INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
MC 61-53
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant

DATE: March 12, 2008

RE: SJC Industries Corp., dba Marque and McCoy Miller / 039-25492-00508

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

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted 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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Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

Federally Enforceable State Operating Permit
OFFICE OF AIR QUALITY

SJC Industries Corp., dba Marque and McCoy Miller
1110 DI 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. 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 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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

Operation Permit No.: F039-25492-00508	
Issued by: Origin signed by Matthew Stuckey, Chief Permits Branch Office of Air Quality	Issuance Date: March 12, 2008 Expiration Date:March 12, 2013

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary ambulance fabrication and assembly plant.

Source Address:	1110 DI Drive, Elkhart, Indiana 46514
Mailing Address:	1110 DI Drive, Elkhart, IN 46514
General Source Phone Number:	574-970-6741
SIC Code:	3710
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

(a) One (1) ambulance assembly shop, identified as MMA, with 0.625 ambulances per hour, applying adhesives to wood and metal, constructed in 1994, emissions uncontrolled, and exhausting to general ventilation;

(b) One (1) ambulance body shop/prime and paint booths, applying coatings to metal, identified as MMP, with 0.625 ambulances per hour, constructed in 1994, using dry filter media to control particulate emissions, and exhausting to stacks SV-2 and SV-4; and

(c) One (1) ambulance undercoating, identified as MMU, applying coatings to metal, with 0.625 ambulances per hour, constructed in 1994, emissions uncontrolled, and exhausting to general ventilation.

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

This stationary source also includes the following insignificant activities:

Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour:

(a) Plant 1:
  (1) Forty-one (41) natural gas fired radiant heaters with each one rated at 0.10 MMBtu/hr.

  (2) One (1) natural gas fired box heater rated at 0.15 MMBtu/hr.

  (3) Three (3) natural gas fired furnaces with each one rated at 0.29 MMBtu/hr.

(b) The following VOC and HAP storage containers:

(1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.

(2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(c) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.

(d) Cleaners and solvents characterized as follows:

(1) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100^{o}F) or;

(2) Having a vapor pressure equal to or less than 0.7 kPA; 5mm Hg; or 0.1 psi measured at 20^{o}C (68^{o}F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(e) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment:

(1) Twenty-one (21) MIG welders, three (3) TIG welders and three (3) plasma cutters, all exhausting inside the building. [326 IAC 6-3-2].

(f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(g) Paved and unpaved roads and parking lots with public access.

(h) Other categories with emissions below insignificant thresholds (i.e. less than 5 pounds per hour particulates and less than 3 pounds per hour VOC).

(1) One (1) ambulance carpenter shop, identified as MMC, with 0.625 ambulances per hour, using a cyclone to control particulate emissions, constructed in 1994, and exhausting to general ventilation. [326 IAC 6-3-2]

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

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

SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, F039-25492-00508, 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 [326 IAC 2-8-6]

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

B.5 Severability [326 IAC 2-8-4(4)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

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

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

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

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

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

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

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

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, 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 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

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

(C) Corrective actions taken.

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

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

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

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

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or

contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

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

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

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

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

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

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

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

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

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

(a) All terms and conditions of permits established prior to F039-25492-00508 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.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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

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

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

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

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

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

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

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

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

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

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

Request for renewal shall be submitted to:

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

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

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

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

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

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

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

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

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

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

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

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

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

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

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

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

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

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

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

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

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

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

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

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

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

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

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

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action or revocation of this permit.

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

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

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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

C.9 Performance Testing [326 IAC 3-6]

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
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.10 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

C.12 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.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; 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 2-8-4][326 IAC 2-8-5]

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

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

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

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

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

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

(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.18 General Reporting Requirements [326 IAC 2-8-4(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

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

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) ambulance assembly shop, identified as MMA, with 0.625 ambulances per hour, applying adhesives to wood and metal, constructed in 1994, emissions uncontrolled, and exhausting to general ventilation;

(b) One (1) ambulance body shop/prime and paint booths, applying coatings to metal, identified as MMP, with 0.625 ambulances per hour, constructed in 1994, using dry filter media to control particulate emissions, and exhausting to stacks SV-2 and SV-4; and

(c) One (1) ambulance undercoating, identified as MMU, applying coatings to metal, with 0.625 ambulances per hour, constructed in 1994, emissions uncontrolled, and exhausting to general ventilation.

(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 2-8-4(1)]

D.1.1 FESOP and VOC BACT Minor Limit [326 IAC 2-8-4] [326 IAC 8-1-6]

The VOC emissions from ambulance body shop/prime and paint booths (MMP) shall be limited to less than 24.80 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limit and the potential VOC emissions from the other emission units will limit the source wide VOC emissions to less than 100 tons per twelve (12) consecutive month period and render 326 IAC 8-1-6 not applicable to the emission unit, identified as MMP and also render 326 IAC 2-7 (Part 70) not applicable to this source.

D.1.2 Best Available Control Technology (BACT) and Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to CP 039-3219-00071, issued on December 15, 1994, the Best Available Control Technology for the spray coating operation (MMA) shall be subject to the following work practices:

(1) The use of high volume low pressure spray and aerosol spray as an acceptable alternative application of air-assisted airless spray. High volume low pressure (HVLP) spray means technology used to apply coating to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(2) Storage containers used to store VOC containing materials shall be kept covered when not in use.

(3) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.

(4) Proper equipment clean-up and maintenance.

D.1.3 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the ambulance undercoating (MMU), shall not exceed 3.5 pounds of VOCs per gallon of coating less water, for extreme performance coatings.

Compliance with the VOC content limit shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

$A = [\sum (C \times U) / \sum U]$

Where:

A is the volume weighted average in pounds VOC per gallon less water as applied;

C is the VOC content of the coating in pounds VOC per gallon less water as applied; and

U is the usage rate of the coating in gallons per day.

If for any given day, all coating materials used in a metal surface coating operation are in compliance with the VOC content limits, then the Permittee shall not be required to perform the daily averaging calculation for that operation on that day.

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 Particulate emissions Limitations, Work Practices and Control Technologies [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2(d), particulate from the spray coating operation (MMP) shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

(b) Pursuant to 326 IAC 6-3-2(d), the spray under-coating operation (MMU) is subject to the following work practice standards:

(1) Operate the coating operation inside the building.

(2) If accumulations of undercoating are observed on fans, stacks or on the ground outside the plant; then overspray controls must be installed.

(3) Maintain and operate the undercoating equipment according to the manufacturer's recommendations.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

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

Compliance with the VOC content and usage limitations contained in Conditions D.1.1, D.1.2(b) 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 2-8-4][326 IAC 2-8-5(a)(1)]

D.1.7 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (SV-2 and SV-4) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

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

D.1.8 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 (5) 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. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

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

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

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

(3) The cleanup solvent usage for each month;

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

(b) To document compliance with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) 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.1.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(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 added to the coating usage records.

(c) To document compliance with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 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. The report submitted by the Permittee does require the certification by the “authorized individual" as defined by 326 IAC 2-7-1(34).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Insignificant Unit

(h) Other categories with emissions below insignificant thresholds (i.e. less than 5 pounds per hour particulates and less than 3 pounds per hour VOC).

(1) One (1) ambulance carpenter shop, identified as MMC, with 0.625 ambulances per hour, using a cyclone to control particulate emissions, constructed in 1994, and exhausting to general ventilation. [326 IAC 6-3-2]

(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 2-8-4(1)]

D.2.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the ambulance carpenter shop (MMC) shall not exceed 1.62 pounds per hour when operating at a process weight rate of 0.25 tons per hour.

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

Interpolation of the data for the process weight rate up to 60,000 pounds per hour was determined by use of the equation:

$E = 4.10\ P^{0.67}$

Where:

E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.2.2 Particulate Control

In order to comply with Condition D.2.1, the cyclone for particulate control shall be in operation at all times when the woodworking facilities are in operation.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: SJC Industries Corp., dba Marque and McCoy Miller
Source Address: 1110 DI Drive, Elkhart, Indiana 46514
Mailing Address: 1110 DI Drive, Elkhart, IN 46514
FESOP Permit No.: F039-25492-00508

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

Please check what document is being certified:

□ Annual Compliance Certification Letter

□ Test Result (specify)_____

□ Report (specify)_____

□ Notification (specify)_____

□ Affidavit (specify)_____

□ Other (specify)_____

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

Signature:

Printed Name:

Title/Position:

Date:

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: SJC Industries Corp., dba Marque and McCoy Miller
Source Address: 1110 DI Drive, Elkhart, Indiana 46514
Mailing Address: 1110 DI Drive, Elkhart, IN 46514
FESOP Permit No.: F039-25492-00508

This form consists of 2 pages **Page 1 of 2**

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

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: SJC Industries Corp., dba Marque and McCoy Miller
Source Address: 1110 DI Drive, Elkhart, Indiana 46514
Mailing Address: 1110 DI Drive, Elkhart, IN 46514
FESOP Permit No.: F039-25492-00508
Facility: Ambulance body shop/prime and paint booths (MMP)
Parameter: VOC input
Limit: Less than 24.8 tons per twelve (12) Consecutive month period with compliance determined at the end of each month.

YEAR:_____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Input This Month	VOC Input Previous 11 Months	VOC Input 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
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: SJC Industries Corp., dba Marque and McCoy Miller
Source Address: 1110 DI Drive, Elkhart, Indiana 46514
Mailing Address: 1110 DI Drive, Elkhart, IN 46514
FESOP Permit No.: F039-25492-00508

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

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".

□ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

□ 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:	

Page 2 of 2

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

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	SJC Industries Corp., dba Marque and McCoy Miller
Source Location:	1110 DI Drive, Elkhart, Indiana 46514
County:	Elkhart
SIC Code:	3710
Permit Renewal No.:	F039-25492-00508
Permit Reviewer:	Josiah Balogun

On February 8, 2008, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that SJC Industries Corp., dba Marque and McCoy Miller had applied for a Federally Enforceable State Operating Permit (FESOP) to continue to operate an ambulance fabrication and assembly plant. The notice also stated that OAQ proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

On February 14, 2008, Kevin Parks of D & B Environmental Services, Inc., submitted comments on the proposed FESOP. The comments are as follows: The Permit language if changed, has deleted language as ~~strikeouts~~ and the new language **bolded**

Comment 1: Section A.1. The Permittee does not own and operate a bus and assembly fabrication plant. The Permittee owns and operate a stationary ambulance fabrication and assembly plant.

Response 1: Section A.1 of the permit has been revised.

No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflects the permit that was on public notice. Changes that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result, ensuring that these types of concerns are documented and part of the record regarding this permit decision.

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

The Permittee owns and operates a stationary ~~bus and~~ ambulance fabrication and assembly plant.

.....

Comment 2 Section A.3 of the Permit. The new permit deleted the old Section A.3 - Specifically Regulated Insignificant Activities of MMC (McCoy Miller carpenter shop, using cyclone) and moved it into Insignificant Activities list.

Response 2: The insignificant activities in Title V permit are refered to as Specifically Regulated Insignificant Activities because we only deal with the insignificant activities that have applicable rules. The FESOP contains all the insignificant activities in the permit because emissions from all the emission units are counted towards the overall

emissions limits. Therefore, no changes were made to the insignificant activities in Section A.3

Comment 3 Section D.1 of the Permit.

The verbiage in Condition D.1.4(b)(3) to maintain and operate the Graco coating equipment should not refer to specific coating equipment. It should simply state "undercoating", so the Permittee will not be required to modify the permit each time a gun is replaced.

Response 3: The verbiage in Condition D.1.4 (b)(3) has been revised.

D.1.4 Particulate emissions Limitations, Work Practices and Control Technologies [326 IAC 6-3-2]

.....

(3) Maintain and operate the ~~Graco coating~~ **undercoating** equipment according to the manufacturer's recommendations.

Other Changes

Upon further review IDEM, OAQ has made the following changes to the Title V permit. (deleted language appears as ~~strikout~~ and the new language **bolded**):

Change 1 IDEM has changed the designation of the issuing officer from Deputy Branch Chief to Branch Chief.

Operation Permit No.: F039-25492-00508	
Issued by: Matthew Stuckey, ~~Deputy Branch~~ Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	**SJC Industries Corp., dba Marque and McCoy Miller**
Source Location:	**1110 DI Drive, Elkhart, Indiana 46514**
County:	**Elkhart**
SIC Code:	**3710**
Permit Renewal No.:	**039-25492-00508**
Permit Reviewer:	**Josiah Balogun**

The Office of Air Quality (OAQ) has reviewed the operating permit application from SJC Industries Corp., dba Marque and McCoy Millller relating to the operation of a bus and ambulance fabrication and assembly.

History

On November 2, 2007, SJC Industries Corp., dba Marque and McCoy Millller submitted an application to the OAQ requesting a transition from TV operating permit to a FESOP operating permit. SJC Industries Corp., dba Marque and McCoy Millller was issued a Part 70 Operating Permit Renewal on October 19, 2006. SJC Industries Corp., dba Marque and McCoy Millller was issued a TV operating permit on October 19, 2006. The US EPA deleted MEK from the list of chemicals regulated as HAPs. The chemical MEK accounts for 5.91 tons per year of the PTE of total HAPs of the source. The true PTE of the source with the removal of MEK will be 20.7 tons per year. Therefore, the exclusion of MEK as HAP means that SJC is an area source of HAP since the total PTE of HAP is less than 25 ton tons per year and single HAP is less than 10 tons per year.

Permitted Emission Units and Pollution Control Equipment

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

(a) One (1) ambulance assembly shop, identified as MMA, with 0.625 ambulances per hour, applying adhesives to wood and metal, constructed in 1994, emissions uncontrolled, and exhausting to general ventilation;

(b) One (1) ambulance body shop/prime and paint booths, applying coatings to metal, identified as MMP, with 0.625 ambulances per hour, constructed in 1994, using dry filter media to control particulate emissions, and exhausting to stacks SV-2 and SV-4; and

(c) One (1) ambulance undercoating, identified as MMU, applying coatings to metal, with 0.625 ambulances per hour, constructed in 1994, emissions uncontrolled, and exhausting to general ventilation.

Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit

There are no unpermitted emission units operating at this source during this review process.

Emission Units and Pollution Control Equipment Removed From the Source

The following emission units have been removed from the source.

(a) One (1) bus assembly, identified as GCA2, with a maximum capacity of 0.7 buses per hour, applying adhesives to wood and metal, using no control, constructed in 1994, and exhausting to general ventilation.

(b) One (1) bus undercoating, identified as GCU2, with a maximum capacity of 0.7 buses per hour, using no control, constructed in 1994, and exhausting to general ventilation.

(c) One (1) bus frame prime coating, identified as GCP2, with a maximum capacity of 0.7 buses per hour, using dry filter media to control particulate emissions, constructed in 1994, and exhausting to general ventilation.

(d) One (1) bus assembly operation, identified as GCA3/4, with a maximum capacity of 0.375 buses per hour, applying adhesives to wood and metal, using no control, constructed in 1994, and exhausting to five (5) stacks.

(e) One (1) bus undercoating, identified as GCU3/4, with a maximum capacity of 0.375 buses per hour, using no control, constructed in 1994, and exhausting to five (5) stacks.

(f) One (1) bus frame prime coating, identified as GCP3/4, with a maximum capacity of 0.375 buses per hour, using dry filter media to control particulate emissions, constructed in 1994, and exhausting to five (5) stacks.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour:

(a) Plant 1:
  (1) Forty-one (41) natural gas fired radiant heaters with each one rated at 0.10 MMBtu/hr.

  (2) One (1) natural gas fired box heater rated at 0.15 MMBtu/hr.

  (3) Three (3) natural gas fired furnaces with each one rated at 0.29 MMBtu/hr.

(b) The following VOC and HAP storage containers:
  (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.

  (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(c) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.

(d) Cleaners and solvents characterized as follows:

  (1) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100^{o}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.

(e) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment:

(1) Twenty-one (21) MIG welders, three (3) TIG welders and three (3) plasma cutters, all exhausting inside the building. [326 IAC 6-3-2].

(f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(g) Paved and unpaved roads and parking lots with public access.

(h) Other categories with emissions below insignificant thresholds (i.e. less than 5 pounds per hour particulates and less than 3 pounds per hour VOC).

(1) One (1) ambulance carpenter shop, identified as MMC, with 0.625 ambulances per hour, using a cyclone to control particulate emissions, constructed in 1994, and exhausting to general ventilation. [326 IAC 6-3-2]

Existing Approvals

Since the issuance of the Part 70 Operating Permit 039-17624-00508 on October 19, 2006, transiting to a FESOP the source has constructed or has been operating under the following approvals as well:

(a) Second Administrative Amendment No. 039-24279-00508, issued on March 6, 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

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations (1 through 12).

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

Pollutant	Status
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, St. Joseph as attainment for the 8-hour ozone standard.

(3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.

(4) 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.

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.

(b) Other Criteria Pollutants
Elkhart County has been classified as attainment or unclassifiable in Indiana for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) 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

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	47.8
PM_{10}	48.0
SO_2	0.01
VOC	124.66
CO	1.88
NO_x	2.2

HAPs	tons/year
Ethylbenzene	less than 10
Toluene	less than 10
MIBK	less than 10
Methanol	less than 10
Benzene	less than 10
Dichlorobenzene	less than 10
Formaldehyde	less than 10
Hexane	less than 10
Lead	less than 10
Cadminum	less than 10
Chromium	less than 10
Manganese	less than 10
Nickel	less than 10
Total	less than 25

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 VOC is equal to or greater than 100 tons per year. The source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to limit their VOC emissions to less than Title V levels, therefore the source will be issued a FESOP.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.

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

(d) 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.

Potential to Emit After Issuance

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

	Potential To Emit (tons/year)						
Process/ Emission Unit	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_x**	**HAPs**
Ambulance Assembly (MMA)	8.34	8.34	0	43.72	0	0	2.19
Shop/Prime and Paint booths (MMP)	0.56	0.56	0	24.8**	0	0	13.81
Ambulance Undercoating (MMU)	5.39	5.39	0	23.79	0	0	3.72
Ambulance Carpenter Shop (MMC)	0.16	0.16	0	0	0	0	0
Natural Gas Combustion units	0.04	0.17	0.01	0.12	1.88	2.24	0.042
Welding Operations	1.89	1.89	0	0	0	0	0.95
Total Emissions	16.1	16.1	0.01	92.43	1.88	2.24	Single less than 10, Total less than 25

** Limites VOC emission to avoid 326 IAC 8-1-6

(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

(a) The requirement of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.390 through 60.398, Subpart MM) “Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations” is not included in the permit. This rule applies to surface coating operations in an automobile or light-duty truck assembly plant. An automobile is defined as a motor vehicle capable of carrying no more than 12 passengers, and a light-duty truck is defined as any motor vehicle rated at 3,580 kilograms gross vehicle weight or less, designed mainly to transport property. This source performs coating on ambulance only. All vehicles are capable of seating more than 12 passengers and weigh greater than 3,580 pounds; therefore, they do not fall under the definition of automobile or light-duty truck. The provisions of Subpart MM are not included in the permit.

(b) The insignificant activities identified as storage tanks, with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons, are not subject to the New Source Performance Standards, 326 IAC 12, (40 CFR Parts 60.110, 110a - 115a or 110b - 117b, as Subparts K, Ka, and Kb, respectively) since the storage capacities associated with these activities are below the minimum applicable threshold to the three rules (i.e., 75 cubic meters (19,813 gallons)).

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Surface Coating of Automobiles and Light Duty Trucks 40 CFR Part 63, Subpart IIII and 326 IAC 20-1-1 are not included in the permit because the source only coats ambulances which do not fit the definition of the automobiles and light duty trucks under 40 CFR 63.3176. Therefore, this source is not a major source of hazardous air pollutants, the requirements of NESHAP, Subaprt IIII are not included in this permit.

(d) The wood surface coating operation under Assembly Operation (MMA) is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for source categories, 326 IAC 20-14, (40 CFR 63, Subpart JJ), National Emission Standards for Wood Furniture Manufacturing Operations because the wood frames which are coated and placed inside the ambulances, do not qualify as wood furniture. Therefore, the the requirements of NESHAP, Subaprt JJ are not included in this permit.

(e) This source is not subject to the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63, Subpart MMMM (Surface Coating to Miscellaneous metal Parts and Products) because the source is not a major source of HAPs.

(f) The source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface coating of Plastic Parts and Products) (326 IAC 20-81) because the source is an area source of HAPs.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)
The uncontrolled potential to emit of all regulated pollutants are less than 250 tons per year, and it is not one of the twenty-eight (28) listed source categories. Therefore, the source is not subject to 326 IAC 2-2 (PSD).

326 IAC 2-6 (Emission Reporting)
Revisions to 326 IAC 2-6 (Emission Reporting) became effective March 27, 2004. The Permittee is no longer required to submit an emission statement; therefore, the emission statement is removed from the permit.

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 2-8-4 (FESOP)
The uncontrolled VOC emissions are greater than 100 tons per year for this source. Therefore, federally enforceable limits for VOC emissions shall be established for this source. Pursuant to 326 IAC 8-1-6, the VOC emissions from ambulance body shop/prime and paint booths (MMP) shall be limited to less than 24.80 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above limit and the potential VOC emissions from the other emission units will limit the source wide VOC emissions to less than 100 tons per twelve (12) consecutive month period and render 326 IAC 2-7 (Part 70) not applicable to this source.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The ambulance assembly shop, identified as MMA, ambulance body shop/prime and paint booths, identified as MMP and ambulance undercoating, identified as MMU, constructed before 1997, will emit less than 10 tons per year of any single HAP or 25 tons per year of any combinations of HAPs. Therefore, the requirements of 326 IAC 2-4.1 are not applicable.

326 IAC 6-4 (Fugitive Dust Emissions)
This source is subject to 326 IAC 6-4 for fugitive dust emissions. 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 6-5 (Fugitive Particulate Matter Emission Limitations)
The fugitive particulate matter emissions from this source are negligible. Therefore, the source is not subject to 326 IAC 6-5 (Fugitive Particulate Matter Emissions Limitations).

326 IAC 8-6 (Organic Solvent Emission Limitations)
This rule applies to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential solvent VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source was constructed after January 1, 1980. Therefore, this rule does not apply to this source.

State Rule Applicability – Individual Facilities

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

(a) Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating operation (MMP) shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

(b) Spray undercoating operation (MMU) which is performed throughout the plant with aerosol spray cans does not have a stack exhaust and therefore is not required to install dry filters. However, as an equivalent means of controlling particulate emissions, MMU shall comply with 326 IAC 6-3-2(d) by complying with the following work practice standards:

(1) Operate the coating operation inside the building.

(2) If accumulations of undercoating are observed on fans, tanks or on the ground outside the plant; then overspray controls must be installed.

(3) Maintain and operate the Graco coating equipment according to manufacturer's recommendations.

(c) The ambulance Assembly Operations identified as MMA, is exempt from the requirements of 326 IAC 6-3 (Particulate emission limitations, work practices, and control technologies) because there is no potential to emit of particulate from glue and adhesive

applications since the application methods that the source employs consist of aerosol, flow and trowel.

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

(a) Pursuant to 326 IAC 6-3-2(e), (Particulate Emission Limitations for Manufacturing Processes), the particulate matter (PM) emissions from the ambulance carpenter shop (MMC) shall not exceed 1.62 pounds per hour when operating at a process weight rate of 0.25 tons per hour:

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

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

The cyclone shall be in operation at all times the carpenter shop is in operation, in order to comply with this limit.

(b) Pursuant to 326 IAC 6-3-1(b)(9), the welding operation is exempt from the requirements of 326 IAC 6-3-2, because each welding operation consumes less than 625 pounds of rod or wire per day.

(c) Pursuant to 326 IAC 6-3-1(b)(10), the plasma cutting operation is exempt from the requirements of 326 IAC 6-3-2, because less than three thousand four hundred (3,400) inches per hour of stock one (1) inch thickness or less is cut.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

This rule requires that new facilities (as of January 1, 1980), which have potential VOC emissions of 25 tons or more per year, located anywhere in the state, which are not otherwise regulated by other provisions of 326 IAC 8, shall reduce VOC emissions using Best Available Control Technology (BACT).

(a) The one (1) ambulance assembly shop (MMA) is subject to the provisions of 326 IAC 8-1-6 since it was constructed after January 1, 1980, and has potential VOC emissions greater than 25 tons per year. Pursuant to CP 039-3219-00071, issued on December 15, 1994, the Best Available Control Technology for the spray coating operation (MMA), constructed in 1994, shall be the following work practices:

(1) The use of high volume low pressure spray and aerosol spray as an acceptable alternative application of air-assisted airless spray. High volume low pressure (HVLP) spray means technology used to apply coating to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(2) Storage containers used to store VOC containing materials shall be kept covered when not in use.

(3) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.

(4) Proper equipment clean-up and maintenance.

(b) The Volatile Organic Compound (VOC) input to the ambulance body shop/prime and paint booths (MMP), shall be limited to 24.80 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

(c) The ambulance undercoating (MMU) has potential to emit of VOC less than twenty-five (25) tons of per year, therefore, the requirements of 326 IAC 8-1-6 are not applicable to this operation.

326 IAC 8-2-2 (Automobile and light duty truck coating operations)
This source is not subject to this rule because the ambulances which are coated at this source do not qualify as automobiles and light duty trucks because the gross vehicle weight of an ambulance is equal to or less than 8,500 pounds.

326 IAC 8-2-9 (Miscellaneous Metal Coating)
Pursuant to 326 IAC 8-2-1 (Applicability) and 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), facilities constructed after July 1, 1990 located in any county, and with actual VOC emissions of greater than fifteen (15) pounds per day before add-on controls shall limit the VOC content of the applied coating to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance coatings.

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the ambulance undercoating (MMU), constructed after 1990 with actual VOC emissions of greater than fifteen (15) pounds per day before add-on controls, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance coatings.

Compliance with the VOC content limit shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

$$A = [\sum (C \times U) / \sum U]$$

Where:

A is the volume weighted average in pounds VOC per gallon less water as applied;
C is the VOC content of the coating in pounds VOC per gallon less water as applied;
and U is the usage rate of the coating in gallons per day.

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 ambulance assembly operation (MMA), and ambulance body shop/prime and paint booths (MMP) are not subject to 326 IAC 8-2-9 because these facilities are engaged in customized top coating of motor vehicles coating less than 35 vehicles per day. Pursuant to 326 IAC 8-2-9(b)(4). Therefore, 326 IAC 8-2-9 does not apply.

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)
The adhesive application operations identified as ambulance assembly operations (MMA and GCA2) are not subject to 326 IAC 8-2-12 because the wood products being coated are floors and/or wood lockers integral to the vehicle being produced, not wood furniture.

Testing Requirements

PM/PM10 testing is not required for any facilities located at this source because: (1) the PM emissions from any one facility do not account for a significant portion of the source's potential to emit PM/PM10; (2) compliance with 326 IAC 6-3-2 is expected with the use of the dry filters for surface coating operations and cyclone for woodworking operation; and (3) compliance monitoring of the control devices will ensure compliance with the limitations.

VOC testing is not required for any facilities located at this source because no facilities utilize a control device and VOC emissions are assumed to be 100% of VOC input. Therefore, compliance is determined through records of VOC usage.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC2-8 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 IAC2-8-4. 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:

Emission Units	Frequency	Parameters
Ambulance body shop/prime and paint booths	Daily	Inspections shall be performed to verify placement, integrity and particle loading of the dry filters.
Ambulance body shop/prime and paint booths	Weekly	Observations of the overspray from the paint booth stacks, while one or more booths are in operation.
Ambulance body shop/prime and paint booths	Monthly	Observations of the coating emission from the stacks, and presence of overspray on rooftops and nearby ground.

Recommendation

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

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

An application for the purposes of this review was received on November 2, 2007.

Conclusion

The operation of this SJC Industries Corp., dba Marque and McCoy Milller shall be subject to the conditions of the attached FESOP No. 039-25492-00508.

Appendix A: Emissions Calculations
Emission Summary
Source Name: SJC Industries Corp., dba Marque and McCoy Miller
Source Location: 1110 DI Drive, Elkhart, Indiana 46514
Permit Number: F039-25492-00508
Permit Reviewer: Josiah Balogun
Date: 26-Jan-2008

Uncontrolled Potential Emissions

	PM (tons/yr)	PM_{10} (tons/yr)	SO_2 (tons/yr)	VOC (tons/yr)	CO (tons/yr)	NOx (tons/yr)	HAPs (tons/yr)
Emission Unit							
Ambulance Assembly (MMA)	8.34	8.34	0	43.72	0	0	2.19
Shop/Prime and paint booths (MMP)	24.19	24.19	0	57.03	0	0	13.81
Ambulance Undercoating (MMU)	5.39	5.39	0	23.79	0	0	3.72
Ambulance Carpenter shop (MMC)	7.98	7.98	0	0	0	0	0
Natural Gas Combustion Units	0.04	0.17	0.01	0.12	1.88	2.24	0.042
Welding Operation	1.89	1.89	0	0	0	0	0.95
Total Emissions	47.8	48.0	0.01	124.66	1.88	2.2	20.7

Appendix A: Emissions Calculations
Emission Summary

Source Name: SJC Industries Corp., dba Marque and McCoy Miller
Source Location: 1110 DI Drive, Elkhart, Indiana 46514
Permit Number: F039-25492-00508
Permit Reviewer: Josiah Balogun
Date: 26-Jan-2008

Limited/Controlled Potential Emissions

	PM (tons/yr)	PM_{10} (tons/yr)	SO_2 (tons/yr)	VOC (tons/yr)	CO (tons/yr)	NOx (tons/yr)	HAPs (tons/yr)
Emission Unit							
Ambulance Assembly (MMA)	8.34	8.34	0	43.72	0	0	2.19
Shop/Prime and paint booths (MMP)	0.56	0.56	0	24.8	0	0	13.81
Ambulance Undercoating (MMU)	5.39	5.39	0	23.79	0	0	3.72
Ambulance Carpenter shop (MMC)	0.16	0.16	0	0	0	0	0
Natural Gas Combustion Units	0.04	0.17	0.01	0.12	1.88	2.24	0.042
Welding Operation	1.89	1.89	0	0	0	0	0.95
Total Emissions	16.4	16.5	0.01	92.43	1.88	2.24	Single HAP <10 Combined HAPs < 25

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

Company Name: SJC Industries Corp., dba Marque and McCoy Miller
Address City IN Zip: 1110 DI Drive, Elkhart, Indiana 46514
Permit No.: F039-25492-00508
Reviewer: Josiah Balogun
Date: 26-Jan-2008

Unit ID: Plant 1: Abmulance Assembly Shop (MMA)

Process/Coating ID	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	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
Wood Patch	10.66	42.50%	0.00%	42.50%	0.00%	97.00%	0.01100	0.625	4.53	4.53	0.031147	0.747533	0.136425	0.00	4.67	100%
Congoleum Adhesive	9.75	47.60%	44.00%	3.60%	39.00%	51.00%	0.99600	0.625	0.58	0.35	0.218498	5.243940	0.957019	0.00	0.69	100%
Adhesive	6.37	70.00%	0.00%	70.00%	0.00%	35.00%	3.05000	0.625	4.46	4.46	8.499969	203.999250	37.229863	7.98	12.74	50%
Dow Silicone	8.66	5.00%	0.00%	5.00%	0.00%	97.00%	0.41200	0.625	0.43	0.43	0.111498	2.675940	0.488359	0.00	0.45	100%
Bender Black Paint	7.50	65.00%	0.00%	65.00%	0.00%	15.00%	0.19500	0.625	4.88	4.88	0.594141	14.259375	2.602336	0.35	32.50	75%
Sikaflex Sealant	9.91	5.00%	0.00%	5.00%	0.00%	96.00%	0.34600	0.625	0.50	0.50	0.107152	2.571645	0.469325	0.00	0.52	100%
Seamfil 901	9.16	53.50%	0.00%	53.50%	0.00%	54.00%	0.05100	0.625	4.90	4.90	0.156138	3.747322	0.683886	0.00	9.07	100%
Cyclo C-33 Silicone	11.00	96.00%	0.00%	96.00%	0.00%	1.00%	0.04000	0.625	10.56	10.56	0.264000	6.336000	1.156320	0.01	1056.00	75%
State Potential Emissions											**9.98**	**239.58**	**43.72**	**8.34**		

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 = Sum of worst case coatings in each booth

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

Company Name: SJC Industries Corp., dba Marque and McCoy Miller
Address City IN Zip: 1110 DI Drive, Elkhart, Indiana 46514
Permit No.: F039-25492-00508
Reviewer: Josiah Balogun
Date: 26-Jan-2008

Unit ID: Plant 1: Ambulance Undercoating (MMU)

Process/Coating ID	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	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
Seal'n Sound Rust Preventive	7.30	47.00%	0.00%	47.00%	0.00%	53.00%	2.03700	0.625	3.43	3.43	4.368092	104.834205	19.132242	5.39	6.47	75%
Lacquer Thinner (Clean up Solvent)	6.80	100.00%	0.00%	100.00%	0.00%	0.00%	0.25000	0.625	6.80	6.80	1.062500	25.500000	4.653750	0.00	0.00	75%
State Potential Emissions											**5.43**	**130.33**	**23.79**	**5.39**		

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 = Sum of worst case coatings in each booth

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

Company Name: SJC Industries Corp., dba Marque and McCoy Miller
Address City IN Zip: 1110 DI Drive, Elkhart, Indiana 46514
Permit No.: F039-25492-00508
Reviewer: Josiah Balogun
Date: 26-Jan-2008

Unit ID: Plant 1: Ambulance prime and paint booths (MMP)

Material Name	Density (Lb/Gal)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating *	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids **	Controlled Efficiency	Controlled PM Emmisions (tons/yr)	Transfer Efficiency
Polyurethane Primer	2.71	1.00000	0.375	2.71	1.017750	24.426000	4.457745	6.70	8.16	99%	0.067	50%
C. R. Primer	3.99	1.50000	0.375	3.99	2.242688	53.824500	9.822971	9.50	7.71	99%	0.095	50%
Clear Coat	4.40	2.00000	0.375	4.40	3.299250	79.182000	14.450715	5.88	3.58	99%	0.059	50%
White Base	5.19	1.00000	0.375	5.19	1.945500	46.692000	8.521290	0.87	1.06	99%	0.009	50%
Red Base	5.19	1.00000	0.375	5.19	1.945500	46.692000	8.521290	0.87	1.06	99%	0.009	50%
Ditzo Remover	6.00	0.05900	0.625	6.00	0.221250	5.310000	0.969075	0.00	0.00	99%	0.000	50%
Acryli-clean	6.36	0.08400	0.625	6.36	0.333900	8.013600	1.462482	0.00	0.00	99%	0.000	50%
Base (Striping)	5.19	0.03200	0.625	5.19	0.103760	2.490240	0.454469	0.05	1.06	99%	0.000	50%
State Potential Emissions						**266.63**	**48.66**	**23.86**			**0.24**	

Note:
* VOC density or Pounds VOC per gallon of coating less water was pre-calculated and provided by the source because all coatings consist of mixtures of multiple coatings.
** lb VOC/gal solids was pre-calculated and provided by the source because all coatings consist of mixtures of multiple coatings.

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 = Sum of worst case coatings in each booth

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

Company Name: SJC Industries Corp., dba Marque and McCoy Miller
Address City IN Zip: 1110 DI Drive, Elkhart, Indiana 46514
Permit No.: F039-25492-00508
Reviewer: Josiah Balogun
Date: 26-Jan-2008

Plant 1: Body Shop Operations (MMP)

Body shop operations have three possible modes of generating air emissions. First, approximately two poinds of body putty are hand applied to the vehicle and (while still soft) cut fair with the body with a knife. Body putty is basically Plater of Paris. This inorganic material emits no volatile organic compounds or HAPs upon application or in curing. After the putty cures, about 10% by weight is removed by standing. We can assume that this 0.2 pounds per vehicle is particulate matter. Finally, the vehicle is prepared for priming by wiping with a lacquer thinner. Approximately 0.75 gallons of thinner is used per vehicle.
Van-type ambulances are not sent through the body shop as a matter of course. All chasis-box ambulances are run through the body shop prior to priming. Therefore, the body shop throughput is 0.375 vehicles per hour.

I. Body Putty:
The inorganic body putty emits no particulates, volatile organic compounds, or HAPs, since it contains none of these pollutants.

Emissions
VOC = 0
PM = 0

II. Sanding
The putty is fully reacted when sanding starts, therefore is no further volatile emissions

Emissions
VOC = 0
PM = 2.0 lb/ambulance x 10% removed x 0.375 ambulance/hr = 0.075 lb/hr or **0.3285 tons per year**

III. Surface Preparation
Lacquer thinner is 100% volatile, therefore there are no PM emissions from this step.

Emissions
VOC = 0.75 gal/ambulance x 6.8 lb/gal (density) x 0.375 ambulance / hr = 1.913 lb/hr or **8.37 tons per year**
PM = 0

Appendix A: Emissions Calculations
HAP Emission Calculations

Company Name: SJC Industries Corp., dba Marque and McCoy Miller
Address City IN Zip: 1110 DI Drive, Elkhart, Indiana 46514
Permit No.: F039-25492-00508
Reviewer: Josiah Balogun
Date: 26-Jan-2008

Unit ID: Plant 1: Abmulance Assembly Shop (MMA)

Process/Coating ID	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Ethylbenzene	Weight % Toluene	Weight % Xylene	Weight % MIBK	Weight % Methanol	Ethylbenzene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	MIBK Emissions (ton/yr)	Methanol Emissions (ton/yr)	Total
Wood Patch	10.66	0.01100	0.625	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Congoleum Adhesive	9.75	0.99600	0.625	0.00%	0.00%	0.00%	0.00%	2.00%	0.00	0.00	0.00	0.00	0.53	0.53
Adhesive	6.37	3.05000	0.625	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Dow Silicone	8.66	0.41200	0.625	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Bender Black Paint	7.50	0.19500	0.625	2.00%	10.00%	5.00%	0.00%	0.00%	0.08	0.40	0.20	0.00	0.00	0.68
Sikaflex Sealant	9.91	0.34600	0.625	0.00%	0.00%	5.00%	0.00%	0.00%	0.00	0.00	0.47	0.00	0.00	0.47
Seamfil 901	9.16	0.05100	0.625	0.00%	20.00%	20.00%	0.00%	0.00%	0.00	0.26	0.26	0.00	0.00	0.51
Cyclo C-33 Silicone	11.00	0.04000	0.625	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
									0.08	0.66	0.93	0.00	0.53	2.19

Total Uncontrolled Potential Emissions

METHODOLOGY

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

Appendix A: Emissions Calculations
HAP Emission Calculations

Company Name: SJC Industries Corp., dba Marque and McCoy Miller
Address City IN Zip: 1110 DI Drive, Elkhart, Indiana 46514
Permit No.: F039-25492-00508
Reviewer: Josiah Balogun
Date: 26-Jan-2008

Unit ID: Plant 1: Ambulance prime and paint booths (MMP)

Process/Coating ID	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Ethylbenzene	Weight % Toluene	Weight % Xylene	Weight % MIBK	Weight % Methanol	Ethylbenzene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	MIBK Emissions (ton/yr)	Methanol Emissions (ton/yr)	Total
Polyurethane Primer	2.71	1.00000	0.375	0.00%	0.00%	36.25%	9.00%	0.00%	0.000	0.00	1.62	0.40	0.00	2.02
C. R. Primer	3.99	1.50000	0.375	0.00%	0.00%	23.75%	0.00%	0.00%	0.000	0.00	2.33	0.00	0.00	2.33
Clear Coat	4.40	2.00000	0.375	0.00%	4.00%	20.75%	0.00%	0.00%	0.000	0.58	3.00	0.00	0.00	3.58
White Base	5.19	1.00000	0.375	0.00%	56.50%	6.25%	0.00%	0.00%	0.000	4.81	0.53	0.00	0.00	5.35
Red Base	5.19	1.00000	0.375	0.00%	0.00%	6.25%	0.00%	0.00%	0.000	0.00	0.53	0.00	0.00	0.53
Ditzo Remover	6.00	0.05900	0.625	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.00	0.00	0.00	0.00	0.00
Acryli-clean	6.36	0.08400	0.625	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.00	0.00	0.00	0.00	0.00
Base (Striping)	5.19	0.03200	0.625	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.00	0.00	0.00	0.00	0.00
									0.00	5.39	8.01	0.40	0.00	13.81

Total Uncontrolled Potential Emissions

METHODOLOGY

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

Appendix A: Emissions Calculations
HAP Emission Calculations

Company Name: SJC Industries Corp., dba Marque and McCoy Miller
Address City IN Zip: 1110 DI Drive, Elkhart, Indiana 46514
Permit No.: F039-25492-00508
Reviewer: Josiah Balogun
Date: 26-Jan-2008

Unit ID: Plant 1: Ambulance Undercoating (MMU)

Process/Coating ID	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Ethylbenzene	Weight % Toluene	Weight % Xylene	Weight % MIBK	Weight % Methanol	Ethylbenzene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	MIBK Emissions (ton/yr)	Methanol Emissions (ton/yr)	Total
Seal'n Sound Rust Preventive	7.30	2.03700	0.625	0.00%	0.00%	0.00%	0.00%	0.00%	0.0000	0.00	0.00	0.00	0.00	0.00
Lacquer Thinner	6.80	0.25000	0.625	0.00%	60.00%	0.00%	10.00%	10.00%	0.0000	2.79	0.00	0.47	0.47	3.72
									0.00	2.79	0.00	0.47	0.47	3.72

Total Uncontrolled Potential Emissions

METHODOLOGY

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

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

Company Name: SJC Industries Corp., dba Marque and McCoy Miller
Address City IN Zip: 1110 DI Drive, Elkhart, Indiana 46514
Permit No.: F039-25492-00508
Reviewer: Josiah Balogun
Date: 26-Jan-2008

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
5.12	44.9

Mccoy Miller Plant	Total (MMBtu/hr)
Forty one (41) natural gas fired radiant heaters with each one rated at 0.10 MMBtu per hour	4.10
One (1) natural gas fired box heater rated at 0.15 MMBtu per hour	0.15
Three (3) natural gas fired furnaces with each one rated at 0.29 MMBtu per hour	0.87
	5.12

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.04	0.17	0.01	2.24	0.12	1.88

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
See next page for HAPs emissions calculations.

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

Company Name: SJC Industries Corp., dba Marque and McCoy Miller
Address City IN Zip: 1110 DI Drive, Elkhart, Indiana 46514
Permit No.: F039-25492-00508
Reviewer: Josiah Balogun
Date: 26-Jan-2008

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	4.709E-05	2.691E-05	1.682E-03	4.037E-02	7.625E-05

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.121E-05	2.467E-05	3.140E-05	8.522E-06	4.709E-05

Methodology is the same as page 10

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