



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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

TO: Interested Parties / Applicant

DATE: June 24, 2010

RE: Great Dane Trailers / 167-29101-00011 & 167-29177-00011

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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June 24, 2010

Brant Cording  
Great Dane Trailers  
4955 N. 13<sup>th</sup> Street  
Terre Haute, IN 47805

Re: 167-29101-00011  
First Significant Source Modification to  
Part 70 Permit Renewal No. T 167-23624-00011

Dear Mr. Cording:

Great Dane Trailers was issued a Part 70 Permit Renewal No. T 167-23624-00011 on October 11, 2007 for a stationary trailer manufacturing plant located at 4955 N. 13<sup>th</sup> Street, Terre Haute, Indiana, 47805. IDEM, OAQ has reviewed a modification application, submitted by Great Dane Trailers on March 23, 2010, relating to the conversion of an existing insignificant sandblast booth into a paint booth for the application of polyurea product. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

- (a) One (1) paint booth approved in 2010 for construction, identified as Fab. Corroguard Coating Booth (unit number 06), equipped with a maximum of two (2) air-assisted airless spray guns (of which a maximum of one (1) is in use when coating), for metal trailer components, using dry filters for overspray control and exhausting at one (1) stack, identified as Stack 08.

The following construction conditions are applicable to the proposed project:

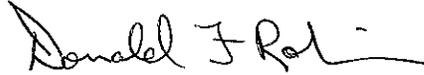
General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit  
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

This significant source modification authorizes construction of the new emission units. Operating conditions shall be incorporated into the Part 70 operating permit as a significant permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12. Operation is not approved until the significant permit modification has been issued.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, and ask for Sarah Conner, Ph. D. or extension 4-6555, or dial (317) 234-6555.

Sincerely,



Donald F. Robin, P.E., Section Chief  
Permits Branch  
Office of Air Quality

Attachments: Updated Permit and Technical Support Document

DFR/SLC

cc: File - Vigo County  
U.S. EPA, Region V  
Vigo County Health Department  
Compliance and Enforcement Branch



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## Significant Source Modification to a Part 70 Source OFFICE OF AIR QUALITY

**Great Dane Trailers  
4955 N. 13th Street  
Terre Haute, Indiana 47805**

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

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 2-7 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. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.

Significant Source Modification No.: 167-29101-00011	
Issued by:  Donald F. Robin, P.E., Section Chief Permits Branch Office of Air Quality	Issuance Date: June 24, 2010

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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 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]

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The Permittee owns and operates a stationary trailer manufacturing plant.

Source Address:	4955 N. 13th Street, Terre Haute, IN 47805
General Source Phone Number:	812-460-7799
SIC Code:	3715
County Location:	Vigo
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD 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 2-7-4(c)(3)][326 IAC 2-7-5(15)]

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

- (a) One (1) paint booth constructed in 1994, identified as Bogie Booth (unit number 01), equipped with a maximum of two (2) airless spray guns, for metal trailer bogie, using dry filters for overspray control and exhausting at one (1) stack, identified as Stack 01.
- (b) One (1) paint booth constructed in 1994, identified as Undercoat Booth (unit number 02), equipped with a maximum of three (3) airless, air-assisted airless cup guns, for metal trailer underbody, using dry filters for overspray control and exhausting at one (1) stack, identified as Stack 02.
- (c) One (1) paint booth constructed in 1994, identified as Fifth Wheel Booth (unit number 04), equipped with a maximum of three (3) airless spray guns, for metal trailer components, using dry filters for overspray control and exhausting at one (1) stack, identified as Stack 05.
- (d) One (1) paint booth constructed in 1994 and modified in 2008, identified as Fab. Primer/Topcoat Booth (unit number 05), equipped with a maximum of eight (8) air-assisted airless spray guns (of which a maximum of two (2) are in use simultaneously), for metal trailer components, using dry filters for overspray control and exhausting at two (2) stacks, identified as Stack 06 and 07.
- (e) One (1) paint booth approved in 2010 for construction, identified as Fab. Corroguard Coating Booth (unit number 06), equipped with a maximum of two (2) air-assisted airless spray guns (of which a maximum of one (1) is in use when coating), for metal trailer components, using dry filters for overspray control and exhausting at one (1) stack, identified as Stack 08.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) BTU per hour [326 IAC 6.5].
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3-2][326 IAC 8-3-5].
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment [326 IAC 6.5].
- (d) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- (e) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations [326 IAC 6.5].

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-7-1]

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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 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

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- (a) This permit, T167-23624-00011, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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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 2-7-7]

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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 2-7-5(5)]

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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 2-7-5(6)(D)]

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

### B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

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- (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. 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 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:
- (i) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(34), and
  - (ii) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (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 July 1 of each year to:

Indiana Department of Environmental Management  
Compliance and Enforcement 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, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (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 2-7-5(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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)][326 IAC 1-6-3]

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- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
- (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.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

The Permittee shall implement the PMPs.

- (c) 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. PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

- (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.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a 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 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 and Enforcement Section)  
Facsimile Number: 317-233-6865
  - (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 and Enforcement 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 2-7-5(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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 2-7-4(c)(9) 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 2-7 and any other applicable rules.
- (g) 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.

B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T167-23624-00011 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Reserved

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B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 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 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 2-7-9(a)(3)]
- (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 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(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 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

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- (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 2-7-4. 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Administration and Support Section, 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 2-7 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, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12][40 CFR 72]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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 Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1 (34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)].

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) 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 preconstruction approval required by 326 IAC 2-7-10.5 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 Administration and Support Section, 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 2-7-20(b),(c), or (e). 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 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(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 2-7-20(c).

- (d) Alternative Operating Scenarios [326 IAC 2-7-20(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 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (e) 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.21 Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2-2-2]

- (a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.
- (b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2-2.

B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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 and U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 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 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 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 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.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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 Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1 (34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][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) Except as provided in 326 IAC 2-7-19(e), 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.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][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

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### C.1 Opacity [326 IAC 5-1]

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Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 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.2 Open Burning [326 IAC 4-1] [IC 13-17-9]

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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.3 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

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

#### C.5 Stack Height [326 IAC 1-7]

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The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

#### C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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- (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  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 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 a "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos Inspector is not federally enforceable.

### **Testing Requirements [326 IAC 2-7-6(1)]**

#### **C.7 Performance Testing [326 IAC 3-6]**

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- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.8 Compliance Requirements [326 IAC 2-1.1-11]**

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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 2-7-5(1)][326 IAC 2-7-6(1)]**

#### **C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]**

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Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, 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 and Enforcement 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

#### **C.10 Reserved**

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C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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- (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 2-7-5][326 IAC 2-7-6]**

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.  
[326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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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 2-7-5] [326 IAC 2-7-6]

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Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to 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 excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned or are returning 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 normal or usual manner of operation.
- (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 record the reasonable responses steps taken.

**C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]**

- (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 submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-50 IGCN 1003  
Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

C.17 General Record Keeping Requirements[326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]

- (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, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

- (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. except that 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. 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, 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) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

**Stratospheric Ozone Protection**

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

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

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) paint booth constructed in 1994, identified as Bogie Booth (unit number 01), equipped with a maximum of two (2) airless spray guns, for metal trailer bogie, using dry filters for overspray control and exhausting at one (1) stack, identified as Stack 01.
- (b) One (1) paint booth constructed in 1994, identified as Undercoat Booth (unit number 02), equipped with a maximum of three (3) airless, air-assisted airless cup guns, for metal trailer underbody, using dry filters for overspray control and exhausting at one (1) stack, identified as Stack 02.
- (c) One (1) paint booth constructed in 1994, identified as Fifth Wheel Booth (unit number 04), equipped with a maximum of three (3) airless spray guns, for metal trailer components, using dry filters for overspray control and exhausting at one (1) stack, identified as Stack 05.
- (d) One (1) paint booth constructed in 1994 and modified in 2008, identified as Fab. Primer/Topcoat Booth (unit number 05), equipped with a maximum of eight (8) air-assisted airless spray guns (of which a maximum of two (2) are in use simultaneously), for metal trailer components, using dry filters for overspray control and exhausting at two (2) stacks, identified as Stack 06 and 07.
- (e) One (1) paint booth approved in 2010 for construction, identified as Fab. Corroguard Coating Booth (unit number 06), equipped with a maximum of two (2) air-assisted airless spray guns (of which a maximum of one (1) is in use when coating), for metal trailer components, using dry filters for overspray control and exhausting at one (1) stack, identified as Stack 08.

(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 2-7-5(1)]

#### D.1.1 PSD Minor Limit [326 IAC 2-2]

The source-wide usage of VOC shall be less than two hundred forty-eight (248) tons of VOC per 12-consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the source-wide potential to emit of VOC to less than 250 tons per 12-consecutive month period. Compliance with this condition will make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

#### D.1.2 Hazardous Air Pollutant (HAP) Limitations [40 CFR 63]

- (a) The use of any single hazardous air pollutant (HAP) in unit numbers 01, 02, 04, 05, and 06, including coatings, dilution solvents, and cleaning solvents shall be limited to less than nine and nine tenths (9.9) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the source-wide potential to emit of single HAPs to less than ten (10) tons per twelve (12) consecutive month period.
- (b) The total usage of hazardous air pollutants (HAPs) in unit numbers 01, 02, 04, 05, and 06, including coatings, dilution solvents, and cleaning solvents shall be limited to less than twenty-four and nine tenths (24.9) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the source-wide potential to emit of total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period.

Compliance with these emission limits will make 40 CFR 63, Subpart Mmmm (Surface Coating of Miscellaneous Parts and Products) not applicable.

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

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- (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 may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds from unit 01, unit 02, unit 04, unit 05, and unit 06 in excess of 4.3 pounds of VOC per gallon of coating excluding water when using clear coatings, and 3.5 pounds of VOC per gallon of coating excluding water when using air dried coatings.
- (b) Pursuant to 326 IAC 8-2-9 (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.1.4 Particulate Matter (PM) [326 IAC 6.5-1]**

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Pursuant to 326 IAC 6.5-1, the PM from the paint booths shall not exceed 0.03 grain per dry standard cubic foot (dscf).

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

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A Preventative Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

**Compliance Determination Requirements**

**D.1.6 Volatile Organic Compounds and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-4]**

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- (a) Compliance with the VOC and HAP usage limitations contained in Conditions D.1.1, D.1.2, and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAP 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.
- (b) If the amount of VOC/HAP in the waste shipped offsite for recycling or disposal is deducted from the monthly VOC/HAP usage reported, the Permittee shall determine the VOC/HAP content of the waste shipped offsite using one or a combination of the following methods:
  - (1) On-site sampling
    - (A) VOC/HAP content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.
    - (B) A representative sample of the VOC/HAP containing waste to be shipped offsite shall be analyzed within 90 days of the issuance of this permit 097-28213-00559.
    - (C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.

- (D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the VOC or HAP content of the VOC/HAP containing waste. Such change could include, but is not limited to, the following:
- (i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or
  - (ii) An operational change in the coating application or cleanup operations.

The new VOC/HAP content shall be used in calculating the amount of VOC/HAP shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.

- (2) Certified Waste Report: The VOC/HAP reported by analysis of an off-site waste processor may be used, provided the report certifies the amount of VOC/HAP in the waste.
- (3) Minimum assumed VOC/HAP content: The VOC/HAP content of the waste shipped off site may be assumed to be equal to the VOC/HAP content of the material with the lowest VOC/HAP content that could be present in the waste, as determined using the "as supplied" and "as-applied" VOC/HAP data sheets, for each month.
- (c) IDEM reserves the right to request a representative sample of the VOC/HAP-containing waste stream and conduct an analysis for VOC/HAP content.
- (d) Compliance with the VOC and HAP usage limitations contained in Conditions D.1.1, D.1.2, and D.1.3 shall be demonstrated within 30 days of the end of each month. This shall be based on the total VOC/HAP usage for the previous month, minus the amount VOC/HAP in the waste shipped out for recycling or disposal, and adding it to previous 11 months total VOC/HAP usage, minus the amount VOC/HAP in the waste shipped out for recycling or disposal, so as to arrive at VOC/HAP usage for the most recent twelve (12) consecutive month period.
- (e) The VOC usage for a month shall be calculated using the following equation:

$$\text{VOC usage} = \text{VOC}_{\text{SCL}} - \text{VOC}_{\text{SR}}$$

Where:

$\text{VOC}_{\text{SCL}}$  = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents, at the coating booths; and

$\text{VOC}_{\text{SR}}$  = The total amount of VOC, in tons, shipped out for either recycling or disposal, including coatings, dilution solvents, and cleaning solvents, from the coating booths.

- (f) The HAP usage for a month shall be calculated using the following equation:

$$\text{HAP usage} = \text{HAP}_{\text{SCL}} - \text{HAP}_{\text{SR}}$$

Where:

$HAP_{SCL}$  = The total amount of HAP, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents, at the coating booths; and

$HAP_{SR}$  = The total amount of HAP, in tons, shipped out for either recycling or disposal, including coatings, dilution solvents, and cleaning solvents, from the coating booths.

#### D.1.7 VOC Emissions

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Compliance with Condition D.1.3 shall be demonstrated no later than 30 days of the end of each calendar month based on the total volatile organic compound usage for each day.

#### D.1.8 Particulate Matter

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In order to comply with Condition D.1.5, the dry filters for PM control shall be in operation and control emissions from the paint booths at all times when the five (5) paint booths (unit number 01, unit number 02, unit number 04, unit number 05, and unit number 06) are in operation.

### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]**

#### D.1.9 Monitoring [40 CFR 64]

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- (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 (01, 02, 05, 06, 07 and 08) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Section C – Response to Excursions or Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. Failure to take response steps 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. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. Section C – Response to Excursions or Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. Failure to take response shall be considered a deviation from this permit.

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### D.1.10 Record Keeping Requirements

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- (a) To document the compliance status with Conditions D.1.1, D.1.2, and D.1.3 the Permittee shall maintain records in accordance with (1) through (5) below when taking credit for the VOC and HAP content of any coating material or solvent waste shipped off-site. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits, the HAP emission limits, and the compliance determination requirements established in Conditions D.1.1, D.1.2, and D.1.3. Records necessary to demonstrate the compliance status shall be available no later than 30 days of the end of each compliance period.
- (1) The amount, VOC content and HAP content of each coating material and solvent used, on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;

- (2) The quantity of coating material and solvent waste shipped offsite each month. Non-VOC waste shall not be commingled with VOC and/or HAP containing waste, if the VOC and/or HAP content of waste shipped offsite is deducted from the reported monthly VOC and/or HAP usage;
  - (3) The total VOC and HAP usage for each month;
  - (4) The weight of VOCs and HAPs emitted for each compliance period; and
  - (5) The results of the laboratory analysis of the VOC and HAP content of the coating material and solvent waste collected and drummed for disposal offsite. A representative sample of the waste to be shipped offsite shall be analyzed for each waste shipment if the waste VOC and HAP content is deducted from the monthly VOC and HAP usage reported.
- (b) To document the compliance status with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.
- (c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

#### D.1.11 Reporting Requirements

Quarterly summaries of the information to document the compliance status with Conditions D.1.2 and D.1.3 shall be submitted, using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The reports submitted by the Permittee do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1 (34).

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) BTU per hour [326 IAC 6.5].
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3-2][326 IAC 8-3-5].
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment [326 IAC 6.5].
- (d) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- (e) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations [326 IAC 6.5].

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 Particulate Matter (PM) [326 IAC 6.5-1]

Pursuant to 326 IAC 6.5-1, the PM from the brazing equipment, cutting torches, soldering equipment, and welding equipment shall not allow or permit discharge into the atmosphere of any gases which contain particulate matter in excess of 0.03 grain per dry standard cubic foot (dscf).

#### D.2.2 Cold Cleaner Operation [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold cleaner operation) for cold cleaner operations conducted after January 1, 1990, the owner or operator shall:

- (1) Equip the cleaner with a cover;
- (2) Equip the cleaner with a facility for draining cleaned parts;
- (3) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (5) Provide a permanent, conspicuous label summarizing the operation requirements;
- (6) 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.2.3 Cold Cleaner Operation [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser without remote solvent reservoirs constructed after July 1, 1990, shall ensure that the following 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<sup>o</sup>C) (one hundred degrees Fahrenheit (100<sup>o</sup>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<sup>o</sup>C) (one hundred degrees Fahrenheit (100<sup>o</sup>F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9<sup>o</sup>C) (one hundred twenty degrees Fahrenheit (120<sup>o</sup>F)):
  - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
  - (B) A water cover when the solvent is 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, construction of which commenced after July 1, 1990, 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.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### PART 70 OPERATING PERMIT CERTIFICATION FORM

Source Name: Great Dane Trailers  
Source Address: 4955 North 13<sup>th</sup> Street, Terre Haute, Indiana 47805  
Part 70 Permit No.: T167-23624-00011

**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 AND ENFORCEMENT BRANCH  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-0178  
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Great Dane Trailers  
Source Address: 4955 North 13<sup>th</sup> Street, Terre Haute, Indiana 47805  
Part 70 Permit No.: T167-23624-00011

**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 <sub>2</sub> , VOC, NO <sub>x</sub> , 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: \_\_\_\_\_

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

**PART 70 QUARTERLY REPORT**

Source Name: Great Dane Trailers  
Source Address: 4955 North 13<sup>th</sup> Street, Terre Haute, Indiana 47805  
Part 70 Permit No.: T167-23624-00011  
Facility: Entire Source  
Parameter: VOC Usage  
Limit: Great Dane Trailers shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents per 12 consecutive month period with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

Month	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

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

**PART 70 QUARTERLY REPORT**

Source Name: Great Dane Trailers  
 Source Address: 4955 North 13<sup>th</sup> Street, Terre Haute, Indiana 47805  
 Part 70 Permit No.: T167-23624-00011  
 Facility: Entire Source  
 Parameter: Single and Combined HAP Usage  
 Limit: Great Dane Trailers shall use less than nine and nine tenths (9.9) tons of any single HAP per 12 consecutive month period with compliance determined at the end of each month and less than twenty-four and nine tenths (24.9) tons for any combination of HAPs per 12 consecutive month period with compliance determined at the end of each month.

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

HAP	Month 1/2/3 (tons)	Previous 11-Month Totals (Month 1/2/3) (tons)	12 Consecutive Month Totals (Month 1/2/3) (tons)
Diethylene Glycol Butyl Ether	/ /	/ /	/ /
Hexamethylene Dicyanate	/ /	/ /	/ /
Formaldehyde	/ /	/ /	/ /
Naphthalene	/ /	/ /	/ /
Ethylene Glycol	/ /	/ /	/ /
Toluene	/ /	/ /	/ /
Cobalt Soap	/ /	/ /	/ /
Cumene	/ /	/ /	/ /
Methyl Alcohol	/ /	/ /	/ /
Manganese Alkanoate	/ /	/ /	/ /
Methyl Isobutyl Ketone	/ /	/ /	/ /
Ethylbenzene	/ /	/ /	/ /
Xylene	/ /	/ /	/ /
Ethylene Glycol Monobutyl Ether Acetate	/ /	/ /	/ /
Total HAP Emissions	/ /	/ /	/ /

Form Completed by: \_\_\_\_\_  
 Title / Position: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

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

**PART 70 OPERATING PERMIT  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Great Dane Trailers  
Source Address: 4955 North 13<sup>th</sup> Street, Terre Haute, Indiana 47805  
Part 70 Permit No.: T167-23624-00011

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

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

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

Technical Support Document (TSD) for a Part 70 Significant Permit  
Modification

**Source Description and Location**

Source Name:	Great Dane Trailers
Source Location:	4955 N. 13th Street, Terre Haute, Indiana 47805
County:	Vigo
SIC Code:	5052
Operation Permit No.:	T 167-23624-00011
Operation Permit Issuance Date:	October 11, 2007
Significant Modification No.:	167-29101-00011
Significant Permit Modification No.:	167-29177-00011
Permit Reviewer:	Sarah Conner, Ph. D.

**Existing Approvals**

The source was issued Part 70 Operating Permit Renewal No. T 167-23624-00011 on October 11, 2007. The source has since received the following approvals:

- (a) Administrative Amendment No. 167-26163-00011, issued on April 17, 2008; and
- (b) Administrative Amendment No. 167-27779-00011, issued on April 30, 2009.

**County Attainment Status**

The source is located in Vigo County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Attainment effective February 6, 2006, for the Terre Haute area, including Vigo County, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM2.5.	

(a) Ozone Standards

- (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph counties 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, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, and Shelby counties as attainment for the 8-hour ozone standard.
- (4) Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) 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 NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Vigo County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM2.5**  
 Vigo 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 15, 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**  
 Vigo County has been classified as attainment or unclassifiable in Indiana for all other criteria 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.

<b>Source Status</b>
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The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

<b>Pollutant</b>	<b>Emissions (ton/yr)</b>
PM	3.98
PM <sub>10</sub>	3.98
PM <sub>2.5</sub>	3.98
SO <sub>2</sub>	negligible
VOC	<250.00
CO	negligible
NO <sub>x</sub>	negligible

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) These emissions are based upon permit renewal No. T 167-23624-00011, issued on October 11, 2007.

The table below summarizes the potential to emit HAPs for the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

HAPs	Potential To Emit (ton/yr)
Any Single HAP	<9.9
<b>Total Combined HAPs</b>	<b>&lt;24.9</b>

This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are limited to 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. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

**Description of Proposed Modification**

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Great Dane Trailers on March 23, 2010, relating to the conversion of an existing insignificant sandblast booth into a paint booth for the application of polyurea product. The following is a list of the modified emission unit and pollution control device:

- (a) One (1) paint booth approved in 2010 for construction, identified as Fab. Corroguard Coating Booth (unit number 06), equipped with a maximum of two (2) air-assisted airless spray guns (of which a maximum of one (1) is in use when coating), for metal trailer components, using dry filters for overspray control and exhausting at one (1) stack, identified as Stack 08.

**Enforcement Issues**

There are no pending enforcement actions related to this modification.

**Emission Calculations**

See Appendix A of this Technical Support Document for detailed emission calculations.

**Permit Level Determination – Part 70**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

PTE Before Controls of the Modification	
Pollutant	Potential To Emit (ton/yr)
PM	65.39
PM <sub>10</sub>	65.39
PM <sub>2.5</sub>	65.39
SO <sub>2</sub>	0.00
VOC	9.00
CO	0.00
NO <sub>x</sub>	0.00

<b>HAP PTE Before Controls of the Modification</b>	
<b>HAPs</b>	<b>Potential To Emit (ton/yr)</b>
Xylenes	1.41E-03
Formaldehyde	8.46E-04
Methanol	3.66E-03
Ethylbenzene	2.82E-04
4,4 dipheynylmethane diisocyanate	7.24
<b>TOTAL</b>	<b>7.25</b>

<b>PTE Change of the Modified Process</b>			
<b>Pollutant</b>	<b>PTE Before Modification (ton/yr)</b>	<b>PTE After Modification (ton/yr)</b>	<b>Net Difference (ton/yr)</b>
PM	negligible	65.39	65.39
PM <sub>10</sub>	negligible	65.39	65.39
PM <sub>2.5</sub>	negligible	65.39	65.39
SO <sub>2</sub>	negligible	0.00	0.00
VOC	negligible	9.00	9.00
CO	negligible	0.00	0.00
NO <sub>x</sub>	negligible	0.00	0.00
HAPs	negligible	7.25	7.25

This source modification is subject to 326 IAC 2-7-10.5(f)(4)(A) because the potential to emit particulate matter (PM) or particulate matter with an aerodynamic diameter less than or equal to ten (10) micrometers (PM<sub>10</sub>) is greater than twenty-five (25) tons per year. Additionally, the modification will be incorporated into the Part 70 Operating Permit Renewal through a significant permit modification issued pursuant to 326 IAC 2-7-12(d), because the modification requires a case-by-case determination of an emission limitation and significant changes in existing monitoring Part 70 permit terms or conditions.

**Permit Level Determination – PSD**

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

<b>Process / Emission Unit</b>	<b>Potential to Emit (ton/yr)</b>						
	<b>PM</b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>	<b>SO<sub>2</sub></b>	<b>VOC</b>	<b>CO</b>	<b>NO<sub>x</sub></b>
Fab. Corroguard Coating Booth (unit number 06)	14.39	14.39	14.39	0	9.00	0	0
Total for Modification	14.39	14.39	14.39	0	9.00	0	0
PSD Significant Level	250	250	250	250	250	250	250

This modification to an existing minor stationary source is not major because the emissions increase is less than the PSD significant levels. In addition, the source is adjusting its VOC limit to add the new unit (06) and will continue to be less than PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

**Federal Rule Applicability Determination**

The following federal rules are applicable to the source due to this modification:

**NSPS:**

- (a) Great Dane Trailers is not subject to the requirements of the New Source Performance Standard for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60.390, Subpart MM, because the source is not an automobile or light-duty truck assembly plant.
- (b) Great Dane Trailers is not subject to the requirements of the New Source Performance Standard for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines, 40 CFR 60.720, Subpart TTT, because the paint booths at the source do not apply prime coats, color coats, texture coats, or touch-up coats to plastic parts for use in the manufacture of business machines.
- (c) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

**NESHAP:**

- (d) Great Dane Trailers is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63.3881, Subpart MMMM) because Great Dane Trailers is not a major source of HAP emissions and is limited to less than ten (10) tons of any single HAP per 12 consecutive month period and less than twenty-five (25) tons for any combination of HAPs per 12 consecutive month period.
- (e) Great Dane Trailers is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, Subpart HHHHHH, due to the following:
  - (1) Great Dane Trailers does not perform paint stripping using MeCl for the removal of dried paint (including, but not limited to, paint, enamel, varnish, shellac, and lacquer) from wood, metal, plastic, and other substrates; and
  - (2) Great Dane does not perform spray application of coatings, as defined in §63.11180, to motor vehicles and mobile equipment; and
  - (3) Great Dane does not perform spray application of coatings that contain the target HAP, as defined in §63.11180, to a plastic and/or metal substrate on a part or product.
- (f) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each new or modified pollutant-specific emission unit that meets the following criteria:
  - (1) has a potential to emit before controls equal to or greater than the Part 70 major source threshold for the pollutant involved;
  - (2) is subject to an emission limitation or standard for that pollutant; and
  - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each new or modified emission unit involved:

CAM Applicability Analysis							
Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (ton/yr)	Controlled PTE (ton/yr)	Part 70 Major Source Threshold (ton/yr)	CAM Applicable (Y/N)	Large Unit (Y/N)
Fab. Corroguard Coating Booth (unit number 06) - PM	Dry filter	Y	65.39	14.39	100	N	N
Fab. Corroguard Coating Booth (unit number 06) - VOC	None	Y	9.00	9.00	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to the Fab. Corroguard Coating Booth (unit number 06) as part of this modification.

<b>State Rule Applicability Determination</b>
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**326 IAC 2-2 (Prevention of Significant Deterioration)**

- (a) This existing stationary source is not major for PSD because the emissions of VOC are limited to less than two hundred fifty (<250) tons per year. Emissions of all other regulated pollutants are less than two hundred fifty (<250) tons per year, and it is not in one of the twenty-eight (28) listed source categories.
- (b) This modification to an existing minor stationary source is not major, because the emissions increase of PM, PM<sub>10</sub>, and VOC are less than the PSD significant levels. Pursuant to 326 IAC 2-2, the PSD requirements do not apply.

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

The operation of Fab. Corroguard Coating Booth (unit number 06) will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

**326 IAC 2-6 (Emission Reporting)**

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially because the source emits all criteria pollutants at less than two hundred fifty (250) tons per year. The first report is due no later than July 1, 2006, and subsequent reports are due every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

**326 IAC 6.5 (Particulate Matter Limitations Except Lake County)**

Pursuant to 326 IAC 6.5-1-2, the particulate matter emissions from the Fab. Corroguard Coating Booth (unit number 06) shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf). Particulate emissions from the Fab. Corroguard Coating Booth (unit number 06) shall be controlled by dry particulate filters in order to comply with this limit.

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

The unrestricted potential to emit of VOC from Fab. Corroguard Coating Booth (unit number 06) is less than twenty-five (25) tons per year. Therefore, Fab. Corroguard Coating Booth (unit number 06) is not subject to the requirements of this rule.

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

- (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 may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds from unit 06 in excess of 4.3 pounds of VOC per gallon of coating excluding water when using clear coatings, and 3.5 pounds of VOC per gallon of coating excluding water when using air dried coatings.
- (b) Pursuant to 326 IAC 8-2-9 (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.

Based on the MSDS submitted by the source and calculations made, the paint booth can comply with this requirement.

<b>Compliance Determination and Monitoring Requirements</b>
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Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

The Compliance Determination Requirements applicable to this modification are as follows:

- (a) In order to comply with Condition D.1.5, the dry filters for PM control shall be in operation and control emissions from the paint booths at all times when the five (5) paint booths (unit number 01, unit number 02, unit number 04, unit number 05, and unit number 06) are in operation.

The Fab. Corroguard Coating Booth (unit number 06) has applicable compliance monitoring conditions as specified below:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filter. To monitor the performance of the dry filter, weekly observations shall be made of the overspray from the Fab. Corroguard Coating Booth (unit number 06) stack 08 while the Fab. Corroguard Coating Booth (unit number 06) is in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Section C – Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps 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. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. Section C – Response to Excursions or Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

These monitoring conditions are necessary because the dry filters for the surface coating booths must operate properly to ensure compliance with 326 IAC 6.5-1 (Particulate Emission Limitations), 326 IAC 2-2 (PSD), and 326 IAC 2-7 (Part 70).

<b>Proposed Changes</b>
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First Administrative Amendment No. 167-26163-00011, issued on April 17, 2008, made changes to Part 70 Operating Permit Renewal No. T 167-23624-00011; however, these changes were inadvertently left out of Second Administrative Amendment No. 167-26163-00011, issued on April 30, 2009. IDEM, OAQ has made revisions to Part 70 Permit Renewal No. T 167-23624-00011 as described below, with deleted language as ~~strikeouts~~ and new language **bolded**.

1. Vigo County had been designated as maintenance attainment for sulfur dioxide and the 8-hour ozone standard. It was redesignated on December 26, 2007 as attainment for sulfur dioxide and the 8-hour ozone standard. This existing source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1); Section A.1 has been amended accordingly.

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary trailer manufacturing plant.

Source Address:	4955 N. 13th Street, Terre Haute, IN 47805
Mailing Address:	4955 N. 13th Street, Terre Haute, IN 47805
General Source Phone Number:	812-460-7799
SIC Code:	3715
County Location:	Vigo
Source Location Status:	<del>Maintenance attainment for Sulfur Dioxide (SO<sub>2</sub>)</del> <del>Maintenance attainment for the 8-hour Ozone standard</del> <del>Attainment or unclassifiable for PM2.5</del> Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act <b>Not 1 of 28 Source Categories</b>

2. IDEM, OAQ has revised the order of conditions in the Section D.1. In addition, condition D.1.8 (Particulate Matter) has been moved to the Compliance Determination Requirements. Therefore, IDEM, OAQ has made revisions to the permit as described below, with deleted language as ~~strikeouts~~ and new language **bolded**:

D.1.43 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

D.1.2 Hazardous Air Pollutant (HAP) Limitations [40 CFR 63]

D.1.31 PSD Minor Limit [326 IAC 2-2]

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D.1.45 Preventative Maintenance Plan [326 IAC 2-7-5(13)]

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D.1.54 Particulate Matter (PM) [326 IAC 6.5-1]

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Compliance Determination Requirements

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D.1.7 VOC Emissions

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**D.1.8 Particulate Matter**

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Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

D.1.89 Monitoring [40 CFR 64]

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~~D.1.9 Particulate Matter~~

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3. The primer paint booth (unit number 03) and the topcoat paint booth (unit number 05) are being reconfigured into one single paint booth (unit number 05). The paint booth will have its emissions controlled by dry filters for overspray control, exhausting at two (2) stacks, identified as Stack 06 and 07. This modification will not result in debottlenecking or increased utilization of other existing units since the maximum throughput rate of the existing plant remains the same. Sections A.2 and D.1 have been revised accordingly.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (a) One (1) paint booth constructed in 1994, identified as Bogie Booth (unit number 01), equipped with a maximum of two (2) airless spray guns, for metal trailer bogie, using dry filters for overspray control and exhausting at one (1) stack, identified as Stack 01.
- (b) One (1) paint booth constructed in 1994, identified as Undercoat Booth (unit number 02), equipped with a maximum of three (3) airless, air-assisted airless cup guns, for metal trailer underbody, using dry filters for overspray control and exhausting at one (1) stack, identified as Stack 02.
- (c) ~~One (1) paint booth constructed in 1994, identified as Fab. Primer Booth (unit number 03), equipped with a maximum of eight (8) airless, air-assisted airless spray guns (of which a maximum of two (2) are in use simultaneously), for metal trailer components, using dry filters for overspray control and exhausting at two (2) stacks, identified as Stack 03 and 04.~~
- (d) (c) One (1) paint booth constructed in 1994, identified as Fifth Wheel Booth (unit number 04), equipped with a maximum of three (3) airless spray guns, for metal trailer components, using dry filters for overspray control and exhausting at one (1) stack, identified as Stack 05.
- (e) (d) One (1) paint booth constructed in 1994 **and modified in 2008**, identified as Fab. **Primer/Topcoat** Booth (unit number 05), equipped with a maximum of eight (8) air-assisted airless spray guns (of which a maximum of two (2) are in use simultaneously), for metal trailer components, using dry filters for overspray control and exhausting at two (2) **stack stacks**, identified as Stack 06 and 07.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (4a) One (1) paint booth constructed in 1994, identified as Bogie Booth (unit number 01), equipped with a maximum of two (2) airless spray guns, for metal trailer bogie, using dry filters for overspray control and exhausting at one (1) stack, identified as Stack 01.
- (2b) One (1) paint booth constructed in 1994, identified as Undercoat Booth (unit number 02), equipped with a maximum of three (3) airless, air-assisted airless cup guns, for metal trailer underbody, using dry filters for overspray control and exhausting at one (1) stack, identified as Stack 02.
- ~~(3) One (1) paint booth constructed in 1994, identified as Fab. Primer Booth (unit number 03), equipped with a maximum of eight (8) airless, air-assisted airless spray guns (of which a maximum of two (2) are in use simultaneously), for metal trailer components, using dry filters for overspray control and exhausting at two (2A) stacks, identified as Stack 03 and 04.~~
- (4c) One (1) paint booth constructed in 1994, identified as Fifth Wheel Booth (unit number 04), equipped with a maximum of three (3) airless spray guns, for metal trailer components, using dry filters for overspray control and exhausting to one (1) stack, identified as Stack 05.
- (5d) One (1) paint booth constructed in 1994 **and modified in 2008**, identified as Fab. **Primer/Topcoat** Booth (unit number 05), equipped with a maximum of eight (8) air-assisted airless spray guns (of which a maximum of two (2) are in use simultaneously), for metal trailer components, using dry filters for overspray control and exhausting at two (2) ~~stack~~ **stacks**, identified as Stack 06 and 07.

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

D.1.13 Volatile Organic Compounds (VOC) Limitations [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 may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds from unit 01, unit 02, ~~unit 03~~, unit 04, and unit 05 in excess of 4.3 pounds of VOC per gallon of coating excluding water when using clear coatings, and 3.5 pounds of VOC per gallon of coating excluding water when using air dried coatings.

...

D.1.98 Particulate Matter

In order to comply with Condition D.1.5, the dry filters for PM control shall be in operation and control emissions from the paint booths at all times when the five (5) paint booths (unit number 01, unit number 02, ~~unit number 03~~, unit number 04, and unit number 05) are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

D.1.89 Monitoring [40 CFR 64]

- (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 (01, 02, ~~03, 04~~, 05, 06, and 07) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take

reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances shall be considered a deviation from this permit.

...

4. The last sentence of original Condition C.2 – Open Burning, was deleted because the provisions of 326 IAC 4-1-3 (a)(2)(A) and (B) are federally enforceable and are included in Indiana’s State Implementation Plan (SIP).

C.2 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. ~~326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.~~

5. The last sentence of original Condition C.4 – Fugitive Dust Emissions, was added because the provisions of 326 IAC 6-4-2(4) are not federally enforceable.

C.4 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). **326 IAC 6-4-2(4) is not federally enforceable.**

6. The last sentence of original Condition C.5 – Stack Height, was added because the provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

C.5 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. **The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.**

The following changes to Part 70 Operating Permit Renewal No. T 167-23624-00011 listed below are due to the proposed modification. Deleted language appears as ~~strike through~~ text and new language appears as **bold** text:

7. An existing insignificant sandblast booth, listed under A.4(e) in Part 70 Operating Permit Renewal No. T 167-23624-00011 is being converted into a paint booth, identified as Fab. Corroguard Coating Booth (unit number 06), equipped with a maximum of two (2) air-assisted airless spray guns (of which a maximum of one (1) is in use when coating), for metal trailer components, for the application of polyurea product. The paint booth will have its emissions controlled by dry filters for overspray control, exhausting at one (1) stack, identified as Stack 08. Sections A.2 and D.1 have been revised accordingly.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

...

- (e) **One (1) paint booth approved in 2010 for construction, identified as Fab. Corroguard Coating Booth (unit number 06), equipped with a maximum of two (2) air-assisted airless spray guns (of which a maximum of one (1) is in use when coating), for metal trailer components, using dry filters for overspray control and exhausting at one (1) stack, identified as Stack 08.**

...

#### SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

...

- (e) **One (1) paint booth approved in 2010 for construction, identified as Fab. Corroguard Coating Booth (unit number 06), equipped with a maximum of two (2) air-assisted airless spray guns (of which a maximum of one (1) is in use when coating), for metal trailer components, using dry filters for overspray control and exhausting at one (1) stack, identified as Stack 08.**

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

##### D.1.31 PSD Minor Limit [326 IAC 2-2]

The source-wide usage of VOC shall be less than two hundred ~~fifty (250)~~ **fourty-eight (248)** tons of VOC per 12-consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the source-wide potential to emit of VOC to less than 250 tons per 12-consecutive month period. Compliance with this condition will make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

##### D.1.2 Hazardous Air Pollutant (HAP) Limitations [40 CFR 63]

- (a) The use of any single hazardous air pollutant (HAP) in unit numbers 01, **02, 04, - 05, and 06**, including coatings, dilution solvents, and cleaning solvents shall be limited to less than nine and nine tenths (9.9) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the source-wide potential to emit of single HAPs to less than ten (10) tons per twelve (12) consecutive month period.
- (b) The total usage of hazardous air pollutants (HAPs) in unit numbers 01, **02, 04, - 05, and 06**, including coatings, dilution solvents, and cleaning solvents shall be limited to less than twenty-four and nine tenths (24.9) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the source-wide potential to emit of total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period.

Compliance with these emission limits will make 40 CFR 63, Subpart M (Surface Coating of Miscellaneous Parts and Products) not applicable.

##### D.1.43 Volatile Organic Compounds (VOC) Limitations [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 may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds from unit 01, unit 02, ~~unit 03~~, unit 04, ~~and unit 05~~, **and unit 06** in excess of 4.3 pounds of VOC per gallon of coating excluding water when using clear coatings, and 3.5 pounds of VOC per gallon of coating excluding water when using air dried coatings.

...

## Compliance Determination Requirements

### ~~D.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)~~

- ~~(a) Compliance with the VOC and HAP usage limitations contained in Conditions D.1.1, D.1.2, and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAP data sheets. IDEM, OAQ reserve the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4. Compliance with the VOC and HAP usage limitations contained in Conditions D.1.1, D.1.2, and D.1.3 shall be demonstrated no later than 30 days of the end of each month.~~
- ~~(b) Each time credit is taken for waste shipped off-site, the Permittee shall determine the VOC, single HAP and total HAP content of the combined coating material and solvent waste shipped off-site pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner. If a shipment consists of separate containers, the Permittee shall sample each container. The testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures), except for notifying IDEM of the test in paragraph (a), all of paragraph (b), and all of paragraph (c). Section C Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.~~
- ~~(c) Each time credit is taken for waste shipped off-site, compliance with the VOC and HAP usage limitations contained in Conditions D.1.1, D.1.2, and D.1.3 shall be based on the total VOC/HAP used for the previous month, minus the VOC/HAP shipped off-site during that same month, and adding it to the previous 11 months total VOC/HAP usage, minus the VOC/HAP shipped off-site during that same period, so as to arrive at VOC/HAP emissions for the most recent twelve (12) consecutive month period.~~
- ~~(1) For the VOC limits in Conditions D.1.1 and D.1.3, the VOC emissions for a month can be arrived at using the following equation:~~

$$\text{VOC emitted} = \text{VOGU} - \text{VOGR}$$

Where

VOGU = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents; and

VOGR = The total amount of VOC, in tons, shipped off-site, including coatings, dilution solvents, and cleaning solvents.

- ~~(2) For the HAP limits in Conditions D.1.2, the HAP emissions for a month can be arrived at using the following equation:~~

$$\text{HAP emitted} = \text{HAPU} - \text{HAPR}$$

Where

HAPU = The total amount of HAP, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents; and

~~HAPR = The total amount of HAP, in tons, shipped off site, including coatings, dilution solvents, and cleaning solvents.~~

**D.1.6 Volatile Organic Compounds and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-4]**

- (a) Compliance with the VOC and HAP usage limitations contained in Conditions D.1.1, D.1.2, and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC and HAP 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.
- (b) If the amount of VOC/HAP in the waste shipped offsite for recycling or disposal is deducted from the monthly VOC/HAP usage reported, the Permittee shall determine the VOC/HAP content of the waste shipped offsite using one or a combination of the following methods:
- (1) On-site sampling
- (A) VOC/HAP content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.
- (B) A representative sample of the VOC/HAP containing waste to be shipped offsite shall be analyzed within 90 days of the issuance of this permit 097-28213-00559.
- (C) If multiple cleanup solvent waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.
- (D) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the VOC or HAP content of the VOC/HAP containing waste. Such change could include, but is not limited to, the following:
- (i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or
- (ii) An operational change in the coating application or cleanup operations.
- The new VOC/HAP content shall be used in calculating the amount of VOC/HAP shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.
- (2) Certified Waste Report: The VOC/HAP reported by analysis of an off-site waste processor may be used, provided the report certifies the amount of VOC/HAP in the waste.

- (3) **Minimum assumed VOC/HAP content:** The VOC/HAP content of the waste shipped off site may be assumed to be equal to the VOC/HAP content of the material with the lowest VOC/HAP content that could be present in the waste, as determined using the "as supplied" and "as-applied" VOC/HAP data sheets, for each month.
- (c) IDEM reserves the right to request a representative sample of the VOC/HAP-containing waste stream and conduct an analysis for VOC/HAP content.
- (d) Compliance with the VOC and HAP usage limitations contained in Conditions D.1.1, D.1.2, and D.1.3 shall be demonstrated within 30 days of the end of each month. This shall be based on the total VOC/HAP usage for the previous month, minus the amount VOC/HAP in the waste shipped out for recycling or disposal, and adding it to previous 11 months total VOC/HAP usage, minus the amount VOC/HAP in the waste shipped out for recycling or disposal, so as to arrive at VOC/HAP usage for the most recent twelve (12) consecutive month period.
- (e) The VOC usage for a month shall be calculated using the following equation:

$$\text{VOC usage} = \text{VOC}_{\text{SCL}} - \text{VOC}_{\text{SR}}$$

Where:

$\text{VOC}_{\text{SCL}}$  = The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents, at the coating booths; and

$\text{VOC}_{\text{SR}}$  = The total amount of VOC, in tons, shipped out for either recycling or disposal, including coatings, dilution solvents, and cleaning solvents, from the coating booths.

- (f) The HAP usage for a month shall be calculated using the following equation:

$$\text{HAP usage} = \text{HAP}_{\text{SCL}} - \text{HAP}_{\text{SR}}$$

Where:

$\text{HAP}_{\text{SCL}}$  = The total amount of HAP, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents, at the coating booths; and

$\text{HAP}_{\text{SR}}$  = The total amount of HAP, in tons, shipped out for either recycling or disposal, including coatings, dilution solvents, and cleaning solvents, from the coating booths.

...

#### D.1.98 Particulate Matter

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In order to comply with Condition D.1.5, the dry filters for PM control shall be in operation and control emissions from the paint booths at all times when the five (5) paint booths (unit number 01, unit number 02, ~~unit number 03~~, unit number 04, **unit number 05**, and unit number **0506**) are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

D.1.89 Monitoring [40 CFR 64]

- (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 (01, 02, ~~03, 04~~, 05, 06, **07** and ~~0708~~) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances shall be considered a deviation from this permit.

...

IDEM, OAQ has made model changes to some of the B, C and D permit conditions to clarify the intent of these conditions. Therefore, IDEM, OAQ has made revisions to the permit as described below, with deleted language as ~~strikeouts~~ and new language **bolded**.

8. IDEM will not list the due date of the next performance test. IDEM will list only the frequency of the testing since the last valid test. This is not a change to the nature or frequency of the requirement since the date listed was based on the frequency listed.

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee ~~prepared and~~ **shall maintain the most recently** submitted written emergency reduction plans (ERPs) consistent with safe operating procedures ~~on July 2, 2004~~.
- (b) Upon direct notification by that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

9. The phrases "no later than" and "not later than" are clearer than "within" in relation to the end of a timeline. Therefore all timelines have been switched to "no later than" or "not later than" except for the timelines in Condition B.11 (Emergency Provisions) and Condition B.23 (Annual Fee Payment). The underlying rules state "within."

The permit conditions affected by this change include the following: Condition B.10 (Preventive Maintenance Plan), Condition C.9 (Compliance Monitoring), Condition C.15 (Actions Related to Noncompliance Demonstrated by a Stack Test), Condition C.18 (General Reporting Requirements), Condition D.1.6 (Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)), Condition D.1.7 (VOC Emissions), Condition D.1.10 (Record Keeping Requirements), and Condition D.1.11 (Reporting Requirements). The changes made to the conditions are shown with deleted language as ~~strikeouts~~ and new language **bolded**.

"~~...within~~ **no later than**..." or "~~...within~~ **not later than**..."

10. 326 IAC 2-7 requires that "a responsible official" perform certain actions. 326 IAC 2-7-1(34) allows for multiple people to meet the definition of "responsible official." Therefore, IDEM is revising all instances of "the responsible official" to read "a responsible official."

11. IDEM has clarified the rule requirements a certification needs to meet.

The permit conditions affected by this change include the following Conditions: B.9 (Annual Compliance Certification), B.10 (Preventive Maintenance Plan), B.11 (Emergency Provisions), B.16 (Permit Modification, Reopening, Revocation and Reissuance, or Termination), B.17 (Permit Renewal), B.18 (Permit Amendment or Modification), B.20 (Operational Flexibility), B.23 (Transfer of Ownership or Operational Control), C.7 (Performance Testing), C.9 (Compliance Monitoring), C.15 (Actions Related to Noncompliance Demonstrated by a Stack Test), C.16 (Emission Statement), C.18 (General Reporting Requirements), and D.1.11 (Reporting Requirements).

The changes made to the conditions are shown with deleted language as ~~strikeouts~~ and new language **bolded**.

"...require ~~thea~~ certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~thea~~ "responsible official" as defined by 326 IAC 2-7-1(34)."

(a) Section B- Permit Amendment or Modification has been revised with deleted language as ~~strikeouts~~ and new language **bolded**.

B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12][40 CFR 72]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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 Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

~~Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

**Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1 (34).**

(b) Section B - Transfer of Ownership or Operational Control has been revised with deleted language as ~~strikeouts~~ and new language **bolded**.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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 Administration and Support Section, 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 the "responsible official" as defined by 326 IAC 2-7-1(34).~~

**Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1 (34).**

12. IDEM has removed the last sentence dealing with the need for certification from the following forms: The Emergency Occurrence Report, Part 70 Quarterly Report, and the Quarterly Deviation and Compliance Monitoring Report because the Conditions requiring the forms already address this issue.

13. Section B -Duty to Provide Information has been revised with deleted language as ~~strikeouts~~ and new language **bolded**.

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(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 the "responsible official" as defined by 326 IAC 2-7-1(34).~~ Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

14. To clarify that Section B - Certification only states what a certification must be IDEM has revised the condition with deleted language as ~~strikeouts~~ and new language **bolded**.

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (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 the "responsible official" of truth, accuracy, and completeness. This certification shall state that,~~ **A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:**
- (i) **it contains a certification by a "responsible official", as defined by 326 IAC 2-7-1 (34), and**
  - (ii) **the certification is** 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 Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.**

15. IDEM has added a new paragraph (b) to handle a future situation where the Permittee adds units that need preventive maintenance plans developed. IDEM has clarified other aspects of Section B - Preventive Maintenance Plan.

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)][326 IAC 1-6-3]

(a) **A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:** ~~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.

**The Permittee shall implement the PMPs.**

(b) **If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:**

- (1) **Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;**
- (2) **A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and**
- (3) **Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.**

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

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

**The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).**

**The Permittee shall implement the PMPs.**

(bc) 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~~ **PMPs and their submittal do not require thea certification that meets the requirements of 326 IAC 2-7-6(1) by thea "responsible official" as defined by 326 IAC 2-7-1(34).**

- (ed) 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.

16. IDEM, OAQ is revising Section B - Emergency Provisions to delete paragraph (h). 326 IAC 2-7-5(3)(C)(ii) allows that deviations reported under an independent requirement do not have to be included in the Quarterly Deviation and Compliance Monitoring Report.

B.11 Emergency Provisions [326 IAC 2-7-16]

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...

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

17. Having a separate condition for the reporting of deviations is unnecessary. Therefore, IDEM has removed Section B - Deviations from Permit Requirements and Conditions and added the requirements of that condition to Section C - General Reporting Requirements. Paragraph (d) of Section C - General Reporting Requirements has been removed because IDEM already states the timeline and certification needs of each report in the condition requiring the report.

B.15 ~~Reserved Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(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 and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2254~~

~~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 the "responsible official" as defined by 326 IAC 2-7-1(34).~~

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

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]  
[326 IAC 2-2][326 IAC 2-3]

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- (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 **except that 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.** This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include ~~the a~~ certification **that meets the requirements of 326 IAC 2-7-6(1)** by a "responsible official" as defined by 326 IAC 2-7-1(34). **A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.**

(b) ~~The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to~~ **address for report submittal is:**

...

(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 the "responsible official" as defined by 326 IAC 2-7-1(34).~~

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

18. IDEM will state which rule establishes the authority to set a deadline for the Permittee to submit additional information. Therefore, Section B - Permit Renewal has been revised.

B.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

...

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have permit is not a violation of 326 IAC 2-7 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, **pursuant to 326 IAC 2-7-4(a)(2)(D)**, in writing by IDEM, OAQ any additional information identified as being needed to process the application.

19. IDEM will state that no notice is required for approved changes in Section B - Permit Revision Under Economic Incentives and Other Programs.

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5 (8)] [326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision **or notice** shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

20. IDEM has added 326 IAC 5-1-1 to the exception clause of Section C - Opacity, since 326 IAC 5-1-1 does list exceptions.

C.1 Opacity [326 IAC 5-1]

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

21. IDEM has revised Section C - Incineration to more closely reflect the two underlying rules.

C.3 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~~ **or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.**

22. IDEM has removed the first paragraph of Section C - Performance Testing due to the fact that specific testing conditions elsewhere in the permit will specify the timeline and procedures.

C.7 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 For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:**

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

23. IDEM has revised Section C - Compliance Monitoring. The reference to recordkeeping has been removed due to the fact that other conditions already address recordkeeping. The voice of the condition has been changed to clearly indicate that it is the Permittee that must follow the requirements of the condition.

C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, **the Permittee shall be allowed up to** ~~shall be implemented within~~ ninety (90) days ~~of~~ **from the date of** permit issuance or ~~ninety (90) days of~~ initial start-up, whichever is later, **to begin such monitoring.** ~~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~~ **the Permittee's** control, ~~that any monitoring equipment required by this permit cannot be installed and operated within~~ **no later than** ninety (90) days **after permit issuance or the date of initial startup, whichever is later,** the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

24. IDEM has removed Section C - Monitoring Methods. The conditions that require the monitoring or testing, if required, state what methods shall be used.

C.10 Reserved 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.~~

25. IDEM has revised Section C - Response to Excursions or Exceedances. The introduction sentence has been added to clarify that it is only when an excursion or exceedance is detected that the requirements of this condition need to be followed. The word "excess" was added to the last sentence of paragraph (a) because the Permittee only has to minimize excess emissions. The middle of paragraph (b) has been deleted as it was duplicative of paragraph (a). The phrase "or are returning" was added to subparagraph (b)(2) as this is an acceptable response assuming the operation or emission unit does return to normal or its usual manner of operation. The phrase "within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable" was replaced with "normal or usual manner of operation" because the first phrase is just a limited list of the second phrase. The recordkeeping required by paragraph (e) was changed to require only records of the response because the previously listed items are required to be recorded elsewhere in the permit.

C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

**Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:**

- (a) ~~Upon detecting an excursion or exceedance,~~ The Permittee shall **take reasonable response steps** to 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 **excess** 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~~ **The response** may include, but are **is** not limited to, the following:
- (1) initial inspection and evaluation;
  - (2) recording that operations returned **or are returning** 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~~ **normal or usual manner of operation**.
- (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 **record** ~~maintain the following records~~ **the reasonable responses steps taken.** :
- (1) ~~monitoring data;~~

~~(2) — monitor performance data, if applicable; and~~

~~(3) — corrective actions taken.~~

26. IDEM has revised Section C - Actions Related to Noncompliance Demonstrated by a Stack Test. The requirements to take response steps and minimize excess emissions have been removed because Section C - Response to Excursions or Exceedances already requires response steps related to exceedances and excess emissions minimization. The start of the timelines was switched from "the receipt of the test results" to "the date of the test." There was confusion if the "receipt" was by IDEM, the Permittee, or someone else. Since the start of the timelines has been moved up, the length of the timelines was increased. The new timelines require action within a comparable timeline; and the new timelines still ensure that the Permittee will return to compliance within a reasonable timeframe.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test  
~~[326 IAC 2-7-5][326 IAC 2-7-6]~~

- (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 ~~its these~~ response actions to IDEM, OAQ, ~~within no later than thirty (30) days of receipt of the test results~~ **seventy-five (75) days after the date of the test.** ~~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 no later than one hundred eighty (180) days of receipt of the original test results~~ **within no later than one hundred eighty (180) days after the date of the test.** Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred ~~eighty (180) days~~ **eighty (180) 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 a~~ certification **that meets the requirements of 326 IAC 326 IAC 2-7-6(1)** by ~~the a~~ "responsible official" as defined by 326 IAC 2-7-1(34).

27. Paragraph (b) of Section C - Emission Statement has been removed. It was duplicative of the requirement in Section C - General Reporting Requirements.

C.16 Emission Statement  
~~[326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]~~

- ~~(a) — Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:~~

~~...~~

- ~~(b) — The emission statement 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.~~

28. The voice of paragraph (b) of Section C - General Record Keeping Requirements has been changed to clearly indicate that it is the Permittee that must follow the requirements of the paragraph.

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]  
[326 IAC 2-2][326 IAC 2-3]

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...

- (b) Unless otherwise specified in this permit, **for** all record keeping requirements not already legally required, **the Permittee shall be allowed up to** ~~shall be implemented within~~ ninety (90) days **from the date** of permit issuance or ~~ninety (90) days~~ **the date** of initial start-up, whichever is later, **to begin such record keeping.**

29. IDEM has simplified the referencing in Section C - Compliance with 40 CFR 82 and 326 IAC 22-1.

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

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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 applicable** 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.~~

30. For clarity, IDEM has changed references to the general conditions: "in accordance with Section B", "in accordance with Section C", or other similar language, to "Section ... contains the Permittee's obligations with regard to the ... required by this condition."

Sections D.1.4, D.1.6, and D.1.8 have been revised to remove the "in accordance with" reference from these conditions.

D.1.4 Preventative Maintenance Plan [326 IAC 2-7-5(13)]

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A Preventative Maintenance Plan, ~~in accordance with Section B - Preventative Maintenance Plan, of this permit~~ is required for these facilities and any control devices. **Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

D.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)

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- (a) Compliance with the VOC and HAP usage limitations contained in Conditions D.1.1, D.1.2, and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAP data sheets. IDEM, OAQ reserve the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4. Compliance with the VOC and HAP usage limitations contained in Conditions D.1.1, D.1.2, and D.1.3 shall be demonstrated within 30 days of the end of each month.

- (b) Each time credit is taken for waste shipped off-site, the Permittee shall determine the VOC, single HAP and total HAP content of the combined coating material and solvent waste shipped off-site pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner. If a shipment consists of separate containers, the Permittee shall sample each container. The testing shall be conducted in accordance with **the provisions of 326 IAC 3-6 (Source Sampling Procedures)** ~~Section C – Performance Testing~~, except for notifying IDEM of the test in paragraph (a), all of paragraph (b), and all of paragraph (c). **Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.**

D.1.8 Monitoring [40 CFR 64]

- (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 (01, 02, 05, 06, 07 and 08) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. ~~in accordance with Section C – Response to Excursions or Exceedances~~ **contains the Permittee's obligation with regard to the reasonable response steps required by this condition.** 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 stack 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~~ **contains the Permittee's obligation with regard to the reasonable response steps required by this condition.** Failure to take response steps ~~in accordance with Section C – Response to Excursions or Exceedances~~, shall be considered a deviation from this permit.

31. The word "status" has been added to Section D - Reporting Requirements. The Permittee has the obligation to document the compliance status. The wording has been revised to properly reflect this.

D.1.11 Reporting Requirements

Quarterly summaries of the information to document **the compliance status** with Conditions D.1.2 and D.1.3 shall be submitted ~~to the addresses 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 not later than** thirty (30) days after the end of the quarter being reported. **Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition.** The reports submitted by the Permittee do require ~~the~~ a certification **that meets the requirements of 326 IAC 2-7-6(1)** by ~~the~~ a "responsible official," as defined by 326 IAC 2-7-1 (34).

32. The word "status" has been added to Section D - Record Keeping Requirements. The Permittee has the obligation to document the compliance status. The wording has been revised to properly reflect this.

D.1.10 Record Keeping Requirements

- (a) To document **the compliance status** with Conditions D.1.1, D.1.2, and D.1.3 the Permittee shall maintain records in accordance with (1) through (5) below when taking credit for the VOC and HAP content of any coating material or solvent waste shipped off-site. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits, the HAP emission limits, and the compliance determination requirements established in Conditions D.1.1, D.1.2, and D.1.3. Records necessary to demonstrate **the compliance status** shall be available no later than 30 days of the end of each compliance period.
- (1) The amount, VOC content and HAP content of each coating material and solvent used, on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
  - (2) The quantity of coating material and solvent waste shipped offsite each month. Non-VOC waste shall not be commingled with VOC and/or HAP containing waste, if the VOC and/or HAP content of waste shipped offsite is deducted from the reported monthly VOC and/or HAP usage;
  - (3) The total VOC and HAP usage for each month;
  - (4) The weight of VOCs and HAPs emitted for each compliance period; and
  - (5) The results of the laboratory analysis of the VOC and HAP content of the coating material and solvent waste collected and drummed for disposal offsite. A representative sample of the waste to be shipped offsite shall be analyzed for each waste shipment if the waste VOC and HAP content is deducted from the monthly VOC and HAP usage reported.
- (b) To document **the compliance status** with Condition D.1.8, 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 **contains the Permittee's obligations with regard to the records required by this condition.**

33. The phrase "of this permit" has been added to the paragraph of the Quarterly Deviation and Compliance Monitoring Report to match the underlying rule.

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This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements **of this permit**, 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".

34. IDEM, OAQ has removed all references to the source mailing address from the permit. The Certification form, the Quarterly Report forms, the Emergency Occurrence Report form, the Quarterly Deviation and Compliance Monitoring Report form and Condition A.1 have all been revised as a result of this change. IDEM, OAQ will continue to maintain records of the mailing address.

37. IDEM, OAQ has clarified Section B - Certification to be consistent with the rule.

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

- (i) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(34), and
- (ii) the certification ~~is~~ **states that**, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

...

<b>Conclusion and Recommendation</b>
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The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 167-29101-00011 and Significant Permit Modification No. 167-29177-00011. The staff recommends to the Commissioner that this Part 70 Significant Source and Significant Permit Modification be approved.

**Emission Calculations  
PTE Summary**

**Company Name:** Great Dane Trailers  
**Address City IN Zip:** 4955 N. 13th Street, Terre Haute, IN 47805  
**Significant Modification No:** 167-29101-00011  
**Significant Permit Modification No:** 167-29177-00011  
**Reviewer:** Sarah Conner, Ph. D.  
**Date:** 3/31/2010

<sup>1</sup> Limited PTE (tons/year) prior to the proposed modification								
Emission Units	PM	PM10	PM2.5	SO2	NOx	VOC	CO	HAPs
<sup>2</sup> Surface Coating (unit number 1, unit number 2, unit number 4 and unit number 5)	3.98	3.98	3.98	-	-	<250.00	-	<9.9 any Single HAP <24.9 combined HAPs

Note 1: Pursuant to Part 70 Operating Permit Renewal No. T 167-23624-00011, issued on October 11, 2007, the Limited PTE (tons/year) is shown.

Note 2: Pursuant to First Administrative Amendment No. 167-26163-00011, issued on April 17, 2008, the primer paint booth (unit number 03) and the topcoat paint booth (unit number 05) were reconfigured into one single paint booth (unit number 05). The paint booth will have its emissions controlled by dry filters for overspray control, exhausting at two (2) stacks, identified as Stack 06 and 07. This modification will not result in debottlenecking or increase utilization of other existing units since the maximum throughput rate of the existing plant remains the same.

Uncontrolled PTE (tons/year) of proposed modification								
Emission Units	PM	PM10	PM2.5	SO2	NOx	VOC	CO	HAPs
Fab. Corruguard Coating Booth (unit number 06)	65.39	65.39	65.39	-	-	9.00	-	7.248 combined HAPs
Controlled PTE (tons/year) of proposed modification								
Emission Units	PM	PM10	PM2.5	SO2	NOx	VOC	CO	HAPs
Fab. Corruguard Coating Booth (unit number 06)	14.39	14.39	14.39	-	-	9.00	-	7.248 combined HAPs
PSD Significant Level	25	15	15	40	40	40	100	N/A

<sup>1</sup> Limited and Controlled PTE (tons/year) after the proposed modification								
Emission Units	PM	PM10	PM2.5	SO2	NOx	VOC	CO	HAPs
<sup>2</sup> Surface Coating (unit number 1, unit number 2, unit number 4 and unit number 5)	3.98	3.98	3.98	-	-	<248.00	-	<9.9 any Single HAP <24.9 combined HAPs
Fab. Corruguard Coating Booth (unit number 06)	14.39	14.39	14.39	-	-		-	
Total Source PTE After Modification	<b>18.37</b>	<b>18.37</b>	<b>18.37</b>	<b>0.00</b>	<b>0.00</b>	<b>&lt;248.00</b>	<b>0.00</b>	<b>&lt;9.9 any Single HAP &lt;24.9 combined HAPs</b>

**HAPs Emission Summary**

HAPs - Uncontrolled PTE (tons/year) prior to the proposed modification								
Total worst case individual HAPs	Xylenes	Formaldehyde	Benzene	Glycol Ethers	Methanol	Ethylbenzene	4,4 dipheynylmethane diisocyanate	Total
<sup>2</sup> Surface Coating (unit number 1, unit number 2, unit number 4 and unit number 5)	0.497	0.132	0.099	2.083	0.000	0.000	0.000	<b>2.811</b>

HAPs - Uncontrolled PTE (tons/year) of the proposed modification								
Total worst case individual HAPs	Xylenes	Formaldehyde	Benzene	Glycol Ethers	Methanol	Ethylbenzene	4,4 dipheynylmethane diisocyanate	Total
Fab. Corruguard Coating Booth (unit number 06)	0.001	0.001	0.000	0.000	0.004	0.000	7.242	<b>7.248</b>

HAPs - Limited PTE (tons/year) of source after the modification								
Entire Source	<b>&lt;9.9 any Single HAP &lt;24.9 combined HAPs</b>							

Note 1: Pursuant to Part 70 Operating Permit Renewal No. T 167-23624-00011, issued on October 11, 2007, the Limited PTE (tons/year) is shown.

Note 2: Pursuant to First Administrative Amendment No. 167-26163-00011, issued on April 17, 2008, the primer paint booth (unit number 03) and the topcoat paint booth (unit number 05) were reconfigured into one single paint booth (unit number 05). The paint booth will have its emissions controlled by dry filters for overspray control, exhausting at two (2) stacks, identified as Stack 06 and 07. This modification will not result in debottlenecking or increase utilization of other existing units since the maximum throughput rate of the existing plant remains the same.

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

**Company Name: Great Dane Trailers  
Address City IN Zip: 4955 N. 13th Street, Terre Haute, IN 47805  
Significant Modification No: 167-29101-00011  
Significant Permit Modification No: 167-29177-00011  
Reviewer: Sarah Conner, Ph. D.  
Date: 3/31/2010**

Fab. Corroguard  
Coating Booth (unit  
number 06)

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Non Volatile / Exempt	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
GatorHyde CG A&B	9.32	2.73%	97.27%	2.73%	0.00%	N/A	6.50000	1.000	0.25	0.25	1.65	39.68	7.24	64.51	N/A	75%
CEC0067 Epoxy Catalyst	7.76	38.17%	61.83%	38.17%	0.00%	56.07%	0.06250	1.000	2.96	2.96	0.19	4.44	0.81	0.33	5.28	75%
EUY0215 Epoxy Primer Base	12.87	27.17%	72.85%	27.17%	0.00%	49.39%	0.05000	1.000	3.50	3.50	0.17	4.20	0.77	0.51	7.08	75%
YYT1059 Flush Solvent	6.66	50.49%	49.51%	50.49%	0.00%	N/A	0.01250	1.000	3.36	3.36	0.04	1.01	0.18	0.05	N/A	75%

**Potential Emissions Uncontrolled (tons/year)  
Potential Emissions <sup>1</sup>Controlled (tons/year)**

**Worst case coating added to all solvents  
Worst case coating added to all solvents**

**9.00  
9.00**

**65.39  
14.39**

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)  
Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)  
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)  
Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \* (8760 hrs/yr) \* (1 ton/2000 lbs)  
Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)  
Total = Worst Coating + Sum of all solvents used

Note 1: In order for the source to remain minor for PSD, the control efficiency of the dry filters must be equal to or greater than 78%. Manufacture guarantee for dry filter control efficiency is generally 95%.

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

**Company Name: Great Dane Trailers  
Address City IN Zip: 4955 N. 13th Street, Terre Haute, IN 47805  
Significant Modification No: 167-29101-00011  
Significant Permit Modification No: 167-29177-00011  
Reviewer: Sarah Conner, Ph. D.  
Date: 3/31/2010**

Fab. Corroguard  
Coating Booth (unit  
number 06)

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Formaldehyde	Weight % Ethylbenzene	Weight % Methanol	Weight % 4,4 dipheynylmethane diisocyanate	Xylene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Methanol Emissions (ton/yr)	4,4 dipheynylmethane diisocyanate (ton/yr)
GatorHyde CG A&B	9.32	6.50000	1.000	0.00%	0.00%	0.00%	0.00%	2.73%	0.000	0.000	0.000	0.000	7.242
CEC0067 Epoxy Catalyst	7.76	0.06250	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000	0.000
EUY0215 Epoxy Primer Base	12.87	0.05000	1.000	0.05%	0.03%	0.01%	0.13%	0.00%	0.001	0.001	0.000	0.004	0.000
YYT1059 Flush Solvent	6.66	0.01250	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.000	0.000	0.000	0.000	0.000

Total Potential Emissions

**1.41E-03      8.46E-04      2.82E-04      3.66E-03      7.24**

**METHODOLOGY**

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

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

**Company Name: Great Dane Trailers  
Address City IN Zip: 4955 N. 13th Street, Terre Haute, IN 47805  
Significant Modification No: 167-29101-00011  
Significant Permit Modification No: 167-29177-00011  
Reviewer: Sarah Conner, Ph. D.  
Date: 3/31/2010**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	<sup>1</sup> Transfer Efficiency
5th Wheel - Undercoating, Dk Gray Dry flex	11.6	24.05%	0.0%	24.1%	0.0%	58.97%	0.16000	2.500	2.80	2.80	1.12	26.87	4.90	3.87	4.75	75%
5th Wheel - Undercoating, Dk Gray Dry flex	11.6	24.05%	0.0%	24.1%	0.0%	58.97%	1.57000	2.500	2.80	2.80	10.99	263.71	48.13	38.00	4.75	75%
Bogie Booth - Undercoating, Dk Gray Dry flex	11.6	24.05%	0.0%	24.1%	0.0%	58.97%	1.57000	2.500	2.80	2.80	10.99	263.71	48.13	38.00	4.75	75%
Fab Primer Booth - S-2096 Acetone/MPK Epoxy Flush	6.7	47.85%	0.0%	47.9%	0.0%	52.15%	0.60000	2.500	3.20	3.20	4.80	115.24	21.03	5.73	6.14	75%
Fab Primer Booth - Undercoating, Dk Gray Dry flex	11.6	24.05%	0.0%	24.1%	0.0%	58.97%	1.57000	2.500	2.80	2.80	10.99	263.71	48.13	38.00	4.75	75%
Fab Primer Booth - Urethane TC, Great Dane grey	10.7	32.80%	0.0%	32.8%	0.0%	51.97%	0.11000	2.500	3.50	3.50	0.96	23.10	4.22	2.16	6.73	75%
Fab Primer Booth - Primer, Buff 3.5 VOC Epoxy	13.0	27.00%	0.0%	27.0%	0.0%	50.92%	0.93000	2.500	3.51	3.51	8.15	195.71	35.72	24.14	6.89	75%
Fab Primer Booth - Primer, 3.5 VOC gray	12.1	27.00%	0.0%	27.0%	0.0%	53.20%	0.30000	2.500	3.27	3.27	2.45	58.81	10.73	7.25	6.14	75%
Fab Topcoat - Urethane TC, Great Dane grey	10.7	32.80%	0.0%	32.8%	0.0%	51.97%	0.11000	2.500	3.50	3.50	0.96	23.10	4.22	2.16	6.73	75%
Fab Topcoat - Urethane TC, White	11.3	46.36%	39.0%	7.4%	44.0%	53.64%	0.41000	2.500	1.48	0.83	0.85	20.41	3.72	6.79	1.55	75%
Undercoat - Undercoating, Dk Gray Dry flex	11.6	24.05%	0.0%	24.1%	0.0%	58.97%	0.16000	1.250	2.80	2.80	0.56	13.44	2.45	1.94	4.75	75%
Undercoat - Undercoating, Dk Gray Dry flex	11.6	24.05%	0.0%	24.1%	0.0%	58.97%	1.57000	1.250	2.80	2.80	5.49	131.85	24.06	19.00	4.75	75%
Undercoat - Primer, 3.5 VOC gray	12.1	27.00%	0.0%	27.0%	0.0%	53.20%	0.30000	1.250	3.27	3.27	1.23	29.40	5.37	3.63	6.14	75%

**Potential Emissions Worst case coating added to all solvents 59.54 1429.04 260.80 190.65**

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)  
Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)  
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)  
Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)  
Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)  
Total = Worst Coating + Sum of all solvents used

Note 1: Pursuant to the calculations found in Appendix A of Part 70 Operating Permit Renewal T167-23624-00011, a transfer efficiency of 90% was used to calculate the uncontrolled PTE. An assumed transfer efficiency of 75% is generally accepted for airless spray application, therefore the transfer efficiency used for the source is 75% for all paint booths because they all use airless spray application.

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

**Company Name: Great Dane Trailers  
Address City IN Zip: 4955 N. 13th Street, Terre Haute, IN 47805  
Significant Modification No: 167-29101-00011  
Significant Permit Modification No: 167-29177-00011  
Reviewer: Sarah Conner, Ph. D.  
Date: 3/31/2010**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Benzene	Weight % Hexane	Weight % Glycol Ethers	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)
5th Wheel - Undercoating, Dk Gray Dry flex	11.6	0.16000	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
5th Wheel - Undercoating, Dk Gray Dry flex	11.6	1.57000	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Bogie Booth - Undercoating, Dk Gray Dry flex	11.6	1.57000	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fab Primer Booth - S-2096 Acetone/MPK Epoxy Flush	6.7	0.60000	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fab Primer Booth - Undercoating, Dk Gray Dry flex	11.6	1.57000	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fab Primer Booth - Urethane TC, Great Dane grey	10.7	0.11000	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	2.50%	0.00%	0.00	0.00	0.00	0.00	0.00	0.32	0.00
Fab Primer Booth - Primer, Buff 3.5 VOC Epoxy	13.0	0.93000	2.500	0.00%	0.00%	0.10%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.13	0.00	0.00	0.00	0.00
Fab Primer Booth - Primer, 3.5 VOC gray	12.1	0.30000	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fab Topcoat - Urethane TC, Great Dane grey	10.7	0.11000	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fab Topcoat - Urethane TC, White	11.3	0.41000	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	2.50%	0.00%	0.00	0.00	0.00	0.00	0.00	1.26	0.00
Undercoat - Undercoating, Dk Gray Dry flex	11.6	0.16000	1.250	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Undercoat - Undercoating, Dk Gray Dry flex	11.6	1.57000	1.250	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Undercoat - Primer, 3.5 VOC gray	12.1	0.30000	1.250	2.50%	0.00%	0.00%	0.50%	0.00%	2.50%	0.00%	0.50	0.00	0.00	0.10	0.00	0.50	0.00

Total Potential Emissions

**0.50    0.00    0.13    0.10    0.00    2.08    0.00**

**METHODOLOGY**

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



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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

*Thomas W. Easterly*  
**Commissioner**

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

## **SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED**

**TO:** Brant Cording  
Great Dane Trailers  
4955 N 13th St  
Terre Haute, IN 47805

**DATE:** June 24, 2010

**FROM:** Matt Stuckey, Branch Chief  
Permits Branch  
Office of Air Quality

**SUBJECT:** Final Decision  
Title V  
167-29101-00011

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:  
Kevin Black, Responsible Official  
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at [jbrush@idem.IN.gov](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 11/30/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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

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[www.idem.IN.gov](http://www.idem.IN.gov)

June 24, 2010

TO: Vigo County Public Library

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

Subject: **Important Information for Display Regarding a Final Determination**

**Applicant Name: Great Dane Trailers**  
**Permit Number: 167-29101-00011**

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures  
Final Library.dot 11/30/07

# Mail Code 61-53

IDEM Staff	DPABST 6/24/2010 Great Dane Trailers 167-29101-00011 (Final)		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

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											Remarks
1		Brant Cording Great Dane Trailers 4955 N 13th St Terre Haute IN 47805 (Source CAATS) (CONFIRM DELIVERY)									
2		Kevin Black Plant Mgr Great Dane Trailers 4955 N 13th St Terre Haute IN 47805 (RO CAATS)									
3		Mr. Charles L. Berger Berger & Berger, Attorneys at Law 313 Main Street Evansville IN 47700 (Affected Party)									
4		Vigo County Board of Commissioners County Annex, 121 Oak Street Terre Haute IN 47807 (Local Official)									
5		Terre Haute City Council and Mayors Office 17 Harding Ave Terre Haute IN 47807 (Local Official)									
6		Vigo County Health Department 147 Oak Street Terre Haute IN 47807 (Health Department)									
7		Vigo Co Public Library 1 Library Square Terre Haute IN 47807-3609 (Library)									
8		J.P. Roehm PO Box 303 Clinton IN 47842 (Affected Party)									
9		Deb Reeves Vigo County Air Pollution Control 121 Oak Terre Haute IN 47807 (Local Official)									
10											
11											
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