



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: January 7, 2009

RE: Royal Cargo Trailers / 039-26852-00598

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

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot12/03/07



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Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Royal Cargo Trailers
51790 County Road 39
Middlebury, Indiana 46540**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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

Operation Permit No.: F 039-26852-00598	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: January 7, 2009 Expiration Date: January 7, 2019

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary cargo trailer manufacturing.

Source Address:	51790 County Road 39, Middlebury, Indiana 46540
Mailing Address:	51790 County Road 39, Middlebury, Indiana 46540
General Source Phone Number:	574-825-9518
SIC Code:	3799
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) spray booth, constructed in 2004, with a maximum capacity of 10 units per hour, using HVLP spray guns for metal coating operations, with particulate emissions controlled by dry filters, and exhausting through stacks S1 and S2.
- (b) One (1) adhesive application process, constructed in 2004, with a maximum capacity of 5 units per hour, and exhausting into the building.

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

This stationary source also includes the following insignificant activities:

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including the following:
 - (1) One (1) clean solvent degreaser, constructed in 2004, with a maximum solvent usage of 0.87 pounds per hour.
 - (2) One (1) aqua works degreaser, constructed in 2004, with a maximum solvent usage of 0.42 pounds per hour.
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment, including the following:
 - (1) Eight (8) MIG station, each with a maximum wire consumption of 0.56 lbs/hr.
 - (2) Two (2) oxyacetylene cutting torches, each with a maximum cutting rate of 1.0 inch per minute for a metal with a thickness of 0.5 inch.
- (c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including the following:

- (1) One (1) radiant heating system, constructed in 2004, with a maximum heat input capacity of 0.16 MMBtu/hr.
- (2) Five (5) natural gas-fired furnaces, identified as H1 through H6, constructed in 2004, each with a maximum heat input capacity of 0.16 MMBtu/hr.

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, F 039-26852-00598, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

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

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

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

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

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

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

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

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

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

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

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

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

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

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall 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.12 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-0178 (ask for Compliance Section)

Facsimile Number: 317-233-6865

Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

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

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

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

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

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

- (a) All terms and conditions of permits established prior to F 039-26852-00598 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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

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

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

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

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

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

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

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

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

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

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

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

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

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

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

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

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

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

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

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any regulated pollutant, except volatile organic compounds (VOCs), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (3) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (4) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) and volatile organic compounds (VOCs) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period each.

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

C.7 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.

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

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

C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

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

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

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

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

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

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

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

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

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

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

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) spray booth, constructed in 2004, with a maximum capacity of 10 units per hour, using HVLP spray guns for metal coating operations, with particulate emissions controlled by dry filters, and exhausting outside through stacks S1 and S2.
- (b) One (1) adhesive application process, constructed in 2004, with a maximum capacity of 5 units per hour, and exhausting into the building.

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

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

D.1.1 VOC Limits [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 the total amount of VOC usage at the spray booth, the adhesive application, sealants, and their associated clean-up activities shall be limited to less than 95 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limitations, combined with the potential to emit VOC from other emission units at this source, shall limit the source-wide potential to emit VOC emissions to less than 100 tons per twelve (12) consecutive month period with compliance determined at the end of each month. These limits will render the requirements of 326 IAC 2-2 and 326 IAC2-7 not applicable.

D.1.2 Volatile Organic Compounds [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or products at the spray booth and adhesive application process may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of three and five tenths (3.5) that applies extreme performance coatings pounds of VOC per gallon of coating excluding water, delivered to a coating applicator.
- (b) Pursuant to 326 IAC 8-2-9 (f) (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.3 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

Pursuant to [326 IAC 2-8-4] the total usage of a single hazardous air pollutant (HAP) at the adhesive spray operation shall be limited to less than 9.0 tons per twelve (12) consecutive month period.

Compliance with this limitation shall limit the source-wide potential to emit a single HAP to less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This limit will render the requirements of 326 IAC 2-2, 326 IAC2-7 and 326 IAC 2-4.1 not applicable.

D.1.4 Particulate Matter Less Than Ten Microns (PM10) [326 IAC 2-8-4] [326 IAC 2-2] [326 IAC 2-7]

Pursuant to 3326 IAC 2-8-4 (FESOP), the PM10 emissions from the spray booth shall be limited to less than 5.94 pounds per hour.

Compliance with the above limit, combined with the potential to emit PM10 from other emission units at this source, shall limit the source-wide potential to emit PM10 emissions to less than 100 tons per twelve (12) consecutive month period with compliance determined at the end of each month. These limits will render the requirements of 326 IAC 2-2 and 326 IAC2-7 not applicable.

D.1.5 Particulate Matter Less Than Two and a half Microns (PM2.5) [326 IAC 2-8-4] [326 IAC 2-2] [326 IAC 2-7]
Pursuant to 326 IAC 2-8-4 (FESOP), the PM2.5 emissions from the spray booth shall be limited to less than 5.94 pounds per hour.

Compliance with the above limit, combined with the potential to emit PM2.5 from other emission units at this source, shall limit the source-wide potential to emit PM2.5 emissions to less than 100 tons per twelve (12) consecutive month period with compliance determined at the end of each month. These limits will render the requirements of 326 IAC 2-2 and 326 IAC2-7 not applicable.

D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC usage and content limitations contained in Conditions D.1.1 and D.1.2 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.

D.1.8 Particulate Control

In order to demonstrate compliance with Conditions D.1.4, and D.1.5 the particulate from the spray booth, shall be controlled by a dry particulate filter, water wash, or an equivalent control device, and the Permittee shall operate the control device in accordance with the manufacturer's specifications.

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

D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray booth, stacks S1 & S2, while booth is in operation. If a condition exists which should result in a response step the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C- Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks, S1 & S2 and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.2 and D.1.3 the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage and the VOC content limits established in Conditions D.1.1, D.1.2(a) and D.1.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC and HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The total VOC and HAP usage for each month.
 - (4) The weight of VOC and HAP emitted for each compliance period.
- (b) To document compliance with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including the following:
 - (1) One (1) clean solvent degreaser, constructed in 2004, with a maximum solvent usage of 0.87 pounds per hour.
 - (2) One (1) aqua works degreaser, constructed in 2004, with a maximum solvent usage of 0.42 pounds per hour.
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment, including the following:
 - (1) Eight (8) MIG station, each with a maximum wire consumption of 0.56 lbs/hr.
 - (2) Two (2) oxyacetylene cutting torches, each with a maximum cutting rate of 1.0 inch per minute for a metal with a thickness of 0.5 inch.
- (c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including the following:
 - (1) One (1) radiant heating system, constructed in 2004, with a maximum heat input capacity of 0.16 MMBtu/hr.
 - (2) Five (5) natural gas-fired furnaces, identified as H1 through H6, constructed in 2004, each with a maximum heat input capacity of 0.16 MMBtu/hr.

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

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

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

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

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

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1,

1990, the Permittee shall ensure that the following control equipment requirements are met:

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

(20%) of the waste solvent by weight could evaporate.

D.2.3 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from each of the welding and cutting operations shall not exceed the pound per hour emission rate established as E in the following formula:

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

$$E = 4.10 P^{0.67}$$

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

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Royal Cargo Trailers
Source Address: 51790 County Road 39, Middlebury, Indiana 46540
Mailing Address: 51790 County Road 39, Middlebury, Indiana 46540
FESOP Permit No.: F 039-26852-00598

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Royal Cargo Trailers
Source Address: 51790 County Road 39, Middlebury, Indiana 46540
Mailing Address: 51790 County Road 39, Middlebury, Indiana 46540
FESOP Permit No.: F 039-26852-00598

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Royal Cargo Trailers
 Source Address: 51790 County Road 39, Middlebury, Indiana 46540
 Mailing Address: 51790 County Road 39, Middlebury, Indiana 46540
 FESOP Permit No.: F 039-26852-00598
 Facility: Spray Booth and Adhesive Application Process
 Parameter: VOC and single HAP usages

- Limit: (a) VOC usage at the Spray Booth and Adhesive Application operation shall be less than 95 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) Total usage of any single hazardous air pollutant (HAP) at the Spray Booth and Adhesive Application operation shall be limited to less than 9.0 tons per twelve (12) consecutive month period.

YEAR: _____

Month	Total Input Usage This Month (tons)		Total Input Usage Previous 11 Months (tons)		Total 12-Month Input Usage (tons)	
	VOC	Single* HAP	VOC	Single* HAP	VOC	Single* HAP
Month 1						
Month 2						
Month 3						

*List the single HAP with the greatest emission rate

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

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Royal Cargo Trailers
Source Address: 51790 County Road 39, Middlebury, Indiana 46540
Mailing Address: 51790 County Road 39, Middlebury, Indiana 46540
FESOP Permit No.: F 039-26852-00598

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

Page 1 of 2

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name:	Royal Cargo Trailers, Inc.
Source Location:	51790 County Road 39, Middlebury, IN 46540
County:	Elkhart
SIC Code:	3799
FESOP Renewal No.:	F 039-26852-00598
Permit Reviewer:	Swarna Prabha

On December 2, 2008, the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) had a notice published in Elkhart Truth, Elkhart, Indiana, stating that Royal Cargo Trailers, Inc. had applied for a renewal to a Federally Enforceable State Operating (FESOP) Permit. Also, the Public Notice was sent to Middlebury Community Library, located at 101 E Winslow St., Middlebury, Indiana to be posted. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments and Responses

NOTE: The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD, but the Permit will have the updated changes.

There were no comments received during Public Notice. The IDEM, OAQ has revised permit Condition D.1.10 to include the HAPs record keeping requirements. The revised permit language is provided below with deleted language as ~~strikeouts~~ and new language **bolded**.

Changes:

The Record Keeping Requirements for the HAPs were inadvertently left out. The HAPs record Keeping Requirements have been added to existing Condition D.1.10.

D.1.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, ~~and~~ D.1.2 **and D.1.3** the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage and the VOC content limits established in Conditions D.1.1, ~~and~~ D.1.2(a) **and D.1.3**. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC **and HAP** content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

- (3) The total VOC **and HAP** usage for each month.
- (4) The weight of VOCs **and HAP** emitted for each compliance period.

.....

IDEM Contact

Question regarding this permit can be directed to Ms. Swarna Prabha the Indiana Department of Environmental Management, Office of Air Quality, 100 North Senate Avenue, MC 6153 IGCN 1003, Indianapolis, In 46204-2251 or by telephone at 317-234-5376 or toll free at 1-800-452-6027 extension 4-5376.

**Indiana Department of Environmental Management
Office of Air Quality**

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

Source Background and Description

Source Name:	Royal Cargo Trailers, Inc.
Source Location:	51790 County Road 39, Middlebury, Indiana 46540
County:	Elkhart
SIC Code:	3799
FESOP Renewal No.:	F 039-26852-00598
Permit Reviewer:	Swarna Prabha

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Royal Cargo Trailers, Inc. relating to the operation of a stationary cargo trailer manufacturing plant.

History

On August 7, 2008 Royal Cargo Trailers, Inc. submitted an application to the OAQ requesting to renew its operating permit. Royal Cargo Trailers, Inc. was issued a FESOP on July 21, 2004.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

- (a) One (1) spray booth, constructed in 2004, with a maximum capacity of 10 units per hour, using HVLP spray guns for metal coating operations, with particulate emissions controlled by dry filters, and exhausting through stacks S1 and S2.
- (b) One (1) adhesive application process, constructed in 2004, with a maximum capacity of 5 units per hour, and exhausting into the building.

Insignificant activities:

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

- (c) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including the following:
 - (1) One (1) clean solvent degreaser, constructed in 2004, with a maximum solvent usage of 0.87 pounds per hour.
 - (2) One (1) aqua works degreaser, constructed in 2004, with a maximum solvent usage of 0.42 pounds per hour.
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment, including the following:
 - (1) Eight (8) MIG station, each with a maximum wire consumption of 0.56 lbs/hr.

- (2) Two (2) oxyacetylene cutting torches, each with a maximum cutting rate of 1.0 inch per minute for a metal with a thickness of 0.5 inch.
- (e) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including the following:
 - (1) One (1) radiant heating system, constructed in 2004, with a maximum heat input capacity of 0.16 MMBtu/hr.
 - (2) Five (5) natural gas-fired furnaces, identified as H1 through H6, constructed in 2004, each with a maximum heat input capacity of 0.16 MMBtu/hr.

Revised Emissions and Pollution Control Equipment

- (a) The description for emission units have been revised to include the process weight rate and provide more clarification about the unit. There is no change in the process operation or throughput.
- (b) The source has replaced the existing Sta-Put spray Adhesive with a new Sta-Put spray canister Adhesive which has no VOC content, and consists of Methylene Chloride as a solvent. Methylene Chloride is considered a HAP.
- (c) There are no new emission units added during the review.

Existing Approvals

Source has been operating under a FESOP No. 039-26852-00598 since July 21, 2004. No new approvals have been issued.

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.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into this FESOP Renewal:

- (a) All construction conditions from all previously issued permits.

Reason not incorporated: All facilities previously permitted have already been constructed; therefore, the construction conditions are no longer necessary as part of the operating permit. Any facilities that were previously permitted but have not yet been constructed would need new pre-construction approval before beginning construction.

- (b) FESOP Condition (D.1.7):

Reason not incorporated: Revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective on June 12, 2002 and were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. Original Condition C.1 – Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour has been revised to remove (1) which contained these requirements, and original Condition D.1.7 – Particulate Matter (PM) [40 CFR 52 Subpart P] which contained these requirements has been removed. Since the requirements of the 326

IAC 6-3-2(d) that were effective June 12, 2002 are now federally enforceable, the statement from original Conditions C.1 (1) and D.1.7 have been removed.

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 Elkhart County.

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

¹Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM2.5.

(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. 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. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules was July 15th, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10

emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.

- (c) **Other Criteria Pollutants**
 Elkhart County has been classified as attainment or unclassifiable in Indiana for other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) **Fugitive Emissions**
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	Potential To Emit (tons/year)
PM	130.67
PM10	130.67
PM2.5	130.67
SO ₂	negl.
NO _x	0.49
VOC	111.52
CO	0.41

HAPs	tons/year
Hexane	8.8E-03
Methylene Chloride	15.0
Glycol Ethers	0.24
Total	0.24

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

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM10, PM2.5 and VOC is equal to or greater than 100 tons per year. The source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to continue to limit their PM10, and VOC emissions to less than Title V levels, therefore the source will be issued a FESOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.
- (d) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Potential to Emit After Issuance

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)								
	PM ⁽¹⁾	PM10	PM2.5*	SO ₂	NOx	VOC	CO	Total HAPs	Worst Single HAP
Spray Booth	130.12	26.02 ⁽²⁾	26.02	-	-	< 95.0 ⁽³⁾	-	0.24	0.24 (Glycol Ethers)
Adhesive Application	-	-	-	-	-		-	<9.0 ⁽⁴⁾	<9.0 (Methylene Chloride)
Insignificant Activities									
Degreasers	-	-	-	-	-	3.55	-	-	-
Welding and Cutting Operations	0.52	0.52	0.52	-	-	-	-	negl.	negl.
Natural Gas Combustion Units	0.04	0.04	0.04	negl.	0.49	0.03	0.41	negl.	negl.
Total PTE of Entire Source	130.67	26.58	26.58	negl.	0.49	<98.6	0.41	0.24	<9.00 (Methylene Chloride)
Title V Major Source Thresholds	NA	100	-	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA

negl. = negligible

* 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.

(1) Represents the potential to emit before controls. Actual emissions will be less than 131 tons per year because the PM emissions are controlled by dry filters with a transfer efficiency of 65%.

(2) Based on the existing PM10 limit of 5.94 lb/hour specified in FESOP 039-18710-00598

(3) Existing VOC emission limits are based on 326 IAC 2-8-4 (FESOP) limitations specified in FESOP 039-18710-00598

(4) Single HAP emission limit based on 326 IAC 2-8-4 (FESOP)

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

(b) Fugitive Emissions
 Since this type of operation is not in one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC2-3, fugitive emissions are not counted towards the determination of PSD and Emission Offset applicability.

(c) FESOP Status

This existing source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels. In addition, this existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Federal Rule Applicability

New Source Performance Standards (NSPS)

- (1) This requirements of 326 IAC 12 or 40 CFR 60, Subpart EE (60.310 through 60.316), Standards of Performance for the surface coating operations to metal furniture are not included in the permit, because this source does not perform Coating of Metal Furniture.
- (2) This requirements of 326 IAC 12 or 40 CFR 60, Subpart MM (60.390 through 60.398), Standards of Performance for the Automobile and Light Duty Truck surface Coating Operations are not included in the permit, because this source assembles cargo trailers.
- (3) There are no New Source Performance Standard (NSPS) (326 IAC 12 and 40 CFR 60) included in this permit renewal.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (1) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart IIII, Surface Coating of Automobiles and Light-Duty Trucks (40 CFR Part 63.3080 - 63.3176), because 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 assembles cargo trailer.
- (2) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart MMMM, Surface Coating of Miscellaneous Metal Parts and Products (40 CFR Part 63.3880 - 63.3981), because this source is not a major source of HAPs as defined in 40 CFR 63.2.
- (3) The degreasing operation identified as Immersion Cleaning, an insignificant activity, is not subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20, (40 CFR 63, Subpart T). Subpart T applies to degreasing operations using one of six listed halogenated solvents, or any combination of the solvents in a concentration greater than 5 percent by weight, as a cleaning or drying agent. The source does not use the regulated halogenated solvents in the degreasing operation; therefore, Subpart T does not apply.
- (4) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPS), 40 CFR 63, 11169 Subpart HHHHHH, surface coating or paint stripping and miscellaneous surface coating operations at area source (40CFR Part 63.11169), because this source is not involved in the use of chemical strippers that contain methyl chloride (MeCl) in paint removal process, and the surface coating used at this source do not contain chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).
- (5) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration(PSD))

PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

This source is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the existing unit is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

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.

326 IAC 2-8-4 (FESOP)

This source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, the following conditions shall apply to this cargo trailer manufacturing source.

(1) PM-10 and PM2.5 Limitations:

The PM10 emissions from the spray booth shall not exceed 5.94 pounds per hour.

(2) VOC Limitations:

The total amount of VOC usage at the spray booth, the adhesive application, sealants, and their associated clean-up activities shall be limited to less than 95 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit, including the potential to emit of VOC limits VOC to less than 100 tons per year.

(3) HAP Limitations:

The single HAP usage at the adhesive application process shall be limited to less than 9.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit, including the potential to emit of HAP limits single HAP to less than 9.0 tons per year.

Compliance with above conditions shall limit the source-wide PM2.5 and PM10 emissions to less than 100 tons per twelve consecutive month period; and VOC, and single HAP, emissions to less than 100, and 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively. These limits will render 326 IAC 2-7 (Part 70), 326 IAC 2-2 and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) not applicable.

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.

State Rule Applicability – Individual Facilities

The Spray Booth

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

The spray booth at this source performs the metal coating process and the source is under the Standard Industrial Classification Code of major group #37. In addition, this booth was constructed after July 1, 1990 and has actual VOC emissions greater than 15 pounds per day. Therefore, this booth is subject to 326 IAC 8-2-9 and has the following requirements:

- (1) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) the VOC content of the coatings delivered to the applicator at the spray booth shall not exceed three and five tenths (3.5) pounds VOC per gallon of extreme performance coatings, excluding water, delivered to the applicators.
- (2) Solvent sprayed from the application equipment during clean-up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is completed, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the Permittee, the VOC contents of the coatings applied in this booth are in compliance with the requirements above.

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)

The requirements of 326 IAC 8-1-6 are not applicable to paint spray booth, since this operation is specifically regulated by IAC 8-2-9.

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

Pursuant to 326 IAC 6-3-2(d), particulate emissions from the paint spray booth must be controlled by dry filters, waterwash, or an equivalent control device and the control device must be operated in accordance with manufacturer's specifications. The source shall operate the dry filters in accordance with manufacturer's specifications.

The Adhesive Application Process

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

The adhesive application process at this source performs the metal coating process and the source is under the Standard Industrial Classification Code of major group #37. In addition, this process was constructed after July 1, 1990 and has actual VOC emissions greater than 15 pounds per day. Therefore, this process is subject to 326 IAC 8-2-9 and has the following requirements:

- (1) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) the VOC content of the coatings applied to this facility shall not exceed three and five tenths (3.5) pounds

VOC per gallon of extreme performance coatings, excluding water, delivered to the applicators.

- (2) Solvent sprayed from the application equipment during clean-up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is completed, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the Permittee, the VOC contents of the coatings applied in the adhesive application process are in compliance with the requirements above.

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)

The requirements of 326 IAC 8-1-6 are not applicable to paint spray booth, since this operation is specifically regulated by IAC 8-2-9.

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

This adhesive application does not generate any particulate emissions. Therefore, the requirements of 326 IAC 6-3-2(d) are not applicable.

Natural Gas space heaters

326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)

The natural gas-fired space heaters, are each not subject to 326 IAC 6-2 as they are not sources of indirect heating.

326 IAC 7-1 (Sulfur dioxide emission limitations: applicability)

The space heaters are not subject to the requirements of 326 IAC 7-1, because the potential and the actual emissions of sulfur dioxide are less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.

Degreasers

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

Any degreaser using VOC containing solvents is considered a cold cleaning operation. The degreasers at this source will be constructed after January 1, 1980 and are subject to 326 IAC 8-3-2. Pursuant to 326 IAC 8-3-2, for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

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

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

The degreasers at this source will be constructed after July 1, 1990 and do not have remote solvent reservoirs. Therefore, these degreasers are subject to 326 IAC 8-3-5 and have the

following requirements:

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

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

There are no other 326 IAC 8 Rules that are applicable to the facility.

326 IAC 20-6-1 (Halogenated Solvent Cleaning)

This source is not subject to the requirements of the 326 IAC 20-6-1, since the degreasing operations do not use a solvent that contains any of the halogenated compounds listed in 326 IAC 20-6-1(a).

MIG stations/cutting torches

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

Pursuant to 326 IAC 6-3-1(b) (10) the welding operations which consume less than 625 pounds of wire per day and torch cutting operations which cuts less than 3,400 inches per hour of one inch thickness stocks are exempt from this rule. The welding and cutting operations at this source are exempt.

Testing Requirements

No stack test is required for this source because compliance with the FESOP limit for VOC can be determined by evaluating MSDSs and keeping records of the amount of VOC applied. The use of dry filters ensures compliance with 326 IAC 2-8 (FESOP) and 326 IAC 6-3 (Process Operations). The compliance monitoring requirements included in the permit should ensure compliance with these rules.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements. Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

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

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (stacks S1 and S2) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to

take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission occurs or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because this spray booth must operate properly to ensure compliance with 326 IAC 2-8-4 (FESOP) and 326 IAC 6-3-2 (Process Operations).

Recommendation

The staff recommends to the Commissioner that the FESOP 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 August 7, 2008 with additional information received on October 22, 2008.

Conclusion

The operation of this cargo trailer manufacturing plant shall be subject to the conditions of the attached FESOP Renewal No. 039-26852-00598.

**Appendix A: Emissions Calculations
Emission Summary**

TSD Appendix A: Page 1 of 8

Company Name: Royal Cargo Trailers, Inc.

Address: 51790 County Rd. 39, Middlebury, IN 46540

FESOP Renewal NO.: 039-26852-00598

Reviewer: Swarna Prabha

Uncontrolled Potential Emissions (tons/year)							
Category	Pollutant	Paint Spray Booth	Adhesive Application	Degreaser	Space heaters	Welding MIG	TOTAL
Criteria Pollutants	PM	130.12			0.04	0.52	130.67
	PM10	130.12			0.04	0.52	130.67
	SO2				2.94E-03		2.94E-03
	NOx				0.49		0.49
	VOC	104.56	3.38	3.55	0.03		111.52
	CO				0.41		0.41
Hazardous Air Pollutants	Glycol Ethers	0.24					2.4E-01
	Manganese				1.86E-06	7.99E-04	8.0E-04
	Nickel				1.03E-05	2.63E-05	3.7E-05
	Toluene				1.67E-05		1.7E-05
	Benzene				1.03E-05		1.0E-05
	Hexane				8.83E-03		8.8E-03
	Formaldehyde				3.68E-04		3.7E-04
	Lead				2.45E-06		2.5E-06
	Xylene						
	Ethylbenzene						
	Methanol						
	Methylene Chloride		14.97				14.97
	Chromium				6.87E-06	2.75E-04	2.8E-04
	Totals		2.4E-01	14.97		9.2E-03	1.1E-03

Controlled Potential Emissions (tons/year)							
Category	Pollutant	Paint Spray Booth	Adhesive Application	Degreaser	Space heaters	Welding MIG	TOTAL
Criteria Pollutants	PM	26.02			0.04	0.52	26.58
	PM10	26.02			0.04	0.52	26.58
	SO2				2.94E-03		2.94E-03
	NOx				0.49		0.49
	VOC	<95*			3.55	0.03	<98.58
	CO				0.41		0.41
Hazardous Air Pollutants	Glycol Ethers	0.24					0.24
	Manganese				1.86E-06	7.99E-04	8.00E-04
	Nickel				1.03E-05	2.63E-05	3.66E-05
	Toluene				1.67E-05		1.67E-05
	Benzene				1.03E-05		1.03E-05
	Hexane				8.83E-03		8.83E-03
	Formaldehyde				3.68E-04		3.68E-04
	Lead				2.45E-06		2.45E-06
	Xylene						
	Ethylbenzene						
	Methanol						
	Methylene Chloride		<9.0				9.00
	Chromium				6.87E-06	2.75E-04	2.82E-04
	Totals		0.24			9.25E-03	1.1E-03

Total emissions based on rated capacity at 8,760 hours/year, after enforceable control and limits.

NOTES:

- 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. There are no emissions for PM2.5 in AP42, therefore PM2.5 = PM10
- *VOC Emission Limits based on permit EFSOP # 039 -18710-00598

**Appendix A: Emission Calculations
VOC and PM/PM10 Emissions
From the Spray Booth**

**Company Name: Royal Cargo Trailers, Inc.
Address: 51790 County Rd. 39, Middlebury, IN 46540
FESOP Renewal NO.: 039-26852-00598
Reviewer: Swarna Prabha**

Material	Density (lbs/gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % Organics	Maximum Throughput (unit/hr)	Maximum Usage (gal/unit)	Pounds VOC per gallon of coating	PTE of VOC (lbs/hr)	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)	*PTE of PM/PM10 before Control (lbs/hr)	*PTE of PM/PM10 before Control (ton/yr)	**Transfer Efficiency	PM/PM10 Control Efficiency	PTE of PM/PM10 after Control (lbs/hr)	PTE of PM/PM10 after Control (tons/yr)
ZPG-20060-B	10.4	22.0%	0.0%	22.0%	10.0	1.04	2.29	23.8	571	104	29.5	129	65%	80%	5.91	25.9
Black W. R. Enamel	8.42	13.1%	0.0%	13.1%	10.0	0.007	1.10	0.08	1.85	0.34	0.18	0.79	65%	80%	0.04	0.16
Total								23.9		105	29.7	130.12			5.94	26.02

* Assume all the PM emissions are PM10 emissions.

There are no emission Factor for PM2.5 in AP42, PM2.5 = PM10

** HVLP application method is used in this booth. The transfer efficiency is from a HVLP document prepared by BINKS.

METHODOLOGY

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

PTE of VOC (lbs/hr) = Pounds of VOC per Gallon coating (lbs/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit)

PTE of VOC (lbs/day) = Pounds of VOC per Gallon coating (lbs/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit) * (24 hr/day)

PTE of VOC (tons/yr) = Pounds of VOC per Gallon coating (lbs/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit) * (8760 hr/yr) * (1 ton/2000 lbs)

PTE of PM/PM10 before Control (lbs/hr) = Max. Throughput (unit/hr) * Max. Usage (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer efficiency)

PTE of PM/PM10 before Control (tons/yr) = Max. Throughput (unit/hr) * Max. Usage (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer efficiency) * (8760 hrs/yr) *(1 ton/2000 lbs)

PTE of PM/PM10 after Control (lbs/hr) = PTE of PM/PM10 before Control (lbs/hr) * (1 - PM/PM10 Control Efficiency)

PTE of PM/PM10 after Control (tons/yr) = PTE of PM/PM10 before Control (lbs/hr) * (1 - PM/PM10 Control Efficiency) * (8760 hr/yr) x (1 ton/2000 lbs)

**Appendix A: Emission Calculations
HAP Emissions
From the Spray Booth**

**Company Name: Royal Cargo Trailers, Inc.
Address: 51790 County Rd. 39, Middlebury, IN 46540
FESOP Renewal NO.: 039-26852-00598
Reviewer: Swarna Prabha**

Material	Density (lbs/gal)	Maximum Throughput (unit/hr)	Maximum Usage (gal/unit)	Weight % Glycol Ethers	PTE of Glycol Ethers (tons/yr)
ZPG-20060-B	10.4	10.0	1.04	0.00%	0.00
Black W. R. Enamel	8.42	10.0	0.007	9.40%	0.24
Total					0.24

METHODOLOGY

PTE of HAP (tons/yr) = Density (lbs/gal) x Max. Throughput (unit/hr) x Max. Usage (gal/unit) x Weight % HAP x 8760 hr/yr x 1 ton/2000 lbs

**Appendix A: Emission Calculations
VOC Emissions
From the Adhesive Application Process**

**Company Name: Royal Cargo Trailers, Inc.
Address: 51790 County Rd. 39, Middlebury, IN 46540
FESOP Renewal NO.: 039-26852-00598
Reviewer: Swarna Prabha**

*Material	Density (lbs/gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % Organics	Weight %HAP (MECL)	Maximum Throughput (unit/hr)	Maximum Usage (gal/unit)	Pounds VOC per gallon of coating	PTE of VOC (lbs/hr)	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)	PTE of Methylene Chloride (tons/yr)
Stay-Put Adhesive		81.0%	0.00%	0.0%	70.0%	5.0	0.096	0.00	0.00	0.0	0.00	14.97
Silicone Sealant	8.67	2.00%	0.00%	2.00%	0.00%	5.0	0.135	0.17	0.12	2.81	0.51	0.0
Chem Link Roof Seal	11.7	1.00%	0.00%	1.00%	0.00%	5.0	1.120	0.12	0.66	15.7	2.87	0.0
Total								0.29	0.77	18.5	3.38	15.0

Based on MSDS the STA-PUT adhesive is applied by spray cans and has 45 to 70 % of Methylene Chloride and no VOC content

Specific Gravity of STA-PUT = 1.222

Specific density of water = 8.34

METHODOLOGY

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

PTE of VOC (lbs/hr) = Pounds of VOC per Gallon coating (lbs/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit)

PTE of VOC (lbs/day) = Pounds of VOC per Gallon coating (lbs/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit) * (24 hr/day)

PTE of VOC (tons/yr) = Pounds of VOC per Gallon coating (lbs/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit) * (8760 hr/yr) * (1 ton/2000 lbs)

PTE of MECL (tons/yr) = Maximum Usage (gal/unit) * Maximum Throughput (Unit/hr) * (Specific gravity of Sta-PUT*Specific gravity of Water)*(Weight %HAP)*(8760 hrs/y)r*(1/2000 tons/lbs)

**Appendix A: Emission Calculations
VOC Emissions
From the Degreasers (Insignificant)**

**Company Name: Royal Cargo Trailers, Inc.
Address: 51790 County Rd. 39, Middlebury, IN 46540
FESOP Renewal NO.: 039-26852-00598
Reviewer: Swarna Prabha**

Unit	Density (lbs/gal)	Weight % VOC	Maximum Usage (lbs/hr)	PTE of VOC (lbs/hr)	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)
Clean Sol Degreaser	7.01	93.0%	0.87	0.81	19.4	3.54
Aqua Works Degreaser	8.30	0.40%	0.42	0.00	0.04	0.01
Total				0.81	19.5	3.55

Note: The solvents used in these degreasers do not contain regulated HAPs.

METHODOLOGY

PTE of VOC (lbs/hr) = Max. Usage (lbs/hr) * Weight % of VOC

PTE of VOC (lbs/day) = Max. Usage (lbs/hr) * Weight % of VOC * (24 hr/day)

PTE of VOC (tons/yr) = Max. Usage (lbs/hr) * Weight % of VOC * (8760 hr/yr) * (1 ton/2000 lbs)

**Appendix A: Emission Calculations
Natural Gas Combustion
(MMBtu/hr < 100)
From Seven (7) Natural Gas Fired Heaters and Furnaces (Insignificant)**

**Company Name: Royal Cargo Trailers, Inc.
Address: 51790 County Rd. 39, Middlebury, IN 46540
FESOP Renewal NO.: 039-26852-00598
Reviewer: Swarna Prabha**

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

1.12 (7 units total)

9.81

Emission Factor in lbs/MMCF	Pollutant					
	PM*	PM10*	SO ₂	**NO _x	VOC	CO
7.6	7.6	0.6	100	5.5	84.0	
Potential Emission in tons/yr	0.04	0.04	2.94E-03	0.49	0.03	0.41

*PM and PM10 emission factors are condensable and filterable PM10 combined.

There are no emission Factor for PM2.5 in AP42, PM2.5 = PM10

**Emission Factors for NO_x: Uncontrolled = 100 lbs/MMCF.

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

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Methodology

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

Potential to Emit (tons/yr) = Potential Throughput (MMCF/yr) x Emission Factor (lbs/MMCF) x 1 ton/2000 lbs

Abbreviations

PM = Particulate Matter

SO₂ = Sulfur Dioxide

VOC = Volatile Organic Compounds

PM10 = Particulate Matter (<10 um)

Nox = Nitrous Oxide

CO = Carbon Monoxide

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

From Seven (7) Natural Gas Fired Heaters and Furnaces (Insignificant)

HAPs Emissions

Company Name: Royal Cargo Trailers, Inc.

Address: 51790 County Rd. 39, Middlebury, IN 46540

FESOP Renewal NO.: 039-26852-00598

Reviewer: Swarna Prabha

	Benzene	Dichlorobenzen	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.10E-03	1.20E-03	7.50E-02	1.80E+00	3.40E-03
Potential Emission in tons/yr	1.03E-05	5.89E-06	3.68E-04	8.83E-03	1.67E-05

HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.00E-04	1.10E-03	1.40E-03	3.80E-04	2.10E-03
Potential Emission in tons/yr	2.45E-06	5.40E-06	6.87E-06	1.86E-06	1.03E-05

Methodology

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

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations

**PM and HAP Emissions
From the Welding Shop (Insignificant)**

Company Name: Royal Cargo Trailers, Inc.
Address: 51790 County Rd. 39, Middlebury, IN 46540
FESOP Renewal NO.: 039-26852-00598
Reviewer: Swarna Prabha

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				Total HAPS (lbs/hr)	
			PM=PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr		
WELDING												
Submerged Arc				0.0360	0.011			0.000	0.000	0	0	0.000
Metal Inert Gas (MIG)(carbon steel)	8	0.56		0.0241	0.000034		0.00001	0.108	1.52E-04	0	0.0000448	1.97E-04
Stick (E7018 electrode)				0.0211	0.0009			0.000	0.000	0	0	0.000
Tungsten Inert Gas (TIG)(carbon steel)				0.0055	0.0005			0.000	0.000	0	0	0.000
Oxyacetylene(carbon steel)				0.0055	0.0005			0.000	0.000	0	0	0.000

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)				Total HAPS (lbs/hr)
				PM=PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	2	0.5	1	0.1622	0.0005	0.0001	0.0003	9.73E-03	3.00E-05	6.00E-06	1.80E-05	5.40E-05
Oxymethane				0.0815	0.0002		0.0002	0.000	0.000	0	0.000	0.000
Plasma**				0.0039				0.000	0	0	0	0.000

EMISSION TOTALS	PM = PM10	Mn	Ni	Cr	Total HAPS
Potential Emissions (lbs/hr)	0.12	1.82E-04	6.00E-06	6.28E-05	2.51E-04
Potential Emissions (lbs/day)	2.82	4.38E-03	1.44E-04	1.51E-03	6.03E-03
Potential Emissions (tons/year)	0.52	7.99E-04	2.63E-05	2.75E-04	1.10E-03

*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 mild steel.

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.
 There are no emission Factor for PM2.5 in AP42, PM2.5 = PM10

METHODOLOGY

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

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

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

Emissions (lbs/day) = emissions (lbs/hr) x 24 hrs/day

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