326 IAC 6-3-2]
 - (1) One (1) aqueous wash line with two (2) natural gas-fired process heaters, identified as WH-1 and WH-2, each with a maximum heat input capacity of 2.5 MMBtu/hr. The wash line uses aqueous solutions containing less than or equal to one percent (1%) by weight of VOCs excluding HAPs.
 - (2) One (1) natural gas-fired drying oven, identified as DO-2, with a maximum heat input capacity of 1.5 MMBtu/hr.
 - (3) One (1) powder coating booth, identified as PC-1, with a maximum capacity of coating 3000 square feet of metal per hour. The booth includes one (1) powder recycling unit which exhausts inside the plant.
 - (4) One (1) natural gas-fired cure oven, identified as CO-3, with a maximum heat input capacity of 4.0 MMBtu/hr.
- (c) Activities with emissions equal to or less than the following thresholds: 5 tons per year PM or PM10, 1.0 ton per year of a single HAP, or 2.5 tons per year of any combination of HAPs: Eighty-five (85) MIG (Metal Inert Gas) welding stations with a capacity of 0.59 lb. of wire per hour per station. [326 IAC 6-3-2]
- (d) Grinding and machining operations controlled with fabric filters with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, and abrasive blasting. [326 IAC 6-3-2]
- (e) The following equipment related to manufacturing activities not resulting in the emissions of HAPs: brazing equipment, cutting torches, and soldering equipment. [326 IAC 6-3-2]
- (f) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]

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

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

D.2.1 Particulate Matter from Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, the particulate matter emissions from the two (2) natural gas-fired 7.0 MMBtu/hr boilers, identified as BO-1 and BO-2, used in conjunction with the pretreatment operation, shall each not exceed 0.55 pounds per MMBtu energy input.

D.2.2 Particulate emission limitations, work practices, and control technologies [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate emission limitations, work practices, and control technologies) Due to the variable rates of the powder coat line the following equations shall be used to determine the particulate limit for differing throughput weights. The allowable particulate emission rate from the powder coat operations shall be limited by the following:

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:

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

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

- (b) Pursuant to 326 IAC 6-3-2(e), the allowable particulate emission rate from the eighty-five (85) MIG (Metal Inert Gas) welding stations shall not exceed 0.551 pounds per hour for a process weight rate of less than 100 pounds per hour.
- (c) Pursuant to 326 IAC 6-3-2(e), the allowable particulate emission rate from the insignificant soldering, cutting, brazing, grinding, and machining operations shall not exceed 0.551 pounds per hour for a process weight rate of less than 100 pounds per hour.
- (d) Pursuant to 326 IAC 6-3-2(d), powder coat booth PC-1 shall be controlled by a dry particulate filter, waterwash, or equivalent control device. The powder recycling unit is considered to be equivalent to dry particulate filters. The source shall operate the powder recycling unit in accordance with manufacturer's specifications.

D.2.3 Cold Cleaner Operations [326 IAC 8-3-2]

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

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

D.2.4 Cold Cleaner Degreaser Operation and Control [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility construction of which commenced

after July 1, 1990, shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

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

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

Source Name: Dexter Chassis Group - Plant 56
Source Address: 2501 Jeanwood Drive, Elkhart, Indiana 46514
Mailing Address: 2501 Jeanwood Drive, Elkhart, IN 46514
Part 70 Permit No.: T039-24691-00498

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

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)
- Report (specify)
- Notification (specify)
- Affidavit (specify)
- Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Dexter Chassis Group - Plant 56
Source Address: 2501 Jeanwood Drive, Elkhart, Indiana 46514
Mailing Address: 2501 Jeanwood Drive, Elkhart, IN 46514
Part 70 Permit No.: T039-24691-00498

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name: Dexter Chassis Group - Plant 56
Source Address: 2501 Jeanwood Drive, Elkhart, Indiana 46514
Mailing Address: 2501 Jeanwood Drive, Elkhart, IN 46514
Part 70 Permit No.: T039-24691-00498
Facility: Booth 1
Electro-Coat
Powder Coat
Parameter: Volatile Organic Compounds (VOC)
Limit: <247.23 Tons per 12 month rolling average with compliance determined at the end of each month.

QUARTER :

YEAR:

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

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

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

Attach a signed certification to complete this report.

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

Source Name: Dexter Chassis Group - Plant 56
 Source Address: 2501 Jeanwood Drive, Elkhart, Indiana 46514
 Mailing Address: 2501 Jeanwood Drive, Elkhart, IN 46514
 Part 70 Permit No.: T039-24691-00498

Months: _____ to _____ Year: _____

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Quality
and Northern Regional Office**

Addendum to the Technical Support Document (ATSD) for a
Part 70 Operating Permit Renewal

Source Background and Description
--

Source Name:	Dexter Chassis Group - Plant 56
Source Location:	2501 Jeanwood Drive; Elkhart, IN 46514
County:	Elkhart
SIC Code:	3499, 3714
Operation Permit No.:	T039-24691-00498
Permit Reviewer:	Brandon Snoddy

On April 26, 2008, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Dexter Chassis Group - Plant 56 had applied for a Part 70 Permit Renewal to continue operations. The notice also stated that the OAQ proposed to issue a Part 70 Permit Renewal for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD, but the Permit will have the updated changes. The comments and revised permit language are provided below with deleted language as ~~strikeouts~~ and new language **bolded**.

Comment 1: On May 1, 2008, Mellisa Bucklen submitted the following comments to IDEM, OAQ on the draft Part 70 Permit Renewal:

I am replying to the letter I received regarding Dexter Chassis Group in Elkhart ,IN. I am VERY against this plant changing their permit in any way. On my letter that I received it says that they are not changing anything it is just a renewal, but on review of their permit that is currently on file they are only allowed 19.5 tons per year and this is allowing them to go up to 26.41 tons per year. Their VOC allowance would more than quadrupled. As you may know IDEM can not tell us how many feet of air travel VOC's take to break down. Manor Estates Subdivision is only 300 feet from this plant. I do believe allowing this plant to change anything on their permit is putting this subdivision and their children in harms way. This plant has already been in severe violation with the city and the county of Elkhart. It already omits a horrendous smell that makes several of the neighbors sick. Not to mention that there is a school less than 100 ft from its doors. I am sure if the air quality was checked on a day they are running full protection they would be in violation. I am strongly against this change. This plant doesn't work in harmony with its neighbors and this would just be an added insult to these homeowners!!!

Response to Comment 1:

IDEM and the U.S. Environmental Protection Agency (U.S. EPA) regulate air emissions. Neither agency has the legal authority to regulate odor or require reductions in odor.

Although unusual odors can be an indicator that a facility is not operating correctly, odors can result from a number of actions and aren't necessarily harmful. Additionally, various odors and levels of odor can affect individuals in different ways. IDEM encourages citizens to notify us of unusual odors so our inspectors can investigate and determine if environmental concerns exist.

When constructed in 1998, Venture Welding was issued an air permit called a Construction Permit (CP) by IDEM granting them the authority to operate according to current state and federal law. In 2001 Electro-Coat Technologies was issued a CP/ Minor Source Operating Permit (MSOP) to construct and operate a facility at the same location. In 2003 Venture Technologies/ Electro-Coat Technologies applied for and was issued a Part 70 Operating Permit to account for all emissions emitted from the above mentioned location. The permit was then modified in 2005 and 2006 to allow for additional expansions and administrative changes. One of the administrative changes made was a name change to Dexter Chassis Group - Plant 56. This permit is up for renewal in 2008 and is the document to which your letter refers.

One aspect of the air permit is to limit the amount of emissions released from the plant. Emission limits in the permit are not based on actual emissions, but on the maximum the facility could emit if it operated 24 hours a day, 7 days a week, 365 days a year. Dexter Chassis Group - Plant 56's permit limits the amount of VOC's the plant may emit. This is the only pollutant being emitted at high enough levels to trigger the need for major source permitting.

The federal Clean Air Act requires the U.S. EPA to set National Ambient Air Quality Standards (NAAQS) for six criteria pollutants - carbon monoxide, lead, sulfur dioxide, particulate matter, nitrogen oxides and ground level ozone.

Elkhart County meets all federal standards for clean air.

The U.S. EPA regulates these pollutants and sets standards for permissible levels low enough to protect the health of sensitive persons, such as persons with respiratory or heart disease, children and the elderly. More information is available at <http://www.epa.gov/air/urbanair/6poll.html>.

Currently, particle pollution and ground level ozone are of concern in Indiana and the United States. There is no NAAQS limit for VOC's because they are difficult to measure in ambient air. However, VOCs combine with nitrogen oxides to form ground level ozone, a substance that has a NAAQS limit and is closely monitored in Elkhart County. If Elkhart County were to fall out of attainment for any of the clean air standards, stricter permit limits would be placed on any new or expanding facility.

In the case of Dexter Chassis Group - Plant 56, the company has agreed to take a limit on their VOC emission to limit them below 250 tons per year. This limit was not in the previously issued Part 70 Operating Permit, nor is it required in the current permit. It should also be noted that in the previously issued permit there were no limits set on the amount of VOC's the plant could emit as part of a permit condition. While there may be an increase in the potential of the plant to emit VOC's due to changes in coating materials this does not necessarily translate to an increase in actual VOC emissions. While Dexter Chassis Group - Plant 56's potential to emit in the previously issued permit was calculated at 195.5 tons per year the highest actual emission from the plant was 40 tons per year, well below their potential.

Dexter Chassis Group - Plant 56's permit requires the use of a control device to control exhaust emissions of coarse particulate matter from the paint room.

The paint room emissions are controlled by dry particulate filters. The dry particulate filters are analogous to the filter on a home heating furnace. The filters clean particulate from the paint room exhaust. Dexter Chassis Group - Plant 56 must inspect the filters at least once each day to

replace any non-functional filters and verify that all filters are in place. Each month, the plant must inspect the paint room exhaust, as well as the roof and nearby ground, to make sure there are no overspray emissions. If any overspray problems are noted, the plant must restore the emissions to normal as expeditiously as possible in accordance with good air pollution control practices. To date, no overspray has been observed.

In addition to the control devices, the permit limits the concentration of VOC's in coating materials and adhesives used each day, which helps maintain good air quality. Monthly records of the amounts and concentrations used must be kept onsite for the IDEM inspector to review.

To demonstrate that the facility is in compliance with its VOC emission limit, Dexter Chassis Group - Plant 56 must send IDEM a report after every calendar quarter summarizing its total usage of VOC's. They must also send IDEM a quarterly report stating any deviations from their permit requirements. To date, all quarterly reports have been timely submitted. Reviews have shown the reports to be satisfactory, citing no deviations from permit requirements.

Dexter Chassis Group - Plant 56 must also submit to IDEM an annual compliance certification report signed by a responsible official of the company. This report states that the facility is in compliance with each term of the permit. Dexter Chassis Group - Plant 56 certification has been satisfactorily submitted for 2006 reporting full compliance and their 2007 certification is due in July of 2008.

Based on inspections, review of monitoring data and compliance with Dexter Chassis Group - Plant 56's permit requirements (including control devices and limits on products used), IDEM has concluded that the facility is operating correctly and in a manner not harmful to the environment or health of surrounding citizens.

No changes were made as a result of this comment.

IDEM Contact

- (a) Questions regarding this proposed Part 70 Permit Renewal can be directed to Brandon Snoddy at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 232-8217 or toll free at 1-800-451-6027 extension 2-8217.
- (b) A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Indiana Department of Environmental Management
Office of Air Quality
and Northern Regional Office

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

Source Background and Description

Source Name:	Dexter Chassis Group - Plant 56
Source Location:	2501 Jeanwood Drive; Elkhart, IN 46514
County:	Elkhart
SIC Code:	3499, 3714
Permit Renewal No.:	T039-24691-00498
Permit Reviewer:	Brandon Snoddy

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Dexter Chassis Group - Plant 56 relating to the operation of a trailer frame fabrication and surface coating manufacturing plant.

History

On April 30, 2007, Dexter Chassis Group - Plant 56 submitted an application to the OAQ requesting to renew its operating permit. Dexter Chassis Group - Plant 56 was issued a Part 70 Operating Permit T039-15364-00498 on February 3, 2003.

Permitted Emission Units and Pollution Control Equipment

- (a) One (1) spray coating operation, constructed in 2001, exhausting to stacks PB1, PB2, PB3, and BO1, consisting of the following equipment:
 - (1) One (1) paint booth, identified as Booth 1, consisting of four (4) spray guns, with a maximum capacity of 180 units per hour, with emissions controlled by dry filters.
 - (2) One (1) flash-off/cool down area.
 - (3) One (1) natural gas-fired bake/cure oven, identified as BKO-1, with a maximum heat input capacity of 3.5 MMBtu/hr.

- (b) One (1) epoxy and acrylic electro coating operation, constructed in 1998, exhausting to vents EF1 through EF5 and stacks S3 through S6, consisting of the following equipment: [326 IAC 8-2-9]
 - (1) Eighteen (18) dip tanks, with an aggregate maximum capacity of 181.2 pounds resin per hour, coating 25.137 units per hour, and 166.8 pounds of aqueous cleaner per hour, with epoxy or acrylic dip application method.
 - (2) One (1) cool down area.
 - (3) One (1) natural gas-fired E-coat cure oven, identified as CO-1, with a maximum heat input capacity of 1.9 MMBtu/hr.
 - (4) One (1) natural gas-fired burn-off oven, identified as BOO-1, with a maximum heat input capacity of 1.6 MMBtu/hr.

Insignificant Activities

- (a) One (1) aqueous pretreatment operation, constructed in 1998, exhausting to stacks S1 and S2, and vents EF1 and EF2, consisting of the following equipment:
 - (1) Three (3) dip tanks, with an aggregate maximum capacity of 166.8 pounds of aqueous cleaner, aqueous rinse, and phosphate solution per hour.
 - (2) Two (2) natural gas fired boilers, identified as BO-1 and BO-2, each with a maximum heat input capacity of 7.0 MMBtu/hr., used to provide indirect heat for hot water. [326 IAC 6-2-4]
- (b) One (1) powder coat system, constructed in 2006, exhausting to stacks W-1 through W-4, DOS-2 and COS-2, consisting of the following equipment: [326 IAC 6-3-2]
 - (1) One (1) aqueous wash line with two (2) natural gas-fired process heaters, identified as WH-1 and WH-2, each with a maximum heat input capacity of 2.5 MMBtu/hr. The wash line uses aqueous solutions containing less than or equal to one percent (1%) by weight of VOCs excluding HAPs.
 - (2) One (1) natural gas-fired drying oven, identified as DO-2, with a maximum heat input capacity of 1.5 MMBtu/hr.
 - (3) One (1) powder coating booth, identified as PC-1, with a maximum capacity of coating 3000 square feet of metal per hour. The booth includes one (1) powder recycling unit which exhausts inside the plant.
 - (4) One (1) natural gas-fired cure oven, identified as CO-3, with a maximum heat input capacity of 4.0 MMBtu/hr.
- (c) Activities with emissions equal to or less than the following thresholds: 5 tons per year PM or PM10, 1.0 ton per year of a single HAP, or 2.5 tons per year of any combination of HAPs: Ninety (90) MIG (Metal Inert Gas) welding stations with a capacity of 0.59 lb. of wire per hour per station. [326 IAC 6-3-2]
- (d) Grinding and machining operations controlled with fabric filters with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, and abrasive blasting. [326 IAC 6-3-2]
- (e) The following equipment related to manufacturing activities not resulting in the emissions of HAPs: brazing equipment, cutting torches, and soldering equipment. [326 IAC 6-3-2]
- (f) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (g) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (h) Natural gas-fired combustion sources with heat input equal to or less than 10 MMBtu per hour: small curing ovens, space heaters, make up heaters, and water heaters.
- (i) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than 6 MMBtu per hour.
- (j) Equipment powered by internal combustion engines of capacity equal to or less than 0.5 MMBtu per hour except where total capacity of equipment operated by one stationary source exceeds 2 MMBtu per hour.

- (k) Combustion source flame safety purging on startup.
- (l) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (m) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (n) Cleaners and solvents characterized as follows:
 - (1) Having a vapor pressure equal to or less than 2kPa; 15mm Hg; or 0.3 psi measured at 38°C (100°F) or;
 - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (o) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (p) Activities associated with the treatment of wastewater streams with a oil and grease content less than or equal to 1% by volume.
- (q) Closed loop heating and cooling systems.
- (r) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (s) Any operation using aqueous solutions containing less than 1% by weight VOCs excluding HAPs.
- (t) Heat exchanger cleaning and repair.
- (u) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.
- (v) Process vessel degassing and cleaning to prepare for internal repairs.
- (w) Filter or coalescer media changeout.
- (x) Purging of gas lines and vessels that are related to the routine maintenance and repair of buildings, structures, or vehicles at the source where emissions from those activities would not be associated with any production process.
- (y) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (z) On-site fire and emergency response training approved by the department.

Existing Approvals

Since the issuance of the Part 70 Operating Permit T039-15364-00498 on February 3, 2003, the source has constructed or has been operating under the following approvals as well:

- (a) First Review Request No. RR039-17362-00498 issued on June 7, 2003;
- (b) First Significant Permit Modification No. SPM039-19563-00498 issued on January 14, 2005;

- (c) First Minor Permit Modification No. MPM039-21696-00498, issued on October 27, 2005, and;
- (d) Second Significant Permit Modification No. SPM039-22106-00498, issued on November 14, 2006.

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

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations. (page 1 - 8)

County Attainment Status

The source is located in Elkhart County

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective July 19, 2007, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM2.5.	

Note: On September 6, 2007 the Indiana Air Pollution Control Board finalized a temporary emergency rule to redesignate Allen, Clark, Elkhart, Floyd, LaPorte, St. Joseph as attainment for the 8-hour ozone standard.

- (a) Volatile or organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx emissions are considered when evaluating the rule applicability relating to ozone. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (b) Elkhart County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions. See the State Rule Applicability – Entire Source section.
- (c) Elkhart County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

- (d) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD or Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	26.48
PM-10	27.92
SO ₂	0.2
VOC	250.67
CO	26.5
NO _x	31.5

HAPs	tons/year
Benzene	Negligible
Cadmium	Negligible
Chromium Compounds	5.51
Cobalt Compounds	1.26
Dichlorobenzene	Negligible
Formaldehyde	0.02
Hexane	0.57
Lead	Negligible
Manganese	Negligible
Magnesium	0.12
Nickel	Negligible
Total	Less than 25
Single HAP (Chromium Compounds)	Less than 10

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of Volatile Organic Compounds (VOCs) is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.

Fugitive Emissions

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

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2006 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	None Reported
PM-10	3
SO ₂	0
VOC	40
CO	1
NO _x	2
HAP	None Reported

Part 70 Permit Conditions

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

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

Potential to Emit After Issuance

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

Process/Emission Unit	Potential to Emit (tons/year)						
	PM	PM10	SO ₂	VOC	CO	NO _x	HAPs
Surface Coat Operations	4.83	4.83	-	<247.23*	-	-	6.77
Solvent Usage	-	-	-	1.94	-	-	Negligible
Natural Gas Combustion	0.6	2.4	0.2	1.8	26.5	31.5	0.602
Welding Operations	0.44	0.08	-	-	-	-	0.12
Total	7.08	8.52	0.2	<250*		31.5	Single <10 Total <25
Title V Source Threshold	100	100	100	100	100	100	Single < 10 Total <25

* The source has agreed to limit the VOC emissions to less than 250 tons per year in order to remain minor for PSD.

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.

- (b) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Federal Rule Applicability

The following federal rules are applicable to the source:

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to existing emission units that involve a pollutant-specific emission unit and meet the following criteria:
- (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant; and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each existing emission unit and specified pollutant subject to CAM:

Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Booth 1 - PM	Dry Filter	N	24.16	4.83	100	N	N
Booth 1 - PM ₁₀	Dry Filter	N	24.16	4.83	100	N	N
Booth 1 - VOCs	None	Y	247.9	247.23	100	N	N
Booth 1 - Chromium Compounds	Dry Filter	N	5.51	1.10	100	N	N
Booth 1 - Cobalt Compounds	Dry Filter	N	1.26	0.25	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the existing units as part of this Part 70 permit renewal.

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))
 This source, constructed in 1998, after the applicability date of August 7, 1980, is not considered a major source because it is not one of the 28 listed source categories and has agreed to limit

VOC emissions from the surface coat operations to less than 247.23 tons per twelve (12) consecutive month average, with compliance determined at the end of each month.

Compliance with the above limit, combined with the potential to emit VOC from other emission units at the source, shall limit the VOC from the entire source to less than 250 tons per twelve (12) consecutive month period and render 326 IAC 2-2 not applicable.

326 IAC 2-3 (Emission Offset)

This source, constructed in 1998, is located in Elkhart County which is designated as attainment for all criteria pollutants, therefore, the requirements of 326 IAC 2-3 (Emission Offset) are not applicable to this source.

326 IAC 2-4.1 (New Source Toxics Control)

This source, constructed in 1998, has a source-wide potential to emit any single HAP, or any combination of HAP's less than ten (10) tons and twenty-five (25) tons per year, respectively. Therefore, the requirements of 326 IAC 2-4.1 (New Source toxics Control) are not applicable to this source.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit under 326 IAC 2-7, Part 70 program. Pursuant to this rule, the Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. In accordance with the compliance schedule specified in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2004 and every three (3) years after. Therefore, the next emission statement for this source must be submitted by July 1, 2010. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), 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.

326 IAC 6-4 (Fugitive Dust Emissions)

The source 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).

326 IAC 6-5 (Fugitive PM/PM10 Emission Limitations)

This source has fugitive emissions greater than 25 tons per year. Paved roads are the only source of fugitive particulate matter at this source and generate an estimated 0.44 tons per year of fugitive particulate matter from vehicular traffic. As a result, the requirements of 326 IAC 6-5 are not applicable to this source.

326 IAC 6.5-1 (Particulate Matter Limitations Except Lake County)

The source is not located in Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vandenburg, Vigo, or Wayne County. Therefore, the requirements of 326 IAC 6.5-1 are not applicable to this source.

State Rule Applicability – Individual Facilities

326 IAC 6-2-4 (Particulate Matter from Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-4, the particulate matter emissions from the two (2) natural gas-fired 7.0 MMBtu/hr boilers used in the pretreatment operation, shall each not exceed 0.55 pounds per MMBtu energy input.

This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. (Q = 14.0 MMBtu/hr).

$$Pt = 0.55 \text{ lb/MMBtu}$$

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

- (a) Pursuant to 326 IAC 6-3-2(d) (Particulate emission limitations, work practices, and control technologies), the dry particulate filters for particulate control shall be operated in accordance with manufacturer's specifications and control emissions from the one (1) spray booth, identified as Booth - 1, and the one (1) powder coat system at all times when these units are in operation.

If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

- (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

- (b) Pursuant to 326 IAC 6-3-2(e) (Particulate emission limitations, work practices, and control technologies), the following emission units located at the source shall not exceed the associated PM emission limitations for process weight rates of less than one hundred (100) pounds per hour:

Emission Unit ID	Emission Unit Description	Emission Limit (lbs./hour)
DO-2	Natural gas fired drying oven	0.551
CO-3	Natural gas fired cure oven	0.551
Insignificant Activities		
90 Welding stations	Metal Inert Gas (MIG) welding stations with a wire capacity of 0.59 lb. per hour per station	0.551 (each station)
Grinding & machining operations	Controlled with fabric filters with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute.	0.551
Cutting torches, brazing, and soldering equipment	No HAP emissions	0.551

PM emissions limitations for the one (1) powder coat operation, and one (1) natural gas-fired bake/cure oven, identified as BKO-1 shall be determined by one of the following equations depending upon process weight:

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:

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

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coating delivered to the applicator at the one (1) spray booth, identified as Booth - 1, and the electro-coat operations shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings .

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

The Permittee is using compliant coatings in the paint booths to comply with 326 IAC 8-2-9.

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

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

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; and
- (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.

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

- (a) Pursuant to 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control), or cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.

- (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) The owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Compliance Determination and Monitoring Requirements

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

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

The compliance monitoring requirements applicable to this source are as follows:

1. The spray coating operation has applicable compliance monitoring conditions as specified below:
 - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters used to control emissions from the spray coating operation. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks PB1, PB2, PB3, and BO-1 while the booth is 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.

These monitoring conditions are necessary because the dry filters must operate properly to ensure compliance with 326 IAC 6-3-2 and 326 IAC 2-7 (Part 70).

Recommendation

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

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

An application for the purposes of this review was received on April 30, 2007.

Conclusion

The operation of this trailer frame fabrication and surface coating manufacturing plant shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. 039-24691-00499.

**Appendix A: Emissions Calculations
Summary Sheet**

Company Name: Dexter Chassis Group - Plant 56
Address City IN Zip: 2501 Jeanwood Drive, P.O. Box 189, Elkhart, IN 46515
Permit Number: T039-24691-00498
Reviewer: Brandon Snoddy
Date: September 4, 2007

Uncontrolled Potential Emissions							
Emission Unit	PM (tons/year)	PM₁₀ (tons/year)	SO₂ (tons/year)	VOC (tons/year)	CO (tons/year)	NO_x (tons/year)	HAPs (tons/year)
Surface Coat Operations	24.16	24.16	-	247.9	-	-	6.77
Solvent Usage	-	-	-	0.97	-	-	-
Natural Gas Combustion	0.6	2.4	0.2	1.8	26.5	31.5	0.602
Welding Operations	1.28	1.28	-	-	-	-	0.12
Fugitive PM Emissions	0.44	0.08	-	-	-	-	-
Total Uncontrolled Emissions	26.48	27.92	0.2	250.67	26.5	31.5	7.492

Limited Potential Emissions							
Emission Unit	PM (tons/year)	PM₁₀ (tons/year)	SO₂ (tons/year)	VOC (tons/year)	CO (tons/year)	NO_x (tons/year)	HAPs (tons/year)
Surface Coat Operations	4.83	4.83	-	247.23*	-	-	1.35
Solvent Usage	-	-	-	0.97	-	-	-
Natural Gas Combustion	0.6	2.4	0.2	1.8	26.5	31.5	0.602
Welding Operations	1.28	1.28	-	-	-	-	0.12
Fugitive PM Emissions	0.44	0.08	-	-	-	-	-
Total Limited Emissions	7.15	8.59	0.2	<250*	26.5	31.5	2.072

* The source has agreed to limit the VOC emissions from the surface coat operations to avoid being a major source for PSD.

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

Company Name: Dexter Chassis Group - Plant 56
Address City IN Zip: 2501 Jeanwood Drive, P.O. Box 189, Elkhart, IN 46515
Permit Number: T039-24691-00498
Reviewer: Brandon Snoddy
Date: September 4, 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)	Control Efficiency	Controlled Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
E-Coat Line							E-Coat											
Acrylics (as supplied)							Unit = 1,000 ft.2											
Powercron CR935 (Resin)	8.7	76.50%	68.5%	8.0%	71.1%	23.50%	3.78600	15.400	2.39	0.69	40.35	968.32	176.72	0.00	N/A	0.00	2.94	100%
Powercron 639J (Paste)	9.5	58.00%	45.7%	12.3%	51.8%	33.00%	0.32500	15.400	2.42	1.17	5.85	140.36	25.62	0.00	N/A	0.00	3.54	100%
Epoxy (as supplied)																		
Powercron CR590	9.1	61.50%	59.6%	1.9%	64.8%	33.00%	1.88000	18.390	0.49	0.17	5.94	142.68	26.04	0.00	N/A	0.00	0.52	100%
Spray Coat Line							Spray Coat											
CARC (ID-B01)							Unit = 1 part											
Dynaspec Black (as applied)	9.8	39.79%	11.3%	28.5%	16.7%	43.17%	0.02000	180.000	3.34	2.78	10.02	240.50	43.89	23.17	80%	4.63	6.45	75%
Dynaspec Tan (as applied)	10.1	39.32%	10.9%	28.4%	16.7%	43.33%	0.02000	180.000	3.45	2.87	10.34	248.09	45.28	24.16	80%	4.83	6.63	75%
Hentzen Green 383 (as applied)	9.8	40.89%	11.3%	29.6%	16.7%	40.95%	0.02000	180.000	3.47	2.89	10.40	249.69	45.57	22.74	80%	4.55	7.06	75%

Add worst case coating to all solvents

Uncontrolled PTE

56.60

1358.37

247.90

24.16

Controlled PTE

56.60

1358.37

247.90

4.83

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: Emissions Calculations
VOC
Solvent

Company Name: Dexter Chassis Group - Plant 56
Address City IN Zip: 2501 Jeanwood Drive, P.O. Box 189, Elkhart, IN 46515
Permit Number: T039-24691-00498
Reviewer: Brandon Snoddy
Date: September 4, 2007

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/year)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC tons per year	lb VOC/gal solids
Dowanol PPH Glycol Ether	8.8	100.00%	0.0%	100.0%	0.0%	0.00%	220.00000	8.80	8.80	0.97	N/A

Add worst case coating to all solvents

Uncontrolled PTE

0.97

METHODOLOGY

Controlled PTE

0.97

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 Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/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: Emissions Calculations

**HAP's
Surface Coating Operations**

Company Name: Dexter Chassis Group - Plant 56
Address City IN Zip: 2501 Jeanwood Drive, P.O. Box 189, Elkhart, IN
Permit Number: T039-24691-00498
Reviewer: Brandon Snoddy
Date: September 4, 2007

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Chromium Compounds	Weight % Cobalt Compounds	Chromium Compound Emissions uncontrolled (ton/yr)	Chromium Compound Emissions controlled (ton/yr)	Cobalt Compound Emissions uncontrolled (ton/yr)	Cobalt Compound Emissions controlled (ton/yr)	Transfer Efficiency**	Control Efficiency**
E-Coat Line											
Powercron CR935 (Resin)	This product contains no Hazardous Air Pollutants (HAPs)										
Powercron 639J (Paste)	This product contains no Hazardous Air Pollutants (HAPs)										
Powercron CR590	This product contains no Hazardous Air Pollutants (HAPs)										
Spray Coat Line											
Dynaspec Black	9.8	0.020000	180.00	0.00%	0.00%	0.00	0.00	0.00	0.00	75%	80%
Dynaspec Tan	10.1	0.020000	180.00	5.00%	0.00%	1.99	0.40	0.00	0.00	75%	80%
Hentzen Green 383	9.8	0.020000	180.00	9.11%	3.26%	3.52	0.70	1.26	0.25	75%	80%
Solvents											
Dowanol PPH Glycol Ethe	This product contains no Hazardous Air Pollutants (HAPs)										

Uncontrolled PTE	5.51	1.26	
Controlled PTE		1.10	0.25
Total uncontrolled HAPs from surface coating		6.77	
Total controlled HAPs from surface coating		1.35	

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*0.25 (transfer efficiency)*0.20 (control efficier
 *Annual usage is 220 gallons. Emissions for Ethylene Glycol was calculated at a rate of 220 gallons per year total usage.
 **Chromium and Cobalt compound HAPs are part of the solid content of the coating used, therefore, the transfer and control efficiency is utilized when calculating the emissions for these

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

Company Name: Dexter Chassis Group - Plant 56
Address City IN Zip: 2501 Jeanwood Drive, Elkhart IN 46514
Permit Number: T039-24691-00498
Reviewer: Brandon Snoddy
Date: September 17, 2007

Emission Unit ID	BTU Rating MMBtu/hr
BCO-1	1.6
BKO-1	3.5
BO-1	7.0
BO-2	7.0
BOO-1	0.7
CO-1	1.9
CO-3	4.0
DO-2	1.5
WH-1	2.5
WH-2	2.5
<u>Building comfort & utility units</u>	<u>40.6</u>
Total	72.8

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
72.8	637.7

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.6	2.4	0.2	31.9	1.8	26.8

*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

Appendix A: Emissions Calculations

Welding

Company Name: Dexter Chassis Group - Plant 56
Address City IN Zip: 2501 Jeanwood Drive, Elkhart IN 46514
Permit Number: T039-24691-00498
Reviewer: Brandon Snoddy
Date: September 17, 2007

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING											
Metal Inert Gas (MIG)(carbon steel)	90	0.59	0.0055	0.0005			0.292	0.027	0.000	0.000	0.027
EMISSION TOTALS											
Potential Emissions lbs/hr							0.29	0.03			0.03
Potential Emissions lbs/day							7.01	0.64			0.64
Potential Emissions tons/year							1.28	0.12			0.12

METHODOLOGY

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

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

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick
 Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)
 Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" t
 Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
 Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
 Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lb

Appendix A: Emissions Calculations
Fugitive PM Emissions

Company Name: Dexter Chassis Group - Plant 56
Address City IN Zip: 2501 Jeanwood Drive, P.O. Box 189, Elkhart, IN 46515
Permit Number: T039-24691-00498
Reviewer: Brandon Snoddy
Date: September 4, 2007

Paved Roads

Maximum Vehicular Speed: 10 mph
Average Distance of Haul: 0.12 miles
Weighted Average Gross Weight: 26.7 tons
Number of One Way trips per hour: 3 trips/hour

Calculations:

$$E = k(sL/2)^{0.65} * (W/3)^{1.5}$$

E = Emission factor (lbs/vehicle miles traveled(VMT))
k = 0.016 particle size multiplier for PM-10
0.082 particle size multiplier for PM
sL = 1.5 road surface silt content (g/m²)
W = 26.7 weighted average vehicle weight (tons)

source: AP-42, chapter 13.2.1, p. 13.2.1-6.

$$VMT = 481.8 \text{ (miles/yr)}$$

PM

$$E = 1.805879 \text{ lbs/VMT}$$

Potential PM Emissions (ton/yr) = Emission factor (lbs/VMT) * VMT / 2000 (lbs/ton)

Potential PM Emissions (ton/yr) = 0.44 tpy

PM-10

$$E = 0.352367 \text{ lbs/VMT}$$

Potential PM-10 Emissions (ton/yr) = Emission factor (lbs/VMT) * VMT / 2000 (lbs/ton)

Potential PM-10 Emissions (ton/yr) = 0.08 tpy