



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: September 17, 2008

RE: Monroe Custom Utility Bodies, Inc. / 059-26389-00026

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

Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

Monroe Custom Utility Bodies, Inc.
3312 North 600 West
Greenfield, Indiana 46140

(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.: M059-26389-00026	
Issued by/Original Signed By: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: September 17, 2008 Expiration Date: September 17, 2018

TABLE OF CONTENTS

A. SOURCE SUMMARY.....	4
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. GENERAL CONDITIONS	6
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] [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]	
C. SOURCE OPERATION CONDITIONS	11
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]	
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]	
Testing Requirements [326 IAC 2-6.1-5(a)(2)]	
C.8 Performance Testing [326 IAC 3-6]	
Compliance Requirements [326 IAC 2-1.1-11]	
C.9 Compliance Requirements [326 IAC 2-1.1-11]	
Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]	
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]	
Corrective Actions and Response Steps	
C.13 Actions Related to Noncompliance Demonstrated by a Stack Test	

- Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]
- C.14 Malfunctions Report [326 IAC 1-6-2]
- C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]
- C.16 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 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]
- D.1.2 Volatile Organic Compounds (VOC) Limitations, Cleanup Requirements [326 IAC 8-2-9]
- D.1.3 Particulate [326 IAC 6-3-2(d)]
- D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

Compliance Determination Requirements

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

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

- D.1.6 Record Keeping Requirement

D.2. EMISSIONS UNIT OPERATION CONDITIONS..... 18

- Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]
- D.2.1 Particulate [326 IAC 6-2-4]

Annual Notification 19

Malfunction Report 20

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 truck body manufacturing plant for preassembled trucks.

Source Address:	3312 North 600 West, Greenfield, Indiana 46140
Mailing Address:	3312 North 600 West, Greenfield, 46140
General Source Phone Number:	317-894-8684
SIC Code:	3713
County Location:	Hancock
Source Location Status:	Attainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

One (1) truck body manufacturing operation, consisting of the following:

- (a) One (1) metal parts surface coating process, capacity: 1,100 pounds of metal parts per hour, consisting of:
 - (1) One (1) undercoating booth, installed in 1989, equipped with high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to a roof fan,
 - (2) One (1) primer coating booth, installed in 1989, equipped with high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to Stack S2, and
 - (3) One (1) color coating booth, installed in 1989, equipped with high volume low dry filters to control particulate overspray, exhausting to Stack S3.
- (b) One (1) caulks and body repairs operations, identified as EU4, installed in 1969, delivers flow coating to the applicators, capacity: 12,000 pounds of metal parts per hour.
- (c) One (1) touch-up operation, equipped with manual spray applicators (aerosol cans).
- (d) One (1) wash bay, identified as EU3, installed in 1969, capacity: 300 gallons of inorganic cleaning solvent per hour.
- (e) One (1) gun cleaning operation, identified as EU5, installed in 1969, capacity 0.125 gallons of cleaner per hour.

- (f) One (1) natural gas-fired boiler, identified as B-1, installed in 1989, exhausting to Stack B-1. The heat input capacity of the boiler is: 1.50 million British thermal units per hour (MMBtu/hr).
- (g) Two (2) natural gas make-up air units, installed in 1989. The heat input capacity of each unit is: 1.00 MMBtu/hr.
- (h) One (1) welding and metal cutting operation, identified as EU2, installed in 1969, exhausting to Stack S1, consisting of the following:
 - (1) Nineteen (19) metal inert gas (MIG) welding stations, using Carbon Steel type of wire, capacity: 0.5 pounds of wire per hour each;
 - (2) Three (3) stick welding stations, capacity: 0.5 pounds per hour of welding rod each;
 - (3) Two (2) portable plasma cutters, each cut hot rolled steel that is 0.125 inches thick at a rate of 30 inches per minute;
 - (4) One (1) plasma table that cuts hot rolled steel that is 0.125 inches thick at a rate of 30 inches per minute; and
 - (5) Nine (9) oxyfuel stations, each cut hot rolled steel that is 0.125 inches thick at a rate of 30 inches per minute.
- (i) Unpaved roads.

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, M059-26389-00026, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

B.8 Certification

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

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

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, IN 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

- (a) All terms and conditions of permits established prior to M059-26389-00026 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 Actions Related to Noncompliance Demonstrated by a Stack Test

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

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

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

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

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

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

- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

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

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description - [326 IAC 2-7-5(15)] Surface Coating:

- (a) One (1) metal parts surface coating process, identified as EU1, capacity: 1,100 pounds of metal parts per hour, consisting of:
 - (1) One (1) undercoating booth, installed in 1989, equipped with high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to a roof fan,
 - (2) One (1) primer coating booth, installed in 1989, equipped with high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to Stack S2, and
 - (3) One (1) color coating booth, installed in 1989, equipped with high volume low dry filters to control particulate overspray, exhausting to Stack S3.
- (b) One (1) caulks and body repairs operations, identified as EU4, installed in 1969, delivers flow coating to the applicators, capacity: 12,000 pounds of metal parts per hour.
- (c) One (1) touch-up operation, equipped with manual spray applicators (aerosol cans).
- (d) One (1) wash bay, identified as EU3, installed in 1969, capacity: 300 gallons of inorganic cleaning solvent per hour.
- (e) One (1) gun cleaning operation, identified as EU5, installed in 1969, capacity 0.125 gallons of cleaner per hour.

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

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, for air dried and extreme performance coatings as delivered to the applicator at the one (1) metal parts coating process, identified as EU1, consisting of one (1) undercoating booth, one (1) prime coating booth, and one (1) color coating booth.

D.1.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of one (1) metal parts coating process during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.1.3 Particulate [326 IAC 6-3-2(d)]

- (a) Pursuant to 326 IAC 6-3-2(d), particulate from the one (1) undercoating booth, the one (1) prime coating booth, and the one (1) color coating booth, shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four

(4) hours after such observation:

- (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the prime coating booth, undercoating booth, and the color coating booth and their respective control devices.

Compliance Determination Requirements

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

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

Compliance Monitoring Requirements [326 IAC 2-1.1-11][326 IAC 2-6.1-5(a)(2)]

There are no compliance monitoring requirements for these facilities.

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

D.1.6 Recordkeeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records as stated below. Records shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

The VOC content of each coating material and solvent used less water.

- (1) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and VOC content.
 - (2) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (b) All records shall be maintained in accordance with Section C - General Recordkeeping Requirements, of this permit.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description - [326 IAC 2-7-5(15)] Combustion, Welding, and Fugitives:

- (f) One (1) natural gas-fired boiler, identified as B-1, installed in 1989, exhausting to Stack B-1, heat input capacity: 1.50 million British thermal units per hour (MMBtu/hr).
- (g) Two (2) make-up air units, installed in 1989, capacity: 1.00 MMBtu/hr.
- (h) One (1) welding and metal cutting operation, identified as EU2, installed in 1969, exhausting to Stack S1, consisting of the following:
 - (1) Nineteen (19) metal inert gas (MIG) welding stations, using Carbon Steel type of wire, capacity: 0.5 pounds of wire per hour each;
 - (2) Three (3) stick welding stations, capacity: 0.5 pounds per hour of welding rod each;
 - (3) Two (2) portable plasma cutters, each cut hot rolled steel that is 0.125 inches thick at a rate of 30 inches per minute;
 - (4) One (1) plasma table that cuts hot rolled steel that is 0.125 inches thick at a rate of 30 inches per minute; and
 - (5) Nine (9) oxyfuel stations, each cut hot rolled steel that is 0.125 inches thick at a rate of 30 inches per minute.
- (i) Unpaved roads.

(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.2.1 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a), the particulate from the one (1) natural gas-fired boiler (B-1), installed in 1989, rated at 1.50 million British thermal units per hour, shall not exceed 0.6 pound per million British thermal units.

Compliance Determination Requirements

There are no compliance determination requirements for these facilities.

Compliance Monitoring Requirements [326 IAC 2-1.1-11][326 IAC 2-6.1-5(a)(2)]

There are no compliance monitoring requirements for these facilities.

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

There are no recordkeeping and reporting requirements for these facilities.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	Monroe Custom Utility Bodies, Inc.
Address:	3312 North 600 West
City:	Greenfield, Indiana 46140
Phone #:	317-894-8684
MSOP #:	M059-26389-00026

I hereby certify that Monroe Custom Utility Bodies, Inc. is : still in operation.
 no longer in operation.
I hereby certify that Monroe Custom Utility Bodies, Inc. is : in compliance with the requirements of MSOP M059-26389-00026.
 not in compliance with the requirements of MSOP M059-26389-00026.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	Monroe Custom Utility Bodies, Inc.
Source Location:	3312 North 600 West, Greenfield, IN 46140
County:	Hancock
SIC Code:	3713
Permit Renewal No.:	059-26389-00026
Permit Reviewer:	Christina Lowry

The Office of Air Quality (OAQ) has reviewed the minor source operating permit renewal application from Monroe Custom Utility Bodies, Inc. relating to the operation of a stationary truck body manufacturing plant for pre-assembled trucks.

History

On April 8, 2008, Monroe Custom Utility Bodies, Inc. submitted an application to the OAQ requesting to renew its minor source operating permit. Monroe Custom Utility Bodies, Inc. was issued a minor source operating permit on August 4, 2003.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted facilities/units:

One (1) truck body manufacturing operation, consisting of the following:

- (a) One (1) metal parts surface coating process, capacity: 1,100 pounds of metal parts per hour, consisting of:
 - (1) One (1) undercoating booth, installed in 1989, equipped with high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to a roof fan;
 - (2) One (1) primer coating booth, installed in 1989, equipped with high volume low pressure (HVLP) spray guns and dry filters to control particulate overspray, exhausting to Stack S2; and
 - (3) One (1) color coating booth, installed in 1989, equipped with high volume low dry filters to control particulate overspray, exhausting to Stack S3.
- (b) One (1) caulks and body repairs operations, identified as EU4, installed in 1969, delivers flow coating to the applicators, capacity: 12,000 pounds of metal parts per hour.
- (c) One (1) touch-up operation, equipped with manual spray applicators (aerosol cans).
- (d) One (1) wash bay, identified as EU3, installed in 1969, capacity: 300 gallons of inorganic cleaning solvent per hour.
- (e) One (1) gun cleaning operation, identified as EU5, installed in 1969, capacity 0.125 gallons of cleaner per hour.
- (f) One (1) natural gas-fired boiler, identified as B-1, installed in 1989, exhausting to Stack B-1, heat input capacity: 1.50 million British thermal units per hour (MMBtu/hr).
- (g) Two (2) make-up air units, installed in 1989, capacity: 1.00 million British thermal units per hour (MMBtu/hr).

- (h) One (1) welding and metal cutting operation, identified as EU2, installed in 1969, exhausting to Stack S1, consisting of the following:
- (1) Nineteen (19) metal inert gas (MIG) welding stations, using Carbon Steel type of wire, capacity: 0.5 pounds of wire per hour each;
 - (2) Three (3) stick welding stations, capacity: 0.5 pounds per hour of welding rod each;
 - (3) Two (2) portable plasma cutters, each cut hot rolled steel that is 0.125 inches thick at a rate of 30 inches per minute;
 - (4) One (1) plasma table that cuts hot rolled steel that is 0.125 inches thick at a rate of 30 inches per minute; and
 - (5) Nine (9) oxyfuel stations, each cut hot rolled steel that is 0.125 inches thick at a rate of 30 inches per minute.
- (i) Unpaved roads.

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

There were no emission units and pollution control equipment constructed and/or operated without a permit.

Emission Units and Pollution Control Equipment Removed From the Source

There were no emission units and pollution control equipment removed from the source.

Existing Approvals

Minor source operating permit, 059-7455-00026, issued on August 4, 2003.

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

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Hancock County:

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective October 19, 2007, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.

¹Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.
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, and 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. Hancock 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) Hancock 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

Hancock County has been classified as attainment or unclassifiable in Indiana for sulfur dioxide (SO₂), carbon monoxide (CO), nitrogen oxides (NO_x) and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(d) Fugitive Emissions

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

Potential to Emit

The table below summarizes the total potential to emit of the significant emission units.

Process/facility	Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Undercoating Booth	0.755	0.755	-	38.1	-	-	-
Primer Coating Booth	1.24	1.24	-	18.9	-	-	Single 3.37 Total 6.84
Color Coating Booth	0.343	0.343	-	14.1	-	-	-
Cleaning/ Purge Solvents	-	-	-	2.20	-	-	Single 0.664 Total 1.33
Touch-up	0.527	0.527	-	0.550	-	-	Single 0.211 Total 0.303
Caulks	-	-	-	0.744	-	-	Single 0.152 Total 0.152
Natural Gas-Fired Boiler and Air Make-up Units	0.029	0.117	0.009	0.084	1.29	1.53	Single 0.028 Total 0.029
Welding, Torch Cutting, and Plasma Cutting	1.82	1.82	-	-	-	-	Single 0.022 Total 0.03
Unpaved Roads	17.1	4.44	-	-	-	-	-
Total Emissions	66.0	53.5	0.009	74.8	1.29	1.53	Single Less than 10 Total Less than 25
Title V Major Source Threshold	-	100	100	100	100	100	10 and 25
PSD Major Source Threshold	250	250	250	250	250	250	-

- (a) Appendix A of this TSD reflects the unrestricted potential emissions of the source.
- (b) Pursuant to 326 IAC 2-2-1(gg), Monroe Custom Utility Bodies, Inc. is not considered a major stationary source because it is not one of the 28 listed source categories and it does not have the potential to emit two-hundred fifty (250) tons per year or more of a regulated New Source Review (NSR) pollutant.

- (c) In accordance with 326 IAC 2-7-1(22)(B), a major source is defined to have the potential to emit (as defined in 326 IAC 2-7-1(29)) 100 tons per year or more of any regulated air pollutant. Monroe Custom Utility Bodies, Inc. has the potential to emit greater than 25 tons per year, but less than 100 tons per year of any regulated air pollutant. Because of this, the source is not considered a major source and is not subject to the provisions of 326 IAC 2-7. The source, therefore, will be issued a Minor Source Operating Permit (MSOP) Renewal.
- (d) Pursuant to 326 IAC 2-7-1(a)(i)(AA) and (BB), a major source is defined to have the potential to emit (as defined in 326 IAC 2-7-1(29)) 10 tons per year or more of any single Hazardous Air Pollutant (HAP). In addition, a major source has the potential to emit twenty-five (25) tons per year or more of a combination of HAPs. Monroe Custom Utility Bodies, Inc. has the potential to emit any single HAP at less than ten (10) tons per year and/or the potential to emit a combination of HAPs at less than twenty-five (25) tons per year. Because of this, the source is not considered a major source and is not subject to the provisions of 326 IAC 2-7. The source, therefore, will be issued a Minor Source Operating Permit (MSOP) Renewal.

Federal Rule Applicability

40 CFR 60.40b, Subpart Db – Standard of Performance of Industrial – Commercial – Institutional steam generating units. 40 CFR 60.40b, Subpart Db applies to steam generating units that commence construction, modification or reconstruction after June 19, 1984, and has a heat input capacity from fuels combusted in the steam generating unit of greater than 100 million British thermal units per hour (MMBtu/hr). Monroe's natural gas-fired boiler is rated at 1.50 MMBtu/hr. Since the heat input capacity of the boiler is less than 100 MMBtu/hr, the New Source Performance Standard (NSPS) does not apply.

40 CFR 60.40c, Subpart Dc – Standard of performance for small Industrial – Commercial – Institutional steam generating units. 40 CFR 60.40c, Subpart Dc applies to steam generating units for which construction, modification or reconstruction is commenced after June 9, 1989 and has a maximum design heat input capacity of 100 MMBtu/hr or less, but greater than or equal to 10 MMBtu/hr. The NSPS does not apply to Monroe's boiler because it is rated at 1.50 MMBtu/hr.

40 CFR 60.390, Subpart MM – Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations. 40 CFR 60.390, Subpart MM applies to facilities in an automobile or light duty truck assembly plant. This NSPS does not apply to Monroe Custom Utility Bodies, Inc. because the vehicles are preassembled.

40 CFR 63.460, Subpart T - National Emission Standards for Halogenated Solvent Cleaning
The provisions of this subpart apply to each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane (CAS No. 71-55-6), carbon tetrachloride (CAS No. 56-23-5) or chloroform (CAS No. 67-66-3), or any combination of these halogenated HAP solvents. The cleaning and purging operations at this source are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart T because this source does not use halogenated solvents.

State Rule Applicability - Entire Source

326 IAC 2 – Prevention of Significant Deterioration (PSD)

In accordance with 326 IAC 2-2-1(gg)(1), Monroe Custom Utility Bodies, Inc. is not one (1) of the twenty-eight (28) major stationary sources. Pursuant to 326 IAC 2-2-1-(gg)(2), the source is not considered a major stationary source because the potential to emit each of the criteria pollutants units is less than 250 tons per year.

326 IAC 2-4.1 – Major Sources of Hazardous Air Pollutants

326 IAC 2-4.1-1 – New source toxics control, states that any owner or operator who constructs or reconstructs a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.41*, after July 27, 1997, including owners or operators with permit applications pending with the department on the effective date of this section, shall comply with the requirements of this section. All facilities at this source were constructed prior to July 27, 1997 and are not a major source of HAPs. Therefore, the requirements of 326 IAC 2-4.1-1 are not applicable.

326 IAC 2-6 – Emission Reporting

According to 326 IAC 2-6-1 – Applicability: this rule applies to all of the following: sources required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program; sources located in Lake, Porter, and LaPorte County that emit volatile organic compounds (VOC) or oxides of nitrogen (NOx) into the ambient air at levels equal to or greater than twenty-five (25) tons per year; and sources that emit lead into the ambient air at levels equal to or greater than five (5) tons per year.

Applicable sources covered by the above criteria must comply with the compliance schedule contained in 326 IAC 2-6-3. Since the source is not required to have an operating permit under 326 IAC 2-7 and the source is located in Hancock County, the source does not have to comply with the compliance schedule contained in 326 IAC 2-6-3. However, all sources permitted by the department are subject to additional information requests contained in 326 IAC 2-6-5.

326 IAC 5-1 – Opacity Limitations

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

- (a) Opacity shall not exceed an average of forty percent (40%) 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 non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 – Fugitive Dust Emissions

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

326 IAC 6-5 – Fugitive Particulate Matter Emissions

According to 326 IAC 6-5-1 – Applicability: any source of fugitive particulate matter emissions located in non-attainment areas for particulate matter as designated by the board (except for such a source located in Lake County) which has potential fugitive particulate matter emissions of twenty-five (25) tons per year or more is subject to 326 IAC 6-5-1.

The potential fugitive particulate matter emissions from the entire source are less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 6-5 are not applicable.

326 IAC 8-6 – Organic Solvent Emission Limitations

326 IAC 8-6-1 is applicable to sources commencing operation after October 7, 1974, and prior to January 1, 1980, located anywhere in the state with potential emissions of 100 tons or greater per year of VOC, not limited to other rules in 326 IAC 8.

There are no VOC emitting facilities at this source that were constructed after October 7, 1974 and prior to January 1, 1980. Furthermore, the potential to emit VOC from the entire source is less than one hundred (100) tons per year, and this source is subject the requirements of 326 IAC 8-2-9. Therefore, the requirements of 326 IAC 8-6 are not applicable.

State Rule Applicability - Individual Facilities

326 IAC 6-2-4 – Emission limitations for facilities specified in 326 IAC 6-2-1(d)

The facility has a source of indirect heating, natural gas-fired boiler, that was installed in 1989. Pursuant to 326 IAC 6-2-4, particulate emissions from indirect heating facilities constructed after September 21, 1983 shall be limited by the following equation:

$$Pt = 1.09/Q^{0.26}$$

where:

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

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

However, pursuant to 326 IAC 6-2-4(a), for Q less than 10 million British thermal units per hour (MMBtu/hr), Pt shall not exceed 0.6 pounds of particulate per million British thermal units.

Based on AP-42 emission factors, the particulate emissions from the one (1) natural gas-fired boiler is as follows:

$$1.9 \text{ lb PM/mmcf} \times 1 \text{ mmcf}/1,000 \text{ MMBtu} = 0.0019 \text{ lb PM/MMBtu}$$

Therefore, the one (1) natural gas-fired boiler, constructed after 1989, will comply with this rule.

326 IAC 6 – Particulate Emission Limitations for Manufacturing Processes

326 IAC 6-3-2 – Particulate emission limitations, work practices, and control technologies.

In accordance with 326 IAC 6-3-2(d), Surface coating, reinforced plastics composites fabricating manufacturing processes, and graphic arts manufacturing processes shall be controlled by a dry particulate filter, water wash, or an equivalent control device, subject to the following:

- (a) The source shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

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

326 IAC 6-3 – Particulate Emission Limitation for Manufacturing Process

326 IAC 6-3-1(b), the following manufacturing processes are exempt from this rule:

- (a) Pursuant to 326 IAC 6-3-1(b)(9), the nineteen (19) MIG welding stations and the three (3) stick welding stations are not subject to the requirements of 326 IAC 6-3 because less than a total of 625 pounds of rod or wire is consumed per day.
- (b) Pursuant to 326 IAC 6-3-1(b)(10), the one (1) oxyfuel flame cutting station is not subject to the requirements of 326 IAC 6-3 because those stations cut less than 3,400 inches per hour of stock less than one (1) inch thick.
- (c) Pursuant to 326 IAC 6-3-1(b)(14), the two (2) portable plasma cutters and the one (1) plasma cutting table are not subject to the requirements of 326 IAC 6-3 because potential particulate emissions from the plasma cutter are less than 0.551 pounds per hour each.

326 IAC 8-2-2 - Automobile and light duty truck coating operations

In accordance with 326 IAC 8-2-2 (a), emission limitations established for automobile and light duty truck surface coating operations which include all passenger car or passenger car derivatives capable of seating twelve (12) or fewer passengers and any motor vehicle rated at 3,864 kilograms (eight thousand five hundred (8,500 pounds) gross weight or less which are designed primarily for the purpose of transportation or are derivatives of such vehicles.

This source is not considered an automobile and light duty truck assembly plant because it operates under the Standard Industrial Classification Code 3713 for the manufacturing of truck bodies for preassembled trucks. Therefore, the requirements of 326 IAC 8-2-2 are not applicable to this source.

326 IAC 8-2-9 - Miscellaneous Metal Coating

According to 326 IAC 8-2-9(a)(5) applies to any other industrial category which coats metal parts or products under the Standard Industrial Classification Code of major group #37.

This source coats metal truck body parts under the SIC Code of major group 37. The one (1) metal parts surface coating process, which consists of the one (1) undercoating booth, the one (1) primer coating booth, and the one (1) color coating booth, each constructed in 1989, has a potential to emit greater than a total of (25) tons of VOC per year. Therefore, pursuant to the 326 IAC 8-2-9, the one (1) metal parts surface coating process is subject to following requirements:

Pursuant to 326 IAC 8-2-9(d)(3) and (4), the volatile organic compound (VOC) content of coating delivered to the applicators in the metal parts surface coating process shall be limited to three and five-tenths (3.5) pounds of VOCs per gallon of coating less water, for air dried and extreme performance coatings.

In addition, 326 IAC 8-2-9(f), solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the metal parts surface coating process is in compliance with this requirement.

326 IAC 8-2 – Surface Coating Emission Limitations

In accordance with 326 IAC 8-2-1(a)(2), facilities, construction of which commences after November 1, 1980, of the types described in section 9 through 10 of this rule located in any county and which have potential emissions of twenty-two and seven-tenths (22.7) megagrams (twenty-five (25) tons) or greater per years of VOC are subject to 326 IAC 8-2-9.

The caulks and body repair operation is not subject to the requirements of 326 IAC 8-2-9 because this source is located in Hancock County and the facility was constructed before November 1, 1980.

326 IAC 8-2-2 – Automobile and light duty truck coating operations

The touch-up operation is not subject to the requirements of 326 IAC 8-2-9 because the facility is not part of the truck body manufacturing line and has a potential to emit of less than fifteen (15) pounds of VOC per day.

Recommendation

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

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

An application for the purposes of this review was received on April 8, 2008. Additional information was also submitted to the Office of Air Quality.

Conclusion

The operation of this truck body manufacturing plant for pre-assembled trucks shall be subject to the conditions of the attached proposed Minor Source Operating Permit Renewal 059-26389-00026.

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

**Company Name: Monroe Custom Utility Bodies, Inc.
Address City IN Zip: 3312 N. 600 W., Greenfield, Indiana 46140
Permit Number 059-26389-00026**

**Reviewer: Christina Lowry
Date: July 11, 2008**

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
Undercoating																
Gel Seal Undercoating	7.50	38.70%	0.0%	38.7%	0.0%	61.30%	1.00	3.00	2.90	2.90	8.71	208.98	38.1	15.1	4.73	75%
Prime Coat																
Vinyl Etch Primer (As Applied Mixed)	6.96	30.90%	0.0%	30.9%	0.0%	69.10%	0.240	4.00	2.15	2.15	2.06	49.55	9.04	5.06	3.11	75%
E2A-823 Primer (As Applied Mixed)	13.43	11.20%	0.0%	11.2%	0.0%	88.80%	1.00	1.50	1.50	1.50	2.26	54.15	9.88	19.6	1.69	75%
Color Coat																
GC-55017 Paint (As Applied Mixed)	8.42	34.00%	0.0%	34.0%	0.0%	58.10%	0.750	1.50	2.86	2.86	3.22	77.30	14.1	6.85	4.93	75%
Clean-up/Purge Solvent																
Superior #10 Thinner	8.42	100.00%	0.5%	99.5%	0.5%	0.00%	0.060	1.00	8.42	8.38	0.50	12.06	2.20	0.00	N/A	100%
Touch-up																
Self Etching	6.68	47.00%	0.0%	47.0%	0.0%	53.00%	0.020	2.00	3.14	3.14	0.13	3.01	0.550	0.527	5.92	15%
Caulking																
Lightweight Body Filler	9.95	3.80%	0.0%	3.8%	0.0%	96.20%	0.020	1.50	0.38	0.38	0.01	0.27	0.050	0.00	0.39	100%
Polyester Glazing Putty	15.00	5.20%	0.0%	5.2%	0.0%	94.80%	0.020	1.50	0.78	0.78	0.02	0.56	0.102	0.00	0.82	100%
3M Autobody Sealant	12.51	12.00%	0.0%	12.0%	0.0%	88.00%	0.060	1.50	1.50	1.50	0.14	3.24	0.592	0.00	1.71	100%

All coatings are "as applied" worst case mixtures or coatings as delivered to the applicators

Note that the touch-up operation is uncontrolled.

PM	Control Efficiency	95.00%			
	Uncontrolled		16.75	402.04	74.67
	Controlled		16.75	402.04	74.67
					47.12
					2.86

Potential to Emit

Add worst case coating to all solvents

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lbs/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Monroe Custom Utility Bodies, Inc.
Address City IN Zip: 3312 N. 600 W., Greenfield, Indiana 46140
MSOP: 059-26389-00026

Reviewer: Christina Lowry
Date: July 11, 2008

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MIBK	Weight % Methanol	Weight % Styrene	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	MIBK Emissions (tons/yr)	Methanol Emissions (tons/yr)	Styrene Emissions (tons/yr)
Prime Coat													
Vinyl Etch Primer (As Applied Mixed)	6.96	0.240	4.00	2.00%	0.80%	11.50%	0.00%	0.00%	0.585	0.234	3.37	0.00	0.00
E2A-823 Primer (As Applied Mixed)	13.43	1.00	1.50	0.00%	0.00%	3.00%	0.00%	0.00%	0.00	0.00	2.65	0.00	0.00
Clean-up/Purge Solvent													
Superior #10 Thinner	8.42	0.060	1.00	0.00%	30.00%	10.00%	20.00%	0.00%	0.00	0.664	0.221	0.443	0.00
Touch-up													
Self Etching	6.68	0.020	2.00	5.00%	2.00%	18.00%	0.00%	0.00%	0.059	0.023	0.211	0.00	0.00
Caulking													
Lightweight Body Filler	9.95	0.020	1.50	0.00%	0.00%	0.00%	0.00%	3.80%	0.00	0.00	0.00	0.00	0.050
Polyester Glazing Putty	15.00	0.020	1.50	0.00%	0.00%	0.00%	0.00%	5.20%	0.00	0.00	0.00	0.00	0.102

All coatings are "as applied" worst case mixtures or coatings as delivered to the applicators

Note that the weight % of styrene is as emitted

0.644 0.921 6.44 0.443 0.152
Overall Total 8.60

METHODOLOGY

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

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

Company Name: Monroe Custom Utility Bodies, Inc.
Address City IN Zip: 3312 N. 600 W., Greenfield, Indiana 46140
Permit number 059-26389-00026

Reviewer: Christina Lowry
Date: July 11, 2008

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

Source-wide natural gas-fired combustion

One (1) boiler @ 1.50 MMBtu/hr

Two (2) air makeup units @ 1.00 MMBtu/hr, each

3.50

30.66

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.029	0.117	0.0092	1.533	0.084	1.288

*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 4 for HAPs emissions calculations.

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

Company Name: Monroe Custom Utility Bodies, Inc.
Address City IN Zip: 3312 N. 600 W., Greenfield, Indiana 46140
Permit number 059-26389-00026

Reviewer: Christina Lowry
Date: July 11, 2008

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 0.0021	Dichlorobenzene 0.0012	Formaldehyde 0.0750	Hexane 1.8000	Toluene 0.0034
Potential Emission in tons/yr	0.00003	0.00002	0.0011	0.0276	0.0001

HAPs - Metals

Emission Factor in lb/MMcf	Lead 0.0005	Cadmium 0.0011	Chromium 0.0014	Manganese 0.00038	Nickel 0.0021	Total HAPs
Potential Emission in tons/yr	0.00001	0.00002	0.00002	0.00001	0.00003	0.029

Methodology is the same as page 3.

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

Source-wide natural gas-fired combustion

Two (2) testing stations @ 1.00 MMBtu/hr, total
One (1) air makeup units @ 2.50 MMBtu/hr

**Appendix A: Emissions Calculations
Welding and Thermal Cutting**

Company Name: Monroe Custom Utility Bodies, Inc.
Address City IN Zip: 3312 N. 600 W., Greenfield, Indiana 46140
Permit Number: 059-26389-00026

Reviewer: Christina Lowry
Date: July 11, 2008

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)	
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr		
WELDING												
Metal Inert Gas (MIG)(carbon steel)	19	0.5						0.052	0.005	0.000	0	0.005
Stick (E7018 electrode)	3	0.5						0.032	0.001	0.000	0	0.001
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	9	0.125	30	0.1622	0.0005	0.0001	0.0003	0.328	1.825E-05	1.46E-08	1.46E-13	0.0000183
Portable Plasma Cutters**	2	0.125	30	0.0039				0.002	0.000	0.000	0.000	0.000
Plasma Table	1	0.125	30	0.0039				0.001	0.000	0.000	0.000	0.000
EMISSION TOTALS												
Potential Emissions lbs/hr								0.415				0.01
Potential Emissions lbs/day								9.96				0.15
Potential Emissions tons/year								1.82				0.03

METHODOLOGY

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

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

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" t

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

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

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

Appendix A: Emission Calculations

Company Name: Monroe Custom Utility Bodies, Inc.
Address City IN Zip: 3312 N. 600 W., Greenfield, Indiana 46140
MSOP: 059-26389-00026

Reviewer: Christina Lowry
Date: July 11, 2008

**** Unpaved Roads ****

The following calculations determine the amount of emissions created by vehicle traffic on unpaved roads, based on 8760 hours of use and AP-42, Ch 11.2.1.

Cars and Personal Trucks

8.0 trips/hr x
0.114 miles/roundtrip x
 8760 hrs/yr = **7989.12** miles per year

For PM **For PM-10**

$$E_f = \{k \cdot [(s/12)^{0.8}] \cdot [(W/3)^b] / [(M_{dry}/0.2)^c] \cdot [(365-p)/365]\}$$

4.27	=	1.11	lb/mile			
10	where k =	2.6		(particle size multiplier for PM-10) (k=10 for PM-30 or TSP)		
7	s =	7		mean % silt content of unpaved roads		
0.5	b =	0.4		Constant for PM-10 (b = 0.5 for PM-30 or TSP)		
0.4	c =	0.3		Constant for PM-10 (c = 0.4 for PM-30 or TSP)		
3	W =	3		tons average vehicle weight		
0.2	Mdry =	0.2		surface material moisture content, % (default is 0.2 for dry conditions)		
125	p =	125		number of days with at least 0.254mm of precipitation (See Figure 13.2.2-1)		
		4.27	lb/mi x	7989.12	mi/yr =	PM 17.07 tons/yr
			2000 lb/ton			
		1.11	lb/mi x	7989.12	mi/yr =	PM-10 4.44 tons/yr
			2000 lb/ton			

**Appendix A: Emission Calculations
Summary**

Company Name: Monroe Custom Utility Bodies, Inc.
Address City IN Zip: 3312 N. 600 W., Greenfield, Indiana 46140
Permit Number 059-26839-00026

Reviewer: Christina Lowry
Date: July 11, 2008

Emissions	Surface Coating and Cleaning	Combustion	Welding; Oxyfuel and Plasma Cutting	Unpaved Roads	Total
PM	47.1	0.029	1.82	17.1	66.0
PM10	47.1	0.117	1.82	4.44	53.5
VOC	74.7	0.084	0.00	0.00	74.8
SO2	0.00	0.009	0.00	0.00	0.009
NOx	0.00	1.53	0.00	0.00	1.53
CO	0.00	1.29	0.00	0.00	1.29
Xylene	0.644	0.00	0.00	0.00	0.644
Toluene	0.921	0.00	0.00	0.00	0.921
MIBK	6.44	0.00	0.00	0.00	6.44
Methanol	0.443	0.00	0.00	0.00	0.443
Styrene	0.152	0.00	0.00	0.00	0.152
Benzene	0.00	0.00	0.00	0.00	0.00
Dichlorobenzene	0.00	0.00	0.00	0.00	0.00
Formaldehyde	0.00	0.001	0.00	0.00	0.001
Hexane	0.00	0.028	0.00	0.00	0.028
Lead	0.00	0.00	0.00	0.00	0.00
Cadmium	0.00	0.00	0.00	0.00	0.00
Chromium	0.00	0.00	0.072	0.00	0.072
Manganese	0.00	0.00	0.001	0.00	0.001
Nickel	0.00	0.00	0.003	0.00	0.003
Total HAPs	8.60	0.029	0.076	0.00	8.71