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: April 15, 2008

RE: Michiana Star Holdings, LCC, dba MEDIX Specialty Vehicles, Inc. / 039-25465-00357

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 according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot12/03/07

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Minor Source Operating Permit Renewal
OFFICE OF AIR QUALITY

Michiana Star Holdings, LLC
d/b/a MEDIX Specialty Vehicles, Inc.
3008 Mobile Dr.
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.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: M039-25465-00357	
Issued by: *Original document signed by* Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: April 15, 2008 Expiration Date: April 15, 2018

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 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 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary an ambulance manufacturing facility.

Source Address:	3008 Mobile Dr., Elkhart, IN, 46514
Mailing Address:	3008 Mobile Dr., Elkhart, IN 46514
General Source Phone Number:	574-266-0911
SIC Code:	3714
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

(a) two (2) surface coating operations, constructed in 2007, identified as Spray Booth 1 (SB1) and Spray Room 1 (SR1), respectively, located in the spray coating building, with the particulate emissions from each area controlled by a dry filter system, and the emissions exhausted through Stacks E1, E2, and E3;

(b) one (1) 11.165 MMBtu/hr natural gas fired air make-up unit, constructed in 1996, identified as H1, located in the spray coating building;

(c) four (4) 0.1 MMBtu/hr natural gas fired radiant heaters, constructed in 1996, identified as H6, H7, H8, and H9, respectively, located in the warehouse building; and

(d) four (4) 0.3 MMBtu/hr natural gas fired space heaters, constructed in 1996, identified as H2, H3, H4, and H5, respectively, located in the warehouse building.

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

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 2-1.1-1) shall prevail.

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, M039-25465-00357, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability

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

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

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

B.7 Duty to Provide Information

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

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification

(a) Where specifically designated by this permit or required by an applicable requirement,

any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

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

(c) The notification 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.

B.10 Preventive Maintenance Plan [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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to M039-25465-00357 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

B.12 Termination of Right to Operate [326 IAC 2-6.1-7(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 ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.13 Permit Renewal [326 IAC 2-6.1-7]

(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 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

(b) A timely renewal application is one that is:

(1) Submitted at least ninety (90) days 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 2-6.1 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.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be

submitted to:

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

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.15 Source Modification Requirement

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

B.16 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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 permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

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

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

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

(c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.18 Annual Fee Payment [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.

(b) 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.19 Credible Evidence [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 2-6.1-5(a)(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 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

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

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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 2-6.1-5(a)(2)]

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

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required 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]

(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

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.14 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]

(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.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) 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

(b) 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.

(c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) 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.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-6.1]:

(a) two (2) surface coating operations, constructed in 2007, identified as Spray Booth 1 (SB1) and Spray Room 1 (SR1), respectively, located in the spray coating building, with the particulate emissions from each area controlled by a dry filter system, and the emissions exhausted through Stacks E1, E2, and E3;

(b) one (1) 11.165 MMBtu/hr natural gas fired air make-up unit, constructed in 1996, identified as H1, located in the spray coating building;

(c) four (4) 0.1 MMBtu/hr natural gas fired radiant heaters, constructed in 1996, identified as H6, H7, H8, and H9, respectively, located in the warehouse building; and

(d) four (4) 0.3 MMBtu/hr natural gas fired space heaters, constructed in 1996, identified as H2, H3, H4, and H5, respectively, located in the warehouse building.

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

Emission Limitations and Standards

D.1.1 Volatile Organic Compound (VOC) Input Limit [326 IAC 8-1-6]

The Permittee shall limit the combined input of VOC delivered to the applicators from surface coating operations SB1 and SR1 to less than twenty-five (25) tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month, including coatings, dilution solvents, and cleaning solvents. Compliance with this limit renders the provisions of 326 IAC 8-1-6 (New Facilities; VOC Reduction Requirements) not applicable.

D.1.2 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d) (Particulate Emission Limitations, Work Practices and Control Technologies),

(a) Particulate from the surface coating operations SB1 and SR1 shall be controlled by dry filters and the Permittee shall operate the control device in accordance with manufacturer's specifications.

(b) 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.

(c) 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.

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of

this permit, is required for this emissions unit and any control devices.

Compliance Determination Requirements

D.1.4 Operation of Control Equipment

In order to comply with Condition D.1.2, the dry filters for particulate control shall be in operation at all times when the surface coating operations SB1 and/or SR1 are in operation.

D.1.5 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC usage limit contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) 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.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.6 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used.

(A) Records shall include purchase orders, invoices, material safety data sheets (MSDS) or other documentation necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(b) To document compliance with the PM overspray limit of Condition D.1.2, the owner or operator 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.1.7 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

Indiana Department of Environmental Management
Office of Air Quality
Compliance Data Section

Quarterly Report

Company Name: Michiana Star Holdings, LLC d/b/a MEDIX Specialty Vehicles, Inc
Location: 3008 Mobile Drive, Elkhart, Indiana 46514
Permit No.: 039-25465-00357
Source/Facility: Spray Booth 1 (SB1) and Spray Room 1 (SR1)
Pollutant: volatile organic compounds (VOC)
Limit: combined input of VOC delivered to the applicators from surface coating operations SB1 and SR1 shall be less than twenty-five (25) tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month, including coatings, dilution solvents, and cleaning solvents

Month: _____ **Year:** _____

	(A) Input VOCs This Month (tons)	(B) Input VOCs Last 11 Months (tons)	(A) + (B) Total Input VOCs (tons)
Spray Booth 1 (SB1)			
Spray Room 1 (SR1)			
		Total	

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Michiana Star Holdings, LLC d/b/a MEDIX Specialty Vehicles, Inc.
Address:	3008 Mobile Dr.
City: 46514	Elkhart, IN
Phone #:	574-266-0911
MSOP #:	M039-25465-00357

I hereby certify that Michiana Star Holdings, LLC d/b/a MEDIX Specialty Vehicles, Inc. is :

☐ still in operation.

☐ no longer in operation.

I hereby certify that Michiana Star Holdings, LLC d/b/a MEDIX Specialty Vehicles, Inc. is :

☐ in compliance with the requirements of MSOP M039-25465-00357.

☐ not in compliance with the requirements of MSOP M039-25465-00357.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-6865

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100 TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF "MALFUNCTION" AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY:_____PHONE NO. ( )_____
LOCATION: (CITY AND COUNTY)_____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP:_____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:_____
_____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER:_____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____

_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____
_____
_____

MALFUNCTION REPORTED BY:_____TITLE:_____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____
*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

_____

_____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

MINOR SOURCE OPERATING PERMIT (MSOP)
CERTIFICATION

Company Name: Michiana Star Holdings, LLC d/b/a MEDIX Specialty Vehicles, Inc
Location: 3008 Mobile Drive, Elkhart, Indiana 46514
Mailing Address: 3008 Mobile Drive, Elkhart, Indiana 46514
MSOP No.: 039-25465-0035

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 Notification

☐ Test Result (specify) _____

☐ Report (specify) _____

☐ Notification (specify) _____

☐ Affidavit (specify) _____

☐ Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Signature:
Printed Name:
Title/Position:
Date:

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Minor Source Operating Permit Renewal

Source Background and Description

Source Name:	Michiana Star Holdings, LLC. d/b/a MEDIX Specialty Vehicles, Inc.
Source Location:	3008 Mobile Drive, Elkhart, Indiana 46514
County:	Elkhart
SIC Code:	3714
Permit Renewal No.:	M039-25465-00357
Permit Reviewer:	Teresa Freeman

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Michiana Star Holdings, LLC, relating to the operation of an ambulance manufacturing facility.

History

On October 29, 2007, Michiana Star Holdings, LLC submitted an application to the OAQ requesting to renew its operating permit. Michiana Star Holdings, LLC was issued a MSOP on March 21, 2002.

On October 29, 2007, the Office of Air Quality (OAQ) issued to Michiana Star Holdings, LLC, Second Notice-Only Change (039-25190-00357) to MSOP No. 039-15151-00357 to indicate a name change to include MEDIX Specialty Vehicles, Inc., to replace two (2) spray surface coating booths with one (1) surface coating room, to change the surface coating materials being used, and to change the source description to an ambulance manufacturing facility.

Permitted Emission Units and Pollution Control Equipment

This stationary source is approved to operate the following emissions units and pollution control devices:

(a) two (2) surface coating operations, constructed in 2007, identified as Spray Booth 1 (SB1) and Spray Room 1 (SR1), respectively, located in the spray coating building, with the particulate emissions from each area controlled by a dry filter system, and the emissions exhausted through Stacks E1, E2, and E3;

(b) one (1) 11.165 MMBtu/hr natural gas fired air make-up unit, constructed in 1996, identified as H1, located in the spray coating building;

(c) four (4) 0.1 MMBtu/hr natural gas fired radiant heaters, constructed in 1996, identified as H6, H7, H8, and H9, respectively, located in the warehouse building; and

(d) four (4) 0.3 MMBtu/hr natural gas fired space heaters, constructed in 1996, identified as H2, H3, H4, and H5, respectively, located in the warehouse building.

Existing Approvals

Since the issuance of MSOP 039-15151-00357 on March 21, 2002, the source has constructed or has been operating under the following approvals as well:

(a) MSOP-Notice Only Change No. 039-22577-00357 issued on February 9, 2006; and

(b) MSOP-Notice Only Change No. 039-25190-00357 issued on October 29, 2007.

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

An enforcement referral is being submitted for failure to submit a timely application pursuant to 326 IAC 2-6.1-3.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM_{10}	attainment
$PM_{2.5}$	attainment
SO_2	attainment
NOx	attainment
8-hour Ozone	attainment
CO	attainment
Lead	attainment

(a) Ozone Standards

(1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

(2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph as attainment for the 8-hour ozone standard.

(3) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC 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 and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM2.5
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 PM2.5 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.

(c) Other Criteria Pollutants
Elkhart County has been classified as attainment or unclassifiable in Indiana for PM10, SO_2, CO and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(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, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Unrestricted Potential Emissions

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants is less than 100 tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.

(c) 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.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

(b) 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 2-4.1-1 (New Source Toxics Control)
Spray Booth 1 (SB1) and Spray Room 1 (SR1) are not subject to 326 IAC 2-4.1-1 (New Source Toxic Control) because the single HAP usage is less than 10 tons per year and total HAPs usage of less than 25 tons per year.

326 IAC 2-6 (Emission Reporting)
This source is located in Elkhart County and the potential to emit of each criteria pollutant is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

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

State Rule Applicability – Individual Facilities

326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices and Control Technologies)
Pursuant to 326 IAC 6-3-2(d) (Particulate Emission Limitations, Work Practices and Control Technologies:

(a) Particulate from Spray Booth 1 (SB1) and Spray Room 1 (SR1) shall be controlled by dry filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

(b) 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.

(c) 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.

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)
The paint booths are not subject to 326 IAC 8-2-9 because the coatings are applied to plastic parts.

326 IAC 8-1-6 BACT Requirements
The spray booths are considered one process because the surface coating operations SB1 and SR1 apply the same coatings, and the plastic parts can be coated in any one or both at the same time.

The Permittee shall limit the combined input of VOC delivered to the applicators from surface coating operations SB1 and SR1 shall use less than twenty-five (25) tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month, including coatings, dilution solvents, and cleaning solvents. Compliance with this limit renders the provisions of 326 IAC 8-1-6 (New Facilities; VOC Reduction Requirements) not applicable.

Compliance Determination and Monitoring Requirements

Compliance Determination Requirements

The Compliance Determination Requirements applicable to the surface coating operations are as follows:

(a) Emission Controls Operation
The dry filter systems of the surface coating operations SB1 and SR1 shall be in operation at all times when SB1 and/or SR1 are in operation.

These requirements are required to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

(b) Compliance with the VOC usage limit 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.

Recommendation

The staff recommends to the Commissioner that the MSOP 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 October 30, 2007.

Conclusion

The operation of this an ambulance manufacturing facility shall be subject to the conditions of the attached MSOP Renewal No. 039-25465-00357.

Appendix A: Emissions Calculations
Summary Emissions

Company Name: Michiana Star Holdings, LLC, d/b/aMEDIX Specialty Vehicles, Inc.
Address City IN Zip: 3008 Mobile Drive, Elkhart, IN 46514
Prepared by: D&B Environmental Services, Inc.
Verified by: Teresa Freeman
Permit ID: 039-25465-00357
Date: January 10, 2008

POTENTIAL TO EMIT IN TONS PER YEAR

Emission Units	PM	PM10	SO_2	NOx	VOC	CO	* Highest Single HAP	Combined HAP
Natural Gas Combustion (NC)	0.02	0.09	0.01	1.22	0.07	1.03	0.00	1.06E-03
Vehicular Traffic (VT)	0.59	0.13	0.00	0.00	0.00	0.00	0.00	0.00
Welding and Thermal Cutting (WD)	0.07	0.07	0.00	0.00	0.00	0.00	0.00	0.00
Surface Coating (SC)	17.01	17.01	0.00	0.00	42.13	0.00	6.29	19.33
TOTALS	**17.69**	**17.30**	**0.01**	**1.22**	**42.20**	**1.03**	**6.29**	**19.34**

***Xylene as Determined Below**

HAZARDOUS AIR POLLUTANTS

Emission Units	Ethyl Benzene Emissions (ton/yr)	Isocyanate Emissions (ton/yr)	Manganese Emissions (ton/yr)	MIBK Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Total HAP Emissions (ton/yr)
Natural Gas Combustion (NC)	0.00	0.00	0.00	0.00	0.00	0.00	1.06E-03
Vehicular Traffic (VT)	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Welding and Thermal Cutting (WD)	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Surface Coating (SC)	1.17	7.13	0.00	3.77	0.98	6.29	19.33
Total Emissions (TPY) by HAP	**1.17**	**7.13**	**0.00**	**3.77**	**0.98**	**6.29**	**19.34**

Appendix A: Emissions Calculations
Natural Gas Fired Space Heaters

Company Name: Michiana Star Holdings, LLC, d/b/aMEDIX Specialty Vehicles, Inc.
Address City IN Zip: 3008 Mobile Drive, Elkhart, IN 46514
Prepared by: D&B Environmental Services, Inc.
Verified by: Teresa Freeman
Permit ID: 039-25465-00357
Date: January 10, 2008

Description	Number of Emission Units	Emission Unit ID	Heat Input Capacity Per Unit (MMBtu/hr)	Total Maximum Potential Throughput (MMCF/yr)
Air Make-up Unit	1	H1	1.117	9.8
Forced Air Space Heater	4	H2 - H5	0.300	10.5
Radient Heater	4	H6 - H9	0.100	3.5
Radient Heater	1	H10	0.075	0.7
Totals	10		2.792	24.5

Emission Factor (lbs/MMCF)						
PM*	PM10*	SO_2	NO_X**	CO	VOC	HAPs
1.9	7.6	0.6	100	84.0	5.5	0.09

Potential To Emit (tons/yr)							
Emission Unit ID	PM	PM10	SO_2	NO_X	CO	VOC	HAPs
H1	0.01	0.04	0.003	0.49	0.41	0.03	4.3E-04
H2 - H5	0.01	0.04	0.003	0.53	0.44	0.03	4.6E-04
H6 - H9	0.00	0.01	0.001	0.18	0.15	0.01	1.5E-04
H10	0.00	0.00	0.000	0.03	0.03	0.00	2.9E-05
TOTALS	**0.02**	**0.09**	**0.01**	**1.22**	**1.03**	**0.07**	**1.1E-03**

* PM and PM10 emission factor are for condensable and filterable PM and PM10 combined.

**Emission factor for NOx: Uncontrolled = 100 lb/MMCF

Emission factors are from AP-42, Chapter 1.4 - Natural Gas Combustion, Tables 1.4-1, 1.4-2, 1.4-3 and 1.4-4. SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03. (AP-42 Supplement D 7/98)

1 MMBtu = 1,000,000 Btu

1 MMCF = 1,000,000 cubic feet of gas

All Emission factors are based on normal firing.

METHODOLOGY

Max. Potential Throughput (MMCF/yr) = Number of Units x Heat Input Capacity/Unit (MMBtu/hr) x 8,760 (hrs/yr) x 1 MMCF/1,000 MMBtu

PTE (tons/yr) = Max. Potential Throughput (MMCF/yr) x Emission Factor (lbs/MMCF) x 1/2,000 (ton/lbs)

Total HAP emissions are negligible.

Appendix A: Emissions Calculations
Particulate
Vehicular Traffic (VT)

Company Name:	**Michiana Star Holdings, LLC, d/b/aMEDIX Specialty Vehicles, Inc.**
Address City IN Zip:	**3008 Mobile Drive, Elkhart, IN 46514**
Prepared by:	**D&B Environmental Services, Inc.**
Verified by:	**Teresa Freeman**
Permit ID:	**039-25465-00357**
Date:	**January 10, 2008**

0.25	Trips/Hr x		
0.076	Miles/Roundtrip x		
8,760.00	Hours/Year =	165.91	Miles/Year

PM	**PM10**	
7.06	**1.56**	Ef = Emission Factor (lb/mile)
10	2.6	k = (particle size multiplier; k = 10 for PM30/TSP)
4.8	4.8	s = (mean % silt of unpaved roads)
0.5	0.4	b = (constant for PM10; b = 0.5 for PM30/TSP)
0.4	0.3	c = (constant for PM10; c = 0.4 for PM30/TSP)
15	15	W = (tons average vehicle weight)
0.2	0.2	Mdry = (surface material moisture content, %; default is 0.2 for dry conditions)
125	125	p = (number of days with at least 0.254 mm precipitation; Figure 13.2.2-1)
0.59	0.13	Potential Emissions (tons/year)

Ef = {k*[(s/12)^0.8]*[(W/3)^b]/[(Mdry/0.2)^c]} * [(365-p)/365]
Ef x Distance (miles/yr) x 1/2,000 (lb/ton)

AP-42, Chapter 13.2.2, Unpaved Roads

Appendix A: Emissions Calculations
Particulate

Company Name: Michiana Star Holdings, LLC, d/b/aMEDIX Specialty Vehicles, Inc.
Address City IN Zip: 3008 Mobile Drive, Elkhart, IN 46514
Prepared by: D&B Environmental Services, Inc.
Verified by: Teresa Freeman
Permit ID: 039-25465-00357
Date: January 10, 2008

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	Electrode Consumption (lb/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
WELDING				PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
Metal Inert Gas (MIG) - carbon steel - 70S-3	4	0.60	2.40	0.0052	3.18E-04	1.00E-06	0.00	1.00E-06	0.012	7.63E-04	2.40E-06	0.00E+00	2.40E-06	7.68E-04
Stick Welding	0	0.10	0.00	0.0241	0.00034	0.00	0.00	0.00010	0.000	-	0.00	0.00	-	-
		Total Electrodes	**2.40**											
	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS**** (lb pollutant/1,000 inches cut)**					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
FLAME CUTTING				PM = PM10	Mn	Ni	Co	Cr	PM = PM10	Mn	Ni	Co	Cr	
Plasma**	1	0.1793	10.00	0.00220	3.30E-05	0.00	0.00	0.00	0.001	1.98E-05	0.00	0.00	0.00	1.98E-05
Arc Carbon Cutter**	1	0.1793	10.00	0.00220	3.30E-05	0.00	0.00	0.00	0.001	1.98E-05	0.00	0.00	0.00	1.98E-05
EMISSION TOTALS														
									PM = PM10	Mn	Ni	Co	Cr	Total HAP
Potential Emissions lbs/hr									0.02	0.001	0.00	0.00	0.00	0.001
Potential Emissions lbs/day									0.36	0.02	0.00	0.00	0.00	0.02
Potential Emissions tons/year									0.07	0.00	0.00	0.00	0.00	0.00

METHODOLOGY

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

**Emission Factor for plasma/arc carbon 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; Estimated at 4.55 mm or 0.1793 inches = 0.0022 lb/1,000 inches.

****HAP emission factors based upon the cutting of carbon steel that is a maxiumum of 1.5% manganese by weight.

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 adjusted to 0.1793 in. thickness)

Plasma cutting and laser cutting HAP emissions are calculated as (fume emission rate x weight % of component in product cut).

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

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

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

Appendix A: Emissions Calculations
VOC and Particulate
Surface Coating Operations (SB1, SR1 & Line 1)

Company Name: Michiana Star Holdings, LLC, d/b/aMEDIX Specialty Vehicles,
Address City IN Zip: 3008 Mobile Drive, Elkhart, IN 46514
Prepared by: D&B Environmental Services, Inc.
Verified by: Teresa Freeman
Permit ID: 039-25465-00357
Date: January 10, 2008

Material	Density (Lb/Gal)	Weight % Volatile (H20 & 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	Material Usage (gal/hr)	Material Usage (lb/hr)	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency*
604 Foam Adhesive	11.00	77.00%	0.00%	77.00%	0.00%	23.00%	0.1250	0.250	8.47	8.47	0.03	0.34	0.26	6.35	1.16	0.09	36.83	75%
Denatured Alcohol	6.79	100.00%	0.00%	100.00%	0.00%	0.00%	0.1250	0.250	6.79	6.79	0.03	0.21	0.21	5.09	0.93	0.00	#DIV/0!	75%
380 RTV Silicone Sealant	8.68	3.00%	0.00%	3.00%	0.00%	97.00%	0.1250	0.250	0.26	0.26	0.03	0.27	0.01	0.20	0.04	0.29	0.27	75%
Accuflex Polyurethane Sealant	10.10	4.73%	0.00%	4.73%	0.00%	95.00%	0.5092	0.250	0.48	0.48	0.13	1.29	0.06	1.46	0.27	1.34	0.50	75%
DC12880 Silaprene Adhesive	6.83	65.00%	0.00%	65.00%	0.00%	35.00%	2.5000	0.250	4.44	4.44	0.63	4.27	2.77	66.59	12.15	1.64	12.68	75%
Stabond Urethane Adhesive	9.10	0.00%	0.00%	0.00%	0.00%	100.00%	2.5000	0.250	0.00	0.00	0.63	5.69	0.00	0.00	0.00	6.23	0.00	75%
ASC-35 Zero VOC Undercoating	8.70	0.02%	0.00%	0.02%	0.00%	99.90%	2.5000	0.250	0.00	0.00	0.63	5.44	0.00	0.03	0.01	5.95	0.00	75%
1500 Lacquer Thinner	6.89	100.00%	0.00%	100.00%	0.00%	0.00%	0.1250	0.250	6.89	6.89	0.03	0.22	0.22	5.17	0.94	0.00	#DIV/0!	75%
DX440 Cleaner	6.94	100.00%	0.00%	100.00%	0.00%	0.00%	0.1250	0.250	6.94	6.94	0.03	0.22	0.22	5.21	0.95	0.00	#DIV/0!	75%
Potential Emission Rates - Fabrication Lines #1&#2													**3.75**	**90.10**	**16.44**	**15.53**		
AND																		
DX1791 Wash Primer	7.38	90.39%	0.00%	90.39%	0.00%	14.72%	0.5000	0.100	6.67	6.67	0.05	0.37	0.33	8.00	1.46	0.04	45.32	75%
DX1792 Primer Catalyst	6.84	99.41%	0.00%	99.41%	0.00%	1.40%	0.5000	0.100	6.80	6.80	0.05	0.34	0.34	8.16	1.49	0.00	485.69	75%
Potential Emission Rates - Wash Primer As Applied													**0.67**	**16.16**	**2.95**	**0.04**		
AND																		
DP50LF Epoxy Primer	11.74	35.36%	0.00%	35.36%	0.00%	64.64%	0.6700	0.100	4.15	4.15	0.07	0.79	0.28	6.68	1.22	0.56	6.42	75%
DP401LF Epoxy Primer Catalyst	7.33	72.99%	0.00%	72.99%	0.00%	29.77%	0.3300	0.100	5.35	5.35	0.03	0.24	0.18	4.24	0.77	0.07	17.97	75%
Potential Emission Rates - Epoxy Primer As Applied													**0.45**	**10.91**	**1.99**	**0.63**		
AND																		
Deltron 2000 Basecoat DBX1689 Base	7.54	90.46%	0.00%	90.46%	0.00%	13.18%	1.5000	0.100	6.82	6.82	0.15	1.13	1.02	24.55	4.48	0.12	51.75	75%
DT885 Reducer	7.04	100.00%	0.00%	100.00%	0.00%	0.00%	2.5000	0.100	7.04	7.04	0.25	1.76	1.76	42.24	7.71	0.00	0.00	75%
Potential Emission Rates - Basecoat As Applied													**2.78**	**66.79**	**12.19**	**0.12**		
AND																		
Clearcoat DC4000	7.84	66.01%	0.00%	66.01%	0.00%	39.68%	1.5000	0.100	5.18	5.18	0.15	1.18	0.78	18.63	3.40	0.44	13.04	75%
DCH 3095 Hardner	8.73	32.69%	0.00%	32.69%	0.00%	73.74%	0.4000	0.100	2.85	2.85	0.04	0.35	0.11	2.74	0.50	0.26	3.87	75%
Potential Emission Rates - Clearcoat As Applied													**0.89**	**21.37**	**3.90**	**0.70**		
AND																		
DX330 Wax & Grease Remover	6.36	100.00%	0.00%	100.00%	0.00%	0.00%	0.6250	0.250	6.36	6.36	0.16	0.99	0.99	23.85	4.35	0.00	0.00	100%
DX840 Blending Solvent	7.27	96.69%	0.00%	96.69%	0.00%	4.13%	0.0400	0.250	7.03	7.03	0.01	0.07	0.07	1.69	0.31	0.00	170.20	100%
Total Potential Emission Rates for Cleanup Solvents													**1.06**	**25.54**	**4.66**	**0.00**		

Potential Emission Rates - Fabrication Lines #1&#2	3.75	90.10	16.44	15.53		
Potential Emission Rates - Wash Primer As Applied	0.67	16.16	2.95	0.04		
Potential Emission Rates - Epoxy Primer As Applied	0.45	10.91	1.99	0.63		
Potential Emission Rates - Basecoat As Applied	2.78	66.79	12.19	0.12		
Potential Emission Rates - Clearcoat As Applied	0.89	21.37	3.90	0.70		
Cleanup Solvents	1.06	25.54	4.66	0.00		
Coating + Cleanup Solvent = Potential to Emit	**9.62**	**230.87**	**42.13**	**17.01**		
Particulate Matter Emission Rates (lb/hr)		**Precontrol PM/PM10**		**3.88**	**lb/hr**	
Particulate Matter Emission Rates (lb/hr)		**Postcontrol PM/PM10**		**0.81**	**lb/hr**	

***Application and Manual Cleaning - Mutually Exclusive Coating Application**

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
HAPs

Company Name: Michiana Star Holdings, LLC, d/b/a MEDIX Specialty V
Address City IN Zip: 3008 Mobile Drive, Elkhart, IN 46514
Prepared by: D&B Environmental Services, Inc.
Verified by: Teresa Freeman
Permit ID: 039-25465-00357
Date: January 10, 2008

HAZARDOUS AIR POLLUTANTS

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethyl Benzene	Weight % Isocyanate Compounds	Weight % MIBK	Weight % Methanol	Weight % Toluene	Weight % Xylene	Ethyl Benzene Emissions (ton/yr)	Isocyanate Compounds Emissions (ton/yr)	MIBK Emissions (ton/yr)	Methanol Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Total HAP Emissions (ton/yr)
380 RTV Silicone Sealant	8.68	0.1250	0.250	1.50%	0.00%	0.00%	0.00%	0.00%	7.00%	0.02	0.00	0.00	0.00	0.00	0.08	0.10
Stabond Urethane Adhesive	9.10	2.5000	0.250	0.00%	24.00%	0.00%	0.00%	0.00%	0.00%	0.00	5.98	0.00	0.00	0.00	0.00	5.98
1500 Lacquer Thinner	6.89	0.1250	0.250	13.00%	0.00%	0.00%	29.00%	59.00%	0.00%	0.12	0.00	0.00	0.27	0.56	0.00	0.95
DX440 Cleaner	6.94	0.1250	0.250	13.00%	0.00%	0.00%	0.00%	0.00%	70.00%	0.12	0.00	0.00	0.00	0.00	0.66	0.79
Potential Emission Rates - Fabrication Lines #1&#2										**0.26**	**5.98**	**0.00**	**0.27**	**0.56**	**0.75**	**7.82**
AND																
DX1791 Wash Primer	7.38	0.5000	0.100	1.50%	0.00%	0.00%	0.00%	7.00%	5.00%	0.02	0.00	0.00	0.00	0.11	0.081	0.218
DX1792 Primer Catalyst	6.84	0.5000	0.100	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.000	0.000
DP50LF Epoxy Primer	11.74	0.6700	0.100	1.00%	0.00%	5.00%	0.00%	7.00%	5.00%	0.03	0.00	0.17	0.00	0.24	0.172	0.620
DP401LF Epoxy Primer Catalyst	7.33	0.3300	0.100	0.00%	0.00%	0.00%	0.00%	0.00%	30.00%	0.00	0.00	0.00	0.00	0.00	0.318	0.318
Deltron 2000 Basecoat DBX1689 Base	7.54	1.5000	0.100	1.50%	0.00%	0.00%	0.00%	0.00%	10.00%	0.07	0.00	0.00	0.00	0.00	0.495	0.570
DT885 Reducer	7.04	2.5000	0.100	5.00%	0.00%	40.00%	0.00%	0.00%	30.00%	0.39	0.00	3.08	0.00	0.00	2.313	5.782
Clearcoat DC4000	7.84	1.5000	0.100	7.00%	0.00%	10.00%	0.00%	0.00%	40.00%	0.36	0.00	0.52	0.00	0.00	2.060	2.936
DCH 3095 Hardner	8.73	0.4000	0.100	1.50%	75.00%	0.00%	0.00%	0.00%	7.00%	0.02	1.15	0.00	0.00	0.00	0.107	1.277
DX840 Blending Solvent	7.27	0.0400	0.250	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
DX330 Wax & Grease Remover	6.36	0.6250	0.250	0.00%	0.00%	0.00%	0.00%	1.50%	0.00%	0.00	0.00	0.00	0.00	0.07	0.00	0.07
Coating + Cleanup Solvent = Potential to Emit										**0.90**	**1.15**	**3.77**	**0.00**	**0.42**	**5.546**	**11.786**

Coating + Cleanup Solvent = Potential to Emit	0.90	1.15	3.77	0.00	0.42	5.55	11.786
Worst Case HAP Emission Rates	**1.17**	**7.13**	**3.77**	**0.27**	**0.98**	**6.29**	**19.61**

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 - Add Worst Case Coating to All Cleanup Solvents