



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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

TO: Interested Parties / Applicant

DATE: July 29, 2008

RE: CMT Group, Inc. / 039-26361-00606

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

## Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

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

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

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

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

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

Enclosures  
FNPER.dot12/03/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
**Governor**

*Thomas W. Easterly*  
**Commissioner**

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

## Minor Source Operating Permit OFFICE OF AIR QUALITY

**CMT Group, Inc.**  
**55068 Phillips Street**  
**Elkhart, Indiana 46514**

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

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

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

|  |  |
|--|--|
| Operation Permit No.: M039-26361-00606   |  |
| Issued by:<br><br><i>Original document signed by</i><br><br>Matthew Stuckey, Branch Chief<br>Permits Branch<br>Office of Air Quality | Issuance Date: July 29, 2008<br><br>Expiration Date: July 29, 2013 |

## TABLE OF CONTENTS

|   |           |
|---|-----------|
| <b>A. SOURCE SUMMARY</b> .....  | <b>4</b>  |
| A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]  |           |
| A.2 Emission Units and Pollution Control Equipment Summary  |           |
| <b>B. GENERAL CONDITIONS</b> .....  | <b>5</b>  |
| B.1 Definitions [326 IAC 2-1.1-1]   |           |
| B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]  |           |
| B.3 Term of Conditions [326 IAC 2-1.1-9.5]  |           |
| B.4 Enforceability  |           |
| B.5 Severability  |           |
| B.6 Property Rights or Exclusive Privilege  |           |
| B.7 Duty to Provide Information   |           |
| B.8 Certification   |           |
| B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]   |           |
| B.10 Preventive Maintenance Plan [326 IAC 1-6-3]  |           |
| B.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]   |           |
| B.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]   |           |
| B.13 Permit Renewal [326 IAC 2-6.1-7]   |           |
| B.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]  |           |
| B.15 Source Modification Requirement  |           |
| B.16 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2]<br>[IC 13-17-3-2][IC 13-30-3-1]                   |           |
| B.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]   |           |
| B.18 Annual Fee Payment [326 IAC 2-1.1-7]   |           |
| B.19 Credible Evidence [326 IAC 1-1-6]  |           |
| <b>C. SOURCE OPERATION CONDITIONS</b> .....   | <b>10</b> |
| <b>Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]</b>   |           |
| C.1 Particulate Emission Limitations For Processes with Process Weight Rates<br>Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2] |           |
| C.2 Permit Revocation [326 IAC 2-1.1-9]   |           |
| C.3 Opacity [326 IAC 5-1]   |           |
| C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]   |           |
| C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]  |           |
| C.6 Fugitive Dust Emissions [326 IAC 6-4]   |           |
| C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]   |           |
| <b>Testing Requirements [326 IAC 2-6.1-5(a)(2)]</b>   |           |
| C.8 Performance Testing [326 IAC 3-6]   |           |
| <b>Compliance Requirements [326 IAC 2-1.1-11]</b>   |           |
| C.9 Compliance Requirements [326 IAC 2-1.1-11]  |           |
| <b>Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]</b>   |           |
| C.10 Compliance Monitoring [326 IAC 2-1.1-11]   |           |
| C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]   |           |
| C.12 Instrument Specifications [326 IAC 2-1.1-11]   |           |
| <b>Corrective Actions and Response Steps</b>  |           |
| C.13 Response to Excursions or Exceedances  |           |

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test

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

- C.15 Malfunctions Report [326 IAC 1-6-2]
- C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]
- C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2]  
[IC 13-14-1-13]

**D.1. EMISSIONS UNIT OPERATION CONDITIONS ..... 16**

**Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]**

- D.1.1 Particulate Matter (PM) [326 IAC 6-3-2]
- D.1.2 Preventive Maintenance Plan

**E.1. EMISSIONS UNIT OPERATION CONDITIONS ..... 17**

|                               |    |
|-------------------------------|----|
| MSOP Certification Form ..... | 18 |
| Annual Notification .....     | 19 |
| Malfunction Report .....      | 20 |
| Attachment A .....            | 22 |

## SECTION A SOURCE SUMMARY

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

### A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

---

The Permittee owns and operates a stationary recreational vehicle and bus painting operation.

|                              |   |
|------------------------------|---|
| Source Address:              | 55068 Phillips Street, Elkhart, Indiana 46514   |
| Mailing Address:             | 55068 Phillips Street, Elkhart, Indiana 46514   |
| General Source Phone Number: | (574) 266-4100  |
| SIC Code:                    | 7532  |
| County Location:             | Elkhart   |
| Source Location Status:      | Attainment for all criteria pollutants  |
| Source Status:               | Minor Source Operating Permit Program<br>Minor Source, under PSD and Emission Offset Rules<br>Minor Source, Section 112 of the Clean Air Act<br>Not 1 of 28 Source Categories |

### A.2 Emission Units and Pollution Control Equipment Summary

---

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

- (a) Three (3) radiant space heaters, identified as H1 through H3, constructed in 2004, with a rated heat capacity of 0.125 million British thermal units (mmBtu) per hour, exhausting to stack SVH1 through SVH3.
- (b) One (1) make-up air heater, identified as AM-1, constructed in 2004, with a rated heat capacity of 2.7 mmBtu per hour, exhausting to stack SVAM1.
- (c) One (1) paint booth, identified as PB1, constructed in 2004, approved for modification in 2008, with a maximum capacity of 0.13 fully assembled recreational vehicle/bus per hour, using dry filters as control, and exhausting to stack PBSV1.
- (d) One (1) paint booth, identified as PB2, constructed in 2004, approved for modification in 2008, with a maximum capacity of 0.13 fully assembled recreational vehicle/bus per hour, using dry filters as control, and exhausting to stack PBSV2.

## **SECTION B GENERAL CONDITIONS**

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

---

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

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

- 
- (a) This permit, M039-26361-00606, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

---

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

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

### **B.4 Enforceability**

---

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

### **B.5 Severability**

---

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

### **B.6 Property Rights or Exclusive Privilege**

---

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

### **B.7 Duty to Provide Information**

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

## B.8 Certification

---

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

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

---

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:  
  
Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, IN 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

## B.10 Preventive Maintenance Plan [326 IAC 1-6-3]

---

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall 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.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

---

- (a) All terms and conditions of permits established prior to M039-26361-00606 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

**B.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]**

---

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

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

---

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
  - (1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the

document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

**B.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]**

---

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

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

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

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

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

**B.15 Source Modification Requirement**

---

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

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

---

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

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

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

---

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

**B.18 Annual Fee Payment [326 IAC 2-1.1-7]**

---

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

**B.19 Credible Evidence [326 IAC 1-1-6]**

---

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

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

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

**C.2 Permit Revocation [326 IAC 2-1.1-9]**

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

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

**C.3 Opacity [326 IAC 5-1]**

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

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

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

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

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

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

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

---

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

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

---

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

All required notifications shall be submitted to:

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

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

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

- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed 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 Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

---

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

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

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

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

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

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

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

---

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

## **Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]**

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

---

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

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

---

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

### **C.12 Instrument Specifications [326 IAC 2-1.1-11]**

---

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

## **Corrective Actions and Response Steps**

### **C.13 Response to Excursions or Exceedances**

---

- (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.14 Actions Related to Noncompliance Demonstrated by a Stack Test**

---

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

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

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

**C.15 Malfunctions Report [326 IAC 1-6-2]**

---

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

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

C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]

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

C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) 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.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) paint booth, identified as PB1, constructed in 2004, approved for modification in 2008, with a maximum capacity of 0.13 fully assembled recreational vehicle/bus per hour, using dry filters as control, and exhausting to stack PBSV1.
- (b) One (1) paint booth, identified as PB2, constructed in 2004, approved for modification in 2008, with a maximum capacity of 0.13 fully assembled recreational vehicle/bus per hour, using dry filters as control, and exhausting to stack PBSV2.

(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 2-6.1-5(a)(1)]

#### D.1.1 Particulate Matter (PM) [326 IAC 6-3-2]

---

- (a) Pursuant to 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes), surface coating processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device according to the manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
  - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
  - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

#### D.1.2 Preventive Maintenance Plan

---

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

## SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) paint booth, identified as PB1, constructed in 2004, approved for modification in 2008, with a maximum capacity of 0.13 fully assembled recreational vehicle/bus per hour, using dry filters as control, and exhausting to stack PBSV1.
- (b) One (1) paint booth, identified as PB2, constructed in 2004, approved for modification in 2008, with a maximum capacity of 0.13 fully assembled recreational vehicle/bus per hour, using dry filters as control, and exhausting to stack PBSV2.

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

### E.1.1 General Provisions Relating to NESHAP HHHHHH [326 IAC 20-1] [40 CFR Part 63, Subpart A]

Pursuant to 40 CFR 63.11174, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, as specified in Table 1 to Subpart HHHHHH of Part 63.

### E.1.2 Miscellaneous Surface Coating Operations NESHAP [40 CFR Part 63, Subpart HHHHHH]

The paint booths (PB1 and PB2) are subject to the National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH (included as Attachment A), unless otherwise specified in 40 CFR 63, Subpart HHHHHH.

Applicable portions of the NESHAP are the following:

- (1) 40 CFR 63.11169
- (2) 40 CFR 63.11170(a)(2)
- (3) 40 CFR 63.11170(b)
- (4) 40 CFR 63.11171
- (5) 40 CFR 63.11172(b)
- (6) 40 CFR 63.11173(e)
- (7) 40 CFR 63.11173(f)
- (8) 40 CFR 63.11173(g)(2)
- (9) 40 CFR 63.11173(g)(3)
- (10) 40 CFR 63.11174
- (11) 40 CFR 63.11175
- (12) 40 CFR 63.11176(a)
- (13) 40 CFR 63.11177
- (14) 40 CFR 63.11178
- (15) 40 CFR 63.11179
- (16) 40 CFR 63.11180

Table 1

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

**MINOR SOURCE OPERATING PERMIT (MSOP)  
CERTIFICATION**

Source Name: CMT Group, Inc.  
Source Address: 55068 Phillips Street, Elkhart, Indiana 46514  
Mailing Address: 55068 Phillips Street, Elkhart, Indiana 46514  
MSOP Permit No.: M039-26361-00606

**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**

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

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

|                      |                        |
|----------------------|------------------------|
| <b>Company Name:</b> | CMT Group, Inc.        |
| <b>Address:</b>      | 55068 Phillips Street  |
| <b>City:</b>         | Elkhart, Indiana 46514 |
| <b>Phone #:</b>      | (574) 266-4100         |
| <b>MSOP #:</b>       | M039-26361-00606       |

I hereby certify that CMT Group, Inc. is :

still in operation.

no longer in operation.

I hereby certify that CMT Group, Inc. is :

in compliance with the requirements of MSOP M039-26361-00606.

not in compliance with the requirements of MSOP M039-26361-00606.

|                                       |
|---------------------------------------|
| <b>Authorized Individual (typed):</b> |
| <b>Title:</b>                         |
| <b>Signature:</b>                     |
| <b>Date:</b>                          |

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

|                       |
|-----------------------|
| <b>Noncompliance:</b> |
|                       |
|                       |
|                       |
|                       |

### MALFUNCTION REPORT

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

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_

INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

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

**326 IAC 1-6-1 Applicability of rule**

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

**326 IAC 1-2-39 "Malfunction" definition**

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

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

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

---

---

## **Attachment A**

### **National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources**

#### **40 CFR 63, Subpart HHHHHH**

## **Subpart HHHHHH—National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources**

**Source:** 73 FR 1760, Jan. 9, 2008, unless otherwise noted.

### **What This Subpart Covers**

#### **§ 63.11169 What is the purpose of this subpart?**

Except as provided in paragraph (d) of this section, this subpart establishes national emission standards for hazardous air pollutants (HAP) for area sources involved in any of the activities in paragraphs (a) through (c) of this section. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission standards contained herein.

(a) Paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl), Chemical Abstract Service number 75092, in paint removal processes;

(b) Autobody refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations;

(c) Spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), collectively referred to as the target HAP to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.

(d) This subpart does not apply to any of the activities described in paragraph (d)(1) through (6) of this section.

(1) Surface coating or paint stripping performed on site at installations owned or operated by the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State), the National Aeronautics and Space Administration, or the National Nuclear Security Administration.

(2) Surface coating or paint stripping of military munitions, as defined in §63.11180, manufactured by or for the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State) or equipment directly and exclusively used for the purposes of transporting military munitions.

(3) Surface coating or paint stripping performed by individuals on their personal vehicles, possessions, or property, either as a hobby or for maintenance of their personal vehicles, possessions, or property. This subpart also does not apply when these operations are performed by individuals for others without compensation. An individual who spray applies surface coating to more than two motor vehicles or pieces of mobile equipment per year is subject to the requirements in this subpart that pertain to motor vehicle and mobile equipment surface coating regardless of whether compensation is received.

(4) Surface coating or paint stripping that meets the definition of “research and laboratory activities” in §63.11180.

(5) Surface coating or paint stripping that meets the definition of “quality control activities” in §63.11180.

(6) Surface coating or paint stripping activities that are covered under another area source NESHAP.

#### **§ 63.11170 Am I subject to this subpart?**

(a) You are subject to this subpart if you operate an area source of HAP as defined in paragraph (b) of this section, including sources that are part of a tribal, local, State, or Federal facility and you perform one or more of the activities in paragraphs (a)(1) through (3) of this section:

(1) Perform paint stripping using MeCl for the removal of dried paint (including, but not limited to, paint, enamel, varnish, shellac, and lacquer) from wood, metal, plastic, and other substrates.

(2) Perform spray application of coatings, as defined in §63.11180, to motor vehicles and mobile equipment including operations that are located in stationary structures at fixed locations, and mobile repair and refinishing operations that travel to the customer's location, except spray coating applications that meet the definition of facility maintenance in §63.11180. However, if you are the owner or operator of a motor vehicle or mobile equipment surface coating operation, you may petition the Administrator for an exemption from this subpart if you can demonstrate, to the satisfaction of the Administrator, that you spray apply no coatings that contain the target HAP, as defined in §63.11180. Petitions must include a description of the coatings that you spray apply and your certification that you do not spray apply any coatings containing the target HAP. If circumstances change such that you intend to spray apply coatings containing the target HAP, you must submit the initial notification required by 63.11175 and comply with the requirements of this subpart.

(3) Perform spray application of coatings that contain the target HAP, as defined in §63.11180, to a plastic and/or metal substrate on a part or product, except spray coating applications that meet the definition of facility maintenance or space vehicle in §63.11180.

(b) An area source of HAP is a source of HAP that is not a major source of HAP, is not located at a major source, and is not part of a major source of HAP emissions. A major source of HAP emissions is any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit any single HAP at a rate of 9.07 megagrams (Mg) (10 tons) or more per year, or emit any combination of HAP at a rate of 22.68 Mg (25 tons) or more per year.

**§ 63.11171 How do I know if my source is considered a new source or an existing source?**

(a) This subpart applies to each new and existing affected area source engaged in the activities listed in §63.11170, with the exception of those activities listed in §63.11169(d) of this subpart.

(b) The affected source is the collection of all of the items listed in paragraphs (b)(1) through (6) of this section. Not all affected sources will have all of the items listed in paragraphs (b)(1) through (6) of this section.

(1) Mixing rooms and equipment;

(2) Spray booths, ventilated prep stations, curing ovens, and associated equipment;

(3) Spray guns and associated equipment;

(4) Spray gun cleaning equipment;

(5) Equipment used for storage, handling, recovery, or recycling of cleaning solvent or waste paint; and

(6) Equipment used for paint stripping at paint stripping facilities using paint strippers containing MeCl.

(c) An affected source is a new source if it meets the criteria in paragraphs (c)(1) and (c)(2) of this section.

(1) You commenced the construction of the source after September 17, 2007 by installing new paint stripping or surface coating equipment. If you purchase and install spray booths, enclosed spray gun cleaners, paint stripping equipment to reduce MeCl emissions, or purchase new spray guns to comply with this subpart at an existing source, these actions would not make your existing source a new source.

(2) The new paint stripping or surface coating equipment is used at a source that was not actively engaged in paint stripping and/or miscellaneous surface coating prior to September 17, 2007.

(d) An affected source is reconstructed if it meets the definition of reconstruction in §63.2.

(e) An affected source is an existing source if it is not a new source or a reconstructed source.

### **General Compliance Requirements**

#### **§ 63.11172 When do I have to comply with this subpart?**

The date by which you must comply with this subpart is called the compliance date. The compliance date for each type of affected source is specified in paragraphs (a) and (b) of this section.

(a) For a new or reconstructed affected source, the compliance date is the applicable date in paragraph (a)(1) or (2) of this section:

(1) If the initial startup of your new or reconstructed affected source is after September 17, 2007, the compliance date is January 9, 2008.

(2) If the initial startup of your new or reconstructed affected source occurs after January 9, 2008, the compliance date is the date of initial startup of your affected source.

(b) For an existing affected source, the compliance date is January 10, 2011.

#### **§ 63.11173 What are my general requirements for complying with this subpart?**

(a) Each paint stripping operation that is an affected area source must implement management practices to minimize the evaporative emissions of MeCl. The management practices must address, at a minimum, the practices in paragraphs (a)(1) through (5) of this section, as applicable, for your operations.

(1) Evaluate each application to ensure there is a need for paint stripping (e.g., evaluate whether it is possible to re-coat the piece without removing the existing coating).

(2) Evaluate each application where a paint stripper containing MeCl is used to ensure that there is no alternative paint stripping technology that can be used.

(3) Reduce exposure of all paint strippers containing MeCl to the air.

(4) Optimize application conditions when using paint strippers containing MeCl to reduce MeCl evaporation (e.g., if the stripper must be heated, make sure that the temperature is kept as low as possible to reduce evaporation).

(5) Practice proper storage and disposal of paint strippers containing MeCl (e.g., store stripper in closed, air-tight containers).

(b) Each paint stripping operation that has annual usage of more than one ton of MeCl must develop and implement a written MeCl minimization plan to minimize the use and emissions of MeCl. The MeCl minimization plan must address, at a minimum, the management practices specified in paragraphs (a)(1) through (5) of this section, as applicable, for your operations. Each operation must post a placard or sign outlining the MeCl minimization plan in each area where paint stripping operations subject to this subpart occur. Paint stripping operations with annual usage of less than one ton of MeCl, must comply with the requirements in paragraphs (a)(1) through (5) of this section, as applicable, but are not required to develop and implement a written MeCl minimization plan.

(c) Each paint stripping operation must maintain copies of annual usage of paint strippers containing MeCl on site at all times.

(d) Each paint stripping operation with annual usage of more than one ton of MeCl must maintain a copy of their current MeCl minimization plan on site at all times.

(e) Each motor vehicle and mobile equipment surface coating operation and each miscellaneous surface coating operation must meet the requirements in paragraphs (e)(1) through (e)(5) of this section.

(1) All painters must be certified that they have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment. The minimum requirements for training and certification are described in paragraph (f) of this section. The spray application of surface coatings is prohibited by persons who are not certified as having completed the training described in paragraph (f) of this section. The requirements of this paragraph do not apply to the students of an accredited surface coating training program who are under the direct supervision of an instructor who meets the requirements of this paragraph.

(2) All spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure that meets the requirements of paragraph (e)(2)(i) of this section and either paragraph (e)(2)(ii), (e)(2)(iii), or (e)(2)(iv) of this section.

(i) All spray booths, preparation stations, and mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least 98-percent capture of paint overspray. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, "Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992" (incorporated by reference, see §63.14 of subpart A of this part). The test coating for measuring filter efficiency shall be a high solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-HVLP) air-atomized spray gun operating at 40 pounds per square inch (psi) air pressure; the air flow rate across the filter shall be 150 feet per minute. Owners and operators may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement. The requirements of this paragraph do not apply to waterwash spray booths that are operated and maintained according to the manufacturer's specifications.

(ii) Spray booths and preparation stations used to refinish complete motor vehicles or mobile equipment must be fully enclosed with a full roof, and four complete walls or complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls or preparation station curtains. However, if a spray booth is fully enclosed and has seals on all doors and other openings and has an automatic pressure balancing system, it may be operated at up to, but not more than, 0.05 inches water gauge positive pressure.

(iii) Spray booths and preparation stations that are used to coat miscellaneous parts and products or vehicle subassemblies must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so that air is drawn into the booth. The walls and roof of a booth may have openings, if needed, to allow for conveyors and parts to pass through the booth during the coating process.

(iv) Mobile ventilated enclosures that are used to perform spot repairs must enclose and, if necessary, seal against the surface around the area being coated such that paint overspray is retained within the enclosure and directed to a filter to capture paint overspray.

(3) All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which written approval has been obtained from the Administrator. The procedure used to demonstrate that spray gun transfer efficiency is

equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's "Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989" and "Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002" (incorporated by reference, see §63.14 of subpart A of this part). The requirements of this paragraph do not apply to painting performed by students and instructors at paint training centers. The requirements of this paragraph do not apply to the surface coating of aerospace vehicles that involves the coating of components that normally require the use of an airbrush or an extension on the spray gun to properly reach limited access spaces; to the application of coatings on aerospace vehicles that contain fillers that adversely affect atomization with HVLP spray guns; or to the application of coatings on aerospace vehicles that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 in.).

(4) All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent. Spray gun cleaning may be done with, for example, hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of non-atomizing methods may also be used.

(5) As provided in §63.6(g), we, the U.S. Environmental Protection Agency, may choose to grant you permission to use an alternative to the emission standards in this section after you have requested approval to do so according to §63.6(g)(2).

(f) Each owner or operator of an affected miscellaneous surface coating source must ensure and certify that all new and existing personnel, including contract personnel, who spray apply surface coatings, as defined in §63.11180, are trained in the proper application of surface coatings as required by paragraph (e)(1) of this section. The training program must include, at a minimum, the items listed in paragraphs (f)(1) through (f)(3) of this section.

(1) A list of all current personnel by name and job description who are required to be trained;

(2) Hands-on and classroom instruction that addresses, at a minimum, initial and refresher training in the topics listed in paragraphs (f)(2)(i) through (2)(iv) of this section.

(i) Spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate.

(ii) Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke.

(iii) Routine spray booth and filter maintenance, including filter selection and installation.

(iv) Environmental compliance with the requirements of this subpart.

(3) A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. Owners and operators who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in paragraph (f)(2) of this section are not required to provide the initial training required by that paragraph to these painters.

(g) As required by paragraph (e)(1) of this section, all new and existing personnel at an affected motor vehicle and mobile equipment or miscellaneous surface coating source, including contract personnel, who spray apply surface coatings, as defined in §63.11180, must be trained by the dates specified in paragraphs (g)(1) and (2) of this section. Employees who transfer within a company to a position as a painter are subject to the same requirements as a new hire.

(1) If your source is a new source, all personnel must be trained and certified no later than 180 days after hiring or no later than July 7, 2008, whichever is later. Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in paragraph (f)(2) of this section satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed.

(2) If your source is an existing source, all personnel must be trained and certified no later than 180 days after hiring or no later than January 10, 2011, whichever is later. Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in paragraph (f)(2) of this section satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed.

(3) Training and certification will be valid for a period not to exceed five years after the date the training is completed, and all personnel must receive refresher training that meets the requirements of this section and be re-certified every five years.

[73 FR 1760, Jan. 9, 2008; 73 FR 8408, Feb. 13, 2008]

### **§ 63.11174 What parts of the General Provisions apply to me?**

(a) Table 1 of this subpart shows which parts of the General Provisions in subpart A apply to you.

(b) If you are an owner or operator of an area source subject to this subpart, you are exempt from the obligation to obtain a permit under 40 CFR part 70 or 71, provided you are not required to obtain a permit under 40 CFR 70.3(a) or 71.3(a) for a reason other than your status as an area source under this subpart. Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart applicable to area sources.

### **Notifications, Reports, and Records**

#### **§ 63.11175 What notifications must I submit?**

(a) Initial Notification. If you are the owner or operator of a paint stripping operation using paint strippers containing MeCl and/or a surface coating operation subject to this subpart, you must submit the initial notification required by §63.9(b). For a new affected source, you must submit the Initial Notification no later than 180 days after initial startup or July 7, 2008, whichever is later. For an existing affected source, you must submit the initial notification no later than January 11, 2010. The initial notification must provide the information specified in paragraphs (a)(1) through (8) of this section.

(1) The company name, if applicable.

(2) The name, title, street address, telephone number, e-mail address (if available), and signature of the owner and operator, or other certifying company official;

(3) The street address (physical location) of the affected source and the street address where compliance records are maintained, if different. If the source is a motor vehicle or mobile equipment surface coating operation that repairs vehicles at the customer's location, rather than at a fixed location, such as a collision repair shop, the notification should state this and indicate the physical location where records are kept to demonstrate compliance;

(4) An identification of the relevant standard (i.e., this subpart, 40 CFR part 63, subpart HHHHHH);

(5) A brief description of the type of operation as specified in paragraph (a)(5)(i) or (ii) of this section.

(i) For all surface coating operations, indicate whether the source is a motor vehicle and mobile equipment surface coating operation or a miscellaneous surface coating operation, and include the number of spray booths and preparation stations, and the number of painters usually employed at the operation.

(ii) For paint stripping operations, identify the method(s) of paint stripping employed (e.g., chemical, mechanical) and the substrates stripped (e.g., wood, plastic, metal).

(6) Each paint stripping operation must indicate whether they plan to annually use more than one ton of MeCl after the compliance date.

(7) A statement of whether the source is already in compliance with each of the relevant requirements of this subpart, or whether the source will be brought into compliance by the compliance date. For paint stripping operations, the relevant requirements that you must evaluate in making this determination are specified in §63.11173(a) through (d) of this subpart. For surface coating operations, the relevant requirements are specified in §63.11173(e) through (g) of this subpart.

(8) If your source is a new source, you must certify in the initial notification whether the source is in compliance with each of the requirements of this subpart. If your source is an existing source, you may certify in the initial notification that the source is already in compliance. If you are certifying in the initial notification that the source is in compliance with the relevant requirements of this subpart, then include also a statement by a responsible official with that official's name, title, phone number, e-mail address (if available) and signature, certifying the truth, accuracy, and completeness of the notification, a statement that the source has complied with all the relevant standards of this subpart, and that this initial notification also serves as the notification of compliance status.

(b) Notification of Compliance Status. If you are the owner or operator of a new source, you are not required to submit a separate notification of compliance status in addition to the initial notification specified in paragraph (a) of this subpart provided you were able to certify compliance on the date of the initial notification, as part of the initial notification, and your compliance status has not since changed. If you are the owner or operator of any existing source and did not certify in the initial notification that your source is already in compliance as specified in paragraph (a) of this section, then you must submit a notification of compliance status. You must submit a Notification of Compliance Status on or before March 11, 2011. You are required to submit the information specified in paragraphs (b)(1) through (4) of this section with your Notification of Compliance Status:

(1) Your company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different.

(2) The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance. For paint stripping operations, the relevant requirements that you must evaluate in making this determination are specified in §63.11173(a) through (d). For surface coating operations, the relevant requirements are specified in §63.11173(e) through (g).

(3) The date of the Notification of Compliance Status.

(4) If you are the owner or operator of an existing affected paint stripping source that annually uses more than one ton of MeCl, you must submit a statement certifying that you have developed and are implementing a written MeCl minimization plan in accordance with §63.11173(b).

### **§ 63.11176 What reports must I submit?**

(a) Annual Notification of Changes Report. If you are the owner or operator of a paint stripping, motor vehicle or mobile equipment, or miscellaneous surface coating affected source, you are required to submit a report in each calendar year in which information previously submitted in either the initial notification required by §63.11175(a), Notification of Compliance, or a previous annual notification of changes report submitted under this paragraph, has changed. Deviations from the relevant requirements in §63.11173(a) through (d) or §63.11173(e) through (g) on the date of the report will be deemed to be a change. This includes notification when paint stripping affected sources that have not developed and implemented a written MeCl minimization plan in accordance with §63.11173(b) used more than one ton of MeCl in the previous calendar year. The annual notification of changes report must be submitted prior to March 1 of each calendar year when reportable changes have occurred and must include the information specified in paragraphs (a)(1) through (2) of this section.

(1) Your company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different.

(2) The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance.

(b) If you are the owner or operator of a paint stripping affected source that has not developed and implemented a written MeCl minimization plan in accordance with §63.11173(b) of this subpart, you must submit a report for any calendar year in which you use more than one ton of MeCl. This report must be submitted no later than March 1 of the following calendar year. You must also develop and implement a written MeCl minimization plan in accordance with §63.11173(b) no later than December 31. You must then submit a Notification of Compliance Status report containing the information specified in §63.11175(b) by March 1 of the following year and comply with the requirements for paint stripping operations that annually use more than one ton of MeCl in §§63.11173(d) and 63.11177(f).

### **§ 63.11177 What records must I keep?**

If you are the owner or operator of a surface coating operation, you must keep the records specified in paragraphs (a) through (d) and (g) of this section. If you are the owner or operator of a paint stripping operation, you must keep the records specified in paragraphs (e) through (g) of this section, as applicable.

(a) Certification that each painter has completed the training specified in §63.11173(f) with the date the initial training and the most recent refresher training was completed.

(b) Documentation of the filter efficiency of any spray booth exhaust filter material, according to the procedure in §63.11173(e)(3)(i).

(c) Documentation from the spray gun manufacturer that each spray gun with a cup capacity equal to or greater than 3.0 fluid ounces (89 cc) that does not meet the definition of an HVLP spray gun, electrostatic application, airless spray gun, or air assisted airless spray gun, has been determined by the Administrator to achieve a transfer efficiency equivalent to that of an HVLP spray gun, according to the procedure in §63.11173(e)(4).

(d) Copies of any notification submitted as required by §63.11175 and copies of any report submitted as required by §63.11176.

(e) Records of paint strippers containing MeCl used for paint stripping operations, including the MeCl

content of the paint stripper used. Documentation needs to be sufficient to verify annual usage of paint strippers containing MeCl (e.g., material safety data sheets or other documentation provided by the manufacturer or supplier of the paint stripper, purchase receipts, records of paint stripper usage, engineering calculations).

(f) If you are a paint stripping source that annually uses more than one ton of MeCl you are required to maintain a record of your current MeCl minimization plan on site for the duration of your paint stripping operations. You must also keep records of your annual review of, and updates to, your MeCl minimization plan.

(g) Records of any deviation from the requirements in §§63.11173, 63.11174, 63.11175, or 63.11176. These records must include the date and time period of the deviation, and a description of the nature of the deviation and the actions taken to correct the deviation.

(h) Records of any assessments of source compliance performed in support of the initial notification, notification of compliance status, or annual notification of changes report.

### **§ 63.11178 In what form and for how long must I keep my records?**

(a) If you are the owner or operator of an affected source, you must maintain copies of the records specified in §63.11177 for a period of at least five years after the date of each record. Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two year period.

### **Other Requirements and Information**

#### **§ 63.11179 Who implements and enforces this subpart?**

(a) This subpart can be implemented and enforced by us, the U.S. Environmental Protection Agency (EPA), or a delegated authority such as your State, local, or tribal agency. If the Administrator has delegated authority to your State, local, or tribal agency, then that agency (as well as the EPA) has the authority to implement and enforce this subpart. You should contact your EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to your State, local, or tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or tribal agency under subpart E of this part, the authorities contained in paragraph (c) of this section are retained by the Administrator and are not transferred to the State, local, or tribal agency.

(c) The authority in §63.11173(e)(5) will not be delegated to State, local, or tribal agencies.

#### **§ 63.11180 What definitions do I need to know?**

Terms used in this subpart are defined in the Clean Air Act, in 40 CFR 63.2, and in this section as follows:

*Additive* means a material that is added to a coating after purchase from a supplier (e.g., catalysts, activators, accelerators).

*Administrator* means, for the purposes of this rulemaking, the Administrator of the U.S. Environmental Protection Agency or the State or local agency that is granted delegation for implementation of this subpart.

*Aerospace vehicle or component* means any fabricated part, processed part, assembly of parts, or completed unit, with the exception of electronic components, of any aircraft including but not limited to airplanes, helicopters, missiles, rockets, and space vehicles.

*Airless and air-assisted airless spray* mean any paint spray technology that relies solely on the fluid pressure of the paint to create an atomized paint spray pattern and does not apply any atomizing

compressed air to the paint before it leaves the paint nozzle. Air-assisted airless spray uses compressed air to shape and distribute the fan of atomized paint, but still uses fluid pressure to create the atomized paint.

*Appurtenance* means any accessory to a stationary structure coated at the site of installation, whether installed or detached, including but not limited to: bathroom and kitchen fixtures; cabinets; concrete forms; doors; elevators; fences; hand railings; heating equipment, air conditioning equipment, and other fixed mechanical equipment or stationary tools; lamp posts; partitions; pipes and piping systems; rain gutters and downspouts; stairways, fixed ladders, catwalks, and fire escapes; and window screens.

*Architectural coating* means a coating to be applied to stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs.

*Cleaning material* means a solvent used to remove contaminants and other materials, such as dirt, grease, or oil, from a substrate before or after coating application or from equipment associated with a coating operation, such as spray booths, spray guns, racks, tanks, and hangers. Thus, it includes any cleaning material used on substrates or equipment or both.

*Coating* means, for the purposes of this subpart, a material spray-applied to a substrate for decorative, protective, or functional purposes. For the purposes of this subpart, coating does not include the following materials:

- (1) Decorative, protective, or functional materials that consist only of protective oils for metal, acids, bases, or any combination of these substances.
- (2) Paper film or plastic film that may be pre-coated with an adhesive by the film manufacturer.
- (3) Adhesives, sealants, maskants, or caulking materials.
- (4) Temporary protective coatings, lubricants, or surface preparation materials.
- (5) In-mold coatings that are spray-applied in the manufacture of reinforced plastic composite parts.

*Compliance date* means the date by which you must comply with this subpart.

*Deviation* means any instance in which an affected source, subject to this subpart, or an owner or operator of such a source fails to meet any requirement or obligation established by this subpart.

*Dry media blasting* means abrasive blasting using dry media. Dry media blasting relies on impact and abrasion to remove paint from a substrate. Typically, a compressed air stream is used to propel the media against the coated surface.

*Electrostatic application* means any method of coating application where an electrostatic attraction is created between the part to be coated and the atomized paint particles.

*Equipment cleaning* means the use of an organic solvent to remove coating residue from the surfaces of paint spray guns and other painting related equipment, including, but not limited to stir sticks, paint cups, brushes, and spray booths.

*Facility maintenance* means, for the purposes of this subpart, surface coating performed as part of the routine repair or renovation of the tools, equipment, machinery, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity. *Facility maintenance* also includes surface coating associated with the installation of new equipment or structures, and the application of any surface coating as part of janitorial activities. *Facility maintenance* includes the application of coatings to stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs. *Facility*

*maintenance* also includes the refinishing of mobile equipment in the field or at the site where they are used in service and at which they are intended to remain indefinitely after refinishing. Such mobile equipment includes, but is not limited to, farm equipment and mining equipment for which it is not practical or feasible to move to a dedicated mobile equipment refinishing facility. Such mobile equipment also includes items, such as fork trucks, that are used in a manufacturing facility and which are refinished in that same facility. *Facility maintenance* does not include surface coating of motor vehicles, mobile equipment, or items that routinely leave and return to the facility, such as delivery trucks, rental equipment, or containers used to transport, deliver, distribute, or dispense commercial products to customers, such as compressed gas canisters.

*High-volume, low-pressure (HVLP) spray equipment* means spray equipment that is permanently labeled as such and used to apply any coating by means of a spray gun which is designed and operated between 0.1 and 10 pounds per square inch gauge (psig) air atomizing pressure measured dynamically at the center of the air cap and at the air horns.

*Initial startup* means the first time equipment is brought online in a paint stripping or surface coating operation, and paint stripping or surface coating is first performed.

*Materials that contain HAP or HAP-containing materials* mean, for the purposes of this subpart, materials that contain 0.1 percent or more by mass of any individual HAP that is an OSHA-defined carcinogen as specified in 29 CFR 1910.1200(d)(4), or 1.0 percent or more by mass for any other individual HAP.

*Military munitions* means all ammunition products and components produced or used by or for the U.S. Department of Defense (DoD) or for the U.S. Armed Services for national defense and security, including military munitions under the control of the Department of Defense, the U.S. Coast Guard, the National Nuclear Security Administration (NNSA), U.S. Department of Energy (DOE), and National Guard personnel. The term military munitions includes: confined gaseous, liquid, and solid propellants, explosives, pyrotechnics, chemical and riot control agents, smokes, and incendiaries used by DoD components, including bulk explosives and chemical warfare agents, chemical munitions, biological weapons, rockets, guided and ballistic missiles, bombs, warheads, mortar rounds, artillery ammunition, small arms ammunition, grenades, mines, torpedoes, depth charges, cluster munitions and dispensers, demolition charges, nonnuclear components of nuclear weapons, wholly inert ammunition products, and all devices and components of any items listed in this definition.

*Miscellaneous parts and/or products* means any part or product made of metal or plastic, or combinations of metal and plastic. Miscellaneous parts and/or products include, but are not limited to, metal and plastic components of the following types of products as well as the products themselves: motor vehicle parts and accessories for automobiles, trucks, recreational vehicles; automobiles and light duty trucks at automobile and light duty truck assembly plants; boats; sporting and recreational goods; toys; business machines; laboratory and medical equipment; and household and other consumer products.

*Miscellaneous surface coating operation* means the collection of equipment used to apply surface coating to miscellaneous parts and/or products made of metal or plastic, including applying cleaning solvents to prepare the surface before coating application, mixing coatings before application, applying coating to a surface, drying or curing the coating after application, and cleaning coating application equipment, but not plating. A single surface coating operation may include any combination of these types of equipment, but always includes at least the point at which a coating material is applied to a given part. A surface coating operation includes all other steps (such as surface preparation with solvent and equipment cleaning) in the affected source where HAP are emitted from the coating of a part. The use of solvent to clean parts (for example, to remove grease during a mechanical repair) does not constitute a miscellaneous surface coating operation if no coatings are applied. A single affected source may have multiple surface coating operations. Surface coatings applied to wood, leather, rubber, ceramics, stone, masonry, or substrates other than metal and plastic are not considered miscellaneous surface coating operations for the purposes of this subpart.

*Mobile equipment* means any device that may be drawn and/or driven on a roadway including, but not

limited to, heavy-duty trucks, truck trailers, fleet delivery trucks, buses, mobile cranes, bulldozers, street cleaners, agriculture equipment, motor homes, and other recreational vehicles (including camping trailers and fifth wheels).

*Motor vehicle* means any self-propelled vehicle, including, but not limited to, automobiles, light duty trucks, golf carts, vans, and motorcycles.

*Motor vehicle and mobile equipment surface coating* means the spray application of coatings to assembled motor vehicles or mobile equipment. For the purposes of this subpart, it does not include the surface coating of motor vehicle or mobile equipment parts or subassemblies at a vehicle assembly plant or parts manufacturing plant.

*Non-HAP solvent* means, for the purposes of this subpart, a solvent (including thinners and cleaning solvents) that contains less than 0.1 percent by mass of any individual HAP that is an OSHA-defined carcinogen as specified in 29 CFR 1910.1200(d)(4) and less than 1.0 percent by mass for any other individual HAP.

*Paint stripping and/or miscellaneous surface coating source or facility* means any shop, business, location, or parcel of land where paint stripping or miscellaneous surface coating operations are conducted.

*Paint stripping* means the removal of dried coatings from wood, metal, plastic, and other substrates. A single affected source may have multiple paint stripping operations.

*Painter* means any person who spray applies coating.

*Plastic* refers to substrates containing one or more resins and may be solid, porous, flexible, or rigid. Plastics include fiber reinforced plastic composites.

*Protective oil* means organic material that is applied to metal for the purpose of providing lubrication or protection from corrosion without forming a solid film. This definition of protective oil includes, but is not limited to, lubricating oils, evaporative oils (including those that evaporate completely), and extrusion oils.

*Quality control activities* means surface coating or paint stripping activities that meet all of the following criteria:

- (1) The activities associated with a surface coating or paint stripping operation are intended to detect and correct defects in the final product by selecting a limited number of samples from the operation, and comparing the samples against specific performance criteria.
- (2) The activities do not include the production of an intermediate or final product for sale or exchange for commercial profit; for example, parts that are surface coated or stripped are not sold and do not leave the facility.
- (3) The activities are not a normal part of the surface coating or paint stripping operation; for example, they do not include color matching activities performed during a motor vehicle collision repair.
- (4) The activities do not involve surface coating or stripping of the tools, equipment, machinery, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity; that is, the activities are not facility maintenance.

*Research and laboratory activities* means surface coating or paint stripping activities that meet one of the following criteria:

- (1) Conducted at a laboratory to analyze air, soil, water, waste, or product samples for contaminants, or environmental impact.

(2) Activities conducted to test more efficient production processes, including alternative paint stripping or surface coating materials or application methods, or methods for preventing or reducing adverse environmental impacts, provided that the activities do not include the production of an intermediate or final product for sale or exchange for commercial profit.

(3) Activities conducted at a research or laboratory facility that is operated under the close supervision of technically trained personnel, the primary purpose of which is to conduct research and development into new processes and products and that is not engaged in the manufacture of products for sale or exchange for commercial profit.

*Solvent* means a fluid containing organic compounds used to perform paint stripping, surface prep, or cleaning of surface coating equipment.

*Space Vehicle* means vehicles designed to travel beyond the limit of the earth's atmosphere, including but not limited to satellites, space stations, and the Space Shuttle System (including orbiter, external tanks, and solid rocket boosters).

*Spray-applied coating operations* means coatings that are applied using a hand-held device that creates an atomized mist of coating and deposits the coating on a substrate. For the purposes of this subpart, spray-applied coatings do not include the following materials or activities:

(1) Coatings applied from a hand-held device with a paint cup capacity that is equal to or less than 3.0 fluid ounces (89 cubic centimeters).

(2) Surface coating application using powder coating, hand-held, non-refillable aerosol containers, or non-atomizing application technology, including, but not limited to, paint brushes, rollers, hand wiping, flow coating, dip coating, electrodeposition coating, web coating, coil coating, touch-up markers, or marking pens.

(3) Thermal spray operations (also known as metallizing, flame spray, plasma arc spray, and electric arc spray, among other names) in which solid metallic or non-metallic material is heated to a molten or semi-molten state and propelled to the work piece or substrate by compressed air or other gas, where a bond is produced upon impact.

*Surface preparation* or *Surface prep* means use of a cleaning material on a portion of or all of a substrate prior to the application of a coating.

*Target HAP* are compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).

*Target HAP containing coating* means a spray-applied coating that contains any individual target HAP that is an Occupational Safety and Health Administration (OSHA)-defined carcinogen as specified in 29 CFR 1910.1200(d)(4) at a concentration greater than 0.1 percent by mass, or greater than 1.0 percent by mass for any other individual target HAP compound. For the purpose of determining whether materials you use contain the target HAP compounds, you may rely on formulation data provided by the manufacturer or supplier, such as the material safety data sheet (MSDS), as long as it represents each target HAP compound in the material that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other target HAP compounds.

*Transfer efficiency* means the amount of coating solids adhering to the object being coated divided by the total amount of coating solids sprayed, expressed as a percentage. Coating solids means the nonvolatile portion of the coating that makes up the dry film.

*Truck bed liner coating* means any coating, excluding color coats, labeled and formulated for application to a truck bed to protect it from surface abrasion.

**Table 1 to Subpart HHHHHH of Part 63.—Applicability of General Provisions to Subpart HHHHHH of Part 63**

| <b>Citation</b>  | <b>Subject</b>   | <b>Applicable to subpart HHHHHH</b> | <b>Explanation</b>   |
|------------------|--|-------------------------------------|--|
| §63.1(a)(1)–(12) | General Applicability  | Yes                                 |  |
| §63.1(b)(1)–(3)  | Initial Applicability Determination  | Yes                                 | Applicability of subpart HHHHHH is also specified in §63.11170.  |
| §63.1(c)(1)      | Applicability After Standard Established   | Yes                                 |  |
| §63.1(c)(2)      | Applicability of Permit Program for Area Sources                                 | Yes                                 | (63.11174(b) of Subpart HHHHHH exempts area sources from the obligation to obtain Title V operating permits. |
| §63.1(c)(5)      | Notifications  | Yes                                 |  |
| §63.1(e)         | Applicability of Permit Program to Major Sources Before Relevant Standard is Set | No                                  | (63.11174(b) of Subpart HHHHHH exempts area sources from the obligation to obtain Title V operating permits. |
| §63.2            | Definitions  | Yes                                 | Additional definitions are specified in §63.11180.   |
| §63.3(a)–(c)     | Units and Abbreviations  | Yes                                 |  |
| §63.4(a)(1)–(5)  | Prohibited Activities  | Yes                                 |  |
| §63.4(b)–(c)     | Circumvention/Fragmentation  | Yes                                 |  |
| §63.5            | Construction/Reconstruction of major sources                                     | No                                  | Subpart HHHHHH applies only to area sources.   |
| §63.6(a)         | Compliance With Standards and Maintenance Requirements—Applicability             | Yes                                 |  |
| §63.6(b)(1)–(7)  | Compliance Dates for New and Reconstructed Sources                               | Yes                                 | §63.11172 specifies the compliance dates.  |
| §63.6(c)(1)–(5)  | Compliance Dates for Existing Sources  | Yes                                 | §63.11172 specifies the compliance dates.  |
| §63.6(e)(1)–(2)  | Operation and Maintenance  | Yes                                 |  |
| §63.6(e)(3)      | Startup, Shutdown, and Malfunction Plan  | No                                  | No startup, shutdown, and malfunction plan is required by subpart HHHHHH.                                    |
| §63.6(f)(1)      | Compliance Except During Startup, Shutdown, and Malfunction                      | Yes                                 |  |
| §63.6(f)(2)–(3)  | Methods for Determining Compliance   | Yes                                 |  |
| §63.6(g)(1)–(3)  | Use of an Alternative Standard   | Yes                                 |  |

|                      |  |     |  |
|----------------------|--|-----|--|
| §63.6(h)             | Compliance With Opacity/Visible Emission Standards                           | No  | Subpart HHHHHH does not establish opacity or visible emission standards.                                 |
| §63.6(i)(1)–(16)     | Extension of Compliance  | Yes |  |
| §63.6(j)             | Presidential Compliance Exemption  | Yes |  |
| §63.7                | Performance Testing Requirements   | No  | No performance testing is required by subpart HHHHHH.  |
| §63.8                | Monitoring Requirements  | No  | Subpart HHHHHH does not require the use of continuous monitoring systems.                                |
| §63.9(a)–(d)         | Notification Requirements  | Yes | §63.11175 specifies notification requirements.   |
| §63.9(e)             | Notification of Performance Test   | No  | Subpart HHHHHH does not require performance tests.   |
| §63.9(f)             | Notification of Visible Emissions/Opacity Test                               | No  | Subpart HHHHHH does not have opacity or visible emission standards.                                      |
| §63.9(g)             | Additional Notifications When Using CMS                                      | No  | Subpart HHHHHH does not require the use of continuous monitoring systems.                                |
| §63.9(h)             | Notification of Compliance Status  | No  | §63.11175 specifies the dates and required content for submitting the notification of compliance status. |
| §63.9(i)             | Adjustment of Submittal Deadlines  | Yes |  |
| §63.9(j)             | Change in Previous Information   | Yes | §63.11176(a) specifies the dates for submitting the notification of changes report.                      |
| §63.10(a)            | Recordkeeping/Reporting— Applicability and General Information               | Yes |  |
| §63.10(b)(1)         | General Recordkeeping Requirements   | Yes | Additional requirements are specified in §63.11177.  |
| §63.10(b)(2)(i)–(xi) | Recordkeeping Relevant to Startup, Shutdown, and Malfunction Periods and CMS | No  | Subpart HHHHHH does not require startup, shutdown, and malfunction plans, or CMS.                        |
| §63.10(b)(2)(xii)    | Waiver of recordkeeping requirements   | Yes |  |
| §63.10(b)(2)(xiii)   | Alternatives to the relative accuracy test                                   | No  | Subpart HHHHHH does not require the use of CEMS.   |
| §63.10(b)(2)(xiv)    | Records supporting notifications   | Yes |  |
| §63.10(b)(3)         | Recordkeeping Requirements for Applicability Determinations                  | Yes |  |
| §63.10(c)            | Additional Recordkeeping   | No  | Subpart HHHHHH does not require  |

|                  |   |     |  |
|------------------|---|-----|--|
|                  | Requirements for Sources with CMS   |     | the use of CMS.  |
| §63.10(d)(1)     | General Reporting Requirements  | Yes | Additional requirements are specified in §63.11176.  |
| §63.10(d)(2)–(3) | Report of Performance Test Results, and Opacity or Visible Emissions Observations | No  | Subpart HHHHHH does not require performance tests, or opacity or visible emissions observations.   |
| §63.10(d)(4)     | Progress Reports for Sources With Compliance Extensions                           | Yes |  |
| §63.10(d)(5)     | Startup, Shutdown, and Malfunction Reports  | No  | Subpart HHHHHH does not require startup, shutdown, and malfunction reports.  |
| §63.10(e)        | Additional Reporting requirements for Sources with CMS                            | No  | Subpart HHHHHH does not require the use of CMS.  |
| §63.10(f)        | Recordkeeping/Reporting Waiver  | Yes |  |
| §63.11           | Control Device Requirements/Flares  | No  | Subpart HHHHHH does not require the use of flares.   |
| §63.12           | State Authority and Delegations   | Yes |  |
| §63.13           | Addresses of State Air Pollution Control Agencies and EPA Regional Offices        | Yes |  |
| §63.14           | Incorporation by Reference  | Yes | Test methods for measuring paint booth filter efficiency and spray gun transfer efficiency in §63.11173(e)(2) and (3) are incorporated and included in §63.14. |
| §63.15           | Availability of Information/Confidentiality                                       | Yes |  |
| §63.16(a)        | Performance Track Provisions—reduced reporting                                    | Yes |  |
| §63.16(b)–(c)    | Performance Track Provisions—reduced reporting                                    | No  | Subpart HHHHHH does not establish numerical emission limits.   |

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Source Specific Operating Agreement Transitioning to a Minor Source Operating Permit (MSOP)

#### Source Description and Location

|                              |  |
|------------------------------|--|
| <b>Source Name:</b>          | <b>CMT Group, Inc.</b>                               |
| <b>Source Location:</b>      | <b>55068 Phillips Street, Elkhart, Indiana 46514</b> |
| <b>County:</b>               | <b>Elkhart</b>                                       |
| <b>SIC Code:</b>             | <b>7532</b>  |
| <b>Operation Permit No.:</b> | <b>M039-26361-00606</b>                              |
| <b>Permit Reviewer:</b>      | <b>Anne-Marie C. Hart</b>                            |

On April 1, 2008, the Office of Air Quality (OAQ) has received an application from CMT Group, Inc. related to the transition of a Source Specific Operating Agreement to a MSOP.

#### Existing Approvals

The source has been operating under Source Specific Operating Agreement No. 039-19247-00606, issued on June 22, 2004.

Due to this application, the source is transitioning from a Source Specific Operating Agreement to a MSOP.

#### County Attainment Status

The source is located in Elkhart County.

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

(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.
- (b) Elkhart County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions.
- (c) Other Criteria Pollutants  
Elkhart County has been classified as attainment or unclassifiable in Indiana for SO<sub>2</sub>, CO, PM<sub>10</sub>, and NO<sub>2</sub>. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

#### **Fugitive Emissions**

- (a) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
- (b) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

#### **Background and Description of Permitted Emission Units**

The Office of Air Quality (OAQ) has reviewed an application, submitted by CMT Group, Inc., on April 1, 2008, relating to the operation of a recreational vehicle and bus painting operation. CMT Group, Inc., acquired ownership of the source from Graphic Solution and is in the process of being converted to a customized recreational vehicle and bus topcoating operation. Because of this conversion from automobile refinishing to customized recreational vehicle and bus painting, the source has requested a transition to a MSOP.

The source consists of the following permitted emission unit(s):

- (a) Three (3) radiant space heaters, identified as H1 through H3, constructed in 2004, with a rated heat capacity of 0.125 million British thermal units (mmBtu) per hour, exhausting to stack SVH1 through SVH3.
- (b) One (1) make-up air heater, identified as AM-1, constructed in 2004, with a rated heat capacity of 2.7 mmBtu per hour, exhausting to stack SVAM1.

The following is a list of the modified emission units and pollution control devices:

- (c) One (1) paint booth, identified as PB1, constructed in 2004, approved for modification in 2008, with a maximum capacity of 0.13 fully assembled recreational vehicle/bus per hour, using dry filters as control, and exhausting to stack PBSV1.
- (d) One (1) paint booth, identified as PB2, constructed in 2004, approved for modification in 2008, with a maximum capacity of 0.13 fully assembled recreational vehicle/bus per hour, using dry filters as control, and exhausting to stack PBSV2.

|                           |
|---------------------------|
| <b>Enforcement Issues</b> |
|---------------------------|

There are no pending enforcement actions related to this source.

|                              |
|------------------------------|
| <b>Emission Calculations</b> |
|------------------------------|

See Appendix A of this TSD for detailed emission calculations.

|  |
|--|
| <b>Permit Level Determination – MSOP</b> |
|--|

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

| Pollutant           | Potential To Emit (tons/year) |
|---------------------|-------------------------------|
| PM                  | 13.49                         |
| PM10 <sup>(1)</sup> | 13.56                         |
| SO <sub>2</sub>     | Negligible                    |
| NO <sub>x</sub>     | 1.37                          |
| VOC                 | 34.48                         |
| CO                  | 1.15                          |

(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.

| HAPs                          | Potential To Emit (tons/year) |
|-------------------------------|-------------------------------|
| Xylene                        | 2.04                          |
| Toluene                       | 1.14                          |
| Methyl isobutyl ketone (MIBK) | 6.88                          |
| Benzene                       | 0.66                          |
| Hexane                        | Negligible                    |
| <b>TOTAL HAPs</b>             | <b>10.75</b>                  |

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of VOC is less than one hundred (100) tons per year, but greater than or equal to twenty-five (25) tons per year. The PTE of all other regulated criteria pollutants are less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A Minor Source Operating Permit (MSOP) will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten

(10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

### **Federal Rule Applicability Determination**

#### New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations 40 CFR 60, Subpart MM (326 IAC 12), are not included in the permit, since this source does not coat automobiles and/or light duty trucks as defined in 40 CFR 60, Subpart MM.
- (b) There are no New Source Performance Standards (NSPS)(40 CFR Part 60) included in the permit.

#### National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR 63, Subpart IIII (40 CFR Part 63.3080 - 63.3176), are not included in the permit, since this source is not a major source of HAPs as defined in 40 CFR 63.2 and does not surface coat automobiles or light duty trucks as defined by 63.3176. This source surface coats recreational vehicles and busses.
- (d) The requirements of the NESHAP for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart MMMM (40 CFR 63.3880 - 63.3981), are not included in the permit, since this source is not a major source of HAPs as defined in 40 CFR 63.2.
- (e) The requirements of the NESHAP for Surface Coating of Plastic Parts and Products, 40 CFR 63, Subpart PPPP (40 CFR 63.4480 - 63.4581), are not included in the permit, since this source is not a major source of HAPs as defined in 40 CFR 63.2.
- (f) This source is subject to the NESHAP for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH (40 CFR Part 63.11169 - 63.11180), because this source this source meets the definition of an area source, as defined in 40 CFR 63.2, and performs spray application of coatings to recreational vehicles and busses, which are considered "mobile equipment", as defined by 40 CFR 63.11180. This source does not perform paint stripping using chemical strippers that contain methylene chloride for the removal of dried paint and does not use surface coatings that contain chromium, lead manganese, nickel or cadmium.

The units subject to this rule include the following:

- (a) One (1) paint booth, identified as PB1, constructed in 2004, approved for modification in 2008, with a maximum capacity of 0.25 fully assembled recreational vehicle/bus per hour, using dry filters as control, and exhausting to stack PBSV1.
- (b) One (1) paint booth, identified as PB2, constructed in 2004, approved for modification in 2008, with a maximum capacity of 0.25 fully assembled recreational vehicle/bus per hour, using dry filters as control, and exhausting to stack PBSV2.

Applicable portions of the NESHAP are the following:

- (1) 40 CFR 63.11169
- (2) 40 CFR 63.11170(a)(2)

- (3) 40 CFR 63.11170(b)
- (4) 40 CFR 63.11171
- (5) 40 CFR 63.11172(b)
- (6) 40 CFR 63.11173(e)
- (7) 40 CFR 63.11173(f)
- (8) 40 CFR 63.11173(g)(2)
- (9) 40 CFR 63.11173(g)(3)
- (10) 40 CFR 63.11174
- (11) 40 CFR 63.11175
- (12) 40 CFR 63.11176(a)
- (13) 40 CFR 63.11177
- (14) 40 CFR 63.11178
- (15) 40 CFR 63.11179
- (16) 40 CFR 63.11180

Table 1

The requirements of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the paint booths (PB1 and PB2) except as otherwise specified in 40 CFR 63, Subpart HHHHHH.

- (g) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

- (d) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

|   |
|---|
| <b>State Rule Applicability Determination</b> |
|---|

The following state rules are applicable to the source:

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))  
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))  
This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated pollutants are less than 250 tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (d) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (e) 326 IAC 5-1 (Opacity Limitations)

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

- (1) 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.
  - (2) 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.
- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)  
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

#### Surface Coating Operation

- (g) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
- (1) Pursuant to 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes), surface coating processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device.
  - (2) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
    - (A) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
    - (B) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
  - (3) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.
- (h) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
Each modified paint booth is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each modified paint booth is less than twenty-five (25) tons per year.
- (i) 326 IAC 8-2-2 (Volatile Organic Compounds, Automobile and Light Duty Truck Coating Operations)  
The requirements of 326 IAC 8-2-2 are not applicable to each of paint booths PB1 and PB2, since they each do not perform surface coating of automobiles or light duty trucks as defined in 326 IAC 8-2-2(a). Paint booths PB1 and PB2 surface coat recreational vehicles and busses.
- (j) 326 IAC 8-2-9 (Volatile Organic Compounds, Miscellaneous Metal Coating Operations)  
Pursuant to 326 IAC 8-2-9(a)(5), the requirements of 326 IAC 8-2-9 are not applicable to metal surface coating in paint booths PB1 and PB2, since each booth does not surface coat metal parts or products under the Standard Industrial Classification Code of major group #37. This source surface coats recreational vehicles and busses under the Standard Industrial Classification Code of 7532 (major group #75).

- (k) 326 IAC 8-10 (Automobile Refinishing)  
Pursuant to 326 IAC 8-10-1(a)(2), the requirements of 326 IAC 8-10 are not applicable to paint booths PB1 and PB2, because the source is located in Elkhart County. 326 IAC 8-10 only applies to automobile refinishing facilities located in Clark, Lake, Floyd, or Porter counties.
- (l) There are no other 326 IAC 8 Rules that are applicable to the paint booths.

**Compliance Determination, Monitoring and Testing Requirements**

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

| <b>Emission Unit/Control</b> | <b>Operating Parameters</b> | <b>Frequency</b>              |
|------------------------------|-----------------------------|-------------------------------|
| Dry Filters                  | Overspray control           | Overspray is visibly detected |

**Conclusion and Recommendation**

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on April 1, 2008.

The operation of this source shall be subject to the conditions of the attached proposed MSOP No. 039-26361-00606. The staff recommends to the Commissioner that this MSOP be approved.

**IDEM Contact**

- (a) Questions regarding this proposed permit can be directed to Anne-Marie C. Hart at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5401 or toll free at 1-800-451-6027 extension 4-5401.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)

**Appendix A: Emission Calculations  
Emissions Summary**

**Company Name:** CMT Group, Inc.  
**Address City IN Zip:** 55068 Phillips Street, Elkhart, Indiana 46514  
**Permit Number:** M039-26361-00606  
**Plt ID:** 039-00606  
**Reviewer:** Anne-Marie C. Hart  
**Date:** April 15, 2008

| Process                | tons/year    |              |             |             |              |             |                     |                           |
|------------------------|--------------|--------------|-------------|-------------|--------------|-------------|---------------------|---------------------------|
|                        | PM           | PM10         | NOx         | SO2         | VOC          | CO          | Total Combined HAPs | Worst-Case Individual HAP |
| Paint Booth 1          | 6.73         | 6.73         | 0.00        | 0.00        | 17.20        | 0.00        | 5.36                | 3.44 (MIBK)               |
| Paint Booth 2          | 6.73         | 6.73         | 0.00        | 0.00        | 17.20        | 0.00        | 5.36                | 3.44 (MIBK)               |
| Natural Gas Combustion | 0.03         | 0.1          | 1.37        | 0.01        | 0.08         | 1.15        | 0.03                | 0.02 (Hexane)             |
| <b>Total</b>           | <b>13.49</b> | <b>13.56</b> | <b>1.37</b> | <b>0.01</b> | <b>34.48</b> | <b>1.15</b> | <b>10.75</b>        |                           |

**Individual Hazardous Air Pollutants (tons/year)**

| Xylene | Toluene | MIBK | Benzene | Hexane |
|--------|---------|------|---------|--------|
| 2.04   | 1.14    | 6.88 | 0.66    | 0.025  |

MIBK is worst-case individual HAP

**Appendix A: Emission Calculations**  
**PM and VOC Emissions from Paint Booths 1 and 2**  
**Company Name:** CMT Group, Inc.  
**Address City IN Zip:** 55068 Phillips Street, Elkhart, Indiana 46514  
**Permit Number:** M039-26361-00606  
**Plt ID:** 039-00606  
**Reviewer:** Anne-Marie C. Hart  
**Date:** April 15, 2008

**Paint Booth 1**

| Material                                 | Density (Lb/Gal) | Weight % Volatile (H2O & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential (ton/yr) | lb VOC/gal solids | Transfer Efficiency |
|--|------------------|------------------------------------|----------------|-------------------|----------------|---------------------------------|------------------------|---------------------|---|----------------------------------|-------------------------------|------------------------------|-----------------------------|--------------------------------|-------------------|---------------------|
| <b>Basecoat Application - Step 1</b>     |                  |                                    |                |                   |                |                                 |                        |                     |   |                                  |                               |                              |                             |                                |                   |                     |
| A-Base Activator                         | 7.05             | 85.60%                             | 0.0%           | 85.6%             | 0.0%           | 14.35%                          | 0.50000                | 0.130               | 6.03  | 6.03                             | 0.39                          | 9.41                         | 1.72                        | 0.07                           | 42.05             | 75%                 |
| 295 HS White Toner                       | 13.69            | 26.60%                             | 0.0%           | 26.6%             | 0.0%           | 73.40%                          | 3.50000                | 0.130               | 3.64  | 3.64                             | 1.66                          | 39.77                        | 7.26                        | 5.01                           | 4.96              | 75%                 |
| E350 Epoxy White Primer                  | 14.58            | 16.60%                             | 0.0%           | 16.6%             | 0.0%           | 83.40%                          | 1.25000                | 0.130               | 2.42  | 2.42                             | 0.39                          | 9.44                         | 1.72                        | 2.16                           | 2.90              | 75%                 |
| <b>Clearcoat Application - Step 2</b>    |                  |                                    |                |                   |                |                                 |                        |                     |   |                                  |                               |                              |                             |                                |                   |                     |
| MS Clear Activator                       | 7.73             | 56.50%                             | 0.0%           | 56.5%             | 0.0%           | 43.50%                          | 0.50000                | 0.130               | 4.37  | 4.37                             | 0.28                          | 6.81                         | 1.24                        | 0.24                           | 10.04             | 75%                 |
| MS Clear Clearcoat                       | 8.61             | 56.80%                             | 0.0%           | 56.8%             | 0.0%           | 43.20%                          | 3.25000                | 0.130               | 4.89  | 4.89                             | 2.07                          | 49.59                        | 9.05                        | 1.72                           | 11.32             | 75%                 |
| Cleaning Solvent                         |                  |                                    |                |                   |                |                                 |                        |                     |   |                                  |                               |                              |                             |                                |                   |                     |
| R859 Wax & Grease Remover (unit cleaner) | 6.26             | 100.00%                            | 0.0%           | 100.0%            | 0.0%           | 0.00%                           | 0.25000                | 0.130               | 6.26  | 6.26                             | 0.20                          | 4.88                         | 0.89                        | 0.00                           | 0.00              | 100%                |

**Emissions from Paint Booth 1 (Step 1 + Step 2 + Step 3)**

**3.93      94.24      17.20      6.73**

**Paint Booth 2**

| Material                                 | Density (Lb/Gal) | Weight % Volatile (H2O & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential (ton/yr) | lb VOC/gal solids | Transfer Efficiency |
|--|------------------|------------------------------------|----------------|-------------------|----------------|---------------------------------|------------------------|---------------------|---|----------------------------------|-------------------------------|------------------------------|-----------------------------|--------------------------------|-------------------|---------------------|
| <b>Basecoat Application - Step 1</b>     |                  |                                    |                |                   |                |                                 |                        |                     |   |                                  |                               |                              |                             |                                |                   |                     |
| A-Base Activator                         | 7.05             | 85.60%                             | 0.0%           | 85.6%             | 0.0%           | 14.35%                          | 0.50000                | 0.130               | 6.03  | 6.03                             | 0.39                          | 9.41                         | 1.72                        | 0.07                           | 42.05             | 75%                 |
| 295 HS White Toner                       | 13.69            | 26.60%                             | 0.0%           | 26.6%             | 0.0%           | 73.40%                          | 3.50000                | 0.130               | 3.64  | 3.64                             | 1.66                          | 39.77                        | 7.26                        | 5.01                           | 4.96              | 75%                 |
| E350 Epoxy White Primer                  | 14.58            | 16.60%                             | 0.0%           | 16.6%             | 0.0%           | 83.40%                          | 1.25000                | 0.130               | 2.42  | 2.42                             | 0.39                          | 9.44                         | 1.72                        | 2.16                           | 2.90              | 75%                 |
| <b>Clearcoat Application - Step 2</b>    |                  |                                    |                |                   |                |                                 |                        |                     |   |                                  |                               |                              |                             |                                |                   |                     |
| MS Clear Activator                       | 7.73             | 56.50%                             | 0.0%           | 56.5%             | 0.0%           | 43.50%                          | 0.50000                | 0.130               | 4.37  | 4.37                             | 0.28                          | 6.81                         | 1.24                        | 0.24                           | 10.04             | 75%                 |
| MS Clear Clearcoat                       | 8.61             | 56.80%                             | 0.0%           | 56.8%             | 0.0%           | 43.20%                          | 3.25000                | 0.130               | 4.89  | 4.89                             | 2.07                          | 49.59                        | 9.05                        | 1.72                           | 11.32             | 75%                 |
| Cleaning Solvent                         |                  |                                    |                |                   |                |                                 |                        |                     |   |                                  |                               |                              |                             |                                |                   |                     |
| R859 Wax & Grease Remover (unit cleaner) | 6.26             | 100.00%                            | 0.0%           | 100.0%            | 0.0%           | 0.00%                           | 0.25000                | 0.130               | 6.26  | 6.26                             | 0.20                          | 4.88                         | 0.89                        | 0.00                           | 0.00              | 100%                |

**Emissions from Paint Booth 1 (Step 1 + Step 2 + Step 3)**

**3.93      94.24      17.20      6.73**

**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)

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

**Company Name:** CMT Group, Inc.  
**Address City IN Zip:** 55068 Phillips Street, Elkhart, Indiana 46514  
**Permit Number:** M039-26361-00606  
**Pt ID:** 039-00606  
**Permit Reviewer:** Anne-Marie C. Hart  
**Date:** April 15, 2008

**Paint Booth 1**

| Material   | Density (Lb/Gal) | Gallons of Material (gal/unit) | Maximum (unit/hour) | Weight % Xylene | Weight % Toluene | Weight % MIBK | Weight % Benzene | Xylene Emissions (ton/yr) | Toluene Emissions (ton/yr) | MIBK Emissions (ton/yr) | Benzene Emissions (ton/yr) | Total Combined HAP Emissions (tons/yr)* |
|--|------------------|--------------------------------|---------------------|-----------------|------------------|---------------|------------------|---------------------------|----------------------------|-------------------------|----------------------------|---|
| <b>Basecoat Application - Step 1</b>                             |                  |                                |                     |                 |                  |               |                  |                           |                            |                         |                            |   |
| A-Base Activator   | 7.05             | 0.500000                       | 0.13                | 0.00%           | 0.00%            | 80.00%        | 0.00%            | 0.00                      | 0.00                       | 1.61                    | 0.00                       |   |
| 295 HS White Toner   | 13.69            | 3.500000                       | 0.13                | 3.00%           | 0.00%            | 8.00%         | 1.00%            | 0.82                      | 0.00                       | 2.18                    | 0.27                       | 3.27                                    |
| E350 Epoxy White Primer  | 14.58            | 1.250000                       | 0.13                | 0.00%           | 0.00%            | 0.00%         | 0.00%            | 0.00                      | 0.00                       | 0.00                    | 0.00                       |   |
| <b>Clearcoat Application - Step 2</b>                            |                  |                                |                     |                 |                  |               |                  |                           |                            |                         |                            |   |
| MS Clear Activator   | 7.73             | 0.500000                       | 0.13                | 8.00%           | 26.00%           | 57.00%        | 2.00%            | 0.18                      | 0.57                       | 1.25                    | 0.04                       | 2.05                                    |
| MS Clear Clearcoat   | 8.81             | 3.250000                       | 0.13                | 0.00%           | 0.00%            | 0.00%         | 0.00%            | 0.00                      | 0.00                       | 0.00                    | 0.00                       |   |
| <b>Cleaning Solvent</b>  |                  |                                |                     |                 |                  |               |                  |                           |                            |                         |                            |   |
| R859 Wax & Grease Remover (unit cleaner)                         | 6.26             | 0.250000                       | 0.13                | 3.00%           | 0.00%            | 0.00%         | 1.00%            | 0.03                      | 0.00                       | 0.00                    | 0.01                       | 0.04                                    |
| <b>Total Individual HAP Emissions (Step 1 + Step 2 + Step 3)</b> |                  |                                |                     |                 |                  |               |                  | 1.02                      | 0.57                       | 3.44                    | 0.33                       |   |

**Paint Booth 2**

| Material   | Density (Lb/Gal) | Gallons of Material (gal/unit) | Maximum (unit/hour) | Weight % Xylene | Weight % Toluene | Weight % MIBK | Weight % Benzene | Xylene Emissions (ton/yr) | Toluene Emissions (ton/yr) | MIBK Emissions (ton/yr) | Benzene Emissions (ton/yr) | Total Combined HAP Emissions (tons/yr)* |
|--|------------------|--------------------------------|---------------------|-----------------|------------------|---------------|------------------|---------------------------|----------------------------|-------------------------|----------------------------|---|
| <b>Basecoat Application - Step 1</b>                             |                  |                                |                     |                 |                  |               |                  |                           |                            |                         |                            |   |
| A-Base Activator   | 7.05             | 0.500000                       | 0.13                | 0.00%           | 0.00%            | 80.00%        | 0.00%            | 0.00                      | 0.00                       | 1.61                    | 0.00                       |   |
| 295 HS White Toner   | 13.69            | 3.500000                       | 0.13                | 3.00%           | 0.00%            | 8.00%         | 1.00%            | 0.82                      | 0.00                       | 2.18                    | 0.27                       | 3.27                                    |
| E350 Epoxy White Primer  | 14.58            | 1.250000                       | 0.13                | 0.00%           | 0.00%            | 0.00%         | 0.00%            | 0.00                      | 0.00                       | 0.00                    | 0.00                       |   |
| <b>Clearcoat Application - Step 2</b>                            |                  |                                |                     |                 |                  |               |                  |                           |                            |                         |                            |   |
| MS Clear Activator   | 7.73             | 0.500000                       | 0.13                | 8.00%           | 26.00%           | 57.00%        | 2.00%            | 0.18                      | 0.57                       | 1.25                    | 0.04                       | 2.05                                    |
| MS Clear Clearcoat   | 8.81             | 3.250000                       | 0.13                | 0.00%           | 0.00%            | 0.00%         | 0.00%            | 0.00                      | 0.00                       | 0.00                    | 0.00                       |   |
| <b>Cleaning Solvent</b>  |                  |                                |                     |                 |                  |               |                  |                           |                            |                         |                            |   |
| R859 Wax & Grease Remover (unit cleaner)                         | 6.26             | 0.250000                       | 0.13                | 3.00%           | 0.00%            | 0.00%         | 1.00%            | 0.03                      | 0.00                       | 0.00                    | 0.01                       | 0.04                                    |
| <b>Total Individual HAP Emissions (Step 1 + Step 2 + Step 3)</b> |                  |                                |                     |                 |                  |               |                  | 1.02                      | 0.57                       | 3.44                    | 0.33                       |   |

\* Indicates Worst-Case Combination

**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: CMT Group, Inc.**

**Address City IN Zip: 55068 Phillips Street, Elkhart, Indiana 46514**

**Permit Number: M039-26361-00606**

**Reviewer: 039-00606**

**Date: Anne-Marie C. Hart**

**April 15, 2008**

| Heat Input (MMBtu/hr) | Unit                      |
|-----------------------|---------------------------|
| 0.125                 | Radiant Space Heater (H1) |
| 0.125                 | Radiant Space Heater (H2) |
| 0.125                 | Radiant Space Heater (H3) |
| 2.75                  | Make-Up Air Heater (AM1)  |

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

3.1

27.4

| Emission Factor in lb/MMCF    | Pollutant |       |             |      |      |      |
|-------------------------------|-----------|-------|-------------|------|------|------|
|                               | PM*       | PM10* | SO2         | NOx  | VOC  | CO   |
| 1.9                           | 7.6       | 0.6   | 100.0       | 5.5  | 84.0 |      |
|                               |           |       | **see below |      |      |      |
| Potential Emission in tons/yr | 0.03      | 0.10  | 0.01        | 1.37 | 0.08 | 1.15 |

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

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See page 5 for HAPs emissions calculations.

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**HAPs Emissions**

**Company Name: CMT Group, Inc.**

**Address City IN Zip: 55068 Phillips Street, Elkhart, Indiana 46514**

**Permit Number: M039-26361-00606**

**Pit ID: 039-00606**

**Reviewer: Anne-Marie C. Hart**

**Date: April 15, 2008**

| HAPs - Organics               |                    |                            |                         |                   |                    |
|-------------------------------|--------------------|----------------------------|-------------------------|-------------------|--------------------|
| Emission Factor in lb/MMcf    | Benzene<br>2.1E-03 | Dichlorobenzene<br>1.2E-03 | Formaldehyde<br>7.5E-02 | Hexane<br>1.8E+00 | Toluene<br>3.4E-03 |
| Potential Emission in tons/yr | 2.874E-05          | 1.643E-05                  | 1.027E-03               | 2.464E-02         | 4.654E-05          |

| HAPs - Metals                 |                 |                    |                     |                      |                   |
|-------------------------------|-----------------|--------------------|---------------------|----------------------|-------------------|
| Emission Factor in lb/MMcf    | Lead<br>5.0E-04 | Cadmium<br>1.1E-03 | Chromium<br>1.4E-03 | Manganese<br>3.8E-04 | Nickel<br>2.1E-03 |
| Potential Emission in tons/yr | 6.844E-06       | 1.506E-05          | 1.916E-05           | 5.201E-06            | 2.874E-05         |
| <b>Total HAPs</b>             |                 |                    |                     |                      | <b>2.583E-02</b>  |

Methodology is the same as page 4.

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